BRGS | Gluten-Free

The Growing Global Importance of Reliable Gluten-Free Products

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BRCGS **Gluten-Free**The Growing Global Importance of
Reliable Gluten-Free Products

Introduction

Gluten is ubiquitous in the modern food industry. A multidimensional protein-starch network, occurring naturally in wheat, rye and barley, it gives breads, cakes, cereals, pastas, and many other grain-based foods their shape, strength and texture¹.

For coeliac suffers however, consuming even microscopic quantities of gluten can cause damage to the lining of the small intestine. This in turn may prevent absorption of vital nutrients causing deficiencies that can lead to serious conditions, including anemia, osteoporosis, diabetes, thyroid disease, and intestinal cancers.

The prevalence of coeliac disease – already one of the most common gastroenterological conditions in the world² - is on the rise. Better diagnosis techniques have resulted in a global increase in the number of people avoiding gluten for medical reasons.

The gluten-free products market is predicted to be worth \$8.3 billion by 2025, growing at a compound annual growth rate of 8.1% between 2020 and 2025³. Consumers are becoming increasingly aware of and wary about the role of gluten in their diet and one in three are now thought to be avoiding or reducing gluten intake⁴. In 2020, gluten-free cereals were added to the basket of goods used to calculate inflation in the UK, reflecting the increasing amount of consumer spending and shelf space allocated to these ranges⁵.

A number of challenges must be overcome to produce safe, reliable gluten-free foods that inspire consumer confidence. These exist throughout the supply chain, from preventing cross contamination in the production process through to branding products with a gluten-free trademark that retailers and most importantly, consumers, truly trust.

The consequences of mis-labelling a product as gluten-free are serious. This is the case for both the consumer, who may suffer serious short- and longer-term health impacts, and brands, which may incur reputational damage and significant costs through product recalls and criminal and civil action.

This paper examines the growing popularity of gluten-free products and the increasingly important role they play in many of our lives. It considers the challenges that brands and suppliers must overcome to offer consumers reliable, trusted gluten-free products, as well as setting out the consequences for all parties when they fail to do so. Finally, it considers the BRCGS Gluten-Free Certification Program (GFCP) and how this can support brands with a scientifically proven, risk-based management systems approach.

 $^{^1}https://www.fda.gov/food/nutrition-education-resources-materials/gluten-and-food-labeling$

² https://www.drschaer.com/uk/institute/a/prevalence-coeliac-disease

³ https://www.prnewswire.com/news-releases/gluten-free-products-market-worth-8-3-billion-by-2025---exclusive-report-by-marketsandmarkets-301133105.html

https://www.celiac.com/articles.html/millennials-driving-gluten-free-demand-around-the-globe-r3795/

https://www.ons.gov.uk/economy/inflationandpriceindices/articles/ukconsumerpriceinflationbasketofgoodsandservices/2020

Coeliac Disease: The Need for Dependable Gluten-Free Products

One of the most frequent and critical reasons for individuals to follow a gluten-free diet is coeliac disease. It is a common genetic disorders for adults and children alike, affecting approximately 1% of people worldwide⁶. Prevalence is rising across geographies and age groups, making gluten-free products a modern dietary health phenomenon.

Coeliac disease in the developed world

A recent review of literature co-authored by Benjamin Lebwohl, MD, MS, found that the incidence of coeliac disease has been rising since the second half of the 20th century in nearly every industrialised Western country where data are available⁷.

The review considered 50 studies and found a consistent pattern of increasing incidence over time across geography, sex and age. It concluded that the rate of new diagnosis of coeliac disease has increased 7.5% every year for the past several decades, with the incidence rising significantly in the second half of the 20th century and into the 21st throughout the Western world⁸. Women were found to have an incidence rate more than double that of men while the rate for children was more than one and a half times that of adults⁹. In the UK, the number of young children diagnosed with coeliac disease has almost tripled over the past 20 years, and the diagnosis rate between 2008 and 2012 was 75% higher than it was between 1993–1997¹⁰.

There are several possible explanations for this sharp rise in incidence. The introduction of blood testing has made diagnosis easier and more cost-effective. Equally, increased awareness in the medical profession has seen patients with non-classical symptoms investigated more frequently¹¹. However, there is also evidence to suggest that the total number of people living with undiagnosed coeliac disease is also on the rise. Research from the Mayo Clinic, published in the Journal of Gastroenterology, suggests that the disease is four times more common in the US today than it was in the 1950s, and not just because doctors are more likely to test for it¹².

