**Global Standard Gluten-Free (Issue 4)**

Auditor Checklist and Site Self-Assessment Tool

**Welcome to the BRCGS Auditor Checklist and Site Self-Assessment tool**

We hope that you will find this useful when preparing your site for an audit against the BRCGS Global Standard Gluten-Free (Issue 4).

**How to use the BRCGS Auditor Checklist and Site Self-Assessment tool?**

This tool is designed to help you assess your operation against the requirements of the Standard and help prepare you for your certification audit.

The checklist covers each of the requirements of the Standard and may be used to check your site’s compliance with each of these requirements. The checklist also allows you to add comments or identify areas of improvement in the empty boxes provided at the end of each section.

While we hope that this tool is useful in helping you prepare for your audit it should not be considered as evidence of an internal audit and will not be accepted by auditors during an audit.

**Training**

The BRCGS Store has e-learning courses available to improve the understanding of the requirements for the BRCGS Global Standard Gluten-Free (Issue 4) and may be useful for the person using this document. For further information on the courses available please visit the [website](https://www.brcgs.com/store/).

**Further Information**

If you have any further questions about this document or the BRCGS Global Standard Gluten-Free (Issue 4), please do not hesitate to contact the BRCGS team.

Email – [brcgs.enquiries@lgcgroup.com](mailto:brcgs.enquiries@lgcgroup.com)

Change log:

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| --- | --- | --- |
| Version no. | Date | Description |
| 1 | 14/02/2024 | New for Issue 4. |
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1 Senior management commitment

**1.1 Commitment to the gluten-free management system**

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| **Clause** | **Requirements** | **Conforms?** | **Comments** |
| 1.1.1 | The site shall have a policy that confirms:   * the senior management’s full support for developing, implementing, continuously improving and maintaining an effective gluten-free management system * the site’s commitment to producing gluten-free products in conformity with all requirements of the Standard.   The policy shall be signed and dated by a representative of the senior management at the site with authority to ensure adherence to responsibilities described in this section.  The policy shall be:   * renewed on an annual basis * renewed if the senior management representative is replaced * communicated to all staff. |  |  |
| 1.1.2 | The site’s senior management shall demonstrate a commitment to the gluten-free management system by:   * providing the necessary resources and the time required for the development, implementation, and effective maintenance of the gluten-free management system and for the training of appropriate staff in their area(s) of responsibility * providing the financial resources to ensure that the construction of the premises, its internal fittings, the installation of the equipment, the maintenance of the premises and equipment, as well as the supplies required to perform the above, meet all applicable regulatory and programme requirements and support the implementation and effectiveness of the gluten-free management system * designating personnel with defined responsibilities and the authority to initiate, implement, and record corrective actions * communicating to employees the importance of meeting the requirements of the site’s gluten-free management system, including any regulatory requirements related to product safety and gluten control, and the importance of reporting problems to the identified person(s) * designating personnel with authority to enforce conformity of the product safety procedures identified in the site’s gluten-free management system for any person entering or working within the site * providing sufficient time for gluten-free management system team meetings * fostering the continuous improvement of the gluten-free management system to ensure its effectiveness. As a guide, this may include the following, although this is not an exhaustive list: * verification of control measures * making changes to the system as a result of corrective actions or reassessment activities * ensuring active participation in gluten-free management system team meetings. |  |  |
| 1.1.3 | The site shall have a genuine, original hard copy or electronic version of the current Standard available and be aware of any changes to the Standard or protocol that are published on the BRCGS website. |  |  |
| 1.1.4 | Where the site is certificated to the Standard, it shall ensure that recertification audits occur on or before the audit due date indicated on the certificate. |  |  |

**1.2 The gluten-free management system team leader**

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| **Clause** | **Requirements** | **Conforms?** | **Comments** |
| 1.2.1 | Senior management shall appoint a gluten-free management system team leader who, irrespective of other responsibilities, shall have the responsibility and authority to:   * ensure that the gluten-free management system is developed, validated, periodically reviewed, implemented, continuously improved and maintained * be the main contact with designated staff and auditors.   It shall be clearly documented who deputises in the absence of the gluten-free management system team leader. |  |  |
| 1.2.2 | The gluten-free management system team leader shall have an in-depth knowledge of, and show competence in, the site’s gluten-free management system principles. |  |  |
| 1.2.3 | The gluten-free management system team leader shall have taken and passed the BRCGS Global Standard Gluten-Free (Issue 4) Sites Training course. |  |  |

