

## Global Standard Gluten-Free, Issue 3

### GF313: Position Statements for Issue 3

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Document Scope: Where clarification of interpretation of a requirement of the Global Standard Gluten-Free Issue 3 or its protocol is necessary this will be published on the BRCGS website ([www.brcgs.com](http://www.brcgs.com)) as a Position Statement. Such statements are mandatory in their use from the date specified for implementation or the date of publication on the BRCGS website, where no date is specified.

Change log:

Version no.	Date	Description
1	07/10/2020	First issue of a position statement on the GFCP Global Standard Issue 3, Part III 'Certification Process and Audit Protocol'
2	02/06/2021	Addition of Position Statement 2 - Part IV Management and Governance – Requirements for Certification Bodies Document format updated.
3	09/07/2021	Amendment to Position Statement 1 – Section 3 Schedule A
4	01/11/2021	Addition of Position Statement 3 - 3.5.1 Marketing Claims Amendment to Position Statement 1 - Section 13 Certification, and Section 3 Schedule A
4.1	10/11/2021	Slight amendment to document title.
5	15/11/2021	Formatting changes made to document to bring in line with BRCGS writing guidelines.

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## 1 Amendment of sections of the GFCP Issue 3, Part III – Certification Process and Audit Protocol

### Section 1 – Registration of Interest to BRCGS

All sites must complete the online 'Register Your Interest' form on the BRCGS website prior to certification. A link to this page can be found on the Gluten-Free Certification Program pages of [www.brcgs.com](http://www.brcgs.com)

#### What has changed?

Minor change in terminology from “application” to “registration” to describe the current process more accurately.

Amendment of the link via which the registration form can be found.

#### What effect has this change made?

Interested sites will be directed to the BRCGS website to register as the link provided in the Standard is now broken.

**Effective date:** October 2020

### Section 3 – Schedule A

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

The audit shall include all applicable requirements within the GFCP Global Standard and all gluten-free production processes undertaken for the products listed on the site's Schedule A.

The product scope category of the audit shall be agreed between the site and the certification body in advance of the audit. The product scope category is determined by assessing the products produced and manufacturing processes, and it must align with one of the categories listed in Appendix 2.

#### What has changed?

Removal of the scope category field from all versions of the Schedule A beginning with the November 2019 issue. This change was made as result of difficulty in identifying the scope categories of some products on the Schedule A from their product name only.

#### What effect has this change made?

It is the responsibility of the site to ensure that only products in scope of their GFCP certification appear on the Schedule A. When examining the Schedule A during the audit, the auditor shall discuss the products and their scope categories with the site.

**Effective date:** October 2020

## Section 7 – Scope of audit

The audit shall include all applicable requirements within the GFCP Global Standard and all gluten-free production processes undertaken for the products listed on the site's Schedule A.

The product scope category of the audit shall be agreed between the site and the certification body in advance of the audit to ensure the allocation of auditor(s) with the correct product knowledge. The product scope category is determined by assessing the products produced and manufacturing processes, and it must align with one of the categories listed in Appendix 2.

### What has changed?

Removal of the scope category field from all versions of the Schedule A beginning with the November 2019 issue.

### What effect has this change made?

The auditor is no longer required to assess the scope category field on the Schedule A. The auditor will still be expected to discuss the products and their scope categories with the site to ensure products listed fall under the scope of the site's GFCP certification.

**Effective date:** October 2020

## Section 12 – Audit Reporting

Following each audit, a full written report shall be prepared in the agreed format. The final report shall be produced in English.

The audit report shall be provided to the site in a timely manner. The report shall accurately reflect the findings of the auditor during the audit. Reports shall be prepared and issued to the site within 42 calendar days of the audit.

The audit report and associated documentation including auditor's notes shall be stored safely and securely for a minimum period of 5 years by the certification body.

### What has changed?

Amendment of the determination of "within 42 calendar days". This shall be calculated from the day that the audit ends, not from the first day of the audit as previously stated.

Removal of the requirement to send a copy of the audit report to BRCGS prior to the certification decision.

### What effect has this change made?

Allowing 42 days from the date of the audit provides a consistent approach to providing a final copy of the audit report in a timely manner.

**Effective date:** October 2020

## Section 13

After a review of the audit report and documentary evidence provided in relation to the nonconformities identified, a certification decision shall be made by the designated technical reviewer. The certificate of recognition, if granted, shall be issued by the certification body within 42 calendar days of the audit. It shall include the required

information found in Appendix 3. Trademarks owned or managed by BRC Global Standards that are used on certificates of recognition shall comply with the GFCP brand standards.