In a similar vein, it is understood that the prevalence of the disease in the UK is approximately 1%, yet only 24% of these cases are actually diagnosed¹³.

Coeliac disease in the developing world

In the past, coeliac was believed to affect only people of European origin, but the availability of new simple, sensitive tests has shown that the disease is increasingly prevalent across Southern Asia, the Middle East, North West Africa, East Africa and South America¹⁴.

While improvements in testing are certainly a factor, consumption of wheat is also on the rise across these regions. This is due to the increased popularity of 'western' diets, and humanitarian interventions which include the distribution of products containing wheat flour¹⁵. People with coeliac disease in the developing world experience difficulties in accessing commercially available gluten-free products, creating a challenging public health problem¹⁶.

 $^{^6\} https://www.ncbi.nlm.nih.gov/pmc/articles/PMC3264942/\#:\sim:text=Celiac\%20disease\%20is\%200f, approximately\%201\%25\%20of\%20individuals\%20worldwide. \& text=In\%20predisposed\%20individuals\%2C\%20gluten\%20ingestion, and \%20affect\%20multiple\%20organ\%20systems$

https://celiac.org/about-the-foundation/featured-news/2020/02/incidence-of-celiac-disease-steadily-increasing/#:~:text=Celiac%20disease%20incidence%20among%20children,over%20the%20past%20several%20decades.

https://celiac.org/main/wp-content/uploads/2020/02/Incidence_of_Celiac_Disease_Is_Increasing_Over.99422.pdf

⁹ https://www.beyondceliac.org/research-news/diagnosis-increasing/

¹⁰ https://www.drschaer.com/uk/institute/a/prevalence-coeliac-disease

 $¹¹ https://www.beyondceliac.org/research-news/diagnosis-increasing/\#: \sim text = The \%20 rate \%20 of \%20 new \%20 diagnosis, Canada \%2C \%20 China \%20 and \%20 Sweden \%20 found for the first of the first$

¹² https://www.gastrojournal.org/article/S0016-5085(09)00523-X/abstract

¹³ https://www.drschaer.com/uk/institute/a/prevalence-coeliac-disease

¹⁴ https://www.ncbi.nlm.nih.gov/pmc/articles/PMC4146836/

¹⁵ https://www.drschaer.com/uk/institute/a/prevalence-coeliac-disease

¹⁶ https://www.ncbi.nlm.nih.gov/pmc/articles/PMC4146836/

The growing global importance of reliable gluten-free products

All available data suggest that the prevalence of coeliac is increasing worldwide and that the disease is currently much more common than previously thought¹⁷. As the globalisation of food continues, it is likely that the prevalence of coeliac disease will rise too¹⁸.

Elective Gluten-Free Diets: Alternative Reasons Consumers Increasingly Avoid Gluten

The number of Americans following a gluten-free diet tripled between 2009 and 2014. Today almost 20% of US consumers actively reduce or eliminate gluten in their diets¹⁹ and yet the proportion of the population with diagnosed coeliac disease is just 1%.²⁰ It is reasonable to ask why there is such a disparity. Several factors are likely at play.

Many people who suffer from coeliac disease remain undiagnosed. These individuals have self-diagnosed based on symptoms experienced after eating gluten-rich products such as bread. Their symptoms are typically mild and do not result in hospitalisation or professional care.

Similarly, others suffer from non-coeliac gluten sensitivity and choose to follow a gluten-free diet without a diagnosis.²¹ It is estimated that 18 million Americans suffer from gluten sensitivity – six times the number of people who have tested positive for coeliac disease.²² Gluten sensitivity and gluten intolerance are terms that have evolved to describe people who cannot tolerate gluten and experience symptoms similar to those with coeliac disease yet do not suffer the intestinal damage associated with the condition. According to a collaborative report published by Sapone et al., individuals with non-coeliac gluten sensitivity have a prevalence of extraintestinal or non-GI symptoms, such as headaches, 'foggy mind', joint pain, and numbness in the legs, arms or fingers.²³

Symptoms typically appear hours or days after gluten has been ingested, a response typical for innate immune conditions. The cause of non-coeliac gluten sensitivity is not yet fully understood. One possible explanation is that the issue is not gluten at all, but short chain carbohydrates present in wheat, barley and rye called FODMAPs (Fermentable Oligosaccharides, Disaccharides, Monosaccharides And Polyol) 25.

