

Global Standard  
**GLUTEN-FREE**  
ISSUE 4

**FREQUENTLY  
ASKED QUESTIONS**

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Issue 1

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Published by:

BRCGS

LGC, Second Floor

80 Victoria Street

London SW1E 5JL

Tel: +44 (0) 20 3931 8150

Email: [brcgs.publishing@lgcgroup.com](mailto:brcgs.publishing@lgcgroup.com)

Website: [brcgs.com](https://brcgs.com)

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## Introduction

A new issue of a standard often generates questions as sites, certification bodies and specifiers ensure they understand the new requirements. The most frequently asked questions relating to the Global Standard Gluten-Free (Issue 4) (referred to as the Standard) are detailed in this document.

BRCGS also operates an enquiry service. If you are unable to find an answer to your question, please visit [www.brcgs.com/contact-us](http://www.brcgs.com/contact-us) and choose the option most relevant to the subject of your enquiry.

## General questions – background

### Why did BRCGS issue a new standard?

Food safety does not stand still. New risks, legislation and practices to improve food safety are continually emerging so as a matter of principle the BRCGS global standards need to be periodically reviewed and updated. The most significant changes in the updated Standard concern:

- Providing greater assurance to our stakeholders by adding grading of non-conformities thereby ensuring the site meets the requirements of the Standard.
- Strengthening of the Standard by adding a section on labelling and pack control to ensure this aspect of the process is more robustly controlled.
- Creating a new optional section of clauses to integrate the AOECs-specific requirements to meet EU legislation and be eligible to use the Association of European Coeliac Societies (AOECs) Crossed Grain Trademark on prepackaged foods.
- Extending the scope to include management of outsourced processing.

### How do I download a copy of the Standard and associated documents?

The Standard is available to download from the BRCGS [Store](#). Access to all the standards and guidelines published by BRCGS are also available on our online information management platform, [Participate](#). Register via [lgcassure.com](http://lgcassure.com).

An Interpretation Guideline and a Guide to Key Changes are also available. The items are available to purchase on the BRCGS Store or can be downloaded from Participate.

### What languages is the Standard available in?

The Standard is currently only available in English.

### What is the difference between the Guide to Key Changes and the Interpretation Guideline?

The Guide to Key Changes introduces the Standard and provides a list of the main changes made to the requirements. It is useful when updating quality systems in preparation for an audit against Issue 4.

The Interpretation Guideline is designed to be used in conjunction with the Standard and will help you understand and comply with individual requirements. It provides more information and detail for each clause.

### How do I keep up to date with any changes to the standard?

During the lifetime of a published Standard, BRCGS may be asked to either review the wording of a clause or provide an interpretation of a requirement or rule. The decision made by BRCGS is known

as a position statement. Position statements are binding on the way that the audit and certification process is carried out and are seen as an extension to the Standard.

Position statements are notified to sites and certification bodies through regular newsletters and are posted on the Gluten-Free page of the BRCGS website and on Participate for registered users. Please check our website on a regular basis and make sure you are [registered to receive our newsletter](#).

Users of Participate will be notified about the publication of a position statement via a monthly newsletter. Make sure someone from your site is registered on Participate to receive this.

#### **Where can I find the Auditor Checklist and Site Self-Assessment Tool for the Standard?**

You can find this document on the BRCGS Help and Guidance page ([www.brcgs.com/our-standards/gluten-free-certification/help-and-guidance](http://www.brcgs.com/our-standards/gluten-free-certification/help-and-guidance)) and on BRCGS Participate ([www.lgcassure.com/participate](http://www.lgcassure.com/participate)) using the search tool at the top of the page.

#### **Can I use the Auditor Checklist and Site Self-Assessment Tool for my internal audits?**

While we hope that this tool is useful in helping your site prepare for a certification audit it should not be considered as evidence of an internal audit and will not be accepted by auditors as such.

You should not only use this document to prove conformity to the clauses, but should have objective evidence, documentation procedures and policies in place which can be referenced.

#### **Is BRCGS Global Standard (Issue 4) training mandatory for Issue 4?**

Yes, and there are two different training courses available with two different methods of delivery.

