

Description of the Certification Procedure for the VLOG-Standard (Manufacturing and Test Standard)



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Have you any questions about this performance description? We will be very pleased to help you.

You can reach us by email at info.tncert@tuev-nord.de or personally by phone from Monday to Friday between 07:30 and 18:00 by calling 0800 – 2457457.

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Rules and service descriptions regarding certification according to the VLOG "Ohne Gentechnik" Standard (no genetic engineering/GMO free)

The rules and the performance descriptions regarding certification according to the VLOG standard form an integral part of the offer. They supplement the General Conditions of Certification.

Signature of the contract also constitutes a declaration on the part of the organisation (business) that it fulfils all the relevant conditions of the VLOG Standard. The VLOG Standard forms an integral part of this contract.

The applicable VLOG standard and further relevant documents and rules can be found on the VLOG website <http://www.ohnegentechnik.org/ohne-gentechnik-siegel/standard00/>.

The organisation acknowledges the information regarding the current VLOG Standard and confirms that it has read and understood these documents prior to signing the contract.

The auditors are selected by TÜV NORD CERT based on approval granted in relation to the sector and their qualification.

Rules of the TÜV NORD CERT certification procedure according to the VLOG "Ohne Gentechnik" Standard

The client undertakes to observe those certification rules of the VLOG Standard issued by the Verband Lebensmittel ohne Gentechnik e.V. (hereinafter referred to as VLOG) which apply to him, on the basis of the particular standard to which the certification refers. The rules and regulations contained in the relevant VLOG documents shall be strictly observed. In particular, these include the following:

- Prior to certification by the certification body, the client shall conclude a certifier recognition contract (Zertifizierer-Anerkennungsvertrag) with the Verband Lebensmittel ohne Gentechnik e.V. and shall inform the certification body of the resulting VLOG-ID number.
- The certification body is entitled to communicate information which is relevant to the certification procedure according to the provisions of the respective VLOG Standard to the Verband Lebensmittel ohne Gentechnik e.V.
- If the client becomes aware that a legal case could be brought with regard to the safety or legality of a product, he shall inform the certification body without delay. For its part, the certification body shall initiate corresponding steps in order to assess the situation and its impact on the certification, and shall take appropriate action.
- In the case of a product recall, the client shall inform the certification body within 2 working days after the recall and shall inform the certification body of the details regarding the event. The information regarding the product recall shall be sent to the following email address: tncert-food-recall@tuev-nord.de
- If analysis results for GMO are positive, the client shall inform the certification body within 2 working days and shall inform the certification body of the details regarding the event. The manner in which positive analysis results are to be handled can be found in the current VLOG Standard. The information regarding the positive analysis results shall be sent to the following email address: tncert-food-recall@tuev-nord.de
- If a VLOG-certified organisation / site should undergo a change of ownership / change of official form of the organisation, the certification body shall be informed without delay.
- If the scope of the current certificate should change, the certification body shall be informed without delay (e.g.: change in product groups, processes, manufacturing plant or outsourcing of activities to third parties). The certification body shall decide if a complete audit is necessary or if only fulfilment of certain specific requirements has to be established.
- The client agrees that the certification body is entitled to communicate the results of the VLOG audit to the Verband Lebensmittel ohne Gentechnik e.V.

- The client agrees that the data, manufacturing sites, licensed products and certification and audit documents will be entered into the ECERT client and certification body portal of VLOG. More detailed information can be found on the VLOG website (<https://www.ohnegentechnik.org/anleitungen-ecert/>).
- If the audit is not passed, the association Lebensmittel ohne Gentechnik e.V. will decide with regard to cancellation of the standard usage agreement, and also, in the case of licensees, with regard to withdrawal of the respective licence for use of the “Ohne GenTechnik” – or “VLOG geprüft” label. The certification body is entitled to perform follow-up audits, audits on suspicion and further inspections.
- The client is aware of his duty to support the performance of witness audits, audits on suspicion, follow-up and additional audits.
- The client shall inform the certification body in the case that an “Integrity Audit” was carried out by the association Verband Lebensmittel ohne Gentechnik e.V.
- Approval shall be sought from the certification body if the VLOG Standard is to be used outside the EU. The certification body shall transfer on the application for approval to the standard owner.
- Usage of the “Ohne GenTechnik” label for identification and advertising of food/animal feed is only permissible with the prior permission of VLOG. The usage is regulated in a contract between the Licensee and VLOG.

1. Certification procedure

The audit preparation serves to establish the readiness of the client for the audit. In order to prepare, the client receives the Facility Description for the respective VLOG Stage and also the client questionnaire. Based on this information, the applicant receives an offer from TÜV NORD CERT. If, during the audit on site, the auditor sees that the information is not correct, more time may be needed for the audit and the cost may be higher. Any additional costs shall be the responsibility of the client.

