

Special requirements for food processing/production

A. General Requirements

I. Facility Description

The facility description is on file and up-to-date. The certification body is to be promptly informed about major changes pertaining to the VLOG certification.

II. Assignment of Responsibilities / Organisational Chart

A current organisational chart shows responsibilities and assigned substitute rules.

III. Risk Management (KO)

1. Risk analysis

A documented risk analysis must be established for all relevant raw materials, products, procedures and processes, including risk assessment for "Ohne Gentechnik"/"VLOG" labelling (analogous to the HACCP concept).

The risk analysis at a minimum covers the following points:

- Raw materials and products (including additives, enzymes, microorganism cultures, processing aids and substances within the meaning of Sec. 3 (5) EGGenTDurchfG for the "Ohne Gentechnik"/"VLOG" area (incl. countries of origin)
- Handling of raw materials and which "Ohne Gentechnik"/"VLOG" labelling would be permissible, and raw materials and products that do not meet the requirements for "Ohne Gentechnik"/"VLOG" labelling
- Production processes and facility parameters
- Procedures for cleaning, previous cargoes in the case of vehicles
- Suppliers and external service providers (certifications, contracts, reliability etc.)
- Other business-specific items as necessary

2. Risk management

Preventive, monitoring and control actions must be introduced, implemented and reviewed for efficacy regarding the identified risks based on the risk analysis.

IV. Commissioning External Service Providers

If activities are outsourced to external service providers, the latter must also be integrated into the business' risk management system.

For activities requiring certification in the areas of food processing, food preparation, transport, storage, handling or trade that VLOG certified businesses commission to external service providers, an audit in the course of the VLOG on-site audit of the client or a certification of the service provider is to be performed.

V. Incoming Goods Inspection (KO)

With regard to incoming goods, it must be ensured that all "all "Ohne Gentechnik"/"VLOG" raw materials and products meet the requirements. If, for systemic reasons, no delivery slips/shipping documents are prepared (e.g. milk collection), there must be a clear contractual provision regarding delivery.

Incoming goods inspection of animal raw materials/products

A certification according to the VLOG Standard must exist for all raw materials and products of animal origin used ¹.

- The bills of lading or in the case of bagged goods the packaging are to be checked for the "VLOG" label within the scope of incoming goods inspection. A complaint is to be issued to the supplier for incomplete or ambiguous bills of lading.
- The VLOG certification of the supplier is to be checked periodically, the minimum being once per calendar year.

Certification under a standard recognised as equivalent by the applicant may be presented as an alternative to VLOG certification.

Incoming goods inspection of non-VLOG-certified raw materials/products of non-animal origin

For all raw materials of non-animal origin, the supplier must submit:

- a GMO-Free Certificate or exemption from labelling according to the VLOG "Ohne Gentechnik" Production and Certification Standard.

The business is to verify once per year, in an expedient manner, whether the certification in the issued form is still valid and whether the specification for the article remains unchanged.

Incoming goods inspection of VLOG-certified raw materials and products of non-animal origin

- The bills of lading are to be checked for the "VLOG" label within the scope of incoming goods processing. A complaint is to be issued to the supplier for incomplete or ambiguous bills of lading.

¹ Honey or other apiculture products that are not certified under the VLOG [Association Food without Genetic Engineering] standard or Council Regulation (EC) 834/2007 may be processed into "VLOG" food if it can be evidenced that no GMOs are cultivated or released within a circumference of 10 km from the apiaries or, alternatively, that there is an analytical result for a batch that was assessed pursuant to VLOG specifications and that shows no genetic modification.

- The VLOG certification of the supplier is to be checked periodically, the minimum being once per calendar year.

VI. Segregation of Goods Flows / Exclusion of Commingling and Swapping (KO)

The physical and/or temporal segregation of goods flow must ensure that raw materials/products not suitable for "Ohne Gentechnik"/"VLOG" labelling at no point come in contact with the goods flows of the products destined for "Ohne Gentechnik"/"VLOG" labelling or for labelling with the "Ohne GenTechnik" seal. Where necessary, interim cleaning must be performed. In addition, all raw materials / semi-finished products / finished products must be clearly and consistently labelled on all process steps. If animals are fed in slaughterhouses (e.g. due to longer wait times) it is to be ensured that the utilised feed is not subject to compulsory labelling according to Regulation (EC) No. 1829/2003 or 1830/2003.

VII. Handling of Non-compliant Raw Materials and Products (KO)

An effective and documented procedure for handling non-compliant raw materials and products must be in place. At a minimum, it must include the following steps:

- Clarification of whether an incident has occurred (cf. XII)
- Labelling of affected raw materials and products
- Notification of customers/buyers and suppliers
- Error management
- Initiation, monitoring, evaluation and documentation of corrective actions
- Blocking and release of raw materials and products
- Documentation and analysis of incidents

The responsibilities are to be defined within the procedure. Test results are to be evaluated.

If the business simultaneously handles "Ohne Gentechnik" products it produces itself and products not suitable for "Ohne Gentechnik" labelling, it must be ensured by appropriate measures that no contamination of food of the different qualities occurs. In addition, the responsible employees must be aware of the GMO status of the product at all stages – from acceptance to production to delivery/transport of the products.

VIII. Inspection of Outgoing Goods / Labelling on Bills of Lading (KO)

It must be ensured that only such raw materials and products that meet in full the requirements for "VLOG" labelling or labelling with the "Ohne GenTechnik" seal leave the business. The certified raw materials and products must be clearly labelled on the bills of lading or in the case of packed goods, on the packaging, using the wording "VLOG" and/or the "Ohne GenTechnik" seal. It must be clearly evident to which raw materials or products the labelling refers. If no bills of lading are produced due to the nature of the systems (e.g. for milk collection), a unequivocal contractual regulation is to be made concerning delivery which ensure the above-mentioned labelling.

