ORGAINVENT

System for the indication of origin of meat

System description

This system description is a summary of the ORGAINVENT System Manual (consisting of the General System Fundamentals as well as guidelines for different types of meat).

- The chapters
- “The ORGAINVENT System”,
- “Inspections” and
- “Sanctions”

have been adopted unchanged from the General System Fundamentals in order to give interested companies a feel for the system.

- The complete General System Fundamentals with the additional chapters
- “Voluntary declarations”,
- “Online trading in meat”,
- “Documentation and evidence”

as well as the relevant guideline (beef // meat of swine, sheep, goat, poultry // meat of other types of animal // origin of the primary ingredient (meat as an ingredient) – processing) are made available to you on admission to the ORGAINVENT System (signature of the system contract, completion of the registration form, proof of closure of a contract for the independent inspection of indication of origin).

In the ORGAINVENT System, every subscriber is required to implement a labelling system and a comprehensive registration system at their operating sites. This is necessary in order to ensure correct customer information and to guarantee the traceability of the labelled meat from the respective goods issue to goods receipt at the company. To aid implementation of the system, ORGAINVENT subscribers are provided with specifications as part of the ORGAINVENT documentation as well as individual advice from the ORGAINVENT “Origin” team.

Foreword

ORGAINVENT is your partner for the reliable indication of origin of all types of meat.

ORGAINVENT offers the only system for independently audited and traceable origin in Germany.

In the ORGAINVENT System, the subscribers determine themselves how much labelling is incorporated into the ORGAINVENT System by selecting the types of meat and the process stages.

The guiding principles used here are the legal requirements for beef labelling (Reg. (EC) No. 1760/2000 + Reg. (EC) No. 1825/2000) and for the indication of origin of meat of swine, sheep, goats and poultry (Reg. (EC) No. 1337/2013). For other types of meat, Meat as (primary ingredient) and for voluntary declarations – are the food information regulation (Reg. (EC) No. 1169/2011), die Reg. (EC) 2018/775 (Origin of the primary ingredient) and the corresponding national legal requirements.

Furthermore, ORGAINVENT offers its subscribers individual assistance and tailor-made solutions, especially in the case of voluntary declarations.

The ORGAINVENT System for the indication of origin of meat facilitates preventive consumer protection and claims that are in clear compliance with competition law.

The ongoing development and refinement of competition law at the national and European level has also changed the requirements made of ORGAINVENT. Originally founded as a provider of an officially approved beef labelling and inspection system, ORGAINVENT is nowadays first and foremost a self-regulatory industry body that is concerned with the safeguarding of the fair market conduct demanded by, in particular, the German Unfair Competition Act (UWG), in relation to the labelling of meat.

All labelling information that is subject to inspection within the ORGAINVENT System plays a decisive role in the purchasing behaviour of consumers and therefore has an equally significant influence on the commercial success of the respective supplier of meat.

Anyone who labels meat on the market with non-existent characteristics or with characteristics of higher value than is actually the case is giving themselves an unfair competitive advantage over their competitors and, by doing so, may be causing damage to the recipients who value these characteristics.

The system of traceability and identity assurance within the framework of the ORGAINVENT System is essential for ensuring the veracity of the declarations and hence the integrity of the trade.

Labelling that is always accurate and truthful is therefore clearly in the congruent interest of both the consumer and the business.

ORGAINVENT System for the indication of origin of meat

The final consumer has been aware of information on the origin of beef since 1998, both at the serving counter and on self-service packaging. This information is required by Reg. (EC) No. 1760/2000.

Businesses have been able to carry out beef labelling with the aid of the ORGAINVENT System since March 1998.

From 1 April 2015 onwards, information on origin has been required for the final consumer as well as for mass caterers (e.g. restaurateurs, commercial kitchens) on prepacked meat of swine, sheep, goats and poultry (SSGP) in accordance with Reg. (EU) No. 1337/2013.

Declarations of origin for the types of meat mentioned are not (yet) legally required at the serving counter but may be given on a voluntary basis.