In addition, the applicant shall name a contact person who will be responsible for the audit procedure on the client's side. This is generally the quality management representative or officer.

1.1 Audit preparation

- Contract between certification body and client (Establishment of the duration of the audit)
- Signed contract with VLOG regarding use of the Standard (issue of the VLOG ID Number)
- Facility description and risk grading (grading is performed by the organisation itself before the audit)
- Date of the audit
- Establishment of the scope
- Initial certification

Following conclusion of the contracts (contract between certification body and client and contract between VLOG and client), the auditor prepares for the audit based on the client questionnaire, the Facility Description and the calculation sheet and discusses and agrees the further procedure with the client. In order to plan the audit, the client sends the documents required by the auditor for the audit preparation to the lead auditor. The auditor creates an audit plan before the audit, which contains all the VLOG requirements to be audited, the relevant processes and organisation units of the client as well as the time schedule for the audit. The client receives the audit plan about two weeks before the

audit. The lead auditor agrees the plan with the audit representative of the client and informs the other auditors in the team, if applicable.

1.2 Certification audit

The on-site audit consists of the following elements:

- Introductory (kick-off) meeting
- Followed by a document review and facility inspection (the auditor determines the order in which this takes place):
- Document review:
 - Viewing of the Facility Description and review of the risk grading
 - Viewing of the relevant documents of the organisation (e.g. organisation chart / organisation, QM System, shipping documents, bills of lading)
 - Review of adherence to the requirements of the Standard (e.g. identification marking of raw materials/animal feed, risk management etc.)
 - Check of quantities and flow of goods (plausibility of in- and output within the business)
- Facility inspection:
 - On-site inspection of the production areas, production plant and equipment and also production processes relevant to the audit
 - Review of fulfilment of system rules (e.g. separate handling, recognition of the risks of contamination and carryover etc.)
 - Interviews with employees
 - Sampling in so far as planned or if suspicion is present
 - Grinding and mixing facilities:
 - Mobile grinding and mixing facilities: The auditor assesses at least two facilities (in particular there is a visual inspection and comparison with documents) which are included in the VLOG certification. Selection of the facilities is based on the risk they present. If only one facility is used for “VLOG geprüft” manufacturing, this facility should be assessed.
 - Service providers (e.g.: warehousing, contract processing)
- Review of the risk grading by the auditor
- Proposal for corrective actions by the organisation
- Acceptance of the corrective actions by the auditor
- Closing meeting/Final discussion

The task of the organisation during the audit is to demonstrate the use of its documented procedures in practice. In order to achieve this, all the product groups and processes which fall within the scope of the certification must be in operation at the time of the audit. These also include outsourced processes. If this is not the case, an additional audit of these processes/product groups will be required, leading to an increase in time and cost. After the end of the audit, the client is informed of the result in a closing meeting. The auditor is permitted to give an estimate of the result, but not the final result itself. The audit result is documented in a report, and the nonconformities are documented in an action plan. The audit can only ever cover one operating site or factory. Further regulations regarding the certification procedure for re-audits (routine audits for recertification), follow-up and expansion audits and also announced and unannounced audit options are described in the respective VLOG standard and are binding.

1.3 Scope of the Standard

The present Standard is the basis for VLOG certification for the stages of animal feed, raw materials, food and associated services and activities in the EU. The VLOG Standard is divided into individual stages and substages. TÜV NORD CERT offers certification of the following stages:

- Logistics (storage, trading) (Part B),
- Food manufacture (Part C),
- Food processing / Preparation (Part G)

If an organisation applies for certification according to VLOG Standard for activities at several stages and / or substages, the auditor shall audit all the requirements of the respective stages / substages. TÜV NORD CERT does not offer VLOG Audits for the Part E (Agriculture) Stage or for the US-American area.

1.4 Risk classification, Sampling and Analysis

Within the self-monitoring system of his organisation, the client is obliged to take samples based on proneness to risk and to have them analysed. The rules concerning risk grading, sampling and frequency of analysis are described in the current VLOG Standard. The auditor is entitled to undertake further sampling and analyses in cases where there is suspicion or based on risk and / or is entitled to instigate further GMO analyses. The costs for the sampling and analyses will be invoiced to the client. All samples are analysed according to the VLOG Guideline for Laboratories. Only analysis reports from VLOG-approved laboratories are accepted.

