

VLOG add-on module  
**Feed Sector**



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# 1 Fundamentals

In order to avoid double audits, the QS scheme participants in the stage feed sector have the possibility to verify during the QS audit the requirements for the label "VLOG geprüft", which is awarded by the Association for Food without Genetic Engineering ("VLOG" for its initials in German). The precondition for this is the prior registration in the QS-database. The verification of this VLOG add-on module "Ohne Gentechnik"/ "VLOG geprüft" is optional and has no influence on the QS certification or the QS audit result. Passing the QS audit along with a successful verification of "Ohne Gentechnik" / "VLOG geprüft" is equivalent to passing the audit according to the VLOG Standard and is recognized by VLOG. The signature of a standard agreement with VLOG is a requirement for receiving the certification. Further information on the VLOG Standard (e.g. on the auditing obligation and explanations) can be found at [www.ohnegentechnik.org/standard](http://www.ohnegentechnik.org/standard).

## 1.1 Scope

The add-on module VLOG can be used by all companies of the feed sector, including mobile feed milling and mixing plants and small scale feed material producers.

## 1.2 Use of the "VLOG geprüft" labelling

In order to explicitly indicate on the feeds package or accompanying documents the absence of a labelling obligation in accordance with **Regulations (EC) No. 1829/2003** and **No. 1830/2003**– and thus its suitability for "ohne Gentechnik" food production– the VLOG Standard requires binding labelling with the word mark "VLOG geprüft" or alternatively, for VLOG-certified feed, with the word/design mark "VLOG geprüft" (seal, see Figure 1). The use of the word mark is regulated in the standard user agreement, which is settled with VLOG as owner of the trademark rights. The use of the word/design mark "VLOG geprüft" is regulated additionally in a license agreement between the licensee and VLOG. When using the word mark it has to be ensured that the visual representation avoids any similarity with the "VLOG geprüft" seal. The basis for the agreement with VLOG is a certification based on this standard. For more information, please see [www.ohnegentechnik.org/standard](http://www.ohnegentechnik.org/standard).



**Figure 1:**

"VLOG geprüft" seal for Feed – Trademark of the Verband Lebensmittel ohne Gentechnik e.V. (VLOG)

Friedrichstraße 153a

10117 Berlin

Tel: +49 30 2359 945 00 Fax: +49 30 2359 945 01

info@ohnegentechnik.org

www.ohnegentechnik.org

## 1.3 Legal basis

### EGGenTDurchfG

EC Genetic Engineering Implementation Act (Gesetz zur Durchführung der Verordnungen der Europäischen Gemeinschaft auf dem Gebiet der Gentechnik und über die Kennzeichnung ohne Anwendung gentechnischer Verfahren hergestellter Lebensmittel, EGGentechnikDurchführungsgesetz, abbreviated EGGenTDurchfG), dated 22 June 2004 (Federal Law Gazette I p. 1244, last amended by Article 2 Abs. 1 G v. 20.12.2022).

According to the **Regulations (EC) No. 1829/2003** or **(EC) No. 1830/2003** the feed for the "VLOG geprüft" labelling cannot be subject to the labelling obligation.

Feed additives must only be considered if they or their components consist of GMOs and, therefore, must be labelled themselves. According to the legal requirements, such feed additives produced by GMOs (or with its help) are not subject to labelling and can be used without restriction.

### Regulations (EC) No 1829/2003 and No 1830/2003

According to **Regulation (EC) No. 1829/2003** and **Regulation (EC) No. 1830/2003** the contamination with GMOs permitted in the EU is exempt from labelling obligations, if the following two conditions are fulfilled:

- the threshold value of GMO content of 0.9% per feed material is not be exceeded and
- the presence of the GMO content is "adventitious or technically unavoidable".

Contamination with approved GMOs under 0.1% is generally considered as technically unavoidable or adventitious.

Contamination in the order of  $> 0.1\%$  to  $\leq 0.9\%$  must be assessed as compliant if the feed company has installed and demonstrably implemented organisational measures to prevent the introduction of GMO material.

