



# Standards

## TRACED GLUTEN-FREE SUPPLY CHAIN

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# Preamble

In Europe, about 1% of the population is affected by Coeliac disease. Intolerant people have to follow a very strict diet and constantly monitor their food consumption: the product, ingredients, potential contamination sources etc.

Inadvertent gluten consumption may occur, for example by cross-contamination. Manufacturers must implement procedures to prevent cross-contamination.

The company Bio-Gascogne, in organic farming for over 20 years, always aimed at providing healthy and traced products. Today, the company wants to share its experience and expertise in the production of quality and safe food in the gluten-free sector.

This initiative, origin of the present standard, has led to the elaboration of demanding criteria to guarantee, to the processors and consumers, an access to traced and safer goods.

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# 1. Introduction

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## 1.1. Objectives and scope of the standard

This standard contains the basic provisions of the development of traced gluten-free supply chain from the field to the shipment of raw materials or finished products to guarantee access to safer products.

It sets objectives and requirements for:

- the production, harvest, transport, storage and preparation of traced gluten-free raw materials and related controls
- the labelling referring to “traced gluten-free supply chain”

This standard applies to the following agricultural products:

- unprocessed plant products
- processed plant products (flour) or packed raw food for human consumption

Excluded from this standard are all agricultural products containing gluten, namely rye, oats, wheat, barley, kamut and spelt.

This standard applies to any operator involved in activities at any stage of production, harvesting, transport, storage or preparation of the products listed above.

## 1.2. Prerequisite

This standard applies without prejudice to national and Community provisions concerning the manufacturing, inspection, packaging, marketing, labelling, importation and distribution of the products.

The European organic certification is a prerequisite for obtaining the "traced gluten-free supply chain" label.

This standard does not replace the European regulation No. 41/2009 concerning the composition and labelling of foodstuffs suitable for people intolerant to gluten or the AFDIAG standard. It is an additional guarantee to strengthen the existing control system.

## 1.3. Definition

For the purpose of this standard, the following definitions apply:

**TRACED GLUTEN-FREE SUPPLY CHAIN:** use of the production method compliant with the requirements laid down in this standard at all stages of production and preparation.

**CROPS CONTAINING GLUTEN:** rye, oat, wheat, barley, kamut and spelt.

**PRODUCTION STAGE:** all stages from primary production to transport and storage.

**OPERATOR:** physical or legal persons responsible for ensuring compliance of their activity with the present standard.

**PLANT PRODUCTION:** production of agricultural crop products

**CONVERSION,** switch from agricultural producing crops containing gluten to traced gluten free products during a given period, in which the requirements of this standard shall be applied.

**PREPARATION** processing operations of the gluten-free products: processing of flour, as well as packaging and labelling.

**AUDIT:** Audit on the site of the certified operator. Verification of compliance of the activity with the requirements of the standard.

**INITIAL AUDIT,** First audit to assess the ability of an operator to meet the requirements of the standard.

**CORRECTIVE ACTION:** action to eliminate the cause of a failure or other undesirable situation detected.

**CERTIFICATE:** document certifying the compliance of operators. It adds value to the products towards third parties with a reference to a "traced gluten-free supply chain".

**STANDARD:** technical document defining the characteristics of complying activity, the control procedures and the modalities to communicate about the audit.

**NON-CONFORMITY (NON-COMPLIANCE):** absence of compliance for a specified requirement of the standard. The severity of the non-conformity depends on the requirement.

**MEASURE** sanction provided by the correction plan of the standard.

**MONITORING:** repetition process of audit, review and decision making to maintain certification.

## 2. Chapters of the standard

### 2.1. Logic of the standard

Within this standard, the requirements are organized around five main chapters:

- Chapter 1 – Production
- Chapter 2 – Harvesting, transport and storage
- Chapter 3 – Preparation
- Chapter 4 – Traceability
- Chapter 5 – Communication and labelling

Each chapter is divided into thematic. Each theme is then broken down into specific control criteria and presented as follows:

n°	Theme	Conformity criteria	Control points
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### 2.2. Contents of the standard