IX. Traceability (KO)

The introduced/installed traceability system must guarantee that:

- All "Ohne Gentechnik"/"VLOG" raw materials and products present in the business can be clearly identified at all times.

The goods flow of "Ohne Gentechnik"/"VLOG" raw materials and products as well as quantity lists and evaluations must be generated within one working day to allow for conclusions about the plausibility of goods flows.

X. Complaint Management

A documented system is to be introduced to address complaints, feedback and comments associated with the requirements of the VLOG Standard. They shall be evaluated in a suitable manner. Corrective actions (including determination of responsibilities and deadlines) are to be initiated for justified complaints and feedback.

XI. Goods Recall

An effective and documented procedure for goods recall, including determination of responsibilities, must be in place for non-compliant raw materials and products according to the VLOG Standard.

XII. Crisis Management (KO)

A current, documented procedure has been introduced for the management of incidents that may lead to a crisis situation. This includes, in particular, incidents that affect the product quality and legitimacy of "Ohne Gentechnik"/"VLOG" raw materials and products. This procedure must be implemented and at includes at least:

- The steps to follow in the event of an incident
- Assigned persons in charge including substitute riles
- Availability (within and outside of business hours)
- List of emergency phone numbers
- A provision requiring immediate notification of the certification body and the applicant's Head Office using the Incident Sheet as well as affected business partners and customers.
- Legal advice (if required)

The crisis management procedure is to be periodically tested internally at least once per calender year with regard to practicality, functionality and immediate implementation, with results documented.

XIII. Corrective Action / Continuous Improvement Process

If non-compliant raw materials or products are identified within the scope of internal audits, external audits or complaint management and/or lead to the identification of deviations from Standard requirements, the business must take and document corrective actions to prevent their reoccurrence.

The corrective actions must be implemented in due time and their effectiveness must be checked within a reasonable period of time. Both are to be documented.

XIV. Documentation and Retention Period

Records must be easily legible and authentic. Post factum manipulation is not allowed. All documents relating to "Ohne Gentechnik"/"VLOG" labelling or labelling with the "Ohne GenTechnik" seal must be retained for at least the following period, unless statutory provisions require a longer retention period: minimum shelf life of the batch/lot plus one year, but not less than two years.

XV. Staff Training

All staff members involved in operating procedures of relevance to "VLOG" labelling, including vehicle operators, must be instructed in the requirements of the VLOG-Standard and the operating procedures laid down for this purpose. Instruction must take place before they take up their activity as well as on an ongoing basis, at least once per calendar year. Trainings are documented regarding their content, their participants, as well as the training date, the training location and the instructors.

XI. Internal Audits

The business must perform at least one internal audit per calendar year that at a minimum covers the general and business specific Standard requirements for the Food Processing/Food Preparation Stage. The internal auditors have to have the corresponding expertise and may not audit their own activities. The results are to be documented in writing and communicated to the affected units.

B. Specific Requirements for Plant-Based Raw Materials, Honey and Salmon

I. Sampling and Testing

Risk-based sampling and GMO testing of raw materials and products relevant for "Ohne Gentechnik" production is to be performed according to the following statements.

1. Sampling and test plan

A written sampling and test plan must be available that describes the sampling and testing procedure and that is implemented according to schedule.

The sampling and test plan must at a minimum contain/define the following:

- Description of the sampling procedure (type of samples, sample locations, designated sampler, creation of reference samples, sample size, sampling documentation, clear sample identification)
- Frequency and periods of sampling and GMO testing
- Description of the testing procedure (commissioned laboratory, scope of testing)

Sampling and GMO testing are not necessary if the genetic modifications of the raw materials and products used cannot be tested, either for technical reasons or if they are not risk-prone. The reasons are documented in the sampling and analysis plan.

Risk analysis to reduce sampling and analysis:

For certain raw materials and products with potential genetic modification, a reduction in sampling and analysis is possible after approval by the certification body (c.f. G 3.1.3). This is based on a risk analysis that determines which raw materials and products can be sampled and analysed less frequently. This risk analysis must include at least the following criteria for all raw materials/products utilised in "Ohne Gentechnik" production:

- Country of origin of the raw material/product
- GMO cultivation authorisation (globally and in country of origin)
- Cross-contamination
- Contamination during transport, storage and processing
- Certification status of the raw material/product (e.g. VLOG or a standard recognised as equivalent)

2. Frequency of Sampling and Testing

The business must carry out the sampling and testing frequency listed in the following table each calendar year, at minimum. All samples to be tested must be quickly sent to a laboratory recognised by the applicant. Based on the risk analysis produced, the business determines the scope for reducing sampling and testing frequency. The certification body reviews and approves the reduction of sampling and testing frequency on the basis of the risk analysis. The respective decision must be documented. In addition, the certification body must notify the applicant of approved reductions and will submit the risk analysis upon which the reduction is based on request by the applicant.

Risk grading	Minimum number of samples and tests of incoming "Ohne Gentechnik" goods per calendar year ²
0	2
1	6
2	12

Table: Minimum number of samples/tests of incoming "Ohne Gentechnik" goods per calendar year

3. Handling of positive test results

Positive test results as well as the affected raw materials and products in the business must be handled in accordance with a procedure specifically developed by the applicant for this purpose.

C. Specific Requirements for Transport, Storage, Handling, Trading and/or Drop Shipping

If the business performs activities in the area of transport, storage, handling, trading or drop shipping of food that are subject to the certification obligation, the relevant requirements must be followed.

² The number of samples relates to the total quantity of raw materials used in VLOG production.