For the classification of when a feed is considered to be subject to labelling in accordance with **Regulations (EC) No 1829/2003** and **1830/2003**, reference is made to the "Guideline on controlling GMOs in feed" available at [www.ohnegentechnik.org/Leitfaden Futtermittel](http://www.ohnegentechnik.org/Leitfaden Futtermittel).

## 1.4 Risk classification

The auditor checks the organization as well as the spatial and temporal processes throughout the entire company. In the area of animal feed, the risk classification must be carried out via the production system of the "VLOG geprüft" production (e.g. dual or completely "label-free"). The classification must be carried out by the company before the audit, it is checked by the auditor during each audit and, if necessary, redefined. The definition must be documented in the company description and in the checklist, or it must be adjusted.

# 2 Requirements "VLOG geprüft" feed sector

## 2.1 General requirements feed sector

### 2.1.1 Facility description

The facility description according to the VLOG standard must be available and must be kept up to date. In case of significant changes affecting the VLOG certification, the certification body must be informed promptly.

**Note:** Information available in electronic format is accepted. For the audit, the current company description, appendices (VLOG templates or own documents with equivalent content) and documents as well as analysis results are presented to the auditor for review. At the company's request, and in order to maintain confidentiality, the confidential documents/information (except for the facility description) remain within the company. The auditor must have reviewed the documents. The current facility description and the documents / information mentioned therein must be submitted to the auditor for further processing in the certification body and forwarding to VLOG.

If a new version of the facility description is published, the previous version of the facility description filled out by the business may still be used if there are no substantive differences or supplements to the subsequent version. Should the clarity and transparency no longer be given, either a new facility description must be filled out or the relevant items in the old description must be supplemented. Facility description

### 2.1.2 Staff training

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

**Note:** The intensity of training varies depending on the staff member and is guided by the responsibility of the staff member for the proper flow of the "VLOG geprüft" operating procedure.

### 2.1.3 [K.O.] Self-assessment system / risk management

The self-assessment system including risk analysis of the feed company must consider the required separate handling of products with and without genetic engineering, contamination and entry possibilities, as well as reflect the production situation of the facility / company. The compliance with the requirements of the VLOG Standard must be clearly regulated in the documents and in the processes within the company. The handling of goods not subject to labelling according to **Reg. (EG) No. 1829/2003** and **1830/2003**, must be taken into account, particularly in the areas of HACCP system, organisational chart and staff training. To this end, precautionary, monitoring and control measures must be taken. Traceability, non-conforming production and complaints must be also included. It must be ensured that sampling and testing processes fulfil the specifications (cf. Chap. 2.2.2, Chap. 2.4.2 and Chap. 2.6.2).

Each calendar year, one internal audit must be carried out within the company at least, that at a minimum covers all general and company-specific requirements of the VLOG add-on module for the feed stage. The internal

audits must be carried out by competent and independent staff. The results must be documented in writing and communicated to the affected areas.

Unless a longer retention period is required by law, the retention period for documents that are relevant for the VLOG certification is the use-by date of the lot/batch plus 1 year or a total of at least 2 years.

## Risk analysis and risk management

### Risk analysis

A documented risk analysis must be in place for all relevant feed, procedures and processes, including risk evaluation for "VLOG geprüft" labelling (analogous to the HACCP concept).

The risk analysis must cover at least the following points:

- Feed and feed additives for the "VLOG geprüft" area (including countries of origin)
- Risk grading of feed (risk-prone/not risk-prone)
- Handling of feed that meet the requirements for "VLOG geprüft" labelling and feed that do not meet the requirements for "VLOG geprüft" labelling
- Production processes and facility parameters
- Procedures for cleaning, previous cargo of the vehicles
- Suppliers and external service providers (certifications, agreements, reliability etc.)
- Other business-specific items as necessary

### Risk management

Based on the risk analysis, precautions, monitoring and management measures for the identified risks must be introduced, implemented and tested for effectiveness.

#### 2.1.4 Commissioning External Service Providers

If activities requiring certification in the area of feed production, transport, storage or transshipment are outsourced to external service providers, an audit in accordance with the VLOG checklist or VLOG add-on module or certification of the service provider in accordance with the VLOG standard must be performed.

