

## PrimusGFS Summary of Changes to Questions & Expectations v2.1-2

Section	v2.1-2 Question #	Original Question Text v2.1	New Question Text v2.1-2	Summary of Change
Management System	1.01.03	Is there an organizational chart of all employees who have food safety related activities?	Is there an organizational chart of all workers who have food safety related activities?	Changed "employee" to "worker". Question expectations remain the same.
Management System	1.01.06	Is there a documented analysis detailing resources required to implement and improve the food safety management system processes with documented commitment from senior management to provide these resources?	No Change.	Explanation expanded to include that there should be "a document from Senior Management demonstrating...a commitment to continually support and invest in adequate food safety resources." "Worker staffing levels" was added as one of the food safety resources that should be covered.
Internal & External Inspections	1.04.02	Are there written procedures for handling regulatory inspections?	No Change.	Changed "employee" to "worker". Question expectations remain the same.
Rejection & Release of Product	1.05.01	Is there a written procedure for handling on hold or rejected products?	No Change.	Explanation expanded to include that the procedure should include "the release of the on hold/rejected product."
Rejection & Release of Product	1.05.03	Is there a documented product release procedure available?	No Change.	Explanation expanded to include that "Note: this procedure is not referring to the release of product placed on hold or rejected, but for the release of all product that is shipped."
Rejection & Release of Product	1.05.04	Are there records of product releases kept on file?	No Change.	Explanation expanded to include that records should demonstrate a "sign off" for all products shipped.

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Supplier Control	1.06.05	If the organization is outsourcing any processes that may affect food safety are there control procedures over such processes?	No Change.	Explanation expanded to include "Note that question 1.06.01 asks for specification regarding services, while this question is asking for SOP's for dealing with outsourced services."
Traceability & Recall	1.07.03	Is testing of recall procedures (including trace back) performed and documented at least every six months? Can the company identify where affected product was sent?	No Change.	Explanation expanded to include clarification for short season operations: "(For short season crops where the operation runs 6 months or less throughout the year, only one mock recall is required.)"
Site Identification	2.02.01	Is the growing area(s) adequately identified or coded to enable trace back and trace forward in the event of a recall?	No Change.	Explanation expanded to include that "there should be field maps available demonstrating the coding details."
Ground History	2.03.07	Has a documented risk assessment been undertaken for the growing area with appropriate corrective actions to minimize identified hazards where necessary?	No Change.	Changed "employee" to "worker". Question expectations remain the same.
Pest & Foreign Material Controls	2.05.03e	If used, are all pest control devices properly installed and secured?	No Change.	Explanation extended to include if bait traps are "have integrated weight."

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Crop Protection	2.09.06	Are there up-to-date records of all crop protection products applied during the growing cycle?	No Change.	Explanation extended to include additional information that should be included in the pesticide application records, such as "time of application," "crop name," "crop protection product code," "applicator name" and "pre-harvest interval."
Crop Protection	2.09.07a	Does the growing operation have the information available for the plant protection products registered and/or authorized for use for the target crops in the country of production?	No Change.	Explanation extended to include that "Organic approval of a chemical should not be confused with being approved as a registered crop protection chemical."
Field Worker Hygiene	2.10.01	Does the growing operation have a documented and implemented policy for dealing with employees who appear to be physically ill, or become ill while working?	Does the growing operation have a documented and implemented policy for dealing with workers who appear to be physically ill, or become ill while working?	Changed "employee" to "worker". Question expectations remain the same.
Field Worker Hygiene	2.10.02	Does the growing operation have a documented and implemented policy regarding employees with open sores and wounds?	Does the growing operation have a documented and implemented policy regarding workers with open sores and wounds?	Changed "employee" to "worker". Question expectations remain the same.
Field Worker Hygiene	2.10.05	Is there a food safety hygiene training program covering new and existing employees and are there records of these training events?	Is there a food safety hygiene training program covering new and existing workers and are there records of these training events?	Changed "employee" to "worker". Question expectations remain the same.
Field Worker Hygiene	2.10.06	Are there operational toilet facilities provided?	No Change.	Changed "employee" to "worker" and explanation extended to address that "Public restrooms do not meet the requirements of this question."

