

BRCGS Gluten-Free Certification Program Issue 3

GF314 AO ECS Position Statement on GFCP Issue 3 Requirements

Introduction

The Crossed Grain Trademark has been used for 50 years on food products within Europe and outside of Europe. Its purpose is to promote safe and clear identification of gluten free food products. The technical requirements for bearing the Crossed Grain trademark on gluten free foods are determined in the AO ECS Standard for Gluten-Free foods which is an integral part of the License Contract of AO ECS Members with food manufacturers or retailers. AO ECS, is the umbrella organization of 38 national coeliac societies and has also several affiliated members outside Europe.

The scope of the GFCP Global Standard applies to processed foods (both own brand and customer branded), ingredients for use by food service companies, catering companies and food manufacturers, pet foods, cosmetics, natural health products and drugs. The AO ECS Standard is in accordance with 2.1.1. Definition of gluten-free foods of the Codex standard 118-1979 (Adoption: 1979, Amendments: 1983 and 2015, Revision: 2008), therefore the Crossed Grain trademark is only permitted for foods complying with the Codex definition of gluten free foods.

Own brand and customer branded foods which bear the Crossed Grain trademark can be audited with most, but not all requirements of the GFCP standard which are outlined in this document. Food bearing the Crossed Grain trademark must comply with the AO ECS standard, this position statement outlines the specific requirements that must be met in order to be compliant.

The AO ECS gluten free standard can be downloaded from the AO ECS website: <http://aoecs.org/aoecs-gluten-free-standard>

Change log

Version no.	Date	Description
1	05/11/2020	First issue.
1.1	09/11/2020	Title of document changed.

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Part II - Requirements

3.3 Supplier approval, purchasing and incoming ingredients and inputs

Clause 3.3.1

Procedures and/or policies related to purchasing of ingredients and inputs shall be developed and implemented to ensure:

- proper control and identification of gluten
- that all ingredients and inputs intended to be rendered gluten-free by a production process are validated using appropriate methodology and testing
- that all gluten-free ingredients and inputs which have been rendered gluten-free by a production process have been validated using appropriate methodology and testing.

Use of ingredients which have been rendered gluten-free through a validated process must be acceptable to BRCGS

AOECS Remarks for use of the Crossed Grain Trademark

Validation of processes used to render ingredients gluten free must be based on the R5 Elisa method (Mendez method) in line with section 6 of the AOECS standard.

3.4 Approval and control of labels and 3.5 Marketing claims

AOECS Remarks for use of the Crossed Grain Trademark

Food labels and marketing claims must comply with the AOECS standard

- foods defined without oats shall be labelled 'gluten free'. The registration number shall be clearly displayed underneath the crossed grain trademark and consist of country code- company code- product number
- foods containing oats either as ingredient, or pure oats, shall be labelled 'gluten free'. However, the word OATS shall be clearly displayed underneath the Crossed Grain trademark before the registration number.
- Foods can be accompanied by additional statements 'suitable for people intolerant to gluten' or 'suitable for coeliacs'. They may be labelled 'specifically formulated for people intolerant to gluten' or 'specifically formulated for coeliacs'.

3.10 Laboratory and testing

AOECS Remarks for use of the Crossed Grain Trademark

Please see remarks relating to Appendix 5 below.

3.12 Recall

AOECS Remarks for use of the Crossed Grain Trademark

Notification must also be given to the AOECS member within 24 hours from the date of release of the official recall or withdrawal notice.

Part III - Certification Process and Audit Protocol

3 Schedule A

Sites must complete and submit a Schedule A and/or an equivalent approved BRCGS process. The Schedule A and/or agreed equivalent BRCGS process must capture all the gluten-free products that will be recognized under the GFCP Global Standard and may require updating from time to time.