#### 2.1.5 [K.O.] Segregation of goods flows / exclusion of contaminations

It must be comprehensibly ensured that feed, which is not suitable for a "VLOG geprüft"-labelling, never enters the flow of goods of feed intended to be labelled as "VLOG geprüft". For this purpose, the flow of goods must be spatially and / or temporally separated, and a clear and complete labelling of all products must be ensured.

Appropriate procedural steps must be taken to ensure that any contamination with GMOs or non-compliant feed/raw materials is reduced to at least an adventitious or technically unavoidable level.

Transport vehicles must be at least cleaned in a dry manner.

 Documentation of measures

#### 2.1.6 [K.O.] Handling of non-compliant feed / positive testing results

An effective and documented procedure for handling non-compliant feed must be in place.

It must include at least the following points:

- Clarification of whether an incident has occurred
- Labelling of the affected feed
- Notification of customers/buyers and suppliers
- Error management
- Initiation, monitoring, evaluation and documentation of corrective actions
- Blocking and release of feed
- Documentation and analysis of incidents


The responsibilities in the procedure must be defined.

In the event of an incident, the VLOG office must be immediately informed using the VLOG incident sheet ([www.ohnegentechnik.org](http://www.ohnegentechnik.org)). The affected business partners and clients must also be informed about the case.

**Note:** *Non-compliant feed can be identified e.g. by means of positive testing results.*

The evaluation of analysis results and the handling of positive testing results must be done in accordance with the VLOG Standard ([www.ohnegentechnik.org/standard001](http://www.ohnegentechnik.org/standard001)).

For guidance, please refer to the "Guidelines for controlling GMOs in Feed" and "Guideline for Handling mislabelled GMO-feed" ([www.ohnegentechnik.org/standard](http://www.ohnegentechnik.org/standard)).

 Documentation of the effectiveness assessment

### 2.1.7 Complaint management and goods recall

A documented system must be introduced to deal with complaints, feedback and hints related to the requirements of the VLOG Standard. These must be evaluated in an appropriate manner. In the case of justified complaints and feedback corrective actions (including responsibilities and deadlines) must be implemented.


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

 Documentation of feedback, corrective actions

### 2.1.8 Corrective actions / Ongoing improvement process

If non-compliances from the VLOG standard requirements are found in the course of internal audits, external audits, complaint management and in the handling of non-compliant products, the company must take and document corrective measures to prevent recurrence and document this.

The timely implementation of the corrective actions must be monitored, and their effectiveness reviewed within a reasonable period. Both must be documented.

 Documentation of corrective actions

## 2.2 Specific requirements for feed production

### 2.2.1 Incoming goods inspection

The incoming goods inspection must ensure that only feed which not subject to the labelling obligation according to **Regulations (EC) No. 1829/2003** or **(EC) No. 1830/2003** is used for the "VLOG geprüft" production or labelling.

#### Incoming goods inspection of VLOG-certified feed:

- During the incoming goods inspection, it must be checked that the shipping documents or in case of packed products the packaging include the labelling "VLOG geprüft" and / or with the seal "VLOG geprüft" (see Figure 1). A complaint must be reported to the supplier in the case of incomplete or unclear shipping documents.
- The supplier's VLOG certification must be periodically checked, the minimum being once per calendar year.

#### Incoming goods inspection of risk-prone not VLOG-certified feed:

A confirmation from the supplier that the product is GMO-free or label-free must be available for all feed and feed additives graded by the company as risk-prone (see Chap. 2.1.3). This can be achieved by means of:

- a separate declaration of the GMO-free status of the currently delivered batch/lot or
- testing result according to the requirements of the VLOG Standard proving the GMO-free status of the batch/lot being delivered or
- an additional indication on the shipping documents declaring the products to be exempt from labelling or
- a clear contractual regulation regarding the delivery of feed exempt from labelling.

 Confirmation from previous supplier

#### Incoming goods inspection of non-risk-prone feed not certified by VLOG

For all feed and feed additives graded as non-risk-prone by the business (see Chap. 2.1.3), the respective shipping documents for the feed need not be labelled under **Regulation (EC) Nos. 1829/2003** and **1830/2003**.

### 2.2.2 Sampling and analysis

A risk analysis (cf. Chap. 2.1.3) of the feed materials used for the "VLOG-geprüft" production or labelling must be available, as part of the self-assessment system, which provides the basis for a risk-based sampling and analysis of GMOs in the company.

