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GUIDANCE ON CRITERIA FOR GLUTEN-FREE ACCREDITATION BODIES



**GUIDANCE ON CRITERIA FOR
GLUTEN-FREE
ACCREDITATION BODIES**

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CONTENT

	PAGE
I FOREWORD	4
II INTRODUCTION	5
1 SCOPE	6
2 NORMATIVE REFERENCES	7
3 TERMS AND DEFINITIONS	8
4 GENERAL REQUIREMENTS	9
4.1 Legal Responsibility	9
4.2 Natural Accreditation Agreement	9
4.3 Use of Accreditation Symbols and Other Claims of Accreditation	9
4.4 Impartiality Requirements	9
4.5 Financing and Liability	9
4.6 Establishing Accreditation Schemes	9
5 STRUCTURAL REQUIREMENTS	9-10
6 RESOURCE REQUIREMENTS	10
6.1 Competence of Personnel	10-11
6.2 Personnel Involved in the Accreditation Process	11
6.3 Personnel Records	11
6.4 Outsourcing	11
7 PROCESS REQUIREMENTS	12
7.1 Accreditation Requirements	12
7.2 Application for Accreditation	12
7.3 Resource Review	12
7.4 Preparation for Assessment	13
7.5 Review of Documented Information	13
7.6 Assessment	13
7.7 Accreditation Decision-Making	13

GUIDANCE ON CRITERIA FOR GLUTEN-FREE ACCREDITATION BODIES

7.8	Accreditation Information	13
7.9	Accreditation Cycle	14
7.10	Extending Accreditation	14
7.11	Suspending, Withdrawing or Reducing Accreditation	14
7.12	Complaints	14
7.13	Appeals	14
7.14	Records on GFABs/CABs	14
8	INFORMATION REQUIREMENTS	14
8.1	Confidential Information	14
8.2	Publicly Available Information	14
9	MANAGEMENT SYSTEM REQUIREMENTS	15
9.1	General	15
9.2	Management System	15
9.3	Document Control	15
9.4	Records Control	15
9.5	Nonconformities and Corrective Actions	15
9.6	Improvement	15
9.7	Internal Audits	15
9.8	Management Reviews	15
-	APPENDIX 1	16

GUIDANCE ON CRITERIA FOR GLUTEN-FREE ACCREDITATION BODIES

I. FOREWORD

The International Natural Accreditation Forum (i-NAF) is an independent, non-government network of natural accreditation bodies all mandated to enforce Natural, Vegan, Vegetarian, Halal Gluten-free, Gluten-Free and Eco Global Labels etc. Life Chain Standards in their economies and regions.

It has been established with the aim of unifying and harmonizing Natural accreditation practices on global level to comply with natural principles, requirements and to develop and maintain Natural Multi-Lateral Arrangements (MLA) among i-NAF member natural accreditation bodies(NABs), this will result in removing technical barriers facing natural / gluten-free / vegan / vegetarian / halal / eco products and services, and facilitating international natural products and services trade, hence protecting the growing number of consumers.

This guide provides the requirements for gluten-free accreditation bodies (GFABs) willing to be i-NAF signatories in the field of gluten-free. This guide endorsed by i-NAF Board of Directors.

This guide is a reference document for gluten-free compliant natural accreditation process. It is prepared based on the requirements of the international standard ISO/IEC 17011 - General requirements for accreditation bodies accrediting conformity assessment bodies. It includes criteria for the application of ISO/IEC 17011 requirements for i-NAF member natural accreditation bodies.

The effective date for implementation of this document is the date of endorsed by i-NAF Board of Directors.

The guide is published on the i-NAF website (www.i-naf.org).



GUIDANCE ON CRITERIA FOR GLUTEN-FREE ACCREDITATION BODIES

II. INTRODUCTION

i-NAF role is to provide and maintain confidence in natural certificates (Natural, Vegan, Vegetarian, Halal Vegan, Gluten-Free, Eco Global Label etc. and marks issued by Natural Conformity Assessment Bodies through mutual acceptance between member natural accreditation bodies in the field of natural products and services.

The purpose of this guide is to address the implementation of the requirements of ISO/IEC 17011:2017 as they relate to the requirements of gluten-free by natural accreditation bodies (NABs/GFABs) working in this field.