**1.3 The gluten-free management system team**

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| **Clause** | **Requirements** | **Conforms?** | **Comments** |
| 1.3.1 | The gluten-free management system team shall be multidisciplinary and shall include those responsible for quality/technical, procurement, product development, sanitation and hygiene, production operations, engineering/maintenance, and other relevant functions. |  |  |
| 1.3.2 | The gluten-free management system team members shall have specific knowledge of gluten controls and relevant knowledge of product, process, marketing claims, relevant legislation and associated hazards. |  |  |
| 1.3.3 | Where the site does not have the appropriate in-house knowledge of gluten controls, external expertise may be used. However, the day-to-day management of the gluten-free management system shall remain the responsibility of the site. |  |  |

**1.4 Gluten-free management system team meetings**

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| **Clause** | **Requirements** | **Conforms?** | **Comments** |
| 1.4.1 | The gluten-free management system team shall meet at appropriately planned intervals, annually at a minimum, to discuss, among other points:   * action plans and timeframes from previous gluten-free management system team meeting reviews * changes in the gluten-free management system * results of internal, second party, and/or third-party gluten-free management system audits * customer complaints and results of any customer feedback * incidents (including both recalls and withdrawals), corrective actions, out-of-specification results, and non-conforming materials * reviews of the effectiveness of the gluten-free management system * resource requirements.   The frequency of meetings shall be sufficient to manage the risks associated with the topics covered and may be increased depending on circumstances. As a guide, these may include the following, although this is not an exhaustive list:   * new product development * following a significant product safety incident (e.g., a product recall) * emergence of a new risk (e.g. known adulteration of an ingredient, risk to supply chain due to climate-affected harvest, or other relevant, published information, such as the recall of a similar product) * change in raw materials or supplier of raw materials * change in ingredients/recipe * change in processing conditions, cleaning and disinfection procedures, process flow or equipment.   Records of the meeting shall be documented and used to encourage continuous improvement. The decisions and actions agreed within the review process shall be effectively communicated to appropriate staff (including senior management), and actions implemented within agreed timescales. |  |  |
| 1.4.2 | A member of the senior management team shall attend, at a minimum, one gluten-free management system team meeting annually. |  |  |
| 1.4.3 | The site shall have a reporting system which enables issues relating to the gluten-free management system to be brought to the attention of senior management. |  |  |

2 The food safety plan - HACCP

**2.1 The food safety plan - HACCP principles**

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| **Clause** | | **Requirements** | **Conforms?** | **Comments** |
| 2.1.1 |  | The site shall have a fully implemented and effective food safety plan based on Codex Alimentarius HACCP principles which specifically considers gluten as a hazard. |  |  |
| 2.1.2 |  | All relevant information needed to conduct the preliminary steps, the hazard analysis, and the determination of the CCPs and process controls shall be documented, updated whenever there are changes, and included within the development and reviews of the gluten-free management system. |  |  |

**2.2 Prerequisite programmes**

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| **Clause** | | **Requirements** | **Conforms?** | **Comments** |
| 2.2.1 |  | The site shall establish and maintain environmental and operational programmes (prerequisite programmes) which control the risk from gluten. As a guide these may include the following, although this is not an exhaustive list:   * premises * purchasing * transportation, receiving, shipping, and storage * equipment and maintenance * personnel and training * sanitation * pest control * traceability, recall, and withdrawal * allergen controls.   The control measures and monitoring procedures for the prerequisite programmes must be clearly documented and included within the development and reviews of the gluten-free management system. |  |  |