#### Sampling and analysis plan

A written sampling and analysis plan based on the company-specific risk grading (see Chap. 2.1.3) for the production of "VLOG geprüft" feed, that describes the sampling and analysis procedure, must be available.

The sampling and analysis plan, must least contain/define the following points:



- description of the sampling procedure (type of samples, sampling locations, designated sampler, preparation of bulk samples, preparation of reserve samples, sample size, final product sampling, sampling documentation, clear sample identification)
- frequency and periodic distribution of sampling and GMO analysis
- description of the analysis procedure (commissioned laboratory, scope of testing)

The sampling and testing plan must be implemented according to schedule.

Sampling and GMO analysis are not required if it is not possible to analyse the used feed for genetic engineering due to technical reasons. In this case a risk analysis must be available for the preparation of an analysis plan, which concludes, that none of the raw materials / feed need to be sampled resp. analysed.

Sampling must be done according to the requirements of the VLOG standard.

**Note:** The VLOG homepage offers an assessment support document on the suitability of feed for analysis: [www.ohnegentechnik.org/standard](http://www.ohnegentechnik.org/standard).

### Sampling and analysis frequency

Each calendar year the sampling and analysis frequency in the company must at least follow the specifications listed in the table below.

All samples must be analysed. The analysis must be performed by a VLOG-recognised laboratory. The commissioning of the analysis laboratory and the shipping of the samples has to be done according to the requirements of the VLOG standard.

Table 1: Minimum number of sampling & analysis - Feed production per calendar year

Production at location	Area	Sampling for "VLOG geprüft"-incoming goods (raw materials)	Minimum number of samples to be taken from „VLOG geprüft“ outgoing goods* per calendar year
Production entirely exempt from the labelling obligation		For every batch of feed materials graded as risk-prone	Up to incl. 10,000 t/year: 1 >10,000 – 50,000 t/year: 2 >50,000 – 100,000 t/year: 4 >100,000 – 200,000 t/year: 6 > 200,000 – 300,000 t/year: 8 for every additional 100,000 t or part thereof: 2 additional samples
Dual production		For every batch of feed materials graded as risk-prone	Up to incl. 2,000 t/year: 1 >2,000 – 5,000 t/year: 3 >5,000 – 10,000 t/year: 5 >10,000 to 50,000 t/year: 10 >50,000 to 100,000 t/year: 15 >100,000 to 200,000 t/year: 20 > 200,000 – 300,000 t/year: 25 for every additional 100,000 t or part thereof: 5 additional samples

\*Locations that only produce feed material exempt from labelling, can skip the sampling/GMO analysis of outgoing feed material, if the corresponding tests were already performed when receiving the goods.

The auditor can take at each audit, further risk-oriented samples and send them for analysis.

### 2.2.3 Outgoing goods inspection / Labelling on shipping documents

It must be ensured that only feed that fully meets the requirements for labelling as "VLOG geprüft" leaves the company as such.

VLOG-certified feed must be clearly labelled with the word mark "VLOG geprüft" and/or the "VLOG geprüft" seal on the shipping documents or, in case of packed goods, on the packaging (see Figure 1). It must be evident to which feed item the labelling refers.



## 2.3 Specific requirements for private labelling

### 2.3.1 [K.O.] Certification status of contract producer

The contract producer must provide evidence of a certification for all activities requiring VLOG certification, or a standard recognized as equivalent (checked at least once per calendar year), or carry out an on-site for all relevant activities, executed by the Private Labeller's certification body and in the framework of the Private Labeller's VLOG audit.

### 2.3.2 Incoming goods inspection

If the private labeller (temporarily) takes physical possession of the manufactured feed, during the incoming goods inspection it must be ensured that all "VLOG geprüft" feed meets the requirements. It must be checked that the identification "VLOG geprüft" and/or with the "VLOG geprüft"-seal is present in the shipping documents, or in the case of packed goods, on the packaging. A complaint must be reported to the supplier if the shipping documents are incomplete or unclear.

