

<b>GLUTEN-FREE OR FREE FROM GLUTEN CLAIM REQUIREMENTS FOR OWN BRANDS PRODUCTS</b>	APPROVAL VP of Food Safety & Quality Assurance <b>Jerry Noland</b>	PROCEDURE NO. <b>8020_1695</b>
	APPROVAL Director, QA, Retail & Own Brands <b>Marlowe Dias</b>	DATE ISSUED <b>Nov 10, 2022</b>
AUTHORIZED FOR USE AT/BY  <b>OWN BRANDS QUALITY ASSURANCE, OWN BRANDS PRODUCT DEVELOPMENT, OWN BRANDS REGULATORY, OWN BRANDS PRODUCT MANAGEMENT, AND OWN BRANDS SUPPLIERS</b>	ISSUED BY Director, QA, Retail & Own Brands <b>Marlowe Dias</b>	SUPERSEDES  <b>January 10, 2019</b>

**I. PURPOSE**

Requirements for Own Brands products labeled as “Gluten-Free” or “Free from Gluten”.  
 Requirements for Own Brands branded products bearing a 3<sup>rd</sup> party Gluten-Free seal.

**II. RESPONSIBILITY**

- OB Product Development
- OB Quality Assurance
- OB Regulatory
- OB Product Managers/Directors
- OB Suppliers

**III. DEFINITIONS**

**Gluten-Free or Free from Gluten Claim:** All products which are identified on the product label as “Gluten-Free” or “Free from Gluten”. Does not include products that are unprocessed agricultural commodity such as fresh corn on the cobs.

**Gluten-Free Seal:** 3<sup>rd</sup> party Gluten-Free auditing body seal. Use of this seal on labels requires prior approval from certification auditing body.

**IV. PROCEDURE/REQUIREMENTS**

- 1. Products bearing a Gluten-Free Seal:**
  - 1.1 All Own Brands suppliers who manufacture products labeled with the Gluten-Free seal must be third-party certified for gluten-free manufacturing, prior to production.
  - 1.2 Only an onsite gluten-free certification audit by a recognized authority is acceptable. Certification audits are available through gluten-free agencies such as GFCO, NSF, QAI and other firms.
  - 1.3 The onsite certification process must assure that preventive systems and processes are in place to avoid any potential cross-contamination by non-gluten-free products.
  - 1.4 Supplier must maintain their certification if production of products bearing the Gluten-Free seal continues.
  - 1.5 If 3rd party gluten-free auditing body requires a signed private label agreement with Albertsons, supplier must coordinate with the Own Brands Director of Quality Assurance.
  - 1.6 In addition to gluten-free certification requirement, supplier must comply with section B of this document.
- 2. Products bearing the claim “Gluten-Free” or “Free from Gluten”:**  
 All Own Brands suppliers who manufacture “Gluten-Free” or “Free from Gluten” labeled products must conduct product testing prior to launch and annually thereafter to ensure compliance with FDA regulation.

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- 2.1 Per FDA requirement, any unavoidable gluten present in a food labeled gluten-free must be less than 20 ppm.
- 2.2 Testing must be conducted by an accredited 3<sup>rd</sup> party laboratory.
- 2.3 3<sup>rd</sup> party laboratory may select the most appropriate test method for the food type. However, methods must be scientifically valid in order for the gluten test results obtained to be reliable and consistent.
- 2.4 The following analytical testing references may be considered when selecting a proper testing methodology.
- FARRP (<https://farrp.unl.edu>)
  - ELISA testing methods recognized by the FDA to test for gluten (gliadin)
    - o [R-Biopharm: Food & Feed Analysis](#)
    - o Morinaga Institute of Biological Science, Inc.: [Wheat Protein ELISA Kit \(Gliadin\)](#)
- 2.5 Effective hold and test procedures shall be used to prevent a recall if test results indicate gluten over the FDA maximum allowable limit. The production lot shall remain on hold until test results confirm compliance with FDA maximum allowable limit.
- 2.6 Product samples shall be taken from the beginning, middle, and end of a run. Alternate statistically-based sampling plans may be employed at the manufacturer's discretion.
- 2.7 In the event that the product test results are out of compliance, it will be deemed unacceptable for distribution to Albertsons Companies.
- 2.8 All finished product test results prior to first production shall be e-mailed to OB Product Development for review and approval.
- 2.9 All (including annual) finished product gluten free test results shall be kept on file and available within 24 hours of request. You may be required to upload your data into Specright.

**3. Label Compliance:**

- 3.1 OB Product Manager initiates claim via the Product Creative Brief.
- 3.2 Supplier completes relevant product information on the Supplier Label Information Copy (SLIC) template within Specright. Supplier to provide testing data and/or third-party certification to validate claim. Substantiation uploaded by supplier into Specright during completion of SLIC template.
- 3.3 OB Regulatory to review the SLIC and verify testing data and/or third-party certification as compliant in collaboration with OB Product Development.
- 3.4 If compliant, OB Regulatory will generate label copy to initiate label artwork.
- 3.5 OB Regulatory will review final artwork to confirm claim aligns as provided in Supplier SLIC.
- 3.6 Gluten-Free FDA regulation compliance of <20 ppm is confirmed by OB Product Development prior to first production.

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#### 4. Supplier Requirements

- 4.1 Suppliers, who are 3<sup>rd</sup> party Gluten-Free certified, with Gluten-Free logo on current labeling, and will not pursue Re-certification, must contact Albertsons Own Brands Brand Manager/Director to have the logo removed from packaging. All obsolete packaging inventory shall be destroyed by supplier along with a completed affidavit of destruction.
- 4.2 Suppliers are responsible for notifying Albertsons Brand Manager if there are any changes to raw materials, finished product formulation processing parameter, or facility that would cause claim to be false or misleading.
- 4.3 Supplier may be subject to higher product testing frequency if deemed necessary by Albertsons and shall submit results to OB FSQA for review.
- 4.4 USDA facilities must comply with FDA gluten-free regulations.

### 5. REFERENCES

1. [https://www.miobs-e.com/product/food\\_allergen\\_elisa2/wheat-gluten/index.html](https://www.miobs-e.com/product/food_allergen_elisa2/wheat-gluten/index.html)
2. <http://www.r-biopharm.com/products/food-feed-analysis>
3. <http://www.fda.gov/Food/GuidanceRegulation/GuidanceDocumentsRegulatoryInformation/Allergens/ucm362510.htm>
4. <http://www.fda.gov/Food/GuidanceRegulation/GuidanceDocumentsRegulatoryInformation/Allergens/ucm362880.htm>

#### CHANGE LOG:

DATE	SECTION	CHANGE	REASON	CHANGED BY
6/10/14	All	Updated the policy in its entirety	FDA Gluten-Free regulation	Leyla Peymandoust
9/12/14	IV	Removed restrictions of GF seal to Eating Right brand only and expanded to all brands	Marketing request	Marlowe Dias
02/03/15	All	Updated logo, personnel titles, Consumer Brands to Own Brands, and Safeway to Albertsons/Safeway	Albertsons/Safeway merger	B. Fournier, L. Ngo.
10/22/18	All	Revised Safeway statements to Albertsons	Albertsons Update	D. Chen
1/10/2019	All	Updated department reference to Own Brands and added on requirement for affidavit of destruction of obsolete packaging.	Own Brands Update	D. Chen
11/8/22	All	Added claim "Free from Gluten", added OB Regulatory label compliance	Marketing request	M. Dias