GUIDANCE ON CRITERIA FOR GLUTEN-FREE ACCREDITATION BODIES

1. SCOPE

i-NAF Members, NSO-NAP 12 Gluten-Free Accreditation Bodies (GFABs) or Natural Accreditation Bodies (NABs) offering natural accreditation services complying with gluten-free accreditation requirements shall perform their activities in accordance with the requirements of ISO/IEC 17011: 2017 and this document.

GUIDANCE ON CRITERIA FOR GLUTEN-FREE ACCREDITATION BODIES

2. NORMATIVE REFERENCES

- 2.1** ISO/IEC 17011:2017 Conformity Assessment — Requirements For Accreditation Bodies Accrediting Conformity Assessment Bodies,
- 2.2** ISO/IEC 17065:2012 Conformity Assessment — Requirements for Bodies Certifying Products, Processes and Services,
- 2.3** ISO/IEC 17021-1:2015 Conformity Assessment — Requirements For Bodies Providing Audit And Certification Of Management Systems — Part 1: Requirements
- 2.4** NSO-NAP 12 : 2019 Gluten Free Product/Service Standard for Life Chain.

GUIDANCE ON CRITERIA FOR GLUTEN-FREE ACCREDITATION BODIES

3. TERMS AND DEFINITIONS

3.1 Terms and definitions contained in clause 3 of ISO/IEC 17011:2017 are applied for gluten-free compliant natural accreditation process Additional requirements to: i-NAF Rules Document; i-NAF NMG 10: 2020 Guidance on Gluten-Free Certification Criteria for Evaluating Gluten-Free Schemes”.

3.2 Gluten:

It is a complex group of proteins containing products as (cereal) wheat, barley, oats, rye, etc. (e.g. gluten, gliadin, secallin, hordein) (NSO-NAP 12)

3.3 Gluten-Free:

Food (including water and beverages) or cosmetic product that does not contain gluten in the structure or contains less than 20 ppm. (20/1.000.000, % 0,00002) of gluten. (NSO-NAP 12)

3.4 Gluten-Free Accreditation Body GFABs/NABs (Gluten-Free compliant Natural Conformity Assessment Body):

Natural Conformity assessment body performs activities that are fully complying with the NSO-NAP 12 Gluten-Free requirements. The term “Gluten-Free” covers products/services.

3.5 Whenever “accreditation” is mentioned in this guide, it means “Gluten-Free Compliant Natural Accreditation Process”.

GUIDANCE ON CRITERIA FOR GLUTEN-FREE ACCREDITATION BODIES

4. GENERAL REQUIREMENTS

4.1 Legal Responsibility

For this clause;

The requirements of clause 4.1 of ISO / IEC 17011 standard shall be applied,

Additional requirements;

Gluten-Free Accreditation Body (GFABs) shall have a mechanism and structure to perform its NSO-NAP 12 Gluten Free Standard compliant natural accreditation services. The structure could be a unit, a team, a committee or any other suitable structure decided by the natural accreditation body.

4.2 Natural Accreditation Agreement

For this clause;

The requirements of clause 4.2 of ISO / IEC 17011 standard shall be applied.

4.3 Use of Accreditation Symbols and Other Claims of Accreditation

For this clause;

The requirements of clause 4.3 of ISO / IEC 17011 standard shall be applied,

Additional requirements;

Gluten-Free Accreditation Bodies (GFABs) complying with NSO-NAP 12 Gluten Free Standard requirements who are signatories of i-NAF MLA shall comply with the requirements set in document i-NAF NPG 2:2018 “GENERAL PRINCIPLES ON THE USE OF THE i-NAF MLA MARK”.

4.4 Impartiality Requirements

For this clause;

The requirements of clause 4.4 of ISO / IEC 17011 standard shall be applied.

4.5 Financing and Liability

For this clause;

The requirements of clause 4.5 of ISO / IEC 17011 standard shall be applied.

4.6 Establishing Accreditation Schemes

The Gluten-Free Accreditation Body shall establish NSO-NAP 12 Gluten Free Standard compliant accreditation schemes that define rules and processes of accrediting natural conformity assessment bodies as per the requirements of clause 4.6 of ISO/IEC 17011: 2017 standard and this guide.

5. STRUCTURAL REQUIREMENTS

For this clause;

The requirements of clause 5 of ISO / IEC 17011 standard shall be applied,

Additional requirements;

The Gluten-Free Accreditation Body (GFABs) shall:

- i. Have the authority and be responsible for its NSO-NAP 12 Gluten Free Standard compliant accreditation decisions, which shall not be subject to approval by any other organization or person.

