

GF409: Gluten-Free, Issue 4

Position Statements

Document scope

Where clarification of interpretation of a requirement of the Global Standard Gluten-Free or its protocol is necessary, this will be published on the BRCGS website (www.brcgs.com), and BRCGS Participate 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

<i>Version</i>	<i>Date</i>	<i>Description</i>
1	12/12/2024	*NEW* Position Statement 1 Explanation of the protocol to be followed by certification bodies when a Global Standard Gluten-Free audit is combined with a GFSI Food Safety Management System Standards Based on ISO/IEC17021. Creation of a new section 3.7.1.1 in Part III Audit protocol.
2	03/06/2025	*NEW* Position Statement 2 Addition to Section 5.1.1 Change of circumstances. Responsibility of the site to notify its Gluten-Free certification body when the site's food safety certification is withdrawn or suspended.
2.1	06/10/2026	Updated for new brand

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Position statement 1

Part III Audit protocol

Currently Part III, section 3.7.1 of the Gluten-Free standard, Issue 4 states:

“Where an audit is combined with a GFSI-benchmarked certification audit, BRCGS Global Standard START Intermediate level audit, or equivalent food safety audit offered by a GFSI-benchmarked certification programme owner, please refer to the audit protocol of the relevant Standard for calculation of re-audit dates.”

As a GFSI Food Safety Management System Standard based on the ISO/IEC17021 certification cycle does not follow yearly re-certification audits, it is foreseeable that subsequent ISO/IEC audit may be scheduled beyond the Global Standard Gluten-Free re-audit due date.

For this reason, the excerpt of section 3.7.1 above has been modified to:

“Where an audit is combined with a GFSI-benchmarked certification audit, BRCGS Global Standard START! Intermediate level audit, or equivalent food safety audit offered by a GFSI-benchmarked certification programme owner, please refer to the audit protocol of the relevant Standard for calculation of re-audit dates. . ***Where an audit is combined with a GFSI Food Safety Management System Standard based on ISO/IEC17021, please also refer to section 3.7.1.1.***”

A new section has been added after section 3.7.1.

New section:

3.7.1.1 Audits combined with a GFSI Food Safety Management System Standard based on ISO/IEC17021.

Where the Gluten-Free audit is combined with a GFSI Food Safety Management System Standard Based on ISO/IEC17021, the re-audit date should be recalculated as the anniversary of the certification audit decision date. The certification expiry date should be set as 42 days after the re-audit due date.

Where an audit is combined with a GFSI Food Safety Management System Standard based on ISO/IEC17021, it is foreseeable that its surveillance and re-certification audits could be scheduled beyond the re-audit date indicated on Global Standard Gluten-Free certificate.

The certification body shall therefore ensure it schedules the combined audit in good time so that the Gluten-Free re-audit date is not exceeded. Where it is not possible for the certification body to schedule the combined audit before the re-audit due date listed on the certificate, the site shall have a standalone Gluten-Free audit.

The subsequent Gluten-Free re-audit date shall correspond with the protocol for standalone audits in 3.7.1.

Effective: 1 January 2025

Position statement 2

Part III Audit protocol

Addition of the following paragraph to Section 5.1.1 Change of circumstances.

Suspension or withdrawal of a site's food safety certification where this certification is provided by a different certification body.

The site shall notify the certification body which issued the last Gluten-Free certificate within 24 hours of the suspension or withdrawal of its GFSI-benchmarked scheme, BRCGS Global Standard START!, or equivalent food safety programme certification, where this certification is provided by a different certification body.

The Gluten-Free certification body shall withdraw or suspend the site's BRCGS Global Standard Gluten-Free certification.

Effective: 3 June 2025