Section	v2.1-2 Question #	Original Question Text v2.1	New Question Text v2.1-2	Summary of Change
Field Worker Hygiene	2.10.06a	Are toilet facilities placed within ¼ mile or 5 minutes walking distance of all employees?	Are toilet facilities placed within ¼ mile or 5 minutes walking distance of all workers?	Changed "employee" to "worker" and added additional guidance that "a 5 minute drive is not acceptable."
Field Worker Hygiene	2.10.06c	Is a minimum of one toilet facility provided for each group of 20 employees?	Is a minimum of one toilet facility provided for each group of 20 workers?	Changed "employee" to "worker". Question expectations remain the same.
Field Worker Hygiene	2.10.06d	Do toilet facilities have visuals or signs, written in the appropriate languages, reminding employees to wash their hands before returning to work?	Do toilet facilities have visuals or signs, written in the appropriate languages, reminding workers to wash their hands before returning to work?	Changed "employee" to "worker". Question expectations remain the same.
Field Worker Hygiene	2.10.08	Are there operational hand washing facilities provided?	No Change.	Changed "employee" to "worker" and added additional guidance that the hand wash water should be "potable."
Field Worker Hygiene	2.10.08a	Are the hand washing facilities placed within ¼ mile or 5 minutes walking distance of all employees?	Are the hand washing facilities placed within ¼ mile or 5 minutes walking distance of all workers?	Changed "employee" to "worker". Question expectations remain the same.
Field Worker Hygiene	2.10.08b	Are hand wash stations clearly visible (e.g. situated outside the toilet facility) and easily accessible to workers?	No Change.	Changed "employee" to "worker". Question expectations remain the same.
Field Worker Hygiene	2.10.08e	Does the growing operation have a documented and implemented policy and procedure in place requiring employees to wash their hands (e.g. prior to beginning work, after breaks, after toilet use)?	Does the growing operation have a documented and implemented policy and procedure in place requiring workers to wash their hands (e.g. prior to beginning work, after breaks, after toilet use)?	Changed "employee" to "worker". Question expectations remain the same.

Section	v2.1-2 Question #	Original Question Text v2.1	New Question Text v2.1-2	Summary of Change
Field Worker Hygiene	2.10.09	Is fresh potable drinking water provided for workers?	No Change.	Changed "employee" to "worker" and extended explanation to include that "The term "potable" meaning that the water is of drinking water quality, e.g. the EPA Drinking Water Standard."
Field Worker Hygiene	2.10.09a	If used, are water containers maintained in a clean condition?	No Change.	Changed "employee" to "worker". Question expectations remain the same.
Field Worker Hygiene	2.10.10	Are first-aid kits available and is the inventory maintained properly?	No Change.	Changed "employee" to "worker". Question expectations remain the same.
Field Worker Hygiene	2.10.11	Are there trash cans available on the field placed in suitable locations?	No Change.	Added the option to score this question as N/A.
Harvesting Inspections, Policies & Training	2.11.05	Is there a food safety hygiene training program covering new and existing employees and are records of these training events?	Is there a food safety hygiene training program covering new and existing workers and are records of these training events?	Changed "employee" to "worker". Question expectations remain the same.
Harvesting Worker Facilities & Sanitary Facilities	2.12.01	Does the harvesting operation have written and implemented policies and procedures regarding employees with open sores and/or wounds and for dealing with employees who appear to be physically ill, or who become ill while working?	Does the harvesting operation have written and implemented policies and procedures regarding workers with open sores and/or wounds and for dealing with workers who appear to be physically ill, or who become ill while working?	Changed "employee" to "worker". Question expectations remain the same.
Harvesting Worker Facilities & Sanitary Facilities	2.12.02	Are any employees eating and drinking (other than water) in active harvest areas, areas yet to be harvested, near harvested product or storage areas?	Are any workers eating and drinking (other than water) in active harvest areas, areas yet to be harvested, near harvested product or storage areas?	Changed "employee" to "worker". Question expectations remain the same.