A representative from each certificated site must complete and pass the BRCGS Global Standard Gluten-Free Issue 4 Sites Training course. The course is available as e-learning, or classroom training through our approved training partners (ATPs).

ATPs are BRCGS approved trainers who train auditors, sites, consultants and retailers to our requirements and protocols.

Either of the above training course delivery options will satisfy the requirement for gluten-free training for the gluten-free management system team leader. Once a delegate has taken and passed the training course, the certificate is valid for the lifetime of Issue 4 of the standard.

Training for auditors is also available through the BRCGS Global Standard Gluten-Free Issue 4 Auditor Training course. The course is available as e-learning, or classroom training through our ATPs.

#### **Can a site still be audited to Issue 3?**

No. Audits against Issue 3 of the Standard ceased on 4 August 2024. Any audits conducted after this date must be against Issue 4.

#### **Where can I find the certificate template?**

Certification bodies can find a blank template to complete following certification audits in MyBRCGS.

Certificated sites can find their completed audit reports and certificates in the BRCGS Directory.

# Questions relating to audit protocol

## 1. The Global Standard Gluten-Free onboarding process

### The Site Programme Agreement

#### **Does my site need to sign a Site Programme Agreement before our initial audit?**

Yes. Sites must contact BRCGS to enter into a Site Programme Agreement and pay the appropriate fees prior to their initial audit. Your certification body will check that you have completed this step prior to scheduling your initial audit.

#### **How far in advance of the initial audit does the site need to sign the Site Programme Agreement?**

Your certification body must be satisfied that a Site Programme Agreement is in place. The site seeking certification will be asked for proof during the application process with the certification body.

There is no defined time by which the site must have the Site Programme Agreement in place, but due to the nature of the process, it will likely be around 1-6 months prior to the audit.

#### **Do we need to sign a new Site Programme Agreement every year?**

No. The Site Programme Agreement automatically renews annually. However, if there are changes to the company name or the site's address, a new agreement must be signed to reflect these changes.

#### **What do I need to do if I don't want to have a Gluten-Free audit in the coming year?**

You must inform the certification body and BRCGS of your decision. The certification body must be notified so that they do not schedule an audit. BRCGS must be notified so that we can cancel your site's Programme Agreement according to the terms and conditions.

Failure to notify BRCGS of the intention to exit the Programme may result in further invoices being raised and charges incurred. The site must notify BRCGS contacts to cancel the Site Programme Agreement. The notification should be sent to both the following emails:

[brcgs.creditcontrol@lgcgroup.com](mailto:brcgs.creditcontrol@lgcgroup.com) and [brcgs.labels@lgcgroup.com](mailto:brcgs.labels@lgcgroup.com).

### The Brand Programme Agreement

#### **When do I need to sign a Brand Programme Agreement?**

A Brand Programme Agreement must be signed when a brand owner indicates they wish to use any of the following trademarks:

- Celiac Canada
- Beyond Celiac
- Informed Gluten-Free

Acelmex and the AOECs Crossed Grain trademark use are not covered by the Brand Programme Agreement. Separate agreements will need to be entered into with these organisations to use their respective trademarks.

#### **My site is willing to pay for the SKU fees incurred by our private label customer's trademark use. What do I need to do?**

If you have not already signed a Brand Programme Agreement, you must do so. Note: the private label customer is not required to sign an agreement. With regard to the Schedule A, you must decide how to manage the private label customer's products. You can either:

- add the private label customer's products to the site's Schedule A
- or
- list the products on the private label customer's Schedule A.

If the second option is chosen, the site must inform BRCGS if the private label customer or the site will be responsible for paying the relevant SKU fees. This will ensure the appropriate company is billed for trademark use.

## 2. General protocol – audit preparation

### **Can a site receive a Standalone initial audit and then receive combined audits subsequently?**

Yes. There is no obligation to continue with standalone audits. Certain situations might dictate that a standalone option is the preferred option for the initial audit, however after this you can combine the Gluten-Free audit with your chosen food safety certification audit. The first time the audit is combined, the site will be subject to a second Gluten-Free audit within a 12-month period.