**2.3 Gluten-free management system maintenance and reassessment**

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| **Clause** | **Requirements** | **Conforms?** | **Comments** |
| 2.3.1 | The gluten-free management system team shall review the system at least annually and prior to any changes that may affect product safety (gluten specifically).  As a guide this may include the following, although this is not an exhaustive list:   * change in gluten-free materials or in a supplier of gluten-free materials * change in ingredients/recipe * change in processing conditions, process flow, or equipment * change in packaging, storage, or distribution conditions * emergence of a new risk (e.g., known adulteration of an ingredient or other relevant, published information, such as a recall of a similar product) * changes required following a recall or withdrawal * new developments in scientific and/or regulatory information associated with ingredients, process, or product * non-conformities identified during monitoring and verification activities * consumer/client complaints * non-conformities identified during Global Standard Gluten-Free audits or surveys done by government agencies or the national, regulatory competent authority * changes in production volume that impact on the product flow, sanitation schedule, employee training, etc..   Appropriate changes resulting from the review shall be incorporated into the gluten-free management system, communicated through relevant training, fully documented, and the validation recorded. |  |  |

3 The gluten-free management system

**3.1 Document control**

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| **Clause** | | **Requirements** | **Conforms?** | **Comments** |
| 3.1.1 |  | The site shall operate an effective document control system to ensure that only the correct versions of documents, including recording forms, are available and in use. |  |  |
| 3.1.2 | | The site shall have a procedure to manage documents that form part of the gluten-free management system. This shall include:   * a list of all controlled documents, indicating the latest version number * the method for the identification and authorisation of controlled documents * a record of the reason for any changes or amendments to documents * the system for the replacement of existing documents when these are updated.   Where documents are stored in electronic form these shall also be:   * stored securely (e.g., authorised access, control of amendments, password protected) * backed up to prevent loss. |  |  |

**3.2 Records**

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| **Clause** | **Requirements** | **Conforms?** | **Comments** |
| 3.2.1 | The company’s management shall ensure all information and documentation is accessible during evaluation processes and subsequent verification/audit activities. |  |  |
| 3.2.2 | Records shall be established to document:   * the monitoring results, including, when necessary, the recording of quantifiable values as prescribed in the gluten control measures * all information and actions taken in response to a deviation identified as a result of monitoring and verification * the verification results.   Records shall be kept to demonstrate the effective application of gluten control measures. |  |  |

**3.3 Internal audits**

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| **Clause** | **Requirements** | **Conforms?** | **Comments** |
| 3.3.1 | The scheduled programme of internal audits shall include:   * the gluten-free management system, including the activities to implement the system (e.g., supplier approval, corrective actions, and verification) * prerequisite programmes * procedures implemented to achieve the requirements of the Standard.   The frequency at which each activity is audited within the scheduled programme shall be established in relation to the risks associated with the activity and previous audit performance; all activities shall be covered at least annually.  Each internal audit within the programme shall have a defined scope and consider a defined activity or section of the gluten-free management system. |  |  |
| 3.3.2 | Internal audits shall be carried out by appropriately trained, competent auditors. Auditors shall be independent (i.e. they shall not audit their own work). |  |  |
| 3.3.3 | The internal audit programme shall be fully implemented. Internal audit reports shall identify conformity as well as non-conformity and include objective evidence of the findings.  The results shall be reported to the personnel responsible for the activity audited.  Corrective actions, preventive actions, and timescales for their implementation shall be agreed and their completion verified. |  |  |