### 2.3.3 Sampling and testing

In the case of bulk goods, if the private labeller (temporarily) takes physical possession, a risk-based sampling and GMO testing of the "VLOG geprüft" feed must be carried out, in accordance with Chapter 2.4.2.

## 2.4 Specific requirements for feed trade

### 2.4.1 [K.O.] Incoming goods inspection

Within the scope of the incoming goods inspection of VLOG-certified feed it must be checked that:

- the labelling "VLOG geprüft" and/or with the "VLOG geprüft"-seal is present on the shipping documents, or in the case of packed goods, on the packaging.

the VLOG certification of the supplier is periodically verified, the minimum being once per calendar year. A complaint must be reported to the supplier if the shipping documents are incomplete or unclear.

### 2.4.2 Sampling and analysis

Risk-based sampling and analysis for GMOs must be available within the framework of the company's own self-assessment system, in accordance with the following specifications.

#### Sampling and analysis plan

A written sampling and analysis plan that describes the sampling and analysis procedure must be available.

The analysis plan must at least contain/define the following:

- description of the sampling procedure (type of samples, sampling locations, designated sampler, preparation of bulk samples, preparation of reserve samples, sample size, final product sampling, sampling documentation, clear sample identification).
- frequency and periods of sampling and GMO analysis
- description of the analysis procedure (commissioned laboratory, scope of testing)

The sampling and analysis plan must be implemented according to schedule.

Sampling and GMO analysis will not be required if the traded feed cannot be analysed for genetic engineering due to technical reasons. In this case the analysis plan must provide for a risk-based analysis concluding that there is no need to sample / analyse any feed.

Sampling must be done according to the requirements of the VLOG standard.

**Note:** The VLOG homepage offers an assessment supporting document to determine the suitability of feed for testing <https://www.ohnegentechnik.org>

#### Frequency of sampling and analysis

Each calendar year the sampling and analysis frequency in the company must follow at least the specifications listed in table 2.

All samples must be analysed. The analysis must be performed by a VLOG-recognised laboratory.

The commissioning of the analysis laboratory and the shipping of the samples has to be done according to the requirements of the VLOG standard.

Table 2: Minimum number of samples & analysis – Feed trade “VLOG geprüft” per calendar year

<b>VLOG products on-site</b> <b>Complete range on-site</b>	<b>Bulk “VLOG geprüft” feed</b> <b>minimum number of samplings + analysis in “VLOG geprüft” outgoing goods per calendar year</b>	<b>VLOG bagged goods</b>
No bulk feed subject to compulsory labelling	Up to incl. 10,000 t/year: 1 >10,000 to 50,000 t/year: 2 >50,000 to 100,000 t/ year: 4 >100,000 to 200,000 t/ year: 6 > 200,000 to 300,000 t/ year: 8 For every additional 100,000 t or part thereof: 2 additional samples	no (additional) sampling
Bulk feed subject to compulsory labelling	Up to incl. 2,000 t/year: 1 >2,000 to 5,000 t/year: 3 >5,000 to 10,000 t/year: 5 >10,000 to 50,000 t/year: 10 >50,000 to 100,000 t/year: 15 >100,000 to 200,000 t/year: 20 > 200,000 to 300,000 t/year: 25 For every additional 100,000 t or part thereof: 5 additional samples	no (additional) sampling

## 2.5 Specific requirements for pure delivery trading

### 2.5.1 [K.O.] Suppliers’ certification status (incoming goods inspection)

In the case of pure delivery trading of “VLOG geprüft” feed, the VLOG certification of the supplier must be regularly checked, the minimum being once per calendar year.

## 2.6 Specific requirements for conversion of feed to “VLOG geprüft”

Conversion of feed materials into “VLOG geprüft” quality: Purchased feed materials can obtain the “VLOG geprüft” quality from a feed trader, if they are included:

- into the auditing according to the VLOG add-on module,
- in the company’s own self-assessment system and
- in the GMO monitoring system described here.

At the same time, feed materials can also be processed (e.g. crushing, grinding, pelleting).

The exclusively applies in combination with the requirements for traders (see Chap. 2.4) or pure delivery traders (see Chap. 2.5). The transfer is only feasible for feed material that can be analysed for GMOs.