### **Are gluten-free products required to be in production during the audit?**

Yes. You must ensure that the production programme at the time of the audit covers products for the intended scope of the certification. Where possible, the widest range of these products shall be in production for the auditor to assess.

This production is **not** restricted to products displaying any of the trademarks available under certification. However the production at the time of the audit should be any product manufactured under the scope of the site's gluten-free management system.

As part of the audit planning for combined unannounced audits, the site must notify the certification body of any days or times when operations are not undertaken. If the combined unannounced audit takes place on a date when there is either no production or the only products being handled are outside the scope of the Standard, then the Gluten-Free portion of the audit cannot go ahead. A further standalone Gluten-Free audit will need to be arranged.

### **Can more than one site be included under a single certification?**

More than one site may be included under a single certification by exception only. It is only allowable where sites:

- sit under the same organisation ownership
- operate against the same quality management system (QMS)
- manufacture product part of the same manufacturing process
- solely supply other sites and no other customers
- are within 30miles/50km of each other.

Details can be found in the Audit Protocol, section 2.8.3 - Defining the limits of a site.

## 3. General protocol – audit planning

### **Can the duration of a standalone audit be less than the 1.5 days specified in the Standard?**

If your site is very small, and the certification body can justify performing the audit in less time than is prescribed in the Standard, a 30% reduction in the audit duration is possible.

Other factors will determine whether this is possible. More information can be found in the Audit Protocol, section 3.1.3 - Duration of the audit.

### **My audit is coming up and I have not yet received the invoice from BRCGS for our annual Site Programme Agreement fees. Should I postpone or delay the audit?**

No! Invoices from BRCGS for annual Site Programme Agreement fees are not linked to the audit and certification cycle.

Invoices are issued in the same calendar month every year. This is normally the month in which the site initially signed the agreement.

While payment is not necessarily required prior to the audit taking place, it may jeopardise your site's continued certification if payment is delayed after the invoice is issued.

## 4. Protocol for audits to include the AOECs-specific requirements

### **I want to include section 8 (AOECs-specific requirements) in our next audit. What should I do?**

Communicate your intention to your certification body as early as possible. It is the responsibility of the site to ensure that products being manufactured at that site are eligible to bear the Crossed Grain Trademark. A list of foods which are not permitted to use the Crossed Grain Trademark can be found in the [AOECs Standard for Gluten-free Foods](#).

The site must ensure that a Crossed Grain Trademark licence has been applied for or is in place between the AOECs member society and the licence holder. To learn about the process to become a Crossed Grain Trademark license holder, contact AOECs ([helpdesk@aoecs.org](mailto:helpdesk@aoecs.org)) or the AOECs member society in the country in which the audit takes place.

## 5. General protocol – post audit

### **We failed our Food Safety certification audit. Can we continue to use trademarks associated with Gluten-Free certification?**

No. Trademark use is dependent on a site maintaining its food safety certification. Your certification body will withdraw or suspend the site's Gluten-Free certification.

If the food safety certification is provided by a different certification body, you must notify the certification body which issued the last Gluten-Free certificate. This certification body shall withdraw or suspend your Gluten-Free certification.

In all cases where a certificate is withdrawn or suspended, trademark use on products manufactured at the site must cease until certification is granted.

### **We have moved site/changed our address. Do we need to sign a new Site Programme Agreement?**

Yes. The Site Programme Agreement is site-specific, so a new agreement must be signed. Contact [brcgs.sales@lgcgroup.com](mailto:brcgs.sales@lgcgroup.com) to arrange a new agreement and to amend any Schedule A you possess.

The site will require a full reaudit at their new premises against the Standard's requirements, plus the requirements of a food safety programme offered by a GFSI certification programme owner.

## 6. Audit duration

### **What is the minimum length of time for a Standalone audit?**

The average duration of an audit is 1.5-2 days at the site (typically 8–9 hours/day, but never in excess of 10 hours/day).