**3.4 Supplier approval, purchasing, and incoming ingredients and inputs**

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| **Clause** | | **Requirements** | **Conforms?** | **Comments** |
| 3.4.1 | | Procedures and policies related to purchasing of ingredients and inputs shall be developed and implemented to ensure:   * proper control and identification of gluten * that any analytical method chosen to verify the gluten-free status of ingredients and inputs shall have a demonstrated fitness for purpose. |  |  |
| 3.4.2 | | The site shall undertake a documented risk assessment of all ingredients and inputs to identify potential gluten sources (including hidden gluten sources of contamination). The risk assessment shall form the basis for the gluten-free ingredients and inputs acceptance as well as for the testing procedure and processes adopted for supplier approval and monitoring. |  |  |
| 3.4.3 | | The risk assessment for gluten-free ingredients and inputs shall be current and shall be updated, at a minimum, when:   * there is a change in gluten-free ingredient or input processing * there is a change in the supplier of the gluten-free ingredient or input * a new risk of gluten contamination emerges * there is a product recall or withdrawal in which a specific gluten-free ingredient or input is implicated. |  |  |
| 3.4.4 | | The site shall have a documented supplier approval procedure to ensure that all suppliers and emergency suppliers of ingredients and inputs effectively manage gluten contamination risks and are operating effective traceability processes. The approval shall be based on risk, and shall include, at a minimum:   * a valid certificate to show that the site conforms to the BRCGS Global Standard Gluten-Free. The scope of the certification shall include the ingredient or input purchased.   **Or**   * a supplier audit, with a scope to include gluten control. The audit report shall be reviewed and verified by a demonstrably competent member of the gluten-free management system team. The supplier audit shall be undertaken by an experienced and demonstrably competent auditor.   Where the supplier audit is completed by a second or third party, the company shall be able to:   * demonstrate the competency of the auditor * confirm that the scope of the audit meets the requirements of this clause * obtain and review a copy of the full audit report.   **Or all of the following**   * A supplier questionnaire, with a scope to include gluten control, that has been reviewed and verified by a demonstrably competent person and member of the gluten-free management system team. * An allergen questionnaire to include questions about gluten content and identifies the gluten status of each ingredient or input. * The supplier’s specification for each ingredient, ingredient blend, and components of ingredient blends (as applicable), clearly listing each ingredient and, where applicable, components of ingredients. Specifications shall be reviewed and agreed on by a member of the gluten-free management system team. * Documentation (e.g., letter of guarantee) indicating that the supplier shall: * meet the site’s specifications * notify the site when a change is made to their ingredient blend formula * confirm that such changes will not be made without prior approval from the site. |  |  |
| 3.4.5 |  | The site shall have an up-to-date, documented list of approved suppliers of gluten-free ingredients and inputs. The list shall be readily available to relevant staff (e.g., at goods receipt). |  |  |
| 3.4.6 |  | The site shall have a procedure for the acceptance of incoming ingredients and inputs on receipt, based upon the risk assessment.  As a guide this may include the following, although this is not an exhaustive list:   * sampling and testing * visual inspection on receipt * certificates of analysis for gluten from an accredited laboratory – specific to each consignment * certificates of analysis for gluten, from suppliers that have used an approved method (as per the BRCGS Guideline on Sampling and Testing for Gluten) that has been validated in-house. Validation shall include participation in a proficiency testing programme, through an accredited proficiency test provider. * checks to ensure that the labels of approved ingredients and inputs received match the site’s ingredient and input specifications * any other means necessary to satisfy the risk assessment.   A list of incoming ingredients and inputs and the requirements to be met for acceptance shall be available. The parameters for acceptance and frequency of testing shall be clearly defined, implemented, and reviewed. |  |  |
| 3.4.7 |  | Procedures shall be in place to ensure that approved changes to ingredients and inputs, or of suppliers, are communicated to goods receipt personnel. Only the correct version of the ingredient and inputs shall be accepted and released into production. |  |  |

**3.5 Management of outsourced processing**

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| **Clause** | **Requirements** | **Conforms?** | **Comments** |
| 3.5.1 | Where any processes are outsourced, including production, manufacture, processing or storage, the risks associated with gluten shall form part of the site’s food safety plan (HACCP plan). |  |  |
| 3.5.2 | The approval process for outsourced processing shall include a review of procedures to prevent contamination by materials containing gluten.  Records of the review shall be kept. |  |  |
| 3.5.3 | The company shall be able to demonstrate that:   * the outsourced processor is certificated to the BRCGS Global Standard Gluten-Free   **Or**   * a supplier audit has been undertaken within the last 12 months, with a scope that includes the applicable requirements of the BRCGS Global Standard Gluten-Free.  Where this supplier audit is completed by a second or third party, the company shall be able to: * demonstrate the competency of the auditor * obtain and review a copy of the full audit report. |  |  |
| 3.5.4 | The company shall establish inspection and test procedures for products where part of the processing has been outsourced, including visual and/or gluten testing.  The frequency and methods of inspection or testing shall depend on risk assessment. |  |  |

**3.6 Finished product specifications**

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| **Clause** | **Requirements** | **Conforms?** | **Comments** |
| 3.6.1 | Documented, accurate and up-to-date specifications shall be available for all gluten-free finished products.  They shall include key data to meet customer and legal requirements and assist the user in the safe usage of the product. |  |  |

