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***Protecting the
allergic consumer
through rigorous
factory controls***

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Spot the difference?

There are many poisonous fungi, some of which are included in this picture. Individuals should never eat any fungi without specialist knowledge and identification.



Allergens Are the #1 Cause of Product Recalls



Gluten-containing product recalls account for an average of 28% of all allergen recalls



- General Mills recalled 1.8M boxes of gluten-free Cheerios
- ~\$11M in lost sales and a decrease in stock price
- Did not have accredited 3rd party management system certification

What Are Consumers Saying About Labelling?



- ✓ 90% of consumers don't trust labels alone that merely suggest a product is gluten-free
- ✓ 91% say their buying decision is impacted by 3rd party verification
- ✓ 63% will stop buying a product if they don't trust the company behind it
- ✓ 76% prefer certified products associated with a celiac/coeliac organization vs. self-declaration

Sources: <https://www.greenbiz.com/article/using-product-certification-win-consumers-hearts-and-minds>
<https://www.beyondceliac.org/>

Family of victim from the Byron Burger allergy death incident demands policy change

They said that simply communicating the food allergy is not enough.

Source: <https://qsrmedia.co.uk/legal/news/family-victim-byron-burger-allergy-death-incident-demands-policy-change/>

What are the challenges and risks?

The Challenges

- Robust, consistent & rigorous management system
- Full supply chain process

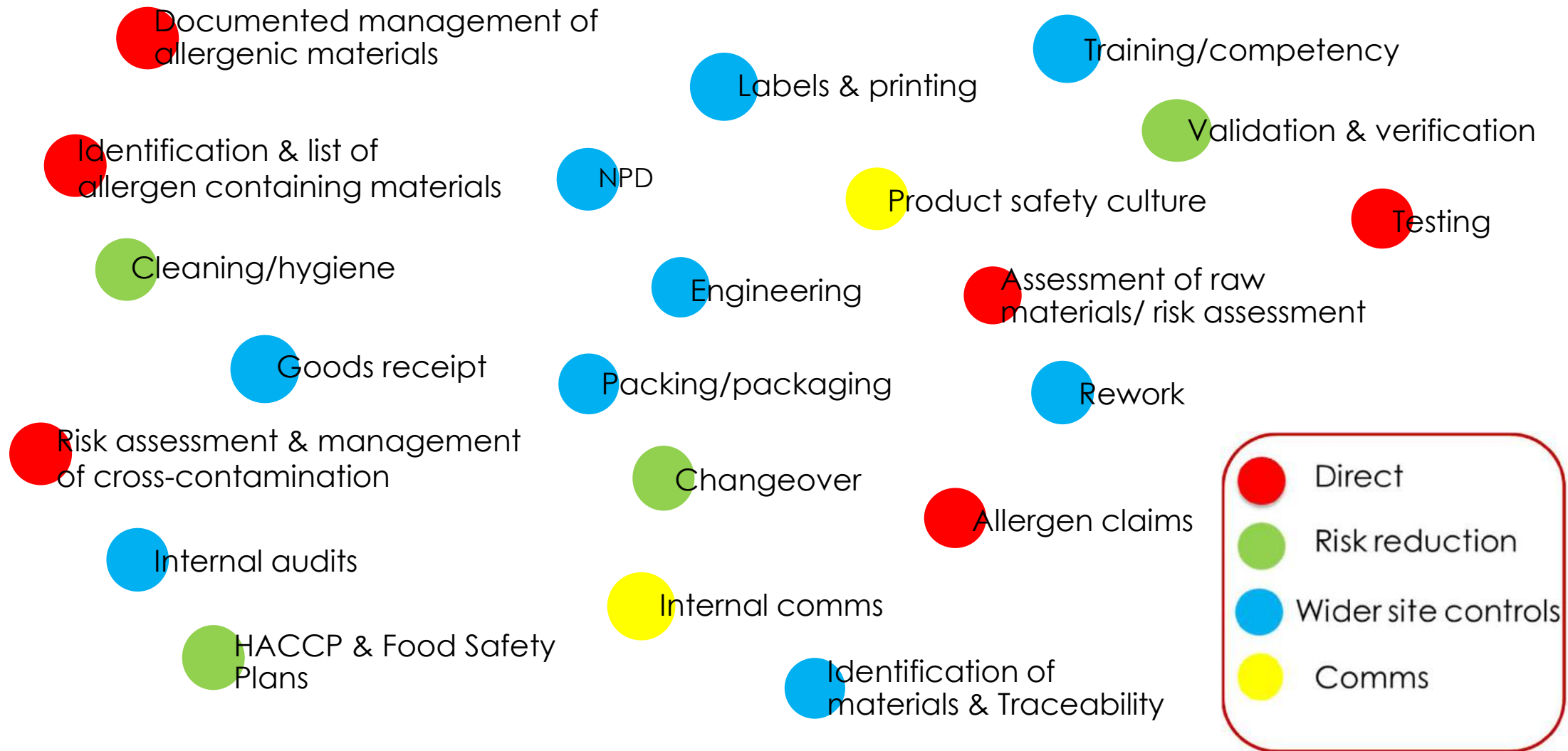


The Risks

- Risk of product failure and recalls
- Damage to brand reputation
- Sickness (and liability)
- Reliance on insufficient systems