1.5 Management of nonconformities (deviations)

The rules for management of nonconformities (deviations) are described in the current VLOG Standard. Monitoring of implementation of the corrective actions is the responsibility of the certification body. The audit findings are described in the VLOG Facility Description and the VLOG Checklist. The evaluations and the associated remarks and corrective actions, including deadlines and responsibilities, are documented on site in the Checklist for the audited Stage. The auditor verifies the corrective actions based on the documentary evidences presented by the organisation or by means of a follow-up audit (to establish improvement), i.e. a new audit on site, and notes this in the action plan. Corrective actions and deadlines for their implementation shall be presented by the audited organisation within 4 weeks after the audit and are subject to approval by the responsible certification body. The Lead Auditor shall decide on the extent of the follow-up audit, but only the requirements of the standard which resulted in nonconformities shall be audited. If the corrective actions are not implemented by the deadline and in a proper manner, the certification body decides if it will withdraw or cancel the certification that was issued. Corrective actions implemented after the audit do not change the audit results. Further requirements regarding management of nonconformities (deviations) can be found in the current VLOG standard and in the sanctions catalogue. Issuance of certificate

As an audit always only covers a sample of the audited operation, the audit statements can only relate to the items that were actually seen and considered. The certificate is only issued following positive review of the certification procedure by the certification body. If the audit is passed, the certification body issues a certificate according to the VLOG Standard to the organisation in accordance with Clause A 3.9.2 at the latest 8 weeks after the last audit day on site. Only after issuance of the certificate for the initial audit are organisations permitted to supply goods according to the Standard. The certificate can only be issued if all nonconformities were corrected and this was demonstrated through presentation of documentary evidence or a follow-up audit, and if corrective actions were present for all nonconformities which were verified and accepted by the auditor. Provisions for auditing fulfilment of the requirements, handling of corrective actions and the deadlines to be observed can be found in the current VLOG Standard. If the certificate is not issued within 8 weeks after the audit, a new regular audit (for recertification) is carried out. In the course of the new document review by the certification

body, the risk grading and category of the organisation is again considered and corrected if necessary. If the risk category is corrected, the organisation will be informed accordingly. If the contract regarding the certification is present and signed, the certificate (if appropriate in several languages) is sent to the client along with the audit report. The certification body has the duty to provide the results of the audit to the Verband Lebensmittel ohne Gentechnik e.V. within eight weeks. The data are entered into the ECERT certification body portal or updated by VLOG. The required documents and records can be found in the current VLOG Standard.

2. Types of audit

2.1 Re-certification (Regular Audit)

The certificate is valid until a new certificate is issued, and at the latest until the end of the following year (related to the audit date). Regular audits are performed each year in the case of logistics companies, feed manufacturers, matrix certifications, food processing / preparation and trading – drop shipping of bulk animal feed. The rules regarding the audit intervals are described in the individual clauses of the applicable Stages in the current VLOG Standard. Recertification (Regular) audits shall be performed in such a way that gap-free subsequent certification is ensured. The audit shall take place at least eight weeks before expiry of the term of validity of the existing certificate. The data of the organisation are updated before recertification, in order to take changes which have a significant impact on the field of activity or the way of working of the client into consideration. Within the framework of the preparation for the follow-up audits, sampling audits, audits on suspicion, surveillance or recertification (regular) audits, the companies are obliged to inform the certification body of significant changes in the structural or procedural organisation of their business. The audit procedure is the same as for the certification audit, as described in the current VLOG Standard.

2.2 Unannounced audits

Regular audits can also take place unannounced. The provisions of the VLOG standard have to be taken into account. The client is informed about the audit 48 hours in advance. If the unannounced audit is to take place in combination with other standards, the requirements of the further Standards shall also be taken into account. The procedure for an unannounced audit is the same as for a recertification audit. If the client refuses to accept performance on an unannounced audit, the certification body shall decide if the refusal is justified. If the refusal is not justified, the certification body will assess the audit with a general K.O and the audit will be considered not passed. If an unannounced audit takes place in combination with another Standard, the requirements of the other standard must also be taken into account. Possible consequences can be loss of the right to supply under the VLOG label and also sanctions.

Further audit types

Further provisions regarding certification procedures for regular audits, initial audits, expansion audits, follow-up audits, audits on suspicion and combined audits are described in the current VLOG Standard and are binding. Any costs for expansion, follow-up audits and audits on suspicion shall be the responsibility of the client.

3. Transfer of certifications from other certification bodies

3.1 Transfer of the certification in case of change of ownership or change of the legal form/name of the organisation

Provisions regarding transfer of the certification in case of change of ownership or change of the legal form/name of the organisation are described in the current VLOG Standard.

3.2 Transfer of the certification in case of change of certification body

Provisions regarding transfer of the certification in case of change of certification body are described in the current VLOG Standard.