**3.7 Complaint handling**

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| **Clause** | **Requirements** | **Conforms?** | **Comments** |
| 3.7.1 | Complaints relating to gluten-free products, where an alleged adverse reaction has been reported, shall be recorded and investigated.  Corrective and preventive actions appropriate to the seriousness and frequency of the problems identified shall be carried out promptly and effectively by appropriately trained staff.  The results of the investigation and subsequent corrective and preventive actions shall be recorded. |  |  |
| 3.7.2 | The site shall notify the certification body issuing the current certificate for the site against this Standard and BRCGS once a substantiated complaint about a gluten-free product indicates it has a high probability of failing to comply with the requirements of the Standard.  Notification to BRCGS shall be via email to [brcgs.integrity@lgcgroup.com](mailto:brcgs.integrity@lgcgroup.com) |  |  |

**3.8** **Product recall and withdrawal**

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| **Clause** | **Requirements** | **Conforms?** | **Comments** | |
| 3.8.1 | The site shall notify the national, regulatory competent authority, certification body, and BRCGS of any recalls or withdrawals related to a gluten-free product. Notification to BRCGS shall be within 24 hours from the date of release of the official recall or withdrawal notice. Notification to BRCGS shall be via email to [brcgs.compliance@lgcgroup.com](mailto:brcgs.compliance@lgcgroup.com).  The company shall then provide sufficient information to enable the certification body to assess any effects of the incident on the ongoing validity of the current certificate within 21 calendar days. As a minimum, this shall include corrective action, root cause analysis and a preventive action plan. |  |  |
| 3.8.2 | The effectiveness of the recall procedures and traceability system shall be tested on one gluten-free product at least annually. |  |  | |

**3.9 Validation of gluten control measures**

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| **Clause** | **Requirements** | **Conforms?** | **Comments** |
| 3.9.1 | Gluten control measures shall be validated. Where the control of gluten is achieved through prerequisite programmes or control measures other than critical control points, this shall be stated and the adequacy of the programme to control gluten validated.  Validation documentation shall include, but are not limited to:   * scientific, technical, or regulatory support to prove effective control of gluten * supporting data to demonstrate that the monitoring procedures are effective enough to detect loss of control at a control point before the finished product leaves the site. |  |  |

4 Product control

**4.1 Product development**

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| **Clause** | | **Requirements** | **Conforms?** | **Comments** |
| 4.1.1 |  | Procedures and policies shall be developed and implemented to ensure adequate control of new or modified product formulations. These shall include, at a minimum:   * a product development and approval process flow, including steps to be followed when modifications to existing product formulations are made * communication links among all the steps in the chain of production once a new formulation or changes in a formulation have been approved * a requirement for the product development and approval process to include review and agreement by the gluten-free management system team leader. |  |  |

**4.2** **Approval and control of labels**

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| **Clause** | **Requirements** | **Conforms?** | **Comments** |
| 4.2.1 | Procedures shall be developed and implemented to ensure effective control of new or modified labels. These shall include, at a minimum:   * a label approval process that includes steps to be followed in case of re-approval of product labels following modifications to existing product formulations * the documentation of the communication links between all the steps in the chain of production following approval of a new label or changes to a label * evidence of physical comparison of received labels to approved labels * confirmation that labels printed internally or externally meet agreed specifications |  |  |
| 4.2.2 | Procedures related to labelling of finished product shall be developed and implemented to ensure that the product label accurately represents the product name and the composition of the product on which the label is affixed.  Where the label information is the responsibility of a customer or a nominated third party the company shall provide information:   * to enable the label to be accurately created * whenever a change occurs which may affect the label information. |  |  |

**4.3 Marketing claims**

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| **Clause** | **Requirements** | **Conforms?** | **Comments** |
| 4.3.1 | The gluten content of finished products shall comply with the legislation of the country in which they are sold. |  |  |
| 4.3.2 | Use of BRCGS-managed trademarks on finished product packaging shall be:   * formally approved by BRCGS, by way of receipt of a signed Trademark Approval Form prior to use * 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. |  |  |
| 4.3.3 | There shall not be any reference to “product certification” on packaging, advertising, marketing, nor any other form of communication materials where BRCGS-managed trademarks are used.  Claims referring to “certification” shall be limited to the site, or the gluten-free management system delivered there. |  |  |