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Harvesting Worker Facilities & Sanitary Facilities	2.12.03	Does the harvesting operation have written and implemented policies and procedures covering employees using tobacco products in active harvest areas, areas yet to be harvested, near harvested product or storage areas? Spitting is not allowed in any areas?	Does the harvesting operation have written and implemented policies and procedures covering workers using tobacco products in active harvest areas, areas yet to be harvested, near harvested product or storage areas? Spitting is not allowed in any areas?	Changed "employee" to "worker". Question expectations remain the same.
Harvesting Worker Facilities & Sanitary Facilities	2.12.05	Is it evident that employees are free of exposed jewelry (except for a single plain wedding band) and other items that may be a source of foreign contamination issue?	Is it evident that workers are free of exposed jewelry (except for a single plain wedding band) and other items that may be a source of foreign contamination issue?	Changed "employee" to "worker". Question expectations remain the same.
Harvesting Worker Facilities & Sanitary Facilities	2.12.06	Where gloves are required to be used by the auditee, are they appropriate for the type of harvesting (e.g., not using cotton gloves for harvesting a product such as lettuce) and are they in good working order?	No Change.	Changed "employee" to "worker". Question expectations remain the same.
Harvesting Worker Facilities & Sanitary Facilities	2.12.08	Are there operational toilet facilities provided?	No Change.	Explanation extended to include that "Public restrooms do not meet the requirements of this question."
Harvesting Worker Facilities & Sanitary Facilities	2.12.08a	Are toilet facilities located in a suitable area and within ¼ mile or 5 minutes walking distance of all employees?	Are toilet facilities located in a suitable area and within ¼ mile or 5 minutes walking distance of all workers?	Changed "employee" to "worker" and added additional guidance that "a 5 minute drive is not acceptable."

Section	v2.1-2 Question #	Original Question Text v2.1	New Question Text v2.1-2	Summary of Change
Harvesting Worker Facilities & Sanitary Facilities	2.12.08c	Are separate toilet facilities provided for men and women in groups larger than 5 employees?	Are separate toilet facilities provided for men and women in groups larger than 5 workers?	Changed "employee" to "worker". Question expectations remain the same.
Harvesting Worker Facilities & Sanitary Facilities	2.12.08d	Is a minimum of one toilet facility provided for each group of 20 employees?	Is a minimum of one toilet facility provided for each group of 20 workers?	Changed "employee" to "worker". Question expectations remain the same.
Harvesting Worker Facilities & Sanitary Facilities	2.12.08e	Do toilet facilities have visuals or signs, written in the appropriate languages, reminding employees to wash their hands before returning to work?	Do toilet facilities have visuals or signs, written in the appropriate languages, reminding workers to wash their hands before returning to work?	Changed "employee" to "worker". Question expectations remain the same.
Harvesting Worker Facilities & Sanitary Facilities	2.12.10a	Are the hand washing facilities placed within ¼ mile or 5 minutes walking distance of all employees?	Are the hand washing facilities placed within ¼ mile or 5 minutes walking distance of all workers?	Changed "employee" to "worker". Question expectations remain the same.
Harvesting Worker Facilities & Sanitary Facilities	2.12.10b	Are hand wash stations clearly visible (e.g. situated outside the toilet facility) and easily accessible to workers?	No Change.	Changed "employee" to "worker". Question expectations remain the same.
Harvesting Worker Facilities & Sanitary Facilities	2.12.10h	Are the employees washing their hands prior to beginning work?	Are the workers washing their hands prior to beginning work?	Changed "employee" to "worker". Question expectations remain the same.
Harvesting Worker Facilities & Sanitary Facilities	2.12.10i	Are the employees washing their hands after break periods?	Are the workers washing their hands after break periods?	Changed "employee" to "worker". Question expectations remain the same.
Harvesting Worker Facilities & Sanitary Facilities	2.12.10j	Are the employees washing their hands after using the toilet facilities?	Are the workers washing their hands after using the toilet facilities?	Changed "employee" to "worker". Question expectations remain the same.