GUIDANCE ON CRITERIA FOR GLUTEN-FREE ACCREDITATION BODIES

- ii. Document the duties, responsibilities and authorities of top management and other personnel associated with the NSO-NAP 12 Gluten Free Standard compliant accreditation body who is involved in the accreditation process.
- iii. Develop policies related to NSO-NAP 12 Gluten Free Standard natural conformity assessment practices.
- iv. Identify requirement for decision making for NSO-NAP 12 Gluten Free Standard compliant natural accreditation process.
- v. When authorities are delegated to other committees or individuals, the Gluten-Free Accreditation Body (GFABs) shall ensure competency of such parties in gluten-free criteria and practices.
- vi. Have access to needed expertise in the field of gluten-free.
- vii. For committees formed to be involved in NSO-NAP 12 gluten-free compliant natural accreditation, the Gluten-Free Accreditation Body shall ensure the competency of committee members including expertise in gluten-free.
- viii. Comply to gluten-free regulation within their economy (if applicable).

6. RESOURCE REQUIREMENTS

6.1 Competence of Personnel

6.1.1 General

For this clause;

Requirements of clause 6.1.1 of ISO/IEC 17011:2017 shall be applied.

6.1.2 Determination of Competence Criteria

For this clause;

Requirements of clause 6.1.2 of ISO/IEC 17011:2017 shall be applied.

Additional requirements;

The Gluten-Free Accreditation Body (GFABs) shall:

- i. Have a documented process for determining and documenting the competence criteria for personnel involved in the management and performance of NSO-NAP 12 Gluten-free compliant assessments and other Gluten-free compliant accreditation activities. Competence criteria shall be determined with regard to the requirements of NSO-NAP 12 Gluten-free accreditation schemes and shall include the required knowledge and skills for performing compliant gluten-free accreditation activities.
- ii. Ensure that its personnel who work in the field of Gluten-free are having the needed knowledge in NSO-NAP 12 Gluten-free compliant conformity assessment practices.
- iii. Ensure the assessment team, and the Gluten-Free Accreditation Body (GFABs) personnel who review documents, review assessment reports, and make gluten-free accreditation decisions includes personnel who demonstrate knowledge of NSO-NAP 12 Gluten-free compliant, and qualified as per NSO-NAP 12 Gluten-free requirements set within the gluten-free conformity assessment schemes shall be reviewed by the accreditation body (Requirements of related clause of ISO/IEC 17065:2012 and ISO/IC 17021-1:2015 shall be applied).

GUIDANCE ON CRITERIA FOR GLUTEN-FREE ACCREDITATION BODIES

- iv.** Ensure the assessment team, and the accreditation body personnel who review assessment reports, make accreditation decisions and manage accreditation schemes, demonstrate knowledge of risk-based assessment principles related to gluten-free compliant accreditation activities/practices.
- v.** Ensure the assessment team has personnel who demonstrate(s) knowledge of gluten-free compliant practices and processes of the gluten-free conformity assessment body's business environment.
- vi.** Ensure that the group or individual that takes the gluten-free accreditation decisions totally understand the applicable gluten-free compliant accreditation scheme requirements and shall have competence to evaluate the outcomes of the NSO-NAP 12 gluten-free compliant assessment, including where appropriate related recommendations of the assessment team related to gluten-free compliant.

NOTE: ANNEX A in ISO/IEC 17011:2017 Standard is applied in Gluten-free compliant accreditation process. Please refer to APPENDIX 1 of this guide for additional competency requirements for experts working in the field of NSO-NAP 12 Gluten-free.

6.1.3 Competence Management

For this clause;

Requirements of clause 6.1.3 of ISO/IEC 17011:2017 shall be applied.

Additional requirements;

The Gluten-Free Accreditation Body (GFABs) shall have access to expert personnel who can evaluate assessors conducting assessments in the field of gluten-free. Each assessor working in NSO-NAP 12 Gluten-free compliant assessment shall be observed during an assessment at regular intervals.

This shall be at least every three (3) years, unless there is sufficient supporting evidence that the assessor is continuing to perform competently.

6.2 Personnel Involved in the Accreditation Process

For this clause;

Requirements of clause 6.2 of ISO/IEC 17011:2017 shall be applied.