**4.4 Contamination control**

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| **Clause** | | **Requirements** | **Conforms?** | **Comments** |
| 4.4.1 |  | Procedures shall be developed and implemented to control substitutions and cross-contamination from sources of gluten in the products. Such procedures shall include, as appropriate:   * production scheduling if dedicated lines for gluten sources are not available * the introduction of gluten by movement of personnel * the traffic patterns of employees who handle gluten sources * the traffic flow and handling during the receiving, storage, processing, and packaging of ingredients containing gluten sources * dedicated uniforms and personal protective equipment for employees handling gluten sources * dedicated or segregated storage of ingredients containing gluten sources * the identification and sanitation of bulk containers housing a gluten source or ingredients containing gluten sources * dedicated utensils, equipment, and areas used to handle gluten sources * the handling and storage of rework product(s) containing ingredients that are gluten sources * the use of equipment, tools, and utensils with sound sanitary design * the cleaning of equipment/product contact surfaces/areas during operations if dedicated lines/equipment/areas for gluten sources are not available * dedicated maintenance and engineering tools * appropriate airflow * the control and separation of ingredients that are used in both gluten-free and gluten-containing production * controls on gluten-containing foods brought onto site by staff, visitors and contractors and for catering purposes. |  |  |

**4.5 Product formulation and rework**

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| **Clause** | | **Requirements** | **Conforms?** | **Comments** |
| 4.5.1 |  | Procedures associated with the processing of gluten-free products shall be developed and implemented to ensure that the correct ingredient is added to the correct product as indicated in the formula. |  |  |
| 4.5.2 |  | Procedures related to the use of rework shall be developed and implemented to prevent the introduction of gluten into a gluten-free product. Procedures shall ensure that the rework formulation ingredients and the product formulation ingredients are compatible, including their appropriate designation (e.g., labelling). |  |  |

**4.6 Segregation and disposal of obsolete and waste material**

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| **Clause** | | **Requirements** | **Conforms?** | **Comments** |
| 4.6.1 |  | Procedures for the segregation and safe disposal of obsolete and waste materials shall be developed and implemented to prevent their inadvertent use or risk of cross-contamination. Obsolete and waste materials include:   * labels (refers to any pre-printed packaging that bears a list of ingredients) * ingredients, inputs and work in progress * finished products. |  |  |

**4.7 Laboratory and testing**

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| **Clause** | | **Requirements** | **Conforms?** | **Comments** |
| 4.7.1 |  | A sampling and gluten-testing programme shall be developed, documented and implemented as part of an overall programme to validate and verify control of cross-contamination by undeclared gluten sources in ingredients and finished products.  Sites shall evaluate their risk of contamination with gluten before they start developing a sampling programme for all incoming materials and for each processing step, following the BRCGS Guideline on Sampling and Testing for Gluten. |  |  |
| 4.7.2 | | An accredited laboratory shall be used annually (at a minimum) to verify the site’s internal testing practices.  The laboratory shall have ISO 17025 accreditation from a competent authority. Methods for gluten testing shall fall within the scope of their accreditation, and the methods for the applicable matrix shall be fully validated at their site. |  |  |

5 Labelling and pack control

**5.1 Packing line and packing area control measures**

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| **Clause** | **Requirements** | **Conforms?** | **Comments** |
| 5.1.1 | There shall be a formal process for the allocation and return of printed packaging materials intended for use on gluten-free products to packing lines.  Control measures in the packing area shall ensure that only the packaging for immediate use on gluten-free products is available to the packing machines.  Where offline coding or printing of packaging materials intended for use on gluten-free products occurs:   * setting and amendments to the printer parameters (e.g. the input of, or changes to, date codes) shall only be completed by an authorised member of staff * controls shall be in place to ensure that only correctly printed material is available at the packing machines.   Processes shall be in place to check label use is reconciled with expected use and the cause of any inconsistencies investigated. |  |  |

**5. 2 Product changeover**

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| **Clause** | | **Requirements** | **Conforms?** | **Comments** |
| 5.2.1 |  | Documented checks of the production line shall be carried out before commencing production and following changes of product. These shall ensure that lines have been suitably cleared and are ready for production.  Documented checks shall be carried out at product changes to ensure that all products and printed packaging and labels from the previous production have been removed from the line before changing to the next production. |  |  |

