

**Interpretation Guideline**  
Global Standard – Issue 3  
Gluten-Free Certification Program

# Contents

## Part I – Introduction

Certification to the Standard	6
First steps to gaining certification	7
What to expect on the audit day(s)	8
Explanation of terms	9

## Part II – Guidance on the Requirements

1 Senior leadership commitment	12
2 Prerequisite programs	17
3 Gluten controls	18
4 HACCP principles	34
5 Records	35
6 Document control	37
7 Validation	38
8 GFMS maintenance and reassessment	39
9 Internal audits	40

## Appendices

Appendix 1 Definitions	44
Appendix 2 Sources of further information	47

# Part I

## Introduction

Welcome to the interpretation guideline for the Gluten-free Certification Program Global Standard (hereafter referred to as the Standard). The interpretation guideline is designed to provide an accompaniment to, and should be read in conjunction with, Issue 3 of the Standard. The full details of the certification process and protocol are contained within the Standard.

This document helps in the understanding of each requirement of the Standard and identifies methods of compliance. Examples are given to explain the types of document, procedures and level of detail that would be required by a certification auditor.

The contents of the guideline are designed to help interpret the Standard across all food sectors; however, the exact requirements for any particular product, process or site will be specific to that industry and situation. Users of the guideline are therefore cautioned not to rely solely on the information provided here, but also to reconfirm their needs on a product-by-product basis. Both legislative and voluntary requirements change frequently, highlighting the need for regular checks of precise requirements.

While adherence to the guideline does not specifically form part of the requirement to achieve certification to the Standard (i.e. it does not form part of the audit requirements), companies will need to demonstrate that they have taken account of the topics addressed within this guideline. Examples are given as points to consider, but they should only be used in the correct context relevant to the business. Practices should be able to withstand challenge by an auditor and be in line with good industry practices.

Achieving a particular requirement is based on evidence collected and observations made during the audit, and on the procedures expected within that industry sector. A non-conformity assigned by an auditor against a requirement of the Standard is an objective judgement with respect to severity and risk, and is based on the evidence seen during the audit and independently verified by the certification body management.

### Certification to the Standard

#### Why is certification required?

There is currently no cure for persons suffering from celiac disease or non-celiac gluten sensitivity or intolerance, nor is there any on the horizon. The only mitigation or treatment is a strict gluten-free diet (i.e. all foods must contain less than 20 ppm gluten, with the ideal being that none is detected), since more recent science indicates that mere avoidance of gluten for these persons is not enough. Foods coming out of sites and systems certified to the Standard will satisfy that essential need.

The Standard has been developed for manufacturers of processed food, food ingredients, pet food, cosmetics, natural health products and drugs. For certification throughout the supply chain, please refer to other Global Standards developed by BRCGS:

- Global Standard Food Safety
- The Plant-Based Global Standard
- Global Standard Packaging Materials
- Global Standard Storage and Distribution
- Global Standard Consumer Products
- Global Standard Agents and Brokers