Gluten-Free Certification Program (GFCP)
TECHNICAL RELEASE #2
October 29, 2014- Toronto, ON

This Technical Release Includes:

1. Release of the New GFCP Audit Form & Guidance Report (Version 1.2) and supporting tools, together with advice on its correct use
   i. Additional suggestions on the performance of the audit are communicated from lessons learned.
   ii. This new Form will be implemented as soon as possible. Naturally, a reasonable transition period will be respected. We would expect that this could be phased-in and completely implemented, within the next 60 days.

2. The role of the President of Allergen Control Group Inc., (ACG) with respect to the GFCP Standards and Policies Document (May 2011).

1. New GFCP Audit Form & Guidance Report (Version 1.2)

Background

As the GFCP has evolved over the last 2 years, clients and Certifying Bodies (CB’s) have provided us with valuable comments and queries, which in the most part have reviewed and captured, as lessons learned. Many suggestions and recommendations may now help to improve functionality and to accommodate the GFCP expansion, beyond just the Canadian market.

The new version of the Gluten-Free Certification Program (GFCP) Audit Form and Guidance Report (Version 1.2) is attached in PDF format, as well as an example of completed Version 1.2. In addition, a MS Word version will be made available for use by auditors. In our continued attempt to provide total transparency, this document is being released now, via this Technical Release #2 to our clients, CB’s, approved auditors and other industry stakeholders.

What’s New in Version 1.2 Besides the Name

As you complete the audit report, you will note that there are very few format changes in the main body of the document, which encompasses Parts 1, 2 and 3. The preamble on page-1 starts from a high-level perspective and then moves to highlighting the detailed differences between the Canadian Celiac Association (Canadian Market) and the National Foundation for Celiac Awareness (USA market) nuances and trademarks.

Some of the important details to note include expanded “Guidance” sections within the most appropriate elements. You should also note, there has been no change to the requirements of products carrying the Canadian Celiac Association (CCA) trademark. However, some incremental additions were needed to deal with use of the National Foundation for Celiac Awareness (NFCA) trademark, which has also endorsed the GFCP and for those products destined primarily for sale, within the USA market.

The two key changes as indicated in the guidance for products due to carry the NFCA endorsed GFCP trademark and destined for the USA are:

- Gluten-free oat containing products are allowed in the USA but not in Canada
- The allowable threshold for gluten contained in any product cannot exceed 10 ppm if using the NFCA trademark, as opposed to not more than 20 ppm, which is permitted for use of the CCA trademark.
Other Minor Changes

- To make it easier for technical review within ACG, we need the answer to the following question:
  - “Is the Site a Dedicated Gluten-Free Facility? Yes ☐ No ☐”
- The term “FAIL” has been removed and replaced with the term “Non-Conformance” or simply “NC” in the report.
- Format of the “Recommendation” and “Sign-off” sections is clearer, more intuitive and easier to fill out.
- New email address: “Following the Technical Review process by the CB, send all completed reports and recommendations to: auditreports@glutenfreecert.com

Advice and Lessons Learned

- CB’s should confirm ahead of time with the auditee that one or more products within the scope of this certification will be in active production, at time of audit.
- CBs should confirm that the auditee has already officially applied for GFCP certification, via the online link at: www.glutenfreecert.com/product/gfcp-application/. Evidence of payment would be sufficient proof.
- If the audited facility does not correct non-conformances within 28 days of the certification audit, certification will not be granted and the facility will have to re-apply for certification, unless justification can be provided to the CB and approved by ACG.
- A GFCP Program License Agreement (PLA) is no longer required to be on-site at the time of audit. However, a duly signed and current version of the GFCP Schedule “A” is now required to be available on-site and at time of the audit; or, substituted with a current letter from ACG, as an equivalent may also suffice.
- Although a valuable reference for consumers, the CCA Pocket Dictionary is no longer a requirement of the Standard and does not need to be available on-site and at the facility, at time of audit.
- It is an expectation that audits will be conducted respecting the guidance in Section 6 of the GFCP Manual and any requirements stipulated in ISO 17021. This would include the use of detailed audit plans and audit trails, focus on gluten controls, competent hazard analysis as required, key personnel training in gluten management/controls, supplier approval processes and incoming ingredient verifications, monitoring and internal auditing of program requirements.

2. Role of the President of Allergen Control Group Inc. (ACG)

The Canadian Celiac Association and the National Foundation for Celiac Awareness fully endorse the GFCP and have granted full authority to ACG to administer the Program, including the authorization to use and sublicense their GFCP registered trademarks. This has been accomplished through written long-term agreements in order to also delegate the longer term design, development and implementation and requirements of the program, in addition to effectively delegating the “day to day” operation, to the President of ACG.

Over time, the role and responsibilities of the President have evolved to ensure maximum efficiency and effectiveness. To maintain transparency and a better understanding, all stakeholders should be aware that any and all the former authorities granted to and by the Executive Director (ED) of CCA, noted within the GFCP Standards and Policies Document (May 2011), now effectively reside with the President of the ACG.

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