No statutory requirements are currently expected for other types of meat on the part of the EU Commission. Nevertheless, Reg. (EU) No. 1169/2011 already includes in the form of Article 26 (5) a) provisions that envisage the potential mandatory declaration of origin of types of meat other than beef and meat of swine, sheep, goats and poultry.

Declarations of origin that are now made for other kinds of meat (e.g., venison, horse, other poultry, e.g. ostrich or quail, exotics, e.g. springbok or lama) are therefore subject only to the general European regulations for voluntary declarations (Chapter V, Reg. (EU) No. 1169/2011) such as “not misleading”, “not ambiguous or confusing”, “factual” and “verifiable”.

Voluntary declarations concerning meat are declarations that the consumers cannot verify for themselves, but which may be important for their decision to purchase. Meat with certain characteristics and information is used to differentiate the range and is usually offered at a higher price.

Examples of voluntary declarations are particular characteristics or the quality of the meat, information about the conditions of production and inspections or tests that go beyond the legal requirements. They also encompass trademarks and quality meat programs.

Bei verarbeiteten Produkten mit Herkunftsangabe ist die gesonderte Nennung der abweichenden Herkunft der primären Zutat erforderlich. Diese Forderung ergibt sich ebenfalls aus Art. 26, Art. 5 der VO(EG) 1169/2011. Im Rahmen des ORGAINVENT-Systems können seit dem 1.4.2020 auch diese Herkunftsangaben abgesichert und bis auf den Wareneingang rückverfolgt werden.

Indication of system membership

Alle ORGAINVENT-Teilnehmer sind in der öffentlich zugänglichen Teilnehmerliste auf der Homepage *www.herkunft.org* mit Firmennamen, PLZ und Ort, angemeldeter Prozessstufe und Fleischarten aufgeführt. Zusätzlich können das Firmenlogo, die URL und ein Link auf die eigene Homepage angegeben werden.

Auf allen Etiketten bzw. dem Aushang an der Bedienungstheke muss sich der ORGAINVENT-Teilnehmer durch seine 5-stellige ORGAINVENT-Nr. ausweisen.
Beispiel für ORGAINVENT-Nr. auf dem Etikett / in der Kundeninfo

ORGAINVENT-Nr.: 32468

In the case of companies that provide contract services, e.g. contract slaughter or contract cutting for other companies, the ORGAINVENT number must be positioned on the label in such a way that it can be clearly associated with the producing company. This can be done by printing the ORGAINVENT number immediately adjacent to the corresponding approval number as well as by using explanatory notes on the label, e.g. “Produced by XYZ GmbH, OI No. 10xxx".

The trademarked logo for the ORGAINVENT System for the indication of origin of meat may be used in accordance with the design guidelines for the use of the mark. It signals to the consumer that the ORGAINVENT System is employed, regardless of any other brands or company names.

In addition to this, ORGAINVENT subscribers from the butcher's shop and direct marketing process stages can apply the MEISTERHAFT standards. These go beyond mere indication of origin labelling and always require at least one voluntary declaration; this is verified throughout the entire process chain back to the origin within the ORGAINVENT System.

The following organisations have firmly embedded indication of origin with the ORGAINVENT System in their standards:

EIFEL	Regionalmarke Eifel GmbH, 54595 Prüm	The quality logo issued by the EIFEL regional brand is a sign which makes special, verified quality from the Eifel region immediately apparent. For the range of fresh meat, indication of origin with the ORGAINVENT System is mandatory for all users.

1.Inspections

The ORGAINVENT System for the indication of origin of meat stipulates internal and external inspections.

Internal Inspections

Performed within the company is the “self-inspection”, which is essentially expressed in the professional implementation of the system. By referring to concrete and understandable work instructions, all employees are aware of the aspects of their work that require special attention. Any “inspection points” or “critical inspection points” that are present in the specifications must be addressed in accordance with the inspection plan. Furthermore, regular internal audits by the company's own quality management can confirm the effectiveness of the internal identification and registration system, or perhaps improve it by indicating corrective measures. ORGAINVENT recommends that, all operating sites that are subscribers to the ORGAINVENT System perform an internal audit and document the effectiveness of the ORGAINVENT System once a year, i.e. every 12 months. This internal audit may be conducted and logged by the company’s own QA department or – at the food retail / butcher level – by employees themselves.