While the certificate of recognition is issued to the site, it remains the property of the certification body, and that body controls its ownership, use, and display. The certification body shall inform BRCGS of its issuance and provide a copy.

All sites that achieve a certificate of recognition shall be entered into the list of certified sites. The audit report shall be uploaded the BRCGS Directory in a timely manner.

All fees relating directly to the site must be paid in full to BRC Global Standards prior to issuance of the certificate of recognition. Neither certification, nor the audit report, shall be valid until all fees have been received, irrespective of the outcome of the certification process.

### **What has changed?**

Amendment of the determination of “within 42 calendar days”. This shall be calculated from the day that the audit ends, not from the first day of the audit as previously stated.

Correction of the Appendix number on which the required information for the site's certificate can be found.

### **What effect has this change made?**

The auditor must continue to ensure that the site presents a valid Schedule A for each of the Brand Owners for whom they are producing. These shall be numbered appropriately by BRCGS to assist the auditor in ensuring all Schedules A are presented.

Allowing 42 days from the date of the audit provides a consistent approach to determining certificate issue dates.

**Effective date:** October 2020

## **Section 14 – Audit frequency and recertification**

The frequency of announced audits shall be 12 months. The due date of the subsequent audit shall be calculated from the date of the previous audit.

The subsequent audit shall be scheduled to occur within a 28-day time period prior to the subsequent audit due date. Where a GFCP Global Standard audit is combined with a GFSI scheme audit, the audit due date shall conform to the protocol of the relevant GFSI scheme.

### **Determining certificate expiry dates for initial audits:**

Where a GFCP Global Standard audit is conducted Standalone, the certificate expiry date shall be calculated as 42 calendar days from the date of the audit. Where a GFCP Global Standard audit is combined with a GFSI scheme audit, the certificate expiry date shall conform to the protocol of the relevant GFSI scheme.

### **Determining certificate expiry dates for re-certification audits:**

Where a GFCP Global Standard audit is conducted Standalone, the site's previous expiry date shall be extended by one calendar year. Where a GFCP Global Standard audit is combined with a GFSI scheme audit, the certificate expiry date shall conform to the protocol of the relevant GFSI scheme.

**What has changed?**

Clarification of the methods to determine certificate expiry dates in different circumstances.

**What effect has this change made?**

Continued maintenance of the 12-month audit cycle.

**Effective date:** October 2020

## 2 Part IV Management and Governance – Requirements for Certification Bodies

The GFCP Global Standard is a process certification scheme. In this standard, sites are certified upon completion of a satisfactory audit by an approved auditor employed by an independent third party – the certification body. The certification body shall have a license in place with BRCGS meeting all license requirements including having a current ISO/IEC 17065 accreditation for a GFSI or equivalent food safety scheme by a national accreditation body. The Standard does not currently require to be accredited itself.

### What has changed?

There is currently no requirement for the Standard to be accredited. Where Certification Bodies choose to continue with accreditation, this shall be to ISO/IEC 17065.

**Effective date:** June 2021

### 3 Marketing Claims (clause 3.5.1)

Use of GFCP and other third-party trademarks or statements on labels, advertising, marketing, and communication material (whether in print or digital/online) must be:

- approved by BRCGS
- in compliance with the BRCGS Free-From Trademark Guideline and/or the requirements of the owner of the trademark or statement
- in compliance with the legislation of the country where the product will be sold.

Any reference to “certification” shall be limited to the site and/or the gluten free management system that is delivered there. There shall not be any reference to “product certification.”

To be considered valid, each of the site’s Schedules A (if required) shall:

- list the site name and address
- be signed and dated by BRCGS
- be less than 12 months old, based on the “Date of Approval” field

Products listed on the Schedule A are not required to use a trademark, however any products displaying a trademark on-pack shall appear on the Schedule A.

A non-conformity shall result for any Schedule A which does not meet the criteria above.

#### **What has changed?**

Amendment of reference to the “Trademark Usage Guide” to “BRCGS Free-From Trademark Guideline”

Official confirmation of the clause under which non-conformances against Schedules A shall be recorded. Addition of criteria to assess the validity of Schedules A.

#### **What effect has this change made?**

Clarity for CBs and auditors on which clause non-conformances against Schedules A shall be recorded.

**Effective date:** 1 January 2022