Elements of a robust control system



Learning from others – UK Non-conformities



Non-conformity ranking	BRCGS Clause
1)	4.11.1 – Cleanliness & hygiene
4)	1.1.2 – Culture plan
8)	3.9.2 – Identification during all stages
9)	3.4.3 – Internal audit reports & actions
10)	4.6.1 – Design & placement of equipment
13)	4.11.2 – Cleaning procedures
14)	4.15.1 – Storage procedures
15)	3.9.3 – Traceability testing
16)	3.4.1 – Internal audit programme

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BRCGS
Gluten-Free
Certification
Program
Issue 3



LOW RES
POSITIONAL ONLY
HIGH RES TO
FOLLOW

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**Gluten-Free
Certification**



Requirements of the Standard



- Senior management commitment
- Prerequisite programmes
- HACCP principles
- Records & document control
- Validation
- GFMS
- Internal audits

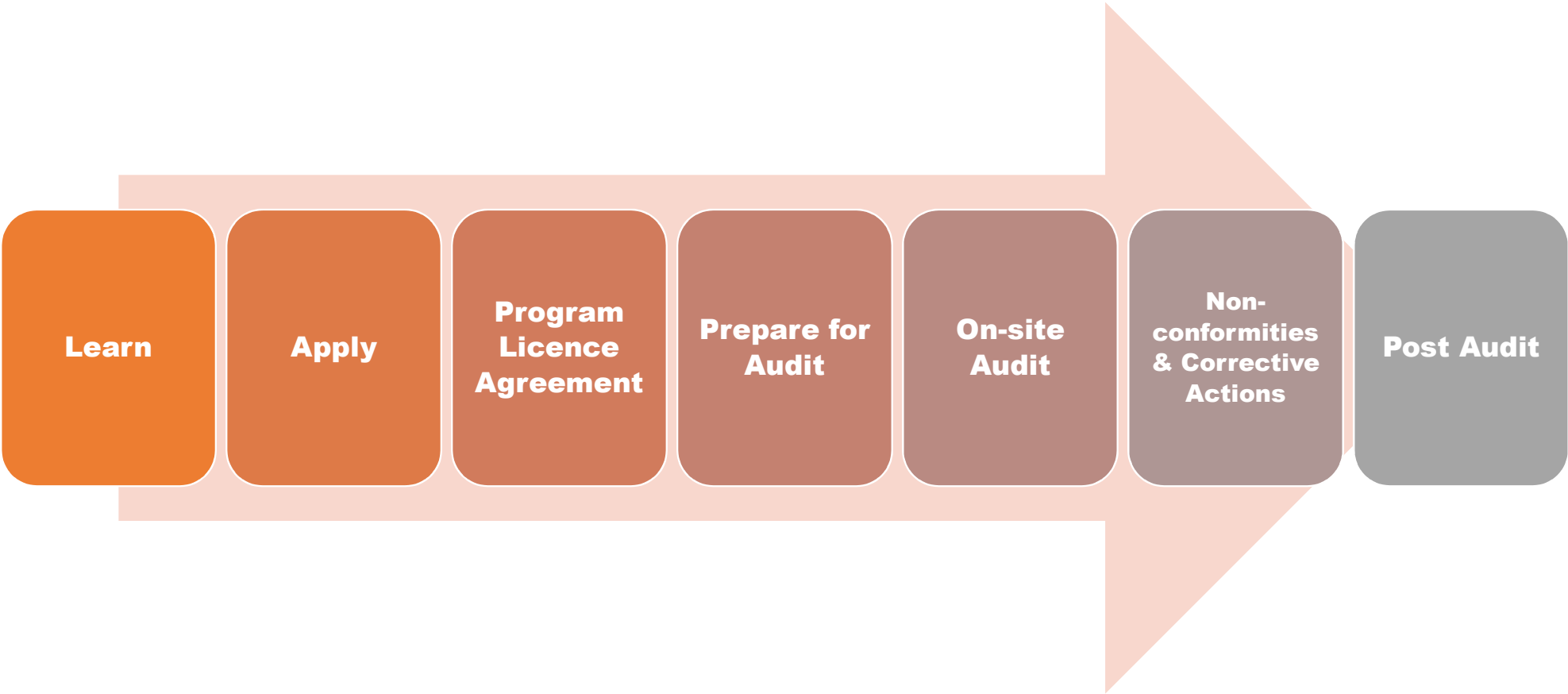


GFMS - Gluten Controls



- Gluten awareness training
- Product development
- Supplier approval, purchasing, goods receipt
- Approval and control of labels
- Marketing claims
- Finished product specifications
- Contamination control
- Work in progress
- Segregation & disposal of obsolete/waste material
- Product testing
- Complaint handling
- Recall procedures

Certification Process





Post Audit Activities



- Reporting on the audit and audit outcome
- Close out corrective actions
- Certification decision - Issuing certificate of recognition
- Publish site certification details on our website
- Trademark usage and label approval (where applicable)

Benefits of Gluten Free Certification

Consistent, global approach

A systems approach to the management of gluten - fully accredited certification programme adding recognition and credibility

A strong level of protection to prevent failure, and if failure does occur, to be able to rapidly identify and manage risks and deviations

Expanding markets to increase the availability and sale of gluten-free products

Meeting regulatory requirements

Increased consumer confidence and product recognition – providing availability and a greater variety of trusted gluten-free choices



GLOBAL STANDARD
FOOD SAFETY ISSUE 7

ALLERGEN MANAGEMENT GUIDELINE



**GLUTEN-FREE
CERTIFICATION PROGRAM
INDUSTRY TRAINING**



GLOBAL STANDARD
FOOD SAFETY ISSUE 8

UNDERSTANDING PRODUCT CHANGEOVER

BRCGS

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**Any
Questions?**