External Inspections

Examination by the independent certification bodies provides an objective view of the processes followed by the company. External persons with the appropriate qualifications check that the system implementation in the company is functional and that the self-inspections and documentation are rigorous and comprehensive. They thus confirm that the system is functioning or reveal weak points that must be remedied with appropriate corrective measures.

The auditors check that the implementation of the labelling system for that particular site (mandatory and voluntary declarations) is functional and that the self-inspections and documentation are rigorous and comprehensive. They also check that suitable evidence of

traceability is available. All interfaces within the business that are relevant to the indication of origin of meat are examined:

- Goods receipt
- the production process
- storage
- goods issue

The scope of this inspection also always includes an audit on the traceability from goods issue back to goods receipt, depending on the goods that are available for sale. The inspections of the goods issue and goods receipt documentation for completeness and consistency, and of any other documents that are necessary for the traceability of the information used in sales, are key components of the audit. Synergies with the existing inspection system provided by QS GmbH are available with regard to independent inspections of businesses.

On their entry to the system, these companies commission an independent certification body themselves to conduct regular monitoring of their processes for the indication of origin of meat.

This certification body must be contractually integrated by ORGAINVENT into the ORGAINVENT System for the indication of origin of meat.

Certification bodies

There are already a large number of independent certification bodies who are contractually incorporated into the ORGAINVENT System. This pool can be extended at the request of the subscriber. The ORGAINVENT subscriber commissions one of these certification bodies according to their own choice. The certification body gives ORGAINVENT a legally binding declaration with regard to the monitoring activities at the companies concerned.

→ ORGAINVENT-Information: Pool of certification bodies

There are no statutory prerequisites or procedures for the approval of independent certification bodies in the area of “monitoring of indications of origin of meat”. Before its acceptance into the ORGAINVENT pool, ORGAINVENT checks the suitability of an independent certification body. The certification body must be capable of making technically competent and independent decisions with regard to certification. ORGAINVENT expects the certification body to be accredited in a testing system that is relevant to the industry (e.g. QS, IFS, BRC) as an essential prerequisite for conducting an independent certification procedure and sets requirements with regard to its deployment of inspection personnel – including professional competence and annual training of the inspectors.

Types of inspection in the ORGAINVENT System

System inspection

During a system inspection, checks are made to determine whether the requirements set out in the System Manual and in the company-specific work instructions are met. In the ORGAINVENT checklist,

this concerns the system fundamentals, goods receipt and the company's internal handling and processing as well as marketing / goods issue, including the voluntary declarations, checking in each case that the documentation is complete.

The traceability audit from goods issue to goods receipt is conducted on a random sample.

The timing of a system inspection can be agreed between the subscriber and the certification body (announced appointment).

Spot check inspection

During a spot check inspection, checks are conducted on 4 specific products from goods issue to determine whether the indication of origin is correct and complete for these products, whether the displayed information can be traced back to the goods receipt documentation and whether there is corresponding evidence for the voluntary declarations that originate from the company itself.

Spot check inspections are always performed unannounced.

Combined inspection

A combined inspection always includes a system inspection and a spot check inspection. On the same date. Combined inspections are always performed unannounced.

Initial inspection

Within the first 8 weeks of registration and admission to the ORGAINVENT System, the commissioned certification body conducts a system inspection on new subscribers. On the basis of this inspection, the subscriber can be issued a certificate by the certification body. After that, the inspections are performed at normal intervals

Should an existing subscriber register one or more new types of animal for which it does not yet have an ORGAINVENT System subscription, a new initial inspection need not be performed. However, if the subscriber would like a certificate for this or these type(s) of animal, this can only be issued after passing a system inspection.

Follow-up inspections

Follow-up inspections are necessary if a regular inspection has not been passed. The follow-up inspection is used to determine whether the agreed corrective measures have been implemented. The inspectors decide whether an on-site follow-up inspection is necessary or whether a review of the documents is sufficient. The checklist for the combined inspection is used for the on-site follow-up inspection.