There are other theories. Gliadin, a class of proteins present in gluten, stimulates the release of Zonulin, a protein used to regulate the permeability of our intestines. Too much Zonulin could lead to a condition informally known as 'leaky gut syndrome'. Whether or not leaky gut syndrome is a real medical issue is still debated – however, people who have self-diagnosed themselves with it typically follow a gluten-free diet.²⁶

Many gluten-free adherents believe the diet to be beneficial whether or not they suffer from any kind of gluten sensitivity. In the US for example, around 26-30% of adults claim to be reducing their gluten intake or avoiding gluten completely, despite not being diagnosed with any form of gluten sensitivity. This dietary shift has been attributed to studies that claim avoiding gluten can have significant benefits such as weight loss and reduced risk of cardiovascular disease.²⁷

¹⁷ https://www.drschaer.com/sites/default/files/2018-12/the_new_epidemiology_of_celiac_disease_catassi.pdf

¹⁸ https://www.ncbi.nlm.nih.gov/pmc/articles/PMC4146836/

¹⁹ https://www.webmd.com/digestive-disorders/celiac-disease/news/20160916/whats-behind-gluten-free-trend#:~:text=These%20days%2C%20a%20gluten%2Dfree,for%20 people%20with%20celiac%20disease.

²⁰ https://www.cureceliacdisease.org/wp-content/uploads/341_CDCFactSheets8_FactsFigures.pdf

²¹ https://www.verywellhealth.com/non-celiac-gluten-sensitivity-research-562960#:~:text=In%20a%20landmark%20study%20on,sensitivity%20will%20never%20develop%20celiac.

 $^{^{22}~\}text{https://www.beyondceliac.org/celiac-disease/non-celiac-gluten-sensitivity/}$

²³ https://www.ncbi.nlm.nih.gov/pmc/articles/PMC3292448/

²⁴ https://www.beyondceliac.org/celiac-disease/non-celiac-gluten-sensitivity/what-is-it/

²⁵ https://pubmed.ncbi.nlm.nih.gov/23648697/

²⁶ https://www.nhs.uk/conditions/leaky-gut-syndrome/

²⁷ https://www.medicalnewstoday.com/articles/312723

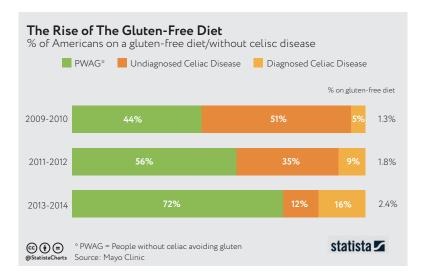


Fig 1: The Rise of The Gluten-Free Diet 28

A 2015 survey of more than 910 elite athletes without coeliac disease found that 41% of respondents followed a gluten-free diet at least half of the time.²⁹ Whether or not gluten-free diets are right for everyone is not settled science but health-conscious consumers are often willing to try unorthodox diets, hence the huge disparity between adherents to the gluten-free diet and people who have diagnosed gluten sensitivity.

The power of recommendation should not be underestimated when considering the ongoing surge in demand for gluten-free products either. Some of the most influential celebrities in the world follow a gluten-free diet and when health-conscious fans see the diet seemingly working for them, it can be a strong endorsement.

The Challenges of Gluten-Free for Brands, Retailers and Consumers

With gluten-free lifestyles becoming increasingly popular, the number of suppliers offering gluten-free products is on the rise. However, there are numerous obstacles producers must overcome to secure the trust of the gluten-free community, especially those who depend on these products for their health. It requires transparency, accountability, and authenticity through the supply chain.

Discrepancies in gluten-free regulations and labelling

For coeliac suffers and those who follow a gluten-free diet, the variations in gluten-free labelling can cause confusion.

