

Sanctions Catalogue for Breaches by Standard Users

1. Definition of Breaches

Each sanction measure taken by Verband Lebensmittel ohne Gentechnik e.V. (VLOG) is always a case-by-case decision.

If a breach is detected, the VLOG office will issue a written notice with a request to take all necessary actions to avoid a recurrence. Implementation of such actions must be demonstrated to the VLOG office before the set deadline. In the event of breaches of the Standard Usage Agreement, a contractual penalty will be imposed, the amount of which is limited as follows, depending on the size of the company:

Total turnover of the company (all divisions, not exclusively VLOG-certified goods) in the past fiscal year	Maximum contractual penalty depending on the severity of the breach
0-5 million euros	Up to 1.000 euros
>5-100 million euros	Up to 3.000 euros
>100 million euros	Up to 5.000 euros

If the breach is not remedied within the set period, VLOG reserves the right to terminate the Standard Usage Agreement extraordinarily.

Note: VLOG shall only be entitled to demand damages in the event of breach of the agreement by the Standard User if the statutory requirements are met. Any contractual penalty paid by the Standard User in respect of the respective breach of obligations is to be credited toward the damage claim.

2. Examples of Breaches (ascending according to severity)

- One or more products marketed with the word mark "VLOG" are not part of the certification, but the requirements of the EC Genetic Engineering Implementation Act (EGGenTDurchfG) are satisfied
Example:
 - *A company is only certified for the scope of Cattle - cow's milk (raw), but also sells aged cows for meat processing, which are labelled with the wording "VLOG".*
- One or more products that are marketed with the word mark "VLOG geprüft"/"VLOG verified" are not part of the certification but the feed must not be labelled as genetically modified in accordance with EU Regulations (EC) No. 1829/2003 and No. 1830/2003.
Example:
 - *A feed company has only had the self-produced feed checked by the certification body and included on the certificate, but not the feed drop shipped and converted to "VLOG geprüft"/"VLOG verified" quality. However, the converted feed must not be labelled as genetically modified in accordance with EU Regulations (EC) No. 1829/2003 and No. 1830/2003.*
- One or more products are marketed with the "Ohne GenTechnik" seal or "VLOG geprüft"/"VLOG verified" seal, although there is no Licence Agreement for the use of a seal. However, the requirements of the EC Genetic Engineering Implementation Act (EGGenTDurchfG) are met.
- One or more products marketed with the word mark "VLOG" are not part of the certification and the requirements of the EC Genetic Engineering Implementation Act (EGGenTDurchfG) are not met.
- One or more products marketed with the word mark "VLOG geprüft"/"VLOG verified" are not part of the certification and the products must be labelled as genetically modified in accordance with EU Regulations (EC) No. 1829/2003 and No. 1830/2003.
- Refusal of on-site inspections by VLOG or third parties authorised by VLOG.