Unannounced and announced inspections

Unannounced inspections are performed at all stages within the ORGAINVENT System. As with the QS System, ORGAINVENT subscribers can decide for themselves whether the next inspection should take place unannounced in due time before expiry of certification (= combined inspection: system and spot inspection on the same day) or whether an unannounced spot inspection should be conducted between two announced system inspections. The unannounced spot inspections occur at least 2 months before or after an announced system inspection.

Kontrollvarianten in Abhängigkeit von der angemeldeten Prozessstufe

Registered process stage	system inspection + unannounced spot inspection	Unannounced combined inspection
Slaughter	X	X
Cutting	X	X
Processing	X	X
Wholesale	X	X
Foot retail	X All inspections are unannounced	X
Butcher Shop, direct marketer The operating site is merely a point of sale	X All inspections are unannounced	X
Butcher Shop, direct marketer (operating site with own slaughtering/ cutting/ processing)	X	X
Special cases		
Initial inspection	X	X
Follow-up inspection (on site)	Always performed as an announced system inspection with 4 samples	

Synergy inspections with QS

All ORGAINVENT subscribers who also subscribe to the system operated by QS GmbH can have their QS and ORGAINVENT inspections conducted in synergy. The prerequisite for this is that the ORGAINVENT System subscriber has also registered with the QS GmbH System the process stages and types of animal that it has registered with ORGAINVENT. For such cases, there is a QS Synergy check module with a reduced checklist + spot check sheet available for the ORGAINVENT inspection,

given that essential legal foundations are already covered by the QS checklist. The process-specific guidelines followed by QS GmbH have been amended according to the relevant legal requirements and thus feed into the QS inspections. This means that incorrect indication of origin or insufficient documentation or traceability of declarations of origin within the company will also have a negative effect of the QS inspection result.

Control variants depending on the registered process stage

ORGAINVENT inspections		QS-Audits	
1	Combined inspection (unannounced)	A	QS-Systemaudit unannounced (only in food retail)
2	System inspection (announced)	B	Systemaudit announced
3	Spot inspection (unannounced)	C	Spotaudit unannounced

ORGAINVENT	QS-System	OK//Nicht-OK	OI-Checkliste	Entry in the database
1	A	Only Food retail	QS-Synergy-checklist, 4 samples	Combined inspection with QS-systemaudit
1	B	Not possible		
1	C	OK	Checklist, 4 samples	Combined inspection with QS-Spotaudit
2	A	Not possible		
2	B	OK	QS-Synergy-checklist, 1 sample	Systeminspection with QS-Systemaudit (announced)
2	C	Not possible		
3	A	Only food retail	4 samples	Spotinspection with QS-Systemaudit or Spotaudit
3	B	Not possible		

3	C	OK	4 samples	Spotinspections with QS-Systemaudit or Spotaudit

In general, though, companies still have the option of additionally checking indication of origin using the ORGAINVENT Checklist, independently of the QS audit.

Should an ORGAINVENT company with a QS subscription also like to make voluntary declarations concerning beef, or meat of swine or poultry (chicken, turkey), the auditor who performs the QS inspection will also check the admissibility and traceability of the voluntary declarations against an additional checklist.

Inspection of other types of animal: If a company should register additional types of meat with ORGAINVENT that are not considered in the QS System, then the ORGAINVENT Checklist should always be used.

Companies without a QS subscription

For all ORGAINVENT members who are not simultaneously subscribers to the QS System, the inspections are organized differently but are conducted in a similar manner. On their entry to the system, these companies commission an independent certification body themselves to conduct regular monitoring of their processes for the indication of origin of meat.