At a national level, several different labels can exist denoting different levels of gluten content. For example, under UK law, the gluten-free claim can only be made on foods that contain 20 parts per million (ppm) or less of gluten.³⁰ Research shows that this tiny amount of gluten can be tolerated by people with coeliac disease. Alternatively, many products will read 'may contain traces of wheat'. This is intended to let the consumer know that there is the possibility of gluten cross-contamination in the product due to the manufacturer not using a dedicated gluten-free facility.³¹

Beyond Celiac explains: 'These claims are confusing, and it is hard for consumers to know what the risk of gluten contamination can be. In the particular case of "may contain traces of wheat," it is a good idea to err on the side of caution and not purchase products with this claim'. ³²

At an international level, the situation can be more confusing still. Gluten-free regulations vary significantly around the world and policies differ.

²⁸ https://www.statista.com/chart/7639/the-rise-of-the-gluten-free-diet/

²⁹ https://pubmed.ncbi.nlm.nih.gov/24901744/

 $^{^{30} \} https://www.coeliac.org.uk/information-and-support/living-gluten-free/the-gluten-free-diet/food-shopping/law-on-gluten-free/the-gluten-free-diet/food-shopping/law-on-gluten-free/the-gluten-free-diet/food-shopping/law-on-gluten-free/the-gluten-free-diet/food-shopping/law-on-gluten-free/the-gluten-free-diet/food-shopping/law-on-gluten-free/the-gluten-free-diet/food-shopping/law-on-gluten-free-diet/foo$

³¹ https://www.beyondceliac.org/q-and-a/may-contain-warnings-on-gluten-free-products/

³² https://www.beyondceliac.org/q-and-a/may-contain-warnings-on-gluten-free-products/

To give examples, Australia and New Zealand have some of the toughest food labelling laws in the world, set by the Australia New Zealand Food Standard's Code. This applies to all food sold or prepared for sale and specifies that foods labelled as 'gluten-free' must not contain any detectable gluten. Foods labelled as 'low gluten' must contain less than 200ppm.33

Canada has similar legislation in place to the UK, with foods required to contain under 20ppm to be considered gluten-free by Health Canada.³⁴ In the EU meanwhile, if food contains less than 100mg/kg, it may be labelled 'very low gluten', while if it contains less than 20mg/kg it may be labelled 'gluten-free'.35

At the other end of the spectrum, a food survey conducted in India in 2020 found that 10% of grain-based foods labelled as gluten-free, and nearly 40% of products labelled as naturally gluten-free, were contaminated with gluten above the legally permitted limit of 20ppm. Some items tested at 90 times this. 36

In addition to the complications which arise as a result of varying standards, language barriers can present a problem for multinational food producers. In 2020, Tesco, Sainsbury's, Asda, Waitrose and Lidl in the UK were forced to issue an urgent recall on Lay's Maxx Oriental Salsa flavoured crisps, as the fact that they contained gluten (in the form of Barley) was not included in English on the label.³⁷

The lack of common global standards, combined with discrepancies in labelling within the domestic markets, and the challenge of overcoming language barriers can present significant obstacles for brands and retailers.

Given the uncertainty and variation in gluten-free labelling, some coeliac sufferers use home testing kits for further reassurance that the product they have bought will not prompt a reaction. However, these are not a substitute for basic due diligence by both brands and consumers. At the present time, the Professional Advisory Council of the Canadian Celiac Association does not recommend that people with coeliac disease or non-coeliac gluten sensitivity use these types of devices to determine the gluten status of a food 38 , indicating that they are not a steadfast solution.

Avoiding cross contamination

Cross-contamination is a significant risk in the production of gluten-free products. This occurs when traces of allergens come into contact with gluten-free products during the manufacturing, handling, transport, or storage of the foods.³⁹ It is a significant concern for people with allergies, with even the smallest quantities of gluten having the potential to result in a flare up.40

In the UK, the law does not require tests to prove foods are gluten-free, but this is widely recognised as good and safe practice.⁴¹ However, the process of testing a small production sample does not necessarily guarantee that there has been no cross-contamination during the manufacturing process.⁴² Additionally, unless the product is a liquid, it is very difficult to get a homogenous sample where gluten is distributed evenly throughout, meaning that results are not necessarily accurate for the batch as a whole⁴³. The risk of cross-contamination can be mitigated with careful management.⁴⁴

³³ https://celiac.org/gluten-free-living/global-associations-and-policies/policies-around-the-world/