Additional requirements; The Gluten-Free Accreditation Body (GFABs) shall:

- i.** Describe the qualifications, experience, knowledge, competence and training required for personnel who are working in NSO-NAP 12 Gluten-free compliant conformity assessment practices.
- ii.** Have access to experts in gluten-free who can carry out gluten-free compliant assessments, review NSO-NAP 12 Gluten-free compliant schemes and documents, and can be involved in decision making process of NSO-NAP 12 Gluten-free compliant accreditation.
- iii.** Ensure that assessors and, where relevant, experts who will work in the field of NSO-NAP 12 Gluten-free compliant accreditation:
 - Familiar with gluten-free, competent and well trained on different aspects of the NSO-NAP 12 Gluten Free Standard and gluten-free requirements in the specific area of specialization.

GUIDANCE ON CRITERIA FOR GLUTEN-FREE ACCREDITATION BODIES

- Familiar with NSO-NAP 12 Gluten-free compliant accreditation procedures, i-NAF requirements for NSO-NAP 12 Gluten-free conformity assessment schemes, NSO-NAP 12 Gluten-free compliant accreditation criteria, and other relevant requirements,
- Have undergone a relevant assessor training related to NSO-NAP 12 Gluten-free compliant.

iv. Have access to at least one assessor(auditor/inspector)/expert and one gluten-free expert for each NSO-NAP 12 Gluten-free discipline that is within its scope of work.

6.3 Personnel Records

For this clause;

Requirements of clause 6.3 of ISO/IEC 17011:2017 shall be applied.

Additional requirements;

The Gluten-Free Accreditation Body (GFABs) shall maintain records of relevant qualifications, training, experience and competence of each person involved in the accreditation process related to gluten-free compliant.

6.4 Outsourcing

For this clause;

Requirements of clause 6.4 of ISO/IEC 17011:2017 shall be applied.

Additional requirements;

If the member accreditation body outsources any of its i-NAF recognized accreditation activities, then it shall have a policy describing the conditions under which outsourcing may take place, and any outsource of service or part of service shall be done with an i-NAF MLA signatory natural accreditation body.

7. PROCESS REQUIREMENTS

7.1 Accreditation Requirements

For this clause;

Requirements of clause 7.1 of ISO/IEC 17011:2017 shall be applied.

Additional requirements;

Gluten-free compliant conformity assessment scheme shall comply with accreditation rules and procedures related to NSO-NAP 12 Gluten-free field and to i-NAF-NMG 9 :2020 Guidance on Criteria for Gluten-Free Certification Bodies

7.2 Application for Accreditation

For this clause;

Requirements of clause 7.2 of ISO/IEC 17011:2017 shall be applied.

7.3 Resource Review

For this clause;

Requirements of clause 7.3 of ISO/IEC 17011:2017 shall be applied.

GUIDANCE ON CRITERIA FOR GLUTEN-FREE ACCREDITATION BODIES

7.4 Preparation for Assessment

For this clause;

Requirements of clause 7.4 of ISO/IEC 17011:2017 shall be applied.

Additional requirements;

The Gluten-Free Accreditation Body (GFABs) shall appoint an assessment team consisting of a team leader and a suitable number of assessor(s)[auditor(s)/inspector(s)]/expert(s) who is/are qualified in gluten-free and competent enough in gluten-free products and services requirements as per the accredited scope of the NSO-NAP 12 Gluten Free Standard.

NOTE: When selecting the assessment team, The Gluten-Free Accreditation Body (GFABs) shall ensure that the expertise brought to each assignment is appropriate.

In particular, the team as a whole:

shall have appropriate expertise in the specific scope of NSO-NAP 12 Gluten Free Standard compliant accreditation.

7.5 Review of Documented Information

For this clause;

Requirements of clause 7.5 of ISO/IEC 17011:2017 shall be applied.

7.6 Assessment

For this clause;

Requirements of clause 7.6 of ISO/IEC 17011:2017 shall be applied.

Additional requirement;

Due care shall be provided to the competences of the staff under assessment. This shall be adequately recorded in the assessment report.

7.7 Accreditation Decision-Making

For this clause;

Requirements of clause 7.7 of ISO/IEC 17011:2017 shall be applied.

