Special requirements for "Logistics"

A. General Requirements

I. Facility Description

The facility description is on file and up-to-date. The certification body is promptly informed about major changes pertaining to the 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 has been created for all relevant raw materials, products, procedures and processes, including risk evaluation for "Ohne Gentechnik"/"VLOG" labelling (analogous to the HACCP concept).

The risk analysis at a minimum covers the following points:

- Raw materials for the "Ohne Gentechnik"/"VLOG" area (incl. countries of origin)
- Handling of raw materials and products that meet the requirements for "Ohne Gentechnik"/"VLOG" labelling, and raw materials and products that do not meet the requirements for "Ohne Gentechnik"/"VLOG" labelling
- Production processes and facility parameters
- Procedures for cleaning, inspection of the loading process, 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 feed manufacturing, transport, storage, handling, trade or drop shipping that VLOG-certified businesses outsource 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. Segregation of Goods Flows / Exclusion of Commingling (KO)

The physical and/or temporal segregation of goods flows must ensure that at no time raw materials or products that are not suitable for "Ohne Gentechnik"/"VLOG" labelling come into contact with the goods flows of the raw materials or products with "Ohne Gentechnik"/"VLOG" labelling. Adequate procedural steps are to be in place to ensure that the contamination by GMO or non-compliant raw materials and/or products is reduced to an at least adventitious and technically unavoidable level. In addition, all raw materials and products must be clearly and consistently labelled in all process steps. Transport vehicles are to be verifiably cleaned at least in the dry.

VI. 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. This includes at a minimum 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 within the procedure are to be defined.

If the business simultaneously handles self-produced "Ohne Gentechnik" products and products not suitable for "Ohne Gentechnik" labelling, it must be ensured by appropriate measures that no commingling or swapping 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.

VII. 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. Certified raw materials and products must be clearly labelled on the bills of lading using the wording "VLOG" and/or the "Ohne GenTechnik" seal. It must be clearly evident to which raw material or product the labelling refers. If no bills of lading are generated in specific systems (e.g. milk collection), a clear contractual regulation for the delivery must ensure the above-listed labelling.

VIII. 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 can be generated within one working day to allow for conclusions about plausibility of goods flows.

IX. Complaint Management

A documented system must be introduced to deal with complaints, feedback and comments associated with the requirements of the VLOG Standard. These are to be evaluated in an appropriate manner. Corrective actions (including determination of responsibilities and deadlines) are to be initiated for justified complaints and feedback.

X. Goods Recall

An effective and documented procedure for goods recall, including determination of responsibilities, is in place for non-compliant raw materials and products.

XI. 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 includes at least:

- The steps to follow in the event of an incident
- Assigned persons in charge including substitutes rules
- Availability (within and outside of business hours)
- List of emergency phone numbers
- Provision requiring immediate notification of the applicant’s head office and the certification body using the VLOG Incident Sheet, using the VLOG Incident Sheet as well as affected business partners and customers,
- Legal advice (if required)

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

XII. 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.

XIII. Documentation and Retention Period

Records must be easily legible and authentic. Post factum manipulation is not allowed. All documents in connection with "VLOG" transport, handling, drop shipping, trading or "VLOG" storage or labelling with the "Ohne GenTechnik" seal must be retained for at least the following period, unless legal requirements provide for a longer retention period: minimum shelf life of the batch/lot plus one year, but not less than two years.

XIV. Staff Training

All staff members involved in the operating procedures of relevance to the "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 is to take place before they take up their activity as well as on an ongoing basis, at least once a year. Training sessions must be documented regarding their content, their participants, as well as the training date, the training facility and the instructors.

XV. Internal Audits

Each calendar year, the business must perform an internal audit that at a minimum covers the general and business specific Standard requirements for the Logistics 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 Storage and Handling

The bills of lading or in the case of bagged goods the packaging are to be checked for the "VLOG" label and/or "Ohne GenTechnik" seal within the scope of incoming goods inspection. A complaint is to be issued to the supplier for incomplete or ambiguous bills of lading.

C. Specific Requirements for Trade

I. Incoming Goods Inspection (KO)

Within the scope of the incoming goods inspection of certified raw materials and products:

- the bills of lading or in the case of packed goods the packaging must be checked for the "VLOG" label or "Ohne GenTechnik" seal.
- the VLOG certification of the supplier is to be checked periodically, the minimum being once per calendar year.

II. Sampling and Testing

Risk-based sampling and GMO testing of the feed and/or raw materials relevant for the "VLOG" trade is to be performed in accordance with the following specifications.

1. Sampling and testing plan

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

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

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

Sampling and GMO testing will not be required if the traded raw materials and products cannot be tested for genetic engineering for technical reasons. In this case the sampling and testing plan must provide for a risk analysis reaching that concludes which raw materials/products do not need to be sampled or tested.

2. Frequency of Sampling and Testing

Each calendar year, the frequency of sampling and testing in the business must at least follow the specifications listed in the following table. All samples to be tested must be quickly sent to a laboratory recognised by the applicant.

List of all bulk raw materials/products handled at the site[1]	**Minimum number of samples + tests of outgoing goods per calendar year**
bulk „Ohne Gentechnik“ raw materials/products	2
bulk “Ohne Gentechnik” raw materials/products + bulk raw materials/products not subject to mandatory labelling but not “Ohne Gentechnik” compliant	6
bulk “Ohne Gentechnik” raw materials/products + raw materials/products subject to mandatory labelling	12

Table: Minimum sampling and testing at the Trading of Food sub-stage 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.

D. Specific Requirements for Drop Shipping

When VLOG raw materials/products are drop shipped, the supplier’s certification is to be checked regularly at incoming goods (KO), at least once per calendar year.

[1] Tamper-proof packaging of raw materials/products has no influence on the number of tests