4. Suspension and withdrawal of the certificate

TÜV NORD CERT is the owner of the VLOG certificate and can suspend or withdraw it at any time. The organisation receives a letter regarding the reasons for the suspension along with actions that are necessary, with deadlines, in order to end the suspension. During the suspension, the client shall not use the VLOG certification for advertising or promotion purposes. The organisation shall inform its customers of the suspension without delay and also inform them of all the circumstances that led to the withdrawal or suspension of the certificate. The customers shall be informed of the corrective actions that have been instigated in order to correct the nonconformities and have the certification status reinstated, and the information shall be provided in concrete form. The certification body shall inform VLOG without delay of the withdrawal of the certification. The further requirements in the VLOG standard (e.g. use of the label/licence agreement with VLOG) shall also be taken into account.

5. MEASURES AND SANCTIONS

If the certification body establishes that the client does not fulfil the provisions of the VLOG Standard or the certification contract, measures and sanctions will be applied in relation to the assessment and certification criteria in accordance with the provisions of the VLOG Standard. The measures and sanctions are as follows:

- Audit on suspicion at the client's premises.
- Follow-up audit of the client.
- More intensive control of the client.
- Additional sampling and analyses by the certification body.
- Suspension of the certification
- Cancellation of the Control Agreement (Kontrollvertrag) / Withdrawal of the VLOG Certificate.

The additional time and cost shall be charged in accordance with the Fee Schedule. Daily rates quoted in the offer, plus travel time and travel costs shall be taken into account. Costs for additional sampling and analyses shall be the responsibility of the client.

6. Sanction Catalogue

The Sanction Catalogue of the Verband für Lebensmittel ohne Gentechnik e.V. as amended shall also apply (<http://www.ohnegentechnik.org/>).

VLOG Annex 10 (Version 23.01)

| Events in operations that trigger sanctions | Sanction by certification body |
|---|--|
| Minor deviation (B-evaluation, not fulfilled) | <ul style="list-style-type: none"> • Written notification (not a sanction in the actual sense but a means to avoid future violations) |
| Breach of documentation obligations that can endanger the safety of the system (possible evaluation: not fulfilled, risk) | <ul style="list-style-type: none"> • Stricter registration and reporting obligation • Follow-up audit, if necessary • Additional sampling and testing, if necessary • Certificate issued only after implementation and verification of corrective action by the certification body |
| Non-compliances that endanger “Ohne Gentechnik” food or “VLOG geprüft” feed, e. g. use of conventional raw materials, failure to comply with conversion periods, no segregation of batches, etc. (possible evaluation: not fulfilled, risk, KO) | <ul style="list-style-type: none"> • Warning letter • Follow-up audit • Additional sampling and testing, if necessary • When evaluation reveals a risk: Certificate issued only after implementation and verification of corrective action by the certification body • When evaluation is KO: revocation of the VLOG certificate within 2 business days |
| Detection of GMOs in a tangibly affected quantity / batch or lot (e. g. a lot in a feed processing plant, etc.) | <ul style="list-style-type: none"> • Exclusion of non-compliant goods/products from the GMO-free claim • Follow-up audit • Additional sampling and testing, if necessary |
| Repeated violation of VLOG Standard | <ul style="list-style-type: none"> • Warning letter • Follow-up audit • Additional sampling and testing, if necessary • Suspension of certification with temporally limited marketing ban on “Ohne Gentechnik” foods or “VLOG geprüft” feeds |
| <ul style="list-style-type: none"> • Major violations; • Lack of willingness to comply with the guidelines; • Misuse of the VLOG certificate for noncertified products/feed or use in a misleading way; • Refusal of follow-up audit, or non-compliant follow-up audit (result) after suspension of certification | <ul style="list-style-type: none"> • Termination of the monitoring contract • Withdrawal of the VLOG certificate |

7. Use of the „Ohne GenTechnik“ label

The prerequisite is that the label fulfils all the conditions for the participants which are, for example, specified in the VLOG standard. Use of the “Ohne GenTechnik” label or the feed label “VLOG geprüft” is only permitted with the approval of the Verband Lebensmittel ohne Gentechnik e.V. The use is regulated in a contract between the licensee and VLOG. The basis of the contract is certification based

on the current applicable Standard. Information on this subject can be found on the website <http://www.ohnegentechnik.org/>. Rules regarding the use of the label can be found in the VLOG Standard. The organisation undertakes to inform the certification body without delay of any violations of the label of which the organisation becomes aware.

8. OTHER PROVISIONS

The client states that he is in agreement with

- Routine announced or unannounced audits or visits by VLOG within the framework of compliance activities.
- Witness audits by VLOG / the certification body or the owner of a specific voluntary audit module, if this is integrated into the certification.
- Participation of auditors who are in training

within his organisation.

There can be a negative impact on the certification status if the client refuses access to parts of the organisation or its processes in relation to the aforementioned points without appropriate reason. Within the framework of quality assurance measures, VLOG can contact the client directly in order to obtain information regarding the certification status of the organisation, the services and performance of TÜV NORD CERT or the content of the reports.