The duration of the audit is based on:

- the number of employees – as full-time equivalent employees per main shift, including seasonal workers
- the size of the manufacturing facility, including on-site storage facilities
- the number of HACCP plans (or food safety plans) included within the scope.

BRCGS recognises that other factors may also influence the audit duration, but these are considered less significant and therefore shall not influence the audit duration by more than 30% of the total audit time.



## 7. Change of certification body

### **As a site, can we change our certification body and get an earlier re-audit?**

You can change certification body for an early audit. This is only allowed under the justifiable or exceptional circumstances listed in the Audit protocol, section 3.7.2, or 3.7.7 respectively. You must provide justification in writing to your certification body, who will submit the request to BRCGS.

The site is responsible for contacting the previous certification body and communicating their decision in good time and following the contract conditions for termination of the service.

## 8. Logo use

### **We are certificated to the Standard. Can companies that use us, but are not certificated themselves use the BRCGS 'Gluten-Free certificated' logo?**

No, the BRCGS certificate only applies to the site audited, therefore the logo cannot be used by their customers. The company cannot display the logo on any of their own marketing materials or website. However, they can state in their marketing materials that they use a certificated site.

**Note:** It is important to differentiate between the BRCGS 'Gluten-Free certificated' logo and the trademarks which are available under BRCGS Gluten-Free certification.\* While the BRCGS logo can only be used by the company to which the certification belongs, products manufactured at a certificated site are eligible to bear any of the trademarks available under certification. These trademarks may also be used on any private label products manufactured at the site, even if that private label company is not certificated.

\* Trademarks include: Acelmex, AO ECS Crossed Grain, Celiac Canada, Beyond Celiac and Informed Gluten-Free.

## Questions relating to specific requirements of the Standard

### 1. Senior management commitment

#### **Clause 1.1.4: We've had difficulty scheduling our audit before the audit due date. Is an extension to our certificate validity possible?**

No. Certificate extensions are not permitted under any circumstances. Your certification body may apply to BRCGS for a concession for a late audit. However, this will only serve to avoid a major non-conformity when the audit takes place, not extend the certificate's expiry.

The audit due date is indicated on both the audit report and the certificate issued to all certificated sites. The responsibility for scheduling the next audit rests with the site.

If a concession is neither sought, nor granted, unless you can demonstrate exceptional circumstances, as identified in the Audit Protocol section of the Standard (Part III, section 3.7.2), a gap in certification may occur and a major non-conformity will be awarded.

In cases where the site's certification expires, trademark use must cease until recertification has been granted.

Any batches of products manufactured prior to the certificate's expiry may continue to bear the trademarks associated with certification to the Standard.

**Clause 1.2.3: Can the gluten-free management system team leader take and pass the BRCGS Global Standard Gluten-Free (Issue 4) Auditor Training course?**

Yes, the site training course is the minimum requirement to meet clause 1.2.3., but the auditor training course is an acceptable alternative. You should investigate the advantages of choosing the auditor course over the site course prior to purchase as there is a significant price difference.

**What is the validity period of the BRCGS Global Standard Gluten-Free (Issue 4) Sites Training course certificate?**

The delegate's Sites Training course certificate is valid for the lifetime of Issue 4 of the Standard. If the delegate subsequently leaves the business and there is no other trained individual, a new member of staff will need to take and pass the training course.

**How many employees must take and pass the BRCGS Global Standard Gluten-Free (Issue 4) Sites Training course?**

Typically, only the gluten-free management system team leader is required to take and pass the course. However, if this role is shared, or gluten-free production takes place when the trained member of staff is not present, a deputy may also need to take the course.

## 2. The food safety plan - HACCP

**Clause 2.1.1: Can we incorporate gluten as a hazard into our existing HACCP plan?**

Yes. The Standard has been developed in such a way so that sites can weave the gluten-free requirements into already established food safety processes and procedures.

## 3. Gluten-free management system

**Clause 3.4.2: The new supplier of a gluten-free ingredient states that there is an environmental risk of gluten being present. Can we still use this ingredient?**

While there may be an environmental risk of gluten being present in the ingredient, your supplier should still be able to provide a specification, a letter of guarantee, and test results from an ISO 17025 accredited laboratory to state that the ingredient still meets your specified threshold for gluten.