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Harvesting Worker Facilities & Sanitary Facilities	2.12.10k	Is it evident that corrective action is taken when employees fail to comply with hand washing guidelines?	Is it evident that corrective action is taken when workers fail to comply with hand washing guidelines?	Changed "employee" to "worker". Question expectations remain the same.
Harvesting Worker Facilities & Sanitary Facilities	2.12.11	Is fresh potable drinking water readily accessible to employees?	Is fresh potable drinking water readily accessible to workers?	Changed "employee" to "worker". Question expectations remain the same.
Harvesting Worker Facilities & Sanitary Facilities	2.12.11a	Are the water containers maintained in a clean condition?	No Change.	Changed "employee" to "worker". Question expectations remain the same.
Harvesting Worker Facilities & Sanitary Facilities	2.12.12	Are first-aid kits available and is the inventory maintained properly?	No Change.	Changed "employee" to "worker". Question expectations remain the same.
Harvest Practices	2.13.03d	Is product and packing material free from exposure to the ground and or any handling contamination?	No Change.	Explanation extended to include that there should be protection underneath products "where it is industry practice to place the products on the ground after harvest (e.g., asparagus)."
Harvest Practices	2.13.06d	Is there an equipment and utensil (e.g. knives) storage and control procedures when not in use?	No Change.	Changed "employee" to "worker". Question expectations remain the same.
Harvest Practices	2.13.09a	Does the process flow, machine layout, employee control, utensil control, etc., ensure that processed products are not contaminated by unprocessed products?	Does the process flow, machine layout, worker control, utensil control, etc., ensure that processed products are not contaminated by unprocessed products?	Changed "employee" to "worker". Question expectations remain the same.



Section	v2.1-2 Question #	Original Question Text v2.1	New Question Text v2.1-2	Summary of Change
Harvest Practices	2.13.09b	Do all employees that come in contact with the product being harvested wear clean protective outer garments (e.g. hairnets, plastic gloves, sleeves and aprons)?	Do all workers that come in contact with the product being harvested wear clean protective outer garments (e.g. hairnets, plastic gloves, sleeves and aprons)?	Changed "employee" to "worker". Question expectations remain the same.
Harvest Practices	2.13.09c	Do all employees that wear protective outer garments remove and keep them in a clean and secure area during breaks or when using the toilet facilities?	Do all workers that wear protective outer garments remove and keep them in a clean and secure area during breaks or when using the toilet facilities?	Changed "employee" to "worker". Question expectations remain the same.
Pest Control	2.17.05	Does the operation have a pest control program?	No Change.	Expectation updated to reflect that "The operation has a pest control program (in-house or contracted) to control rodents (also insects, reptiles and birds where necessary) and prevent infestation."
Operational Practices	2.19.01	Does the process flow, facility layout, employee control, utensil control, internal vehicle use, etc. ensure that finished (processed) products are not contaminated by raw (unprocessed) products?	Does the process flow, facility layout, worker control, utensil control, internal vehicle use, etc. ensure that finished (processed) products are not contaminated by raw (unprocessed) products?	Changed "employee" to "worker". Question expectations remain the same.
Operational Practices	2.19.09	Does the facility have the appropriate test strips, test kits or test probes for verifying the concentrations of anti-microbial chemicals (product washing water, terminal sanitizers, dip stations, etc.) being used and are they in operational condition?	Does the facility use the appropriate test strips, test kits or test probes for verifying the concentrations of anti-microbial chemicals (product washing water, terminal sanitizers, dip stations, etc.) being used and are they in operational condition?	Changed "employee" to "worker". Question expectations remain the same.