### 2.6.1 Specific Requirements for risk management

In addition to the requirements in Chapter 2.1.3, risk analysis has to include the following items:

- Risk grading of feed material (risk-prone/not risk-prone) for the “VLOG geprüft” area
- Additionally, in the case of pure delivery trading: No later than at the conclusion of a purchase agreement by the pure delivery trader and the supplier, the pure delivery trader must have a written confirmation from the supplier that the goods are not subject to compulsory GMO labelling (which must be batch-specific or for a specific period of time)

### 2.6.2 Incoming goods inspection

When goods are received, it must be ensured that only label-free feed is transferred to ‘VLOG geprüft’ quality.

#### Incoming goods inspection of high-risk feeds

For all feed and feed additives that are classified as high-risk by the company (see section 2.1.3), the supplier must confirm that they are GMO-free or label-free. This can be done via:

- a separate GMO-free declaration for the batch currently supplied or
- analysis result in accordance with the requirements of the VLOG Standard on GMO-free labelling for the batch currently supplied or
- an addition on the shipping documents stating that the feed is label-free, or
- a clear contractual regulation on the delivery of label-free feed.

### Incoming goods inspection of feed that is not at risk

For all feed and feed additives that are classified by the company as non-hazardous (see Chapter 2.1.3), the corresponding shipping documents for the feed must not bear any labelling in accordance with Regulation (EC) No. 1829/2003 and 1830/2003.

### 2.6.3 Sampling and analysis for conversion

For the conversion of not-labelled feed materials to "VLOG geprüft"-quality, the business must perform sampling and analysing with at least the frequency indicated in Table 3 each year additionally to the requirements of Chapter 2.2.2.

All samples must be analysed. The analysis must be performed by a VLOG-recognised laboratory.

Table 3: Annual minimum number of samples /analysis for the conversion of not subject to labelling feed into "VLOG geprüft" quality

Complete range on-site	Area	Incoming goods	Outgoing goods
No bulk feed subject to compulsory labelling		1 sample for every batch of feed material, which is classified as risk-prone and supposed to be converted	up to incl. 10,000 t/year: 1 >10,000 to 50,000 t/year: 2 >50,000 to 100,000 t/year: 4 >100,000 to 200,000 t/year: 6 > 200,000 to 300,000 t/year: 8 For every additional 100,000 t or part thereof: 2 additional samples
Bulk feed subject to compulsory labelling		1 sample for every batch of feed material, which is classified as risk-prone and supposed to be converted	up to incl. 2,000 t/year: 1 sample >2,000 to 5,000 t/year: 3 samples >5,000 to 10,000 t/year: 5 samples >10,000 to 50,000 t/year: 10 samples >50,000 to 100,000 t/year: 15 samples >100,000 to 200,000 t/year: 20 samples > 200,000 to 300,000 t/ year: 25 samples For every additional 100,000 t or part thereof: 5 additional samples
Pure delivery trader		1 sampling and analysis for every batch of feed material graded as risk-prone and supposed to be converted. If soy, rapeseed/canola, corn/maize, sugar beets or cotton are converted and all lots are graded as non-risk-prone, the following applies: at least 1 sampling and analysis per year. The exact number is to be determined by the business based on risk (e.g., depending on the number of suppliers and countries of origin). The conversion of feed by the pure delivery trader is only possible if sampling and analysis of the feed can be organised by the pure delivery trader.	

## 2.7 Specific requirements for transshipment and storage of feed

### 2.7.1 [K.O.] Incoming goods inspection

During the incoming goods inspection it must be checked that the shipping documents or, in case of packed goods, the shipping documents include the labelling "VLOG geprüft". A complaint must be reported to the supplier if the shipping documents are incomplete or unclear.

## 2.8 Specific requirements for mobile feed milling and mixing plants

### 2.8.1 Specific measures to rule out contaminations

Milling and mixing plants that also process feed containing GMOs must:

- depending on the type of plant and internal risk assessment - perform at least one complete discharge and/or system purge following mixtures subject to compulsory labelling and before use in VLOG production. Regardless of the operator's risk assessment, a system purge must always be performed if more than 40% of the previous mixture consisted of feed subject to compulsory labelling (based on total mixture weight). This is also compulsory if a complete discharge had already been performed.
- the system purge is carried out in accordance with the manufacturer's instructions and with a sufficiently large quantity. The auditor must be provided with clear justification that the batch size is sufficient (e.g. manufacturer's information on carryover or own test results).
- subsequently use the system purges outside of the VLOG production.