Once received, the site can (at a frequency based on risk) conduct its own verification testing on the ingredient to ensure it continues to meet specifications.

**Clause 3.4.6: Where can we find the BRCGS Guideline on Sampling and Testing for Gluten?**

The document can be found on the BRCGS Store in both printable and non-printable versions. For sites who are certificated to BRCGS Global Standard Food Safety, the document is available on Participate.

**Clause 3.8.2: Do mock recalls/withdrawals need to be completed if we have had a recall in the last 12 months?**

If your site has had an actual withdrawal or recall related to a gluten-free product, then this would be a substitute for a recall test. To be considered acceptable, a record of the recall must have been kept and an analysis of the effectiveness of the procedure carried out, with any areas for improvement identified and acted upon.

## 4. Product control

**Clause 4.3.2: Can we start using trademarks as soon as we gain certification for the first time?**

All use of BRCGS-managed trademarks on finished product packaging must be formally approved by BRCGS, prior to use.

The only official proof of permission to use any BRCGS-managed trademark on a product is by way of receipt of a Trademark Approval Form which has been signed by BRCGS.

Send all labels for approval to [brcgs.labels@lgcgroup.com](mailto:brcgs.labels@lgcgroup.com)

**Can we send labels for approval to use BRCGS-managed trademarks before our initial audit?**

We will be happy to review labels for compliance with our Free-From Trademark Guideline prior to certification being granted. This will allow you more time to make any necessary corrections to the artwork.

However, we cannot formally approve the use of the trademarks until certification is granted. Only batches of products manufactured after certification is granted may bear a trademark.

**Clause 4.3.3: Why can't we say 'certified gluten-free' on product packaging?**

BRCGS Gluten-Free certification is a facility certification, not a product certification. Therefore, claims referring to 'certification' shall be limited to the site, or the gluten-free management system delivered there.

If you are unsure as to whether a specific claim will be accepted, please contact us at [brcgs.labels@lgcgroup.com](mailto:brcgs.labels@lgcgroup.com).

## 5. Labelling and pack control

No questions have been asked relating to this section of the Standard.

## 6. The Schedule A

**Clause 6.1.1: Do I need a Schedule A for my initial audit?**

The Schedule A is only required when any of the four trademarks covered by the document are being used. You will not be using any of these trademarks at an initial audit because certification will not have been granted.

There may be times where you want to begin using the trademarks immediately after certification has been granted. In these cases, the Schedule A may be in place at the audit in preparation for certification.

The Schedule A does **not** indicate formal approval for use of the trademarks. Formal approval for the use of the trademark(s) must be sought from BRCGS or its affiliates prior to use, but we cannot formally approve the use of the trademarks until certification is granted. Only batches of products manufactured after certification is granted may bear a trademark.

**Clause 6.2.1: How do we communicate amendments to the Schedule A to BRCGS?**

Any amendments can be communicated to us via [brcgs.labels@lgcgroup.com](mailto:brcgs.labels@lgcgroup.com)

**Clause 6.3.1: Do we still have to update the Schedule A every 12 months?**

No. The requirement to ensure the Schedule A was updated every 12 months was removed for Issue 4.

Now, the Schedule A must only be updated when changes are made to Part A or Part C. The auditor will verify at the audit that all information is correct. If there have been changes which have not been reflected on the Schedule A, a non-conformity will be awarded.

## 7. Gluten-free training

No questions have been asked relating to this section of the Standard.

## 8. AO ECS-specific requirements

No questions have been asked relating to this section of the Standard.

## 9. Appendices

### Appendix 6 Certificate template:

#### **What information is required in the 'Product categories' section of the certificate template?**

The minimum information required follows the format listed in Appendix 5 of the Standard:

- Field of audit
- Category number
- Category description

No further information is required. If you or your specifier requests it, a more detailed scope wording may be present in place of the minimum information.