Inspection frequency

Equal treatment of all system subscribers through the use of a standardised inspection regime is paramount within the ORGAINVENT System. ORGAINVENT looks to the QS System with regard to inspection frequency. Every registered operating site must be inspected. The frequency with which system inspections take place is graduated in accordance with inspection results. The inspection result is given in the form of an ORGAINVENT status:

- ORGAINVENT Status I: Inspection frequency: 2 years
- ORGAINVENT Status II: Inspection frequency: 1 year
- ORGAINVENT Status III: Inspection frequency: 6 months
- ORGAINVENT Status failed: Inspection frequency dependent on the result of the follow-up inspection

ORGAINVENT Status failed: Inspection frequency dependent on the result of the follow-up inspection

The deciding factor is the time of the previous combined or system inspection. If the inspection is not passed, a follow-up check is necessary. This can be done either as an on-site follow-up inspection or as a document review. If the document inspection was successful or the on-site inspection was completed with ORGAINVENT Status I, an inspection frequency of 2 years then applies, going from the last regular system or combined inspection. Otherwise, the corresponding reduced inspection frequencies apply.

Exceptions to the inspection of every operating site are possible for subscribers who have registered the process stages at the point of final sale – food retail, cash and carry, butcher's shops and direct marketing business – and which also have multiple operating sites. However, these exceptions apply

specifically to operating sites which have registered only the process stages of food retail and butcher's shops.

If the subscriber has only registered one operating site at the final sale stage, the frequency of checks shall be as indicated above.

For more than one registered operating site at the stage of purely final sales, there is a spot inspection regulation for groups of branches as well as for independently managed retail outlets. These clusters are monitored annually, typically with 10% of the registered operating sites in the cluster, but at least one inspection. If more than 20% of the operating sites inspected in the previous year are deemed to have "failed", the spot inspection quota is raised to 15%.

In each case, a system inspection is performed at half of the visited operating sites, while a spot inspection is performed at the other half – if no combined inspections are made at all

All inspections at the retail sales stage (food retailer, C&C, butcher's shop) take place unannounced.

If, in addition to the purely retail outlets, a subscriber has also registered operating sites at the preliminary stages of slaughter, cutting, processing and/or wholesale, the normal frequency of inspection shall apply to these operating sites. The same applies to operating sites that have registered another process stage in addition to the final sales stage.

Overview:

For all Status I: Each operating site: All process stages except purely final sale

(registered) System inspection Every 2 years + unannounced spot check inspection with min. 2 month interval to system inspection, usually in the "intermediate year"	Unannounced combined inspection every 2 years (system + spot check inspection on the same date)

At the point of final sale

Unannounced system inspection in 5% of branches Spot check inspection in another 5% of branches annually	Unannounced combined inspections in 10% of branches annually

Inspections results

The preliminary result of an inspection is determined by the auditor and communicated to the business immediately after it has taken place:

- ORGAINVENT Status I: No deficiencies could be identified; the system for the indication of origin of meat is functioning
- ORGAINVENT Status II: The ORGAINVENT System is implemented with minor deviations at the site
- ORGAINVENT Status III: The ORGAINVENT System is implemented with major deviations at the site
- Failed: The ORGAINVENT System is not implemented properly at the site; the information for the customers and/or traceability is not guaranteed

After it has been cross-checked by the certification body, the inspection report is uploaded to the ORGAINVENT database *https://db.herkunft.org*

The inspection report is finally released by ORGAINVENT after random spot checking. In the event of any discrepancies, the inspection report is sent back to the certification body for rectification. In isolated cases, this may result in amendment of the preliminary inspection report and of the inspection result. The subscriber is notified of the amendment by the certification body.

If the result of the inspection is ORGAINVENT Status II or III, or “Failed”, the independent certification body is obliged:

- to stipulate, in consultation with the subscriber, correctional measures to remedy the deviation (documentation in the test report),
- to fix a reasonable period of time or a date for the correction of the deviation (max. 6 weeks).
- To perform a follow-up inspection to verify the successful implementation of the corrective measures:
    - Using documents: The corrective measures with regard to the certification body shall be implemented by submitting appropriate documentation to the certification body.
    - Follow-up inspection on-site: If a follow-up inspection by means of documents is not sufficient, an appointment for an on-site appraisal must be made. A follow-up inspection on site is always performed as a full combined inspection.