### 2.8.2 Safeguarding by means of carryover tests

In order to validate the effectiveness of the measures taken against carryover, the plant operator must conduct a carryover test for each used model identical in construction.

A carry-over test can be omitted for systems in which both a complete emptying and a rinsing batch are carried out according to the manufacturer's instructions after each mixture requiring labelling and before a "VLOG mixture".

If the company has several identical models, the test must be conducted at the plant with the highest risk of carryover (e.g. according to age or type/extent of repairs).

The carryover test must be performed when the VLOG production starts and be then repeated at least every 5 years or when there are significant changes to the plant (repairs, wear and tear, defects...), which can affect the carryover.

The test and its results must be documented and retained at least until the next test. If necessary, the company must derive appropriate measures from the results.

For brand new plants the carryover test can be omitted for the entry into VLOG production, if there is a sound expert report from the manufacturer, which provides evidence-based information on the specific carryovers resulting from each measure (complete discharge, use of a hammer mill, system purge of a certain size/quality, etc.),

### 2.8.3 Mixing documentation and mixing protocols

Once completed, every "VLOG mixture" must be documented via a 2-fold mixing protocol according to the VLOG standard or a content equivalent mixing protocol, which must be signed by the facility operator. The plant operator and client must both receive one copy.

In the case of mixtures subject to labelling, the percentage of feed subject to labelling in the mixture must be documented.

### 2.8.4 Sampling permission

The operator of mobile milling and mixing plant must have written permission from every VLOG- certified agricultural company or agricultural VLOG group member, which authorise him/her to sample the manufactured "VLOG mixture".

### 2.8.5 Identification on shipping documents

VLOG-certified mixtures of feed not subject to compulsory labelling must be labelled on the shipping documents using the wording "VLOG mixture".

## 3 Matrix organisation for the stages feed trading and transport

A matrix organisation is defined as an association of different companies/locations for the purpose of the VLOG certification. The matrix is organised by a matrix organiser, while the participating companies are referred to as matrix members, and their locations, as matrix sites/locations. The matrix organisation is both possible for a company with at least two locations, as well as for multiple companies with their respective locations.

A matrix organisation may be requested for the following scopes:

- Feed transport
- Feed trade/drop shipping
- Feed storage/transshipment

It is also possible to combine several scopes in a single matrix organisation.

Matrix members are subject to the corresponding requirements of Chapter 2.1. Further information on the matrix organisation (e.g. granting of certificates and explanations) can be found at [www.ohnegentech-nik.org/standard](http://www.ohnegentech-nik.org/standard).

### 3.1 Specific requirements for the matrix organisers

#### 3.1.1 Matrix description, locations' list

According to the VLOG Standard ([www.ohnegentech-nik.org/standard001](http://www.ohnegentech-nik.org/standard001)), the matrix organiser must possess a matrix description as well as a locations' list. In case of significant changes of the matrix description affecting the VLOG certification, the certification body must be informed promptly by the matrix organizer.

#### 3.1.2 [K.O.] Contractual binding of the members

The matrix members must be contractually bound to the matrix organiser. This agreement must regulate the compliance with the VLOG Standard at the corresponding stage. In particular, the member must confirm the implementation of corrections and corrective measures ordered by the matrix organiser within the determined deadlines. The declaration of participation/contract must be signed by the member.

#### 3.1.3 Sampling and analysis

Evaluation of analysis data

The matrix organiser must:

- collect the analysis results of the matrix locations and evaluate them at least once per calendar year. There must be an evaluation for every location.
- if necessary, define risk-based measures for the locations.

## **Add-on module VLOG Feed Sector**

### **QS Qualität und Sicherheit GmbH**

Managing Director: Dr. A. Hinrichs

Schwertberger Straße 14, 53177 Bonn

T +49 228 35068 -0

F +49 228 35068 -10

E [info@q-s.de](mailto:info@q-s.de)

Photos: QS

[q-s.de](http://q-s.de)