AOECS Remarks for use of the Crossed Grain Trademark

Prior to a GFCP audit, AOECS member societies will provide the Certification Body with the 'Site Crossed Grain Trademark Certificate(s)', a list of products by production site to be included in the relevant Crossed Grain trademark license(s)*. This will act as confirmation that the site has entered into an agreement to manufacture products that carry the Crossed Grain trademark OR hold a license agreement with an AOECS member society. The auditor will confirm that the list of products is consistent with the actual products to which the trademark is applied.

* sites may produce for more than one Crossed Grain trademark licensee.

4 Selection of an audit option

Combined audit: the focus of a combined audit is on the GFCP Global Standard requirements in conjunction with any other third-party food safety management system audit

AOECS Remarks for use of the Crossed Grain Trademark

If a combined audit is chosen all AOECS requirements must be met if the certified site is to qualify for a license for the using the Crossed Grain trademark.

13 Certification

Trademarks owned or managed by BRCGS that are used on certificates of recognition shall comply with the GFCP brand standards

AOECS Remarks for use of the Crossed Grain Trademark

The GFCP is a certification standard that can be used for audit purposes as part of the technical requirements to obtain the Crossed Grain trademark.

17 Suspension of a certified site

Note: BRCGS reserves the right to inform the brand owner (if different from the site) if certification is suspended. In the event of suspension of certification, the site must cease use of all associated logos and/or trademarks as per the site's PLA.

AOECS Remarks for use of the Crossed Grain Trademark

If a company is using the Crossed Grain trademark on their products and a non-conformance is detected at any time following completion of the audit, the company must inform the member society who has licensed the trademark, of this non-conformity within 24hrs of the non-conformance being detected.

Part IV - Management and Governance

Use of the Trademarks

Certified sites that intend to use the GFCP owned or managed trademarks must meet all requirements outlined in the GFCP Trademark Usage Guide.

AOECS Remarks for use of the Crossed Grain Trademark

The copyright of the Crossed Grain trademark is owned by Coeliac UK and the trademark is registered and managed in a harmonized approach by AOECS and its members under the European Licensing Scheme. Only food companies that have a license contract with the corresponding AOECS member society are allowed to use the Crossed Grain trademark on their products.

Appendices

Appendix 2 - GFCP Global Standard product/scope categories

AOECS Remarks for use of the Crossed Grain Trademark

To become a Licence holder of the Crossed Grain trademark only food products complying with definition of the “AOECS standard for gluten free foods” are permitted to bear the Crossed Grain trademark. Annex I of the AOECS Standard lists foods which are not permitted to bear the Crossed Grain trademark.

Appendix 5 - Guide to best practices for sampling and testing, and risk management for gluten

3 Determine the testing methodology (p45)

Table 5 Guidelines for determining the appropriate method of analysis (p47)

Schedule 5 Comparison of commercially available ELISA and LFD test kits (p58)

AOECS Remarks for use of the Crossed Grain Trademark

The R5-sandwich-ELISA (Mendez Method) or R5-competitive-ELISA for fermented or partially hydrolysed gluten are the only approved analytical methods for manufacturers wishing to use the Crossed Grain trademark on their products.

Appendix 5 - Guide to best practices for sampling and testing, and risk management for gluten

Schedule 2

- Very likely to contain gluten
- Likely to somewhat contain gluten
- Somewhat likely to contain gluten
- Extremely unlikely to contain gluten

AOECS Remarks for use of the Crossed Grain Trademark

The AOECS Standard complies with the Codex Standard 118-1979, amended 2015, the EU Regulation 828/2014 and the EU-Regulation 1169/2011, including Appendix II.

The Appendix II of the EU-Regulation defines exception of “Allergen labelling” in terms of gluten because these substances do not contain gluten: (a) wheat based glucose syrups including dextrose, (b) wheat based maltodextrins, (c) glucose syrups based on barley, (d) cereals used for making alcoholic distillates including ethyl alcohol agricultural origin.

The AO ECS Standard differentiates between high risk ingredients/foods, low risk ingredients/foods and foods which are not processed, and contamination cannot appear (Annex I).