

**ISSUE 3
GLUTEN-FREE
CERTIFICATION
PROGRAM**

Summary of Key Changes
for Issue 3

**GLUTEN-FREE
CERTIFICATION PROGRAM
GLOBAL STANDARD:
SUMMARY OF KEY
CHANGES FOR ISSUE 3**

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Introduction

Background to the production of
Issue 3 and objectives

02



Introduction

BRCGS published Issue 3 of the Gluten-Free Certification Program Global Standard (hereafter referred to as the Standard) in February 2019. This new issue of the Standard will be applicable for all audits conducted from 1 August 2019. Certificates issued against Issue 2 will remain valid for the duration indicated on the certificate.

This document is intended to introduce the new issue and provide a summary of the changes since Issue 2.

Background to the production of Issue 3 and objectives

Consultation and development process

Before starting the review for Issue 3, BRCGS undertook an extensive consultation with key stakeholders from two working groups to understand the strengths of the previous issue of the Standard and identify any potential areas for improvement. Each group was made up of industry representatives from retailers, certification bodies, trade associations, and food manufacturers.

The key objectives identified for the working groups were:

- **Consistency:** Ensure global applicability
- **Focus:** Continue activities to reduce the burden of duplicate audits on certificated sites and ensure a clear focus on gluten control
- **Sampling and testing:** Provide enhanced clarity on sampling and testing requirements
- **Grain handlers/suppliers:** Consider the activities of raw grain suppliers.

Key changes for Issue 3

Consistency	04
Focus	04
Sampling and testing	04
Grain handlers/suppliers	04



Key changes for Issue 3

Consistency

The format of the Standard was updated to align with the suite of Global Standards. In addition, the requirement for certification bodies to be accredited to ISO 17065 and/or ISO 17021 has been called out. This will result in a consistent approach to auditing and managing the Standard, which in turn will ensure that sites are operating at a reliably high level. Key terminology has been updated in line with other Global Standards.

Focus

Issue 2 of the Standard included a generic prerequisite program and HACCP requirements to ensure that all sites were operating to a basic minimum standard. Since many sites were also certified to a GFSI scheme, these requirements were superfluous. Consequently, the prerequisite program and HACCP requirements were removed from the Standard, providing a clearer focus on gluten control measures. Sites that are not GFSI-certified will be required to adopt the *BRCGS START!* program (or equivalent) to ensure that they are operating to minimum requirements.

Sampling and testing

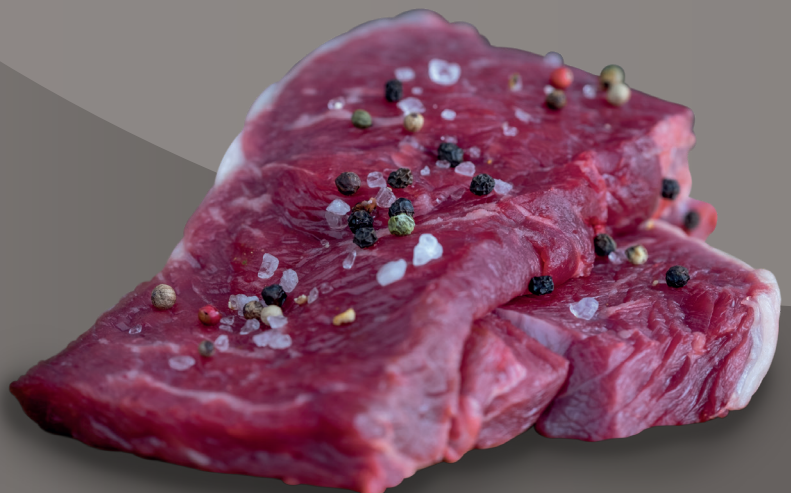
Guide to Best Practices for Sampling and Testing and Risk Management for Gluten May 15 2018, published by the Allergen Control Group, was added to Issue 3 as an appendix. The sampling guide is intended to help manufacturers committed to producing gluten-free products, regardless of whether they are manufacturing their products in a dedicated gluten-free facility. It provides an overview of best practices for developing sampling plans and testing protocols to detect gluten in a wide variety of foods and on different environmental surfaces in order to support gluten-free claims.

Grain handlers/suppliers

At the request of both gluten-free manufacturers and the grain-handling industry which supplies gluten-free manufacturers, an appendix detailing the requirements for grain suppliers was developed. This appendix specifies the unique conditions required in a grain-handling environment in order to ensure gluten-free grain ingredients. The appendix fills a gap that is generally recognized as a constraint in advancing the gluten-free market.

Further amendments

Clarity	06
Customer complaints	06
Finished product specification	06
Document control	06



Further amendments

Clarity

Issue 2 of the Standard combined the requirements with recommended guidance. The working group felt it was difficult to distinguish between the requirements and the guidance. Therefore, all guidance was removed from Issue 3, so that only the requirements remained.

Customer complaints

The importance of recording and investigating customer complaints is well recognized, as they provide companies with suggestions for improvement, and cause them to investigate trends which could indicate a failure in their gluten-free management system. Issue 2 of the Standard did not deal with customer complaints; therefore clause 3.11 was added to Issue 3 to fill the gap.

Finished product specifications

Finished product specifications provide key data to demonstrate that the products meet both customer and legal requirements and reassure the user in the safe consumption of the product. The working group identified that Issue 2 of the Standard lacked any requirements relating to the finished product. As such, clause 3.6 was added.

Document control

Robust document control procedures are necessary for the success of any food safety management system. Clause 6 was added to the Standard to ensure documents control procedures are in place.

Changes to the audit protocol



Changes to the audit protocol

The removal of the prerequisite program and HACCP requirements from the Standard allows the audit to focus on the site's gluten-free management system and gluten controls.

Standalone audits continue to be an option for sites that do not wish to combine their GFSI or *START!* program audit with the audit for the Standard. In this case, the auditor will need to confirm that the site is certified in an acceptable program.

Clarification has been given to unannounced combined audits. If there is no gluten-free production when the unannounced combined audit takes place, the audit may still be conducted, providing the auditor can walk through the process and understand the controls that operate during gluten-free production. Records from previous gluten-free production runs shall be made available. In this case, the next audit of the Standard must be conducted while gluten-free production is taking place. The walk-through option is not permitted if it is the site's first audit.

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