HIGH QUALITY FOOD (KMÉ)

CERTIFICATION MARK SCHEME

SPECIFIC CERTIFICATION REQUIREMENTS

Gluten-free bread, pastry and fine bakery ware

Budapest, December 2025

Gluten-free bread, pastry and fine bakery ware

Applications for the award of the High Quality Food (KMÉ) and High Quality Food Gold Grade trademarks may be submitted for gluten-free products which are marketed in a pre-packaged form, and the production conditions of which comply with the applicable Hungarian and EU legal requirements. Furthermore, these products shall also meet the following requirements in addition to the requirements specified in the Codex Alimentarius Hungaricus.

Mandatory elements

Criteria for the ingredients:

- only naturally gluten-free ingredients may be used,
- mycotoxin testing of the relevant cereal, pseudo-cereal and other meals (maize meal, oat meal, rice flour and other seed flours (e.g. from oilseeds)) shall be carried out per supplier pursuant to Commission Regulation (EU) 2023/915, but at least on a quarterly basis [1]
- only plant material/cereal meal (mainly oats) which does not present a risk of gluten contamination during cultivation, harvesting and storage and which has been milled in a gluten-free mill may be used,
- leavening preparations to substitute the sourdough starter cannot be used,
- palm oil may only be used if it has the sustainable RSPO certification,
- products shall not contain insect proteins,
- in the case of products enriched with eggs, only preservative-free egg preparations may be used,
- food additives with a technological function as preservatives in accordance with Regulation (EC) No 1333/2008 of the European Parliament and of the Council shall not be used.

Criteria for the finished product:

- Nutrition criteria:
    - minimum dietary fibre content of 3.0 g/100 g product or 1.5 g/100 kcal (in compliance with the ‘source of dietary fibre’ requirements of Regulation (EC) No 1924/2006 of the European Parliament and of the Council)

- Salt content expressed as NaCl in the dry matter: not more than 1.3 % for bread and pastry.

[1] Measurement results provided in the supplier's certificates may also be taken into account when carrying out the mandatory tests specified above.

Optional elements

Applications for the High Quality Food (KMÉ) and High Quality Food Gold Grade trademarks may be submitted for products that, in addition to the above-mentioned mandatory requirements, also comply with at least one point in each of the optional element categories I and II.

I. Production process

Self-testing

1. Comprehensive quarterly self-testing of the finished product (physical-chemical, microbiological, packaging, weight, labelling).

2. The cereal raw materials used shall be tested for pesticide residues twice a year, on a random basis.

3. Batch-based self-testing with a focus on the production process (from the receipt of the raw material to the delivery of the finished product), primarily with regard to gluten content

4. Trend analysis within the framework of self-testing: creation of a quality control chart for the graphical representation of analytical and microbiological values, with an indication of guidance values, a warning threshold and/or limit values. These values shall be compared with the data collected from self-testing, and, if necessary, appropriate measures shall be taken.

5. Operation of food safety and quality management systems certified by an independent organisation (e.g. IFS, ISO 22000, BRC, BRCGS FOOD, FSSC 22000), possession of a certification as proof.

6. Continuous maintenance of the European Licensing System licence agreement operated by the Association of European Coeliac Societies (AOECS) and compliance with its provisions for the use of the Crossed Grain Trademark. www.aoecs.org

Production process

7. Compliance with higher hygiene requirements during the production process: for raw materials, the microbiological parameters listed in Annex 4 of Decree No 4/1998 of 11 November of the Ministry of Health on the allowable limits of microbiological contamination of foodstuffs shall be tested in every tenth batch in the production raw material, but such tests shall be carried out at least once a month.

8. There shall be a raw material evaluation/supplier programme in place, where trend analysis is performed based on laboratory findings.

9. The operation of food safety and quality management systems (e.g. IFS, ISO 22000, BRC, BRCGS FOOD, FSSC 22000) certified by an independent organisation for the raw material suppliers, use of the AOECS CGT trademark, the existence of certifications as proof.

10. Use of raw materials bearing a KMÉ trademark.

11. The eggs/liquid egg to be used shall be of Class A and come from free-range or alternative farming.

12. In-line metal or X-ray detector for all primary packaging passing through.

13. Certified organic production pursuant to the control and certification systems laid down in Regulation (EU) 2018/848 of the European Parliament and of the Council. (not optional in combination with point 26)

II. Sustainability

Environmental protection (reduction of environmental footprint, green logistics)

- **Use of environment friendly, renewable energy resources**

14. The plant/applicant derives part of its energy from renewable energy sources (e.g. thermal water, geothermal heat, solar panels, biogas) in the production and preparation process.