³⁴ https://celiac.org/gluten-free-living/global-associations-and-policies/policies-around-the-world/

³⁵ https://celiac.org/gluten-free-living/global-associations-and-policies/policies-around-the-world/

³⁶ https://www.celiac.com/articles.html/gluten-free-grain-based-foods-in-india-contain-up-to-90-times-permitted-gluten-levels-r5178/

³⁷ https://www.coeliac.org.uk/about-us/media-centre/news/lays-maxx-oriental-salsa-crisps-recalled-because-of-undeclared/ ³⁸ Confidently Compliant: A Food Safety Podcast, Episode 5 - Why care about trademarks?

³⁹ https://www.food.gov.uk/business-guidance/allergen-labelling-for-food-manufacturers

⁴⁰ https://www.glutafin.co.uk/living-gluten-free/cross-contamination/#:~:text=Cross%20contamination%20is%20when%20your,free%20toast%20could%20be%20contaminated.

⁴¹ https://www.coeliac.org.uk/information-and-support/living-gluten-free/the-gluten-free-diet/food-shopping/law-on-gluten-free/

⁴² https://cdhf.ca/health-lifestyle/how-to-know-which-brands-are-really-celiac-safe/

⁴³ Confidently Compliant: A Food Safety Podcast, Episode 5 - Why care about trademarks?

⁴⁴ https://www.food.gov.uk/business-guidance/allergen-labelling-for-food-manufacturers

The Importance of Reliable Gluten-Free Certification for Brands, Retailers and Consumers

For consumers

For those with coeliac disease, the consequences of mislabelling can be catastrophic, with even very small amounts of gluten presenting a risk.⁴⁵ Coeliac disease is an autoimmune disease, meaning that the immune system mistakes substances found inside gluten as a threat to the body and attacks them. This can cause damage to the surface of the small bowel, disrupting the body's ability to take in nutrients from food.⁴⁶

Left untreated, coeliac disease can lead to serious health problems. People with the disease have a two times greater risk of developing coronary artery disease, and a four times greater risk of developing small bowel cancer. 47 Untreated coeliac disease can lead to the development of other autoimmune disorders like Type I diabetes and multiple sclerosis (MS), and many other conditions, including dermatitis herpetiformis, anemia, osteoporosis, infertility and miscarriage, epilepsy, migraines, heart disease and intestinal cancer. 48

There are no pharmaceutical treatments or cures for coeliac disease and a 100% gluten-free diet is the only existing method to avoid these consequences.⁴⁹ Given this, many coeliac suffers are highly reliant on certification which confirms that manufacturers and retailers of gluten-free food are employing the highest standards to minimise the risk to the consumer.

For brands and retailers

Approximately 20% of consumers worldwide avoid certain foods due to allergies and intolerances, creating significant opportunities for brands and retailers who can fill a niche within these markets⁵⁰.

The global gluten-free market was valued at around \$4.72 billion in 2017, and is expected to reach approximately \$7.6 billion by 2024⁵¹. This exponential growth, driven by the increasing prevalence of coeliac diseases and growing awareness amongst consumers of the potential health benefits of reducing gluten intake, means that there has never been greater impetus for brands and retailers to produce gluten-free goods.

Crucially, however, as this paper has outlined, those following a gluten-free diet (especially if done so for medical reasons) value certification very highly. The term "gluten-free" is covered by law in many countries, including the UK^{52} and the USA^{53} , with it only legal to use it on products containing 20 ppm or less of gluten. Despite this, 91% of consumers declare that their buying decisions are impacted by third party verification and 76% prefer products certified by a recognised coeliac association⁵⁴. Likewise, a further 63% of consumers will not buy a product if they do not trust the company behind it.⁵⁵

The rapid growth in the popularity of gluten-free products combined with a proven dependence on accreditation amongst consumers reliant on these ranges demonstrates the increasing importance of recognised certification schemes for brands and retailers catering to the gluten-free market.