Section	v2.1-2 Question #	Original Question Text v2.1	New Question Text v2.1-2	Summary of Change
Operational Practices	2.19.11	Are toilet facilities adequate in number and location and are they adequately stocked (e.g. toilet paper, disposable towels, soap, etc.)?	No Change.	Changed "employee" to "worker". Question expectations remain the same.
Operational Practices	2.19.12	Are secondary hand sanitation stations e.g. hand dip, gel or spray stations adequate in number and location? Are the stations maintained properly?	No Change.	Expectation updated to reflect that secondary hand sanitations stations "should be non-perfumed.)
Employee Practices	2.20.01	Are employees washing and sanitizing their hands before starting work each day, after using the restroom, after breaks and whenever hands may be contaminated?	Are workers washing and sanitizing their hands before starting work each day, after using the restroom, after breaks and whenever hands may be contaminated?	Changed "employee" to "worker". Question expectations remain the same.
Employee Practices	2.20.02	Are employees' fingernails clean, short and if gloves are not used, free of nail polish?	Are workers' fingernails clean, short and if gloves are not used, free of nail polish?	Changed "employee" to "worker". Question expectations remain the same.
Employee Practices	2.20.03	Is there no sign of any employees with boils, sores, open wounds or exhibiting signs of foodborne illness excluded from operations involving direct and indirect food contact?	Is there no sign of any workers with boils, sores, open wounds or exhibiting signs of foodborne illness excluded from operations involving direct and indirect food contact?	Changed "employee" to "worker". Question expectations remain the same.
Employee Practices	2.20.04	Are employees wearing effective hair restraints?	Are workers wearing effective hair restraints?	Changed "employee" to "worker" and expanded expectation to include that "Wearing effective hair restraints is required in all operations where product is exposed."

Section	v2.1-2 Question #	Original Question Text v2.1	New Question Text v2.1-2	Summary of Change
Employee Practices	2.20.06	Are all employees wearing outer garments suitable for the operation (e.g. smocks, aprons, sleeves, gloves)?	Are all workers wearing outer garments suitable for the operation (e.g. smocks, aprons, sleeves, gloves)?	Changed "employee" to "worker". Question expectations remain the same.
Employee Practices	2.20.07	Do employees remove protective outer garments e.g. smocks, aprons, sleeves and gloves when on break and before using the toilets and when going home at the end of their shift?	Do workers remove protective outer garments e.g. smocks, aprons, sleeves and gloves when on break and before using the toilets and when going home at the end of their shift?	Changed "employee" to "worker". Question expectations remain the same.
Employee Practices	2.20.08	Is there a designated area for employees to leave protective outer garments e.g. smocks, aprons, sleeves and gloves when on break and before using the toilets?	Is there a designated area for workers to leave protective outer garments e.g. smocks, aprons, sleeves and gloves when on break and before using the toilets?	Changed "employee" to "worker". Question expectations remain the same.
Employee Practices	2.20.09	Employees personal items are not being stored in the production and material storage areas?	Workers personal items are not being stored in the production and material storage areas?	Changed "employee" to "worker". Question expectations remain the same.
Equipment	2.21.03	Does equipment design and condition (e.g. smooth surfaces, smooth weld seams, non-toxic materials, no wood) facilitate effective cleaning and maintenance?	No Change.	Explanation expanded to include that equipment designed for easy cleaning includes "hollow structures on supports, rollers, racks, etc."
General Cleaning	2.23.11	Are worker break facilities clean, including microwaves and refrigerators? No rotting or out of date foodstuffs?	No Change.	Changed "employee" to "worker". Question expectations remain the same.
Buildings & Grounds	2.24.05	Is ventilation adequate to control dust, condensation, odors and vapors?	No Change.	Explanation extended to include that ventilation systems refer to both "cooling and heating."

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Buildings & Grounds	2.24.14	Is an 18" internal wall perimeter being maintained within the facility, with adequate access to these wall perimeters thereby allowing inspection and cleaning?	No Change.	Changed "employee" to "worker". Question expectations remain the same.
Chemical Files	2.25.01	Are copies of all Materials Safety Data Sheets (detergents, sanitizers, pesticides, etc.) on file and fully accessible at all times with clear indexes?	Are copies of all Safety Data Sheets (detergents, sanitizers, pesticides, etc.) on file and fully accessible at all times with clear indexes?	Changed all references to "MSDS" to "SDS and "employee" to "worker". Question expectations remain the same.
Maintenance & Sanitation Files	2.28.01	Does the facility have a preventative maintenance program and schedule?	No Change.	Explanation expanded to include that "Equipment includes for example production line equipment, cooling equipment, compressed air equipment, water treatment equipment, etc."
Maintenance & Sanitation Files	2.28.08	Is there a routine program and written procedure to validate sanitation effectiveness using ATP bioluminescence?	Is there a routine program and written procedure to validate sanitation effectiveness using rapid post sanitation checks, e.g., ATP measurements?	Changed the question to allow other rapid post sanitation methods besides ATP. The guidance criteria was altered to reflect the change in the question requirement.
Employee Documentation	2.29.01	Are there records of new employee food safety (GMP) orientation training (with topics covered and attendees) and are new employees required to sign the company's food safety hygiene and health policy?	Are there records of new worker food safety (GMP) orientation training (with topics covered and attendees) and are all workers required to sign the company's food safety hygiene and health policy?	Changed "employee" to "worker". Expanded the question and expectations to require training for all workers versus only new workers.
Employee Documentation	2.29.02	Are there logs of ongoing employee food safety education training with topics covered and attendees?	Are there logs of ongoing worker food safety education training with topics covered and attendees?	Changed "employee" to "worker". Question expectations remain the same.