**5.3 Product label verification measures**

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| **Clause** | | **Requirements** | **Conforms?** | **Comments** |
| 5.3.1 |  | Procedures shall be in place to ensure that all gluten-free products are packed into the correct packaging and correctly labelled. These shall include checks:   * at the start of packing * during the packing run (e.g. at predefined intervals and when printed packaging or labels are brought to the line during the production run) * when changing batches of packaging materials at the end of each production run.   The checks shall also include verification of any printing carried out at the packing stage. |  |  |
| 5.3.2 |  | Where online verification equipment (e.g. bar code scanners) is used to check product labels and printing, the site shall establish and implement procedures for the operation and testing of the equipment to ensure that the system is correctly set up and capable of alerting or rejecting product when packaging information is out of specification.  At a minimum, testing of the equipment shall be completed at:   * the start of the packing run * the end of the packing run * a frequency based on the site’s ability to identify, hold and prevent the release of any implicated materials should the equipment fail (e.g. during the packing run or when changing batches of packaging materials).   The site shall establish and implement procedures in the event of a failure in the online verification equipment (e.g., a documented and trained manual checking procedure). |  |  |

6 Schedule A

**6.1 Products listed**

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| **Clause** | | **Requirements** | **Conforms?** | **Comments** |
| 6.1.1 |  | Where finished products manufactured at the site display, or are developed with the intention of displaying, any of the trademarks covered by a Schedule A, these products shall be listed.  The site shall have a separate Schedule A for each brand owner, with the appropriate trademark use for each product indicated.  A Schedule A shall not be required where no trademarks are used. |  |  |

**6.2 Communication of amendments**

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| **Clause** | **Requirements** | **Conforms?** | **Comments** |
| 6.2.1 | The site shall immediately communicate any of the following changes to any Schedule A to BRCGS:   * cessation of production for any of its brand owners * addition or removal of products bearing a trademark * change of trademark use * change of Universal Product Code (UPC), or product identification number * change of company name or site address. |  |  |

**6.3 Schedule A validity**

|  |  |  |  |
| --- | --- | --- | --- |
| **Clause** | **Requirements** | **Conforms?** | **Comments** |
| 6.3.1 | The site shall possess a valid Schedule A indicating trademark use for each brand owner at the audit. Each Schedule A shall list the products displaying any of the trademarks covered by the schedule.  To be considered valid, every Schedule A shall:   * list the site name and current address * be an accurate reflection of trademark use * be signed and dated by BRCGS. |  |  |

7 Gluten-free training

**7.1 Training of personnel**

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| --- | --- | --- | --- |
| **Clause** | **Requirements** | **Conforms?** | **Comments** |
| 7.1.1 | All personnel, including engineers, agency-supplied staff, temporary staff and contractors, shall have received general gluten-free training and be trained in the site’s gluten control measures and gluten handling procedures commensurate with their role. |  |  |
| 7.1.2 | Where personnel are engaged in activities relating to gluten control measures and critical control points, relevant gluten-free training and competency assessments shall be in place. |  |  |

**7.2 Documented training programme**

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| --- | --- | --- | --- |
| **Clause** | **Requirements** | **Conforms?** | **Comments** |
| 7.2.1 | The site shall have a documented gluten-free training programme in place, covering the training needs of personnel. These shall include, at a minimum:   * identifying the necessary competencies for specific roles * providing training or other action to ensure staff have the necessary competencies * reviewing the effectiveness of gluten training * delivery of training in the appropriate language of trainees. |  |  |

**7.3 Labelling and packing process training**

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
| **Clause** | | **Requirements** | **Conforms?** | **Comments** |
| 7.3.1 |  | All relevant personnel shall have received training on the site’s labelling and packing processes which are designed to ensure the correct labelling and packing of gluten-free products. This includes agency-supplied staff, temporary staff and contractors. |  |  |

**7.4 Training records**

|  |  |  |  |
| --- | --- | --- | --- |
| **Clause** | **Requirements** | **Conforms?** | **Comments** |
| 7.4.1 | Records of all relevant gluten-free training shall be available. Where relevant gluten-free training is undertaken by agencies on behalf of the company, records of the training shall be available. |  |  |

**7.5 Review of staff competence**

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| --- | --- | --- | --- |
| **Clause** | **Requirements** | **Conforms?** | **Comments** |
| 7.5.1 | The company shall routinely review the competencies of its staff. As appropriate, it shall provide relevant gluten-free training. This may be in the form of training, refresher training, coaching, mentoring or on-the-job experience. |  |  |

8 AOECS-specific requirements

This section contains the AOECS-specific requirements for access to the European market and use of the Crossed Grain Trademark.