- In parallel with this, ORGAINVENT shall penalise the deviations revealed in a “failed” inspection in accordance with the system’s internal sanctions system.

All inspection results can be viewed by the respective subscriber in the ORGAINVENT System database. The access data are communicated on an individual user basis after entry to the system.

→ https://db.herkunft.org

Spot audits on the upstream stage

All voluntary declarations relating to beef and meat of swine, poultry, sheep and goat (e.g. category, breed, maturity, regional details and many more) as well as all the voluntary declarations relating to other kinds of meat (including declarations of origin) are not subject to any multi-stage inspections (as for the declarations of origin of beef and meat of swine, poultry, sheep and goat meat) across all sales and production stages.

The independent inspections at the sites take into consideration only the correct propagation of the aforementioned declarations within the company as well as the traceability of the declarations from the goods issued back to the goods receipt areas of the business. The truth of the declaration or admissibility of the declaration is not verified.

Should the upstream suppliers also be subscribers to the ORGAINVENT System, the chain is also closed with regard to the voluntary declarations. If the upstream suppliers are not in the ORGAINVENT System, so-called “spot audits” can be commissioned to safeguard the declarations at the precursor stage. The mandate is issued by the respective ORGAINVENT subscriber, who explicitly designates the supplier to be audited and the voluntary declarations that are to be traced back to the goods receipt of the supplying company. The organisation and execution are the responsibility of ORGAINVENT.

The purpose of the spot audits is to ensure the traceability of voluntary declarations back to their respective origin and to integrate the suppliers into the ORGAINVENT System. The advantage for the suppliers is clear: Participation in the system saves them from what could be large number of spot audits by different customers.

Farms

Farms are typically not ORGAINVENT subscribers, insofar as they are involved only with the production of animals for slaughter and do not act as a processors / marketer of meat. The requirement for verification of the origin of living animals (as demanded by the EU) is lifted at the slaughterhouse. Voluntary monitoring of the declarations of origin on site is possible on farms within the framework of voluntary spot audits.

If **voluntary declarations** (e.g. rearing conditions or feed declarations) that originate at the farm stage and which cannot be evidenced by official documents or by existing and recognised inspection systems (QS, BIO, branded meat programs) are to be made concerning the meat, then the admissibility of these declarations must be independently verified by inspection at the upstream

businesses within the framework of the ORGAINVENT System. The slaughterhouse commissions these inspections. An annual inspection quota of 10 % of the farms is reasonable. Evidence of these inspections must be kept available at the slaughterhouse.

Official inspection

Obligatory beef labelling is subject to official inspection by the national authorities, in Germany: BLE as the market regulatory authority.
The indication of origin of meat of swine, poultry, sheep and goats, as well as the verification of volun-tary declarations concerning beef, are governed by the competent authorities for food quality monitor-ing in the german federal states.
The official inspections proceed in a similar manner to the independent inspections. Moreover, the au-thorities have the right to take product samples in order to check their classification according to CN code.

Direct Special inspections by ORGAINVENT

The content of direct inspections by ORGAINVENT is equivalent to the inspections already mentioned. They can be arranged by ORGAINVENT in exceptional circumstances or in the event of imminent danger. The inspection costs are to be paid by the ORGAINVENT subscriber in the event of deviations.

2. Sanctions system

Reg. (EU) No. 653/2014 provides for official sanctions in the event of violations of the provisions applicable to beef labelling. For all other types of meat, official sanctions are applicable as set out in Reg. (EU) No. 1169/2011.
The primary objective of the independent inspections within the ORGAINVENT System is to confirm that their implementation in businesses is legally and system compliant. Any deviations that are detected during independent inspections must be remedied as quickly as possible. As an immediate measure, a follow-up inspection (on site if necessary) is conducted by the independent certification body a short while later (max. 8 weeks).
The ORGAINVENT sanctions system has as its principal objectives the sustainable maintenance of sys-tem-compliant behaviour on behalf of the community of subscribers and the penalisation of miscon-duct.
If the result of an inspection is “failed” (with the exception of failed initial inspections), a sanctioning procedure is always initiated. A reasonable period of time is set, during which the system participant is given the opportunity to submit a written statement (by letter, fax or email). The system participant receives written notice of this.
Independently of any immediate corrective measures implemented on the part of the system partici-pant, ORGAINVENT assesses whether a sanctioning procedure is to be initiated according to the nature of the breach of the contractual agreements or the requirements of the ORGAINVENT System. The decision to initiate a sanctioning procedure is based on the severity and the number / frequency of any breaches that were identified.
A sanctioning procedure is not initiated for a failed initial inspection.