    (The undertaking has a certified green product, green service, or sells green energy /solar energy, wind energy, hydropower, biogas, geothermal energy/).
    Document to demonstrate the distribution of total and renewable electricity consumption in the last financial year).

- **Use of sustainable management inputs/technological methods**

15. A more efficient management of resources: the modernisation of processing technologies that are material-, energy- and water-efficient and reduce pressure on the environment

    (e.g. regenerative heat recovery, waste heat recovery, the improvement of the efficiency of the cooling systems, the reduction of energy consumption).

    (It shall be demonstrated:
    – whether it has environmental compliance/certification
    – whether it uses a qualified green product or service for its operation.
    It has a process in place to identify, assess and respond to environmental and social risks and opportunities.
    It is necessary to examine what proportion of the materials used by the undertaking or by the undertakings in its value chains are recycled, reclaimed, renewable and non-renewable raw materials /circular economy/.)

16. Energy recovery system on production machines.

(For example, the use of any equipment that captures and transfers compressor waste heat. Recycling of thermal energy for other industrial processes that require heat or steam).

17. Application of an Environmental Management System (EMS) or EMAS (Eco-Management and Audit Scheme) in accordance with standard MSZ EN ISO 14001:2015, certifying environmental compliance.

    (Preparation of annual reports which provide information about the energy use, waste management, water use and other environmental impacts.)

18. Certified and regularly used environmentally friendly and/or water-saving cleaning products and detergents.

    (Certifications, safety data sheets, specifications, trademarks on the packaging. Certificates from certification bodies, e.g. Ecocert, Green Certification, Breeam, Leed.)

19. Utilisation of by-products, minimisation of product and material losses.

    (The undertaking has a process in place to identify, assess and respond to environmental and social risks and opportunities. The undertaking uses raw materials, secondary raw materials produced from waste in accordance with circular economy principles, and the circular economy requirements are taken into account in the design of the product, including the packaging of the product.)

20. Operation of an environmentally sound waste management system. Separate waste collection and recycling, in a documented form.

    (The undertaking is authorised to handle, collect, transport, store and dispose of persistent organic pollutants in a non-polluting way once they become waste.)

21. Efficient and environmentally friendly waste water treatment technology (e.g. biological waste water treatment).

22. Verified decrease in specific water use.

    (*E.g. use of effluent hot water from installations for secondary cleaning tasks, drip irrigation, rainwater collection and recycling, grey water recycling.*)

- **Green rating**

23. Official proof of a recognised, certified sustainability rating in accordance with the EU legislation in force (e.g. but not limited to: EcoVadis, B Corp, BREEAM, LEED, ISCC).

24. Green sourcing policy, documented: prioritising suppliers that have made sustainability investments.

    (The undertaking makes its suppliers carry out an environmental assessment of the products and/or services. Demonstration of the proportion in which suppliers use, for example, renewable energy sources, whether they take building energy aspects into

account, whether they operate an environmentally sound waste system, minimise the environmental impact of the logistics network and that of transport.)

25. The undertaking has a Science Based Target Initiative (SPTI) commitment.

26. The raw material used in the production of the product originates from an organic producer (operator or group of operators) certified in accordance with Regulation (EU) 2018/848 of the European Parliament and of the Council, or is obtained from extensive farming or from production with a reduced environmental footprint that can be otherwise scientifically demonstrated. *E.g. product with organic labelling, environmentally friendly product.* (not optional in combination with point 13)

- **Use of eco-friendly packaging solutions**

27. Application of an environmentally friendly packaging solution for packaged products (reduced packaging size or alternative packaging materials e.g. compostable; FSC or PEFC logo).

28. Suppliers of primary packaging material that comes into contact with the product are certified as BRC or IFS PACsecure.

- **Transport**

29. The main component comes to the processing plant from own holding or from within a distance of 100 km.

    (Place of production, manufacturing and/or processing site may be located within a distance of 100 km.)

30. Plant protection products, materials that improve or maintain the fertility of the soil shall be manufactured and transferred to the production site from within 100 km.

31. Transport optimisation, route planning to reduce emissions.

    (Lean & Green program)

32. The product shall be delivered to the consumer through a short supply chain.

Social aspects

33. Existence of SMETA (Supplier Ethical Data Exchange) audit.

34. Prevention of food waste through donation.

35. Prevention of food waste by preventing waste generation in production and logistics.