#### 2.2.1. Chapter 1 –Production

n°	Theme	Conformity criteria	Control points
1	<b>100% traced gluten-free supply chain Farm</b>	The entire farm must meet the requirements of this standard, including animal feed.	<b>Documentary check</b> Breeding Book, rations, purchase invoices <b>Field check</b> Farm inspection
2	<b>Mixed farming</b>	The cultures containing gluten, namely: rye, oats, wheat, barley, kamut and spelt are excluded from crop rotation including green manures.	<b>Documentary check</b> Purchase Invoices, cultivation register <b>Field check</b> Field inspection
3	<b>Field</b>	All the agricultural land of the operator must comply with the requirements of the « traced gluten-free supply chain » standard.	<b>Documentary check</b> Cultivation registers, CAP declaration, production logbook, description of the activity... <b>Field check</b> Field inspection

n°	Theme	Compliance criteria	Control Elements
4	Seeds	<p>The used seeds must come from:</p> <ul style="list-style-type: none"> <li>▪ The operation of the committed operator</li> <li>▪ From seed companies or cooperatives and have a certificate of origin (SOC)</li> <li>▪ Another operator compliant to the « traced gluten-free supply chain » standard.</li> </ul>	<p><b>Documentary check</b></p> <p>Seed purchase invoice, SOC guarantees, certificate of the « traced gluten-free supply chain » standard</p> <p><b>Field check</b></p> <p>Check of the seed stocks and labels</p>
5		<p>Stocks of seeds present at the operator's facilities are exclusively crop seeds which do not contain gluten.</p> <p>Gluten-containing seed stocks must be removed.</p>	<p><b>Documentary check</b></p> <p>Sales invoices, attestation of cessation, proof of destruction of seeds containing gluten ...</p> <p><b>Field check</b></p> <p>Check of the seed stocks and labels</p>
6	Equipment	<p>The equipment used is exclusively dedicated to gluten-free crops certified or in conversion "traced gluten-free supply chain".</p>	<p><b>Documentary check</b></p> <p>Records for crop production, certificate of the « traced gluten-free supply chain » standard for the subcontractor</p> <p><b>Field check</b></p> <p>Inspection of the equipment</p>
7	Cleaning	<p>At the first use, if the equipment is not new, it must be cleaned in order to guarantee the absence of gluten-containing crop residues.</p>	<p><b>Documentary check</b></p> <p>Cleaning invoices, cleaning procedures</p> <p><b>Field check</b></p> <p>Inspection of the equipment</p>

n°	Theme	Compliance criteria	Control Elements
8	<b>Conversion of plots of land</b>	<p>All plots of land of the farm are subject to a conversion period of :</p> <ul style="list-style-type: none"> <li>▪ 2 years if the last harvest of gluten containing cultures took place in year N-1</li> <li>▪ 1 year if the last harvest of gluten containing cereals took place in year N-2</li> </ul> <p>The date of start of conversion of a plot of land will at the earliest be at the date of the last harvest of gluten containing cereals.</p>	<p><b>Documentary check</b></p> <p>Records for crop production, CAP declaration, production register...</p> <p><b>Field check</b></p> <p>Field inspection</p>
9	<b>Reduction of the conversion period</b>	<p>It is possible to reduce the conversion period if the plots of land haven't been cultivated with gluten containing cultures for at least 3 years.</p> <p>In this case, the plots of land can be certified « traced gluten-free supply chain » without undergoing a prior conversion period.</p>	<p><b>Documentary check</b></p> <p>Records for crop production, CAP declaration, production register...</p> <p><b>Field check</b></p> <p>Field inspection</p>
10	<b>Precautionary measures</b>	<p>The operator must implement sufficient measures in order to limit spontaneous regrowth of cultures containing gluten on plots of land in conversion (ex. handpicking of regrowth).</p>	<p><b>Field check</b></p> <p>Field inspection</p>