If the assessment indicates that no sanctioning procedure is to be initiated, this is communicated to the system participant – subject to further conditions or instructions if appropriate.
If the assessment indicates that a sanctioning procedure is to be initiated, the case is passed to the sanctions committee.
The sanctions committee is an independent body within the ORGAINVENT System and is appointed by the supervisory board of ORGAINVENT.

The sanctions are imposed by ORGAINVENT directly against the contractual partner (member) rather than against the component (e.g. outlet, operating site, branch) of the company responsible for the violation, since it is the task of the contractual partner to ensure the correct implementation of the OR-GAINVENT System at all operating sites. ORGAINVENT holds the contractual partner responsible for remedying without delay any deficiencies that are detected.

Multi-level sanctions system:

- Sanction level 0: The assessment of the sanctions committee leads to the result that no further action against the contracting partner is necessary. The corrective measures have been effective; the system is functioning.
- Sanction level 1: The assessment of the sanctions committee leads to the result that the contractual partner should be issued with a reprimand and informed that indication of origin must implemented with more diligence by the company.
- The assessment of the sanctions committee leads to the result that the contractual partner should be issued with a warning.
- The assessment of the sanctions committee leads to the result that the contractual partner must be issued with a warning in conjunction with a contractual penalty. At sanction level 3, a contractual penalty of up to €10,000 may be imposed. The level of the penalty shall depend on the severity of the violations and/or the degree of damage caused by the violations; it shall also take into consideration the size of the company and any advantages gained through actions contrary to the system. ORGAINVENT shall support the system participants at their request in identifying the causes and determining appropriate preventive and corrective measures. Any contractual penalty shall be set on an individual basis at the discretion of the independent sanctions committee.

The contractual partner shall bear the costs of any legal proceedings required for the enforcement of the contractual penalty
In addition, the sanctions committee may recommend the following measures:

- Individual ORGAINVENT training
- Review of work instructions and labelling
- Store check
- Fitness test
- E-learning tools (from 2020))

Consequent to the meetings of the sanctions committee, ORGAINVENT has a duty to:

- inform the contractual partner of the decision of the sanctions committee and
- enforce against the contractual partner the penalty that was set by the sanctions committee.

At sanction level 3, ORGA INVENT has, furthermore, a duty to:

- examine the extent to which use should be made of the contractually regulated right of extraordinary termination so to protect the mutual interests of all contractual partners,
- issue the termination notice if necessary and
- if necessary, take further steps towards the settlement of civil claims (for damages).

Following extraordinary termination of a system contract, the contractual partner concerned may re-join the ORGAINVENT System after the expiry of a period of at least six months, subject to reexamination to verify that the prerequisites are met.

If a sanction should result in a termination of the system contract that is merely temporary, then – regardless of who initiated the termination – re-entry to the system is permitted without any further waiting period, but only after re-examination of the prerequisites.

Appealing against the sanctioning decision

An appeal against the decision of the sanctions committee is permitted. The appeal is to be lodged in writing at the ORGAINVENT office (ORGAINVENT GmbH, Schwertberger Str. 16, 53177 Bonn) within 30 days of receipt of the decision in written form.
Reasons must be given for it.
An appeal that is submitted with a written justification shall have a suspensory effect. The decision of the sanctions committee will only become effective if the sanctions committee, in exceptional cases, has decided on the immediate enforcement of a sanction. In such cases, compliance with the sanctions that have been laid down is required first, regardless of any appeal. After the appeal has been lodged, the sanctions committee shall review its decision and inform the system participant in writing of the out-come of this review.