Prior to a BRCGS Global Standard Gluten-Free audit incorporating the AOECS-specific requirements, the current or potential licence holder must contact the [AOECS member society](https://www.aoecs.org/about-us/members/), to coordinate the necessary steps to obtain or maintain a valid Crossed Grain Trademark licence. In countries where there is no AOECS member society, they will contact AOECS at [helpdesk@aoecs.org](mailto:helpdesk@aoecs.org).

The clauses below outline the specific requirements that must be met in order to be compliant.

**8.1 Supplier approval, purchasing, and incoming ingredients and inputs**

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| --- | --- | --- | --- |
| **Clause** | **Requirements** | **Conforms?** | **Comments** |
| 8.1.1 | Use of ingredients either gluten-free by nature or which have been rendered gluten free must be in accordance with 2.1 of the AOECS Standard for Gluten-free Foods. The R5 ELISA method (Mendez method) must be used to confirm that the gluten level does not exceed 20 mg/kg based on the food as sold or distributed to the consumer.  (See clause 3.4) |  |  |

**8.2 Product recall and withdrawal**

|  |  |  |  |
| --- | --- | --- | --- |
| **Clause** | **Requirements** | **Conforms?** | **Comments** |
| 8.2.1 | The food business operator using or intending to use the Crossed Grain trademark on their product(s), has a recall procedure to notify any recall and withdrawals to the AOECS member within 24 hours from the date of release of the official recall or withdrawal notice.  (See clause 3.8) |  |  |

**8.3 Approval and control of labels**

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| --- | --- | --- | --- | --- |
| **Clause** | | **Requirements** | **Conforms?** | **Comments** |
| 8.3.1 |  | Food labels must comply with the AOECS Standard for Gluten-free Foods.   * Foods as defined without any oats shall be labelled “gluten-free”. The registration number shall be clearly displayed underneath the Crossed Grain Trademark and consist of the ISO country code – licence number – product number. * Foods containing oats, shall be labelled “gluten-free”. However, the word “OATS” (and in the local language, if agreed by the AOECS member society) shall be clearly displayed underneath the Crossed Grain Trademark before the registration number. * Foods may be accompanied by additional statements ‘suitable for people intolerant to gluten’ or ‘suitable for coeliacs’, if permitted by national legislation. They may be labelled ‘specifically formulated for people intolerant to gluten’ or ‘specifically formulated for coeliacs’, if permitted by national legislation.   (See clause 4.2) |  |  |

**8.4 Marketing claims**

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
| **Clause** | | **Requirements** | Conforms? | Comments |
| 8.4.1 |  | Use of the Crossed Grain Trademark alongside marketing claims must comply with the AOECS Standard for Gluten-free Foods.   * Foods as defined without any oats shall be labelled “gluten-free”. The registration number shall be clearly displayed underneath the Crossed Grain Trademark and consist of the ISO country code – licence number – product number. * Foods containing oats, shall be labelled “gluten-free”. However, the word “OATS” (and in the local language, if agreed by the AOECS member society) 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’, if permitted by national legislation.   (See clause 4.3) |  |  |

**8.5 AOECS Crossed Grain Trademark license**

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| --- | --- | --- | --- | --- |
| **Clause** | | **Requirements** | Conforms? | Comments |
| 8.5.1 |  | Only food business operators that have a valid license contract with the corresponding AOECS member society are allowed to bear the Crossed Grain Trademark on their product(s). |  |  |

**8.6 Laboratory and testing**

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| --- | --- | --- | --- |
| **Clause** | **Requirements** | Conforms? | Comments |
| 8.6.1 | 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.  (See clause 4.7) |  |  |