2.2.2. Chapter 2 – Harvest, transport and storage

n°	Theme	Compliance criteria	Control Elements
11	<b>Harvest</b>	The operator is not authorised to harvest simultaneously crops certified or in conversion « traced gluten-free supply chain » and of non-certified crops.	<p><b>Documentary check</b></p> <p>Records for crop production and harvest, invoices of services providers</p> <p><b>Field check</b></p> <p>Field inspection</p>
12	<b>Equipment</b>	The equipment used to harvest crops is exclusively dedicated to gluten-free crops certified or in conversion “traced gluten-free supply chain”	<p><b>Documentary check</b></p> <p>Records for crop production and harvest, invoices of services providers , certificate of the “traced gluten-free supply chain” standard for the subcontractor</p> <p><b>Field check</b></p> <p>Equipment inspection</p>
13	<b>Cleaning</b>	At the first use, if the equipment is not new, it must be cleaned in order to guarantee the absence of gluten-containing crop residues.	<p><b>Documentary check</b></p> <p>Cleaning invoices, cleaning procedures</p> <p><b>Field check</b></p> <p>Equipment inspection</p>
14	<b>Transportation</b>	The operator must ensure that the productions certified or in conversion “traced gluten-free supply chain” are transported in packaging, containers or trucks in appropriate manner to ensure that no substitution is possible.	<p><b>Documentary check</b></p> <p>Records for crop production, transportation register, transportation procedures...</p> <p><b>Field check</b></p> <p>Transportation inspection</p>
15		Packaging, containers or trucks used are exclusively dedicated to gluten-free productions.	<p><b>Documentary check</b></p> <p>Records for crop production, transportation register, transportation procedures...</p> <p><b>Field check</b></p> <p>Transportation inspection</p>

n°	Theme	Compliance criteria	Control Elements
16	<b>Cleaning (transport)</b>	At the first use, if the containers or trucks used are not new, they must be cleaned in order to guarantee the absence of gluten-containing crop residues.	<p><b>Documentary check</b></p> <p>Cleaning invoices, cleaning procedures</p> <p><b>Field check</b></p> <p>Equipment inspection</p>
17	<b>Storage of unprocessed agricultural products</b>	Stocks of plants (unprocessed agricultural product) present at the operator's facilities are exclusively plants certified or in conversion "traced gluten-free supply chain".	<p><b>Documentary check</b></p> <p>Sales invoices, attestation of cessation, proof of destruction of plants containing gluten</p> <p><b>Field check</b></p> <p>Check of the seed stocks and labels</p>
18		Gluten-containing stocks must be removed.	<p><b>Field check</b></p> <p>Storage areas inspection</p>
19	<b>Storage of unprocessed agricultural products</b>	Areas dedicated to the storage of certified or in conversion production "traced gluten-free supply chain" are exclusively used for gluten-free products.	<p><b>Field check</b></p> <p>Storage areas inspection</p>
20		It is forbidden to have areas dedicated to the storage of certified or in conversion products "traced gluten-free supply chain" and gluten-containing products although the areas are physically separated.	<p><b>Documentary check</b></p> <p>Activity description</p> <p><b>Field check</b></p> <p>Storage areas inspection</p>
21	<b>Cleaning (storage)</b>	Storage units are exclusively dedicated to certified or in conversion products "traced gluten-free supply chain"	<p><b>Field check</b></p> <p>Storage units inspection</p>
21	<b>Cleaning (storage)</b>	At the first use, if the storage areas and units are not new, they must be cleaned in order to guarantee the absence of gluten-containing crop residues.	<p><b>Documentary check</b></p> <p>Cleaning invoices, cleaning procedures</p> <p><b>Field check</b></p> <p>Storage areas and storage units inspection</p>

n°	Theme	Compliance criteria	Control Elements
22	<b>Precautionary measures</b>	The operator is not authorised to harvest simultaneously crops certified “traced gluten-free supply chain” and in conversion crops.  The harvest must be separated in space and time.	<b>Documentary check</b>  Records for crop production and harvest, invoices of services providers
23		The operator is not authorised to simultaneously transport crops certified “traced gluten-free supply chain” and in conversion crops.  The transport must be separated in space and/or time.	<b>Documentary check</b>  Records for crop production and harvest, transportation register, transport procedures  <b>Field check</b>  Transportation inspection
24		In case of products in conversion and products certified “traced gluten-free supply chain”, storage units must be clearly identified and dedicated to one type of products.	<b>Documentary check</b>  Storage register  <b>Field check</b>  Storage unit inspection
25	<b>Reception of products from other operators</b>	The operator must ensure the conformity of products in conversion or certified “traced gluten-free supply chain” at their reception: packaging/containers, accompanying document, labelling.	<b>Documentary check</b>  Checking procedures, raw materials guarantees, origin label  <b>Field check</b>  Storage areas and units inspection