Additional requirements;

- i. The Gluten-Free Accreditation Body (GFABs) shall ensure that personnel involved in NSO-NAP 12 Gluten-free compliant accreditation decision making are competent in gluten-free and well trained on gluten-free requirements including expertise.
- ii. The Gluten-Free Accreditation Body (GFABs) shall define the criteria of competency for personnel involved in NSO-NAP 12 Gluten-free compliant accreditation decision making.
- iii. It is recommended that NSO-NAP 12 Gluten-free Accreditation Assessment Results should be accepted between the i-NAF signatory members. And this is subjected to further arrangements between members.

7.8 Accreditation Information

For this clause;

Requirements of clause 7.8 of ISO/IEC 17011:2017 shall be applied.

GUIDANCE ON CRITERIA FOR GLUTEN-FREE ACCREDITATION BODIES

7.9 Accreditation Cycle

For this clause;

Requirements of clause 7.9 of ISO/IEC 17011:2017 shall be applied.

7.10 Extending Accreditation

For this clause;

Requirements of clause 7.10 of ISO/IEC 17011:2017 shall be applied.

7.11 Suspending, Withdrawing or Reducing Accreditation

For this clause;

Requirements of clause 7.11 of ISO/IEC 17011:2017 shall be applied.

7.12 Complaints

For this clause;

Requirements of clause 7.12 of ISO/IEC 17011:2017 shall be applied.

In addition:

The decision to be communicated to the complainant shall be made by, or reviewed and approved by, individual(s) not involved in the activities in question and knowledgeable in NSO-NAP 12 Gluten-free compliant accreditation process and gluten-free requirements as per gluten-free definition.

7.13 Appeals

For this clause;

Requirements of clause 7.13 of ISO/IEC 17011:2017 shall be applied.

Additional requirements;

The decision to be communicated to the appellant shall be made by, or reviewed and approved by, individual(s) not involved in the activities in question and knowledgeable in NSO-NAP 12 Gluten-free compliant accreditation process and gluten-free requirements as per gluten-free definition.

7.14 Records on GFABs/CABs

For this clause;

Requirements of clause 7.14 of ISO/IEC 17011:2017 shall be applied.

8 INFORMATION REQUIREMENTS

8.1 Confidential Information

For this clause;

Requirements of clause 8.1 of ISO/IEC 17011:2017 shall be applied.

8.2 Publicly Available Information

For this clause;

Requirements of clause 8.2 of ISO/IEC 17011:2017 shall be applied.

GUIDANCE ON CRITERIA FOR GLUTEN-FREE ACCREDITATION BODIES

9 MANAGEMENT SYSTEM REQUIREMENTS

9.1 General

For this clause;

Requirements of clause 9.1 of ISO/IEC 17011:2017 shall be applied.

9.2 Management System

For this clause;

Requirements of clause 9.2 of ISO/IEC 17011:2017 shall be applied.

Additional requirements;

The Gluten-Free Accreditation Body (GFABs) shall ensure having all needed procedures and policies that enables it to fulfill requirements related to NSO-NAP 12 gluten-free accreditation in conformity assessment practices.

9.3 Document Control

For this clause;

The requirements of clause 9.3 of ISO / IEC 17011 standard shall be applied.

9.4 Records Control

For this clause;

Requirements of clause 9.4 of ISO/IEC 17011 shall be applied.

9.5 Nonconformities and Corrective Actions

For this clause;

Requirements of clause 9.5 of ISO/IEC 17011:2017 shall be applied.

9.6 Improvement

For this clause;

Requirements of clause 9.6 of ISO/IEC 17011:2017 shall be applied.

9.7 Internal Audits

For this clause;

Requirements of clause 9.7 of ISO/IEC 17011:2017 shall be applied.

9.8 Management Reviews

For this clause;

Requirements of clause 9.8 of ISO/IEC 17011:2017 shall be applied.

Additional requirements;

Inputs to management reviews shall include:

- i.** Considering results of peer evaluations done under i-NAF.
- ii.** Feedback from interested parties in field of gluten-free.

GUIDANCE ON CRITERIA FOR GLUTEN-FREE ACCREDITATION BODIES

APPENDIX 1
TABLE OF KNOWLEDGE AND SKILLS

KNOWLEDGE AND SKILLS	GLUTEN-FREE ACCREDITATION ACTIVITIES				
	Application Review Including Selection of Team Members	Document Review	Assessment	Reviewing Assessment Reports and Making accreditation decisions	Management of Accreditation Schemes
Adequate Knowledge of Gluten-Free Requirements		√	√	√	