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Employee Documentation	2.29.03	Is there a documented training program with training logs for the sanitation employees including best practices and chemical use details?	Is there a documented training program with training logs for the sanitation workers including best practices and chemical use details?	Changed "employee" to "worker". Question expectations remain the same.
Employee Documentation	2.29.06	Is there an employee non-compliance/disciplinary action procedure? (verbal confirmation accepted)	Is there a worker non-compliance/disciplinary action procedure (verbal confirmation accepted)?	Changed "employee" to "worker". Question expectations remain the same.
Testing / Analyses Records	2.30.03	Are there routine microbiological tests on water used in the facility (sampled from within the facility)?	No Change.	Explanation expanded to include that the "Testing frequency should be related to the risk assessment of the production."
Testing / Analyses Records	2.30.04	Are there routine microbiological tests on ice used in the facility (either produced in-house or purchased)?	No Change.	Explanation expanded to include that the "Testing frequency should be related to the risk assessment of the production."
Testing / Analyses Records	2.30.05	N/A (New Question)	Are routine tests (e.g., microbiological, moisture, etc.) performed on compressed air that is used directly on food and food contact surfaces?	Added a new question related to compressed air.
Allergen Control	2.32.01	There are no allergen risks handled or stored within production and storage areas?	No Change.	Explanation expanded to include that "legislation should be reviewed to see if the country of production or countries being exported to have different allergen listings e.g. mustard, celery and sesame."

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Allergen Control	2.32.07	Are employees trained with respect to allergen risks and the facility allergen cross contamination controls (including hand washing between production runs) and are there records of this allergen training?	Are workers trained with respect to allergen risks and the facility allergen cross contamination controls (including hand washing between production runs) and are there records of this allergen training?	Changed "employee" to "worker". Question expectations remain the same.
Preliminary Steps	3.02.01	Has a documented hazard analysis for the process been conducted, showing the various types of hazard, their likelihood of occurrence and their associated severity? ANY DOWNSCORE IN THIS QUESTION RESULTS IN AUTOMATIC FAILURE OF THE AUDIT.	Has a documented hazard analysis for the process been conducted, showing the various types of hazard, their likelihood of occurrence and their associated severity? A ZERO POINT (NON-COMPLIANCE) DOWNSCORE IN THIS QUESTION RESULTS IN AUTOMATIC FAILURE OF THIS AUDIT.	The scoring was changed so that only a zero point non-compliance would result in an automatic failure.
Preliminary Steps	3.02.02	Have CCPs been developed?	No Change.	Explanation expanded to include the following sentence: "The CCP's should be created from the documented hazard analysis, i.e. there should be a logical documented approach showing why the process was deemed a CCP or not."
Preliminary Steps	3.02.11	Are changes in the process, equipment, ingredients etc., causing timely reviews of HACCP systems, including hazard analysis, CCP decisions, CCP records and staff training?	No Change.	Changed "employee" to "worker". Question expectations remain the same.

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Preliminary Steps	3.02.12	Is there evidence recorded for HACCP training to all plant employees, including training for CCP operators?	Is there evidence recorded for HACCP training to all plant workers, including training for CCP operators?	Changed "employee" to "worker". Question expectations remain the same.