⁴⁵ https://www.coeliac.org.uk/information-and-support/coeliac-disease/about-coeliac-disease/myths-about-coeliac-disease/

⁴⁶ https://www.nhs.uk/conditions/coeliac-disease/

⁴⁷ https://celiac.org/about-celiac-disease/what-is-celiac-disease/

⁴⁸ https://celiac.org/about-celiac-disease/what-is-celiac-disease/

⁴⁹ https://www.beyondceliac.org/celiac-disease/facts-and-figures/

 $^{^{50}\} https://www.globenewswire.com/news-release/2018/12/05/1662178/0/en/Gluten-Free-Product-Market-Will-Reach-USD-7-60-Billion-By-2024-Globally-Zion-Market-Research.html$

 $[\]label{eq:sum_entropy} $51 https://www.globenewswire.com/news-release/2018/12/05/1662178/0/en/Gluten-Free-Product-Market-Will-Reach-USD-7-60-Billion-By-2024-Globally-Zion-Market-Research.html.$

 $^{^{52}\} https://www.coeliac.org.uk/information-and-support/living-gluten-free/the-gluten-free-diet/food-shopping/food-labels/$

⁵³ https://celiac.org/gluten-free-living/gluten-free-foods/label-reading-the-fda/

⁵⁴ https://www.brcgs.com/about-brcgs/news/2021/aoecs-and-brcgs-join-forces-to-promote-greater-access-to-safe-and-reliable-gluten-free-products-in-europe/

⁵⁵ https://www.greenbiz.com/article/using-product-certification-win-consumers-hearts-and-minds

The BRCGS Solution: Identifying, Managing and Reducing Risk

BRGCS operates the Gluten-Free Certification Program (GFCP), which uses a scientifically proven, risk-based management systems approach for effectively controlling gluten and gluten cross-contamination from incoming ingredients to final product. Launched in 2009, and developed through consultations with food industry experts, consumer groups and government stakeholders, it is a standardised set of global requirements for gluten-free foods, and is a credible, trustworthy, endorsed gluten-free trademark at the point of purchase.

The BRCGS Gluten-Free Certification Program (GFCP) uses a management system approach whereby brands must go further than simply carrying out end-product testing to gain the certification. It combines product testing with certifying the production facility or site itself through an annual third-party audit. The program manages gluten at every step of the production process, from receiving raw ingredients right through to final packaging and labelling.

Carrying out checks throughout the manufacturing process hugely reduces the risk, providing added reassurance to those following a gluten-free diet. It also brings significant benefits to food producers, lowering the likelihood that a product recall will be required, with the associated costs and reputational damage that this can incur, and making it easier to identify where the issue in the supply chain lies.

The GFCP standard is recognised by leading coeliac organisations around the world covering Europe, the USA, Canada and Mexico, which means that sites which are BRCGS certified are also able to include these trusted marks on their products.

Highly identifiable, these seals of approval can significantly improve market access for brands, with consumers far more likely to trust and purchase a gluten-free product with one of these signs of certification. 76% of consumers prefer certified products associated with a recognised coeliac organisation, when compared to a brand self-declaring its products as gluten-free.

Combined, these features make the BRCGS GFCP one of the most rigorous and well-regarded schemes in the world. The value of certification cannot be underestimated, in ensuring safe production and providing customers with steadfast reassurance that a product is reliably free of gluten contamination.

BRCGS is a global leader in food safety and gluten-free certification, with over 250 approved GFCP auditors in over 15 countries. It has certified over 400 brands across 300 sites producing more than 5,000 gluten-free products including non-food products, such as cosmetics. It works with large retailers and contract manufacturers, multinational brand owners engaged in speciality foods across EMEA, the Americas, the UK, and APAC.

BRCGS was established 25 years ago by retailers who wanted to harmonise food safety standards across the supply chain. Today, it is a globally recognised consumer protection organisation, across both food and non-food categories, operating the most rigorous third party certification scheme of its type.

BRCGS certification spans many industries with Global Standards for Food Safety, Packaging and Packaging Materials, Storage and Distribution, Consumer Products, Agents and Brokers, Retail, Gluten-Free, Plant-Based and Ethical Trading. It is the market-leading benchmark for good manufacturing practice, providing assurance of supply chain integrity and therefore, that the resulting products and services are safe, legal and of high quality. Compliance is a critical cornerstone of BRCGS' offering, a unique selling point that differentiates BRCGS certification. Through a rigorous compliance programme comprising of five layers, it delivers results that brands and consumers can trust and have confidence in.

For more information, please visit https://www.brcgs.com/



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