

General information regarding elements of the BRCGS Scheme and certification process are described below however it is important that you visit www.brcgs.com to access and review all the BRCGS Scheme documents in full including any additional updates from BRCGS such as bulletins and guidance documents. Please feel free to contact us to discuss how we can better serve your organization.

SAI Global Full-Service Team

Upon selection of SAI Global as your Registrar and submission of the signed Application for Certification, SAI Global will assign your dedicated service team.

Your service team will be selected to suit your specific industry and will consist of an Account Manager, a Regional Account Representative/ Scheduler, a Lead Auditor and other team members as needed to support your certification. The roles of each member of your service team are as follows: your Account Manager will manage the business relationship, including contract negotiation and changes to your certification requirements; your Regional Account Representative will manage the back-office processes including scheduling and customer service related to certificates and invoicing; your Lead Auditor will manage the delivery relationship. As your primary contact with SAI Global, the Lead Auditor assigned provides you with ongoing industry developments and interpretations and ensures coordination of all audit-related activities for your company. If additional audit team members are required, they are selected from our experienced auditor base. Your audits will be consistent in approach, technically sound and relevant to your business needs.

Introduction

This document provides information for Applicants and Certified sites. It describes the procedures for application, audit, certification, complaints and appeals. SAI Global operate the GFCP ('Standard') under accreditation.

Certification against the GFCP (GLUTEN FREE CERTIFICATION PROGRAM) provides a mechanism for giving assurances to retailers and consumers about the production standards of suppliers and thereby assurances regarding the safety, and integrity of the product that carry the 'Gluten-free' designation. The system has been designed to provide assurances that food products are manufactured in accordance with GFCP, which goes beyond the relevant legislation and demands best commercial practice.

Certification will only be granted to certified sites who comply with the Standard and follow the Rules set out in the BRCGS Gluten Free standard published by the CPO (CERTIFICATION PROGRAM OWNER). Participation is conditional on an initial audit together with routine audits/visits to ensure continual conformance with the Standard.

Participation must be renewed annually or when the next audit is due. In the event of any changes to the Standard or Rules, Applicants and Certified sites must conform to the new requirements from the effective date of introduction of the changes. Applicants and Certified sites will be given notice in writing of any changes.

Application

Suppliers who wish to be certified against should read carefully the applicable BRCGS Gluten Free standard and the related documents accessible in CPO's (Certification Program Owner) website. A site is required to register with the program online.

Only GFSI-recognized Standard/Scheme Certificate holders can apply for this scheme such as BRCGS Food, SQF, FSSC, IFS, etc. or Global Markets Programs such as BRC START! Or other GFSI fundamentals program. All sites applying for GFCP certification must obtain "**Schedule A**" which lists the products that are in the scope of the Gluten Free audit/certificate. 'Schedule A' must be signed by CPO (Certification Program Owner) refer BRCGS <https://www.brcgs.com/brcgs/gluten-free-certification-program/benefits/>.

Upon completing preparations and receiving this document contact SAI Global for setting up of the Certification Audit.

Self-assessment of compliance

The GFCP Global Standard should be read and understood, and a preliminary self-assessment should be conducted by the site against the GFCP Global Standard, using the GFCP self-assessment checklist. Any areas of identified nonconformity should be addressed by the site before ordering an audit. This can be done as part of a site's internal audit.

SAI Global Certification against the GFCP can be achieved via various means. Please see the applicable Standard for options regarding standalone or combined, announced or unannounced audits etc.

The application fee (detailed on a separate fee sheet) is payable upon submission of the application form. If the Applicant withdraws their application before the initial audit, the fee may be refundable in part at the discretion of SAI Global. Withdrawals of applications must be made in writing to the SAI Global office.

Audit

The Applicant will be contacted by SAI Global to make an appointment for an audit at a mutually acceptable date. If an Applicant cannot agree a suitable appointment date for the audit the onus is on the Applicant to contact SAI Global when they are ready for the audit. The applicant must contact SAI Global within 6 months of this notice; otherwise their application will be withdrawn. This only applies to new applicants. Once certified, Certified sites must make themselves available for audit promptly; at or prior to the designated re-audit dates.

A GFCP-approved auditor will conduct the GFCP Audit. The audits may be combined with other GFSI-recognized system/program, as an addendum of 0.5 day in length on-site. In the case of this practice some adjustments or allowances may take place to synchronize the GFCP audit dates to the GFSI or other food safety Management system/program re-audit dates. These combined audits are short on-site as auditor takes in to consideration the Management System/ hazard/risk-assessment of the GFSI program audit. Where the GFCP is done at a different time to the GFSI audit (Standalone audit) may be 1.5 or more days, during which the auditor audits the Gluten Free Management System as a whole. Sites requesting Standalone) GFCP audits must hold a valid GFSI-recognized scheme/program certificate.

Certification

Following an audit, the auditor will submit a report to the SAI Global Office. SAI Global will determine the eligibility of the Applicant for certification as a certified site. Applicants with no outstanding non-conformities will normally receive the audit report and a certificate 42 days after the first day of the GFCP audit; but not before all fees relating to the site are paid in full.