2.2.3. Chapter 3 – Preparation

n°	Theme	Compliance criteria	Control Elements
26	<b>Bagging</b>	Bagging equipment used is exclusively dedicated to products in conversion or certified “traced gluten-free supply chain”.	<b>Documentary check</b> Preparation register <b>Field check</b> Products label
27	<b>Cleaning (bagging)</b>	At the first use, if the bagging equipment is not new, it must be cleaned in order to guarantee the absence of gluten-containing crop residues.	<b>Documentary check</b> Cleaning invoices, cleaning procedures <b>Field check</b> Equipment inspection
28	<b>Flour mill</b>	The flour mill used is exclusively dedicated to products in conversion or certified “traced gluten-free supply chain”.	<b>Documentary check</b> Preparation register <b>Field check</b> Products label
29	<b>Cleaning (flour mill)</b>	At the first use, if the flour mill equipment is not new, it must be cleaned in order to guarantee the absence of gluten-containing crop residues.	<b>Documentary check</b> Cleaning invoices, cleaning procedures <b>Field check</b> Equipment inspection
30	<b>Precautionary measures</b>	Segregation, traceability and cleaning measures must be taken to ensure high quality products and the type of products (certified or in conversion).	<b>Documentary check</b> Preparation register, procedures <b>Field check</b> Products label

## 2.2.4. Chapitre 4 – Traceability

n°	Theme	Compliance criteria	Control Elements
31	<b>Internal traceability system</b>	<p>An internal traceability system must index the inputs and outputs (seeds, raw materials, final products).</p> <p>The system must trace the entire production certified “traced gluten-free supply chain” from the harvest to the shipment.</p>	<p><b>Documentary check</b></p> <p>Traceability system</p>
32	<b>Records</b>	<p>Records for crops production must be done and provide the following information :</p> <ul style="list-style-type: none"> <li>▪ regarding crops: seeds used, sowing date and sowing quantity</li> <li>▪ regarding harvest: date of harvest, type and quantity of the harvest (conversion, certified)</li> </ul>	<p><b>Documentary check</b></p> <p>Records for crops production</p>
33		<p>The operator must have a storage register that provides the following information:</p> <ul style="list-style-type: none"> <li>▪ Products storage in each silo and the nature of the product (conversion, certified)</li> <li>▪ Date of input, output and the quantity.</li> </ul>	<p><b>Documentary check</b></p> <p>Storage records</p>
34		<p>The operator must have a preparation register that provides the following information :</p> <ul style="list-style-type: none"> <li>▪ Regarding bagging : date, format, quantities bagged, batch number, nature of the product (conversion, certified)</li> <li>▪ Regarding the flour mill : date, processed quantities, batch number, nature of the product (conversion, certified)</li> </ul>	<p><b>Documentaire</b></p> <p>Preparation register</p>

n°	Theme	Compliance criteria	Control Elements
35	Service providers	<p>Service providers for the activities of production, harvest or storage must be certified “traced gluten-free supply chain” for their activity.</p> <p>It means :</p> <ul style="list-style-type: none"> <li>▪ For production: the service provider must use exclusively equipment dedicated to crops in conversion or certified “traced gluten-free supply chain”.</li> <li>▪ For harvest: the service provider must use equipment dedicated to crop in conversion or certified “traced gluten-free supply chain”.</li> <li>▪ For storage, the service provider must use storage areas and units dedicated to products in conversion or certified “traced gluten-free supply chain”.</li> </ul>	<p><b>Documentary check</b></p> <p>Service agreement, certificate</p>
36		<p>Service providers for the activity of transportation must clean and ensure the cleaning of the transport box.</p>	<p><b>Documentary check</b></p> <p>Cleaning attestation for the transport box</p>

2.2.5. Chapter 5 – Communication and labelling

n°	Theme	Compliance criteria	Control Elements
37	<b>Labelling</b>	Labelling must be clear and legible and has to refer to the conversion or certification of the “traced gluten-free supply chain”.	<b>Documentary check</b> Label <b>Field check</b> Label
38	<b>Communication</b>	The operator must include in its invoices, a reference to the conversion or certification “traced gluten-free supply chain”	<b>Documentaire</b> Sales invoices