## Supporting resources for gluten-free certification

- Information for certification success
- Useful guidance
- Additional resources to support certification

Publication	Description	Where to find a copy
<b>Global Standard Gluten-Free (Issue 4)</b>	It is a requirement that all sites undergoing a BRCGS audit to the Standard have an official copy of this publication.	BRCGS Store and Participate
<b>Interpretation Guideline</b>	Further explains and discusses the principles behind each of the requirements of the Standard clause by clause.	BRCGS Store and Participate
<b>Guide to Key Changes</b>	Provides full details of all changes to the requirements of the Standard compared against Issue 8.	BRCGS Store and Participate
<b>Frequently Asked Questions</b>	The most frequently asked questions relating to the Standard.	BRCGS website and Participate
<b>Position Statements</b>	<p>This document contains all position statements against the Standard since publication.</p> <p>Position statements are binding on the way that the audit and certification process is carried out and are considered to be an extension to the Standard. Sites must be aware of any published position statements and, where necessary, ensure the information is transferred into action.</p>	BRCGS website and Participate
<b>Auditor Checklist and Site Assessment Tool</b>	Checklist for sites to assess themselves against the requirements before audit.	BRCGS website and Participate
<b>Trademark Approval Form</b>	Document used to indicate the products approved for trademark use.	BRCGS website and Participate
<b>Schedule A</b>	A document used to list all products using trademarks for a specific brand owner at a certificated site.	BRCGS website and Participate
<b>Free-From Trademark Guideline</b>	Guideline showing the trademarks available under certification and how they should be used on consumer-facing packaging.	BRCGS website and Participate
<b>Guideline on Sampling and Testing for Gluten</b>	An overview of best practices for developing sampling plans and testing protocols to detect gluten.	BRCGS website and Participate
<b>Guidance on Handling Grain for</b>	Guidance on the procurement and purchasing process for gluten-free grains.	BRCGS website and Participate

<b>Gluten-Free Production</b>		
<b>Understanding Production Risk Zones</b>	Helps sites understand whether the products they produce will require handling in a high-risk, high-care or ambient high-care area, and how the specific clauses for these areas should be interpreted.	BRCGS Store and Participate
<b>Effective Allergen Management</b>	Provides explanation of the allergen management requirements and aids companies in the development of robust allergen management systems and procedures.	BRCGS Store and Participate
<b>Effective Environmental Monitoring</b>	Assistance on designing, implementing and maintaining an environmental monitoring programme.	BRCGS Store and Participate
<b>Guide to Lighting Best Practice</b>	Guidance on lighting for production lines, warehouses and working areas.	BRCGS Store and Participate
<b>Best Practice Guide to Product Safety Culture</b>	Looks at the critical role played by culture in ensuring the effective implementation of product safety management systems, and in helping to prevent product safety incidents.	BRCGS Store and Participate
<b>Understanding Product Changeover</b>	Provides good-practice guidance to help manage product changeover effectively.	BRCGS Store and Participate
<b>Understanding Vulnerability Assessments</b>	Looks at the subject of food fraud and how to spot, avoid and manage the risks of its occurrence in the site's supply chains.	BRCGS Store and Participate
<b>Understanding Air Quality in Food Production</b>	Helps sites to define the air quality required in facilities and the specification or classification of air filtration needed to achieve it.	BRCGS Store and Participate
<b>Understanding Root Cause Analysis</b>	Guidance to help sites carry out effective investigation into the cause of incidents, product recalls and non-conformities.	BRCGS Store and Participate
<b>Ethical Appraisal Tool</b>	A gap analysis on ethical aspects of the business that helps to enhance practices and improve accountability.	BRCGS Store and Participate
<b>Global Standard Gluten-Free: Sites Training</b>	Course to gain a full understanding of the general principles of the Standard, and how to comply with the requirements.	BRCGS website

**BRCGS**  
LCC - Floor 2  
80 Victoria Street  
London SW1E 5JL

**T:** +44 (0)20 3931 8150  
**E:** [brcgs.enquiries@lgcgroup.com](mailto:brcgs.enquiries@lgcgroup.com)  
**W:** [brcgs.com](http://brcgs.com)

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