If the auditor reported that an audited site did not conform to all requirements of the Standard, SAI Global will make a decision as to certification based on the degree of non-conformity. Documentary evidence or re-visit may be required to verify that non-conformities have been rectified. If a re-visit is necessary, a further fee will be incurred. Where possible, each Applicant will be notified in writing of the decision (if certificate is granted or not granted) in relation to their application for certification within 42 days after the audit.

If a site is refused certification SAI Global shall, by written notice, advise the Applicant of the reason(s) for the refusal, remaining courses of actions (e.g.: corrective actions), or their right of appeal and provide details of the Appeal Procedure (see Appeals). If the site wishes to be reconsidered following refusal, a new application is required.

Similarly, the certificate nor the audit report, shall be valid until all fees have been received, irrespective of the outcome of the certification process.

If an application is refused certification SAI Global shall, by written notice, advise the Applicant of the reason(s) for the refusal, their right of appeal and provide details of the Appeal Procedure (see Appeals). If an Applicant wishes to be reconsidered following refusal, a new application is required.

The final decision relating to certification (whether on appeal or otherwise) rests with the SAI Global Certification Committee whose decision is final and binding. The site will be informed of the certification decision following the Technical Review. The final report is produced in English.

By joining the program, the Applicant / Certified site consents to the processing by SAI Global of data and the subsequent release of the audit report to the Certification Program Owner (CPO). In all other cases the audit reports will be confidential to SAI Global and the client unless a consent form (available from the SAI Global office or SAI Global auditor) has been signed by the Applicant or Certified site.

Certificates are not transferable and remain the property of SAI Global who controls its ownership, use and display. The certificate must be returned to them upon request. Only Certified sites can use SAI Global certificates, and strictly only in relation to the scope of their certification. Certified sites must not make any express or implied claim that certification applies to product, locations or activities that are not included in the scope of their certificate. Only Certified sites can use SAI Global marks or logos and only in accordance with the Conditions of Use. By joining the program, the Applicant / Certified site consents to the transmission of certification status details including an electronic copy of the Certificate of Conformity (where one is issued) to the CPO (Certification Program Owner).

Site Obligations

The BRCGS scheme has numerous obligations conditions that apply as well as SAI Global standard terms and conditions. You need to refer to BRCGS Code and all normative documents and below are some highlights:

- Allowing the supervised training/witnessing of new auditors by SAI Global
- Routine SAI Global shadow witness audit program
- Witness audits by Accreditation Bodies, BRCGS, GFSI or other stakeholders
- Witness audits by a specifier where a specifier specific additional audit module is included
- Any specific requirements for additional audit modules are to be in accordance with the respective protocols
- Certification details are published in various public registers including BRCGSI, SAI Global, Accreditation bodies.
- In the event of a significant food safety incident, including a product recall or regulatory food safety non-conformity (e.g. a regulatory enforcement notice), the certification body issuing the current certificate for the site against this Standard shall be informed within 3 days
- BRCGS reserves the right to contact the site or conduct its own audit or visit to a site once certified in response to complaints or as part of the routine BRCGS compliance activity to ensure the integrity of the Global Standards schemes. Such visits may be announced or unannounced.

Certified sites must obtain the consent of SAI Global to use certification against the Gluten Free Certification Program as a defence to any legal action or investigation against them. Prior to giving this consent, SAI Global reserves the right to undertake an audit to confirm continued conformance to the Standard and Rules at any time for an additional audit fee which will be paid by the certified site.

Renewal of Certification

The period of validity of certification shall be in line with the requirements specified in the applicable GFSI Standard. An Auditor or SAI Global Manager will normally contact certified sites before the re-audit due date to arrange renewal.

The renewal fee is payable before the due date. Renewal fees cannot be refunded. SAI Global reserves the right to amend fees as necessary and will notify Applicants and Certified sites in writing of any amendments to fees.

Revocation of Participation/ Withdrawal of Certificate

The certification body or BRCGS reserves the right to withdraw the certification.

Any Certified site who is in breach of any provisions of the Standard and/or Rules may have their certification withdrawn with immediate effect by written notice from SAI Global. This notice will inform the certified site of the reasons for withdrawal and will also provide details of the Appeal procedure.

A Certified site may voluntarily withdraw from certification against the Standard by notification of such in writing to SAI Global. In all cases of revocation/withdrawal of participation, there is no entitlement to any refund of fees. The supplier must return their Certificate of Conformity and must not make any further claims, whether express or implied, that they are certified by SAI Global.

Certified sites whose certification is revoked must make a new application if they wish to re-gain certification. No new application will normally be considered by SAI Global for a period of at least 3 months following revocation.

A Certified site whose certification has been revoked has the right of appeal against this decision. SAI Global shall by written notice advise the Certified site of the right of appeal and provide details of the Appeal Procedure (see Appeals).