This document provides supplement text to clarify the intent of the requirement and should be used in conjunction with PrimusGFS v3.1 Normative Documents and Interpretation Guidelines				
Section	**Q #**	**Question**	**Interpretation Guidelines**	**Azzule Supplemental Interpretation/Expectation**
Agronomic Inputs (Untreated animal manure)	2.08.03e	Are there Certificate(s) of Analysis (CoA) from the supplier(s) that cover pathogen testing (plus any other legally/best practice required testing) and does the grower have relevant letters of guarantee regarding supplier SOPs and logs?	There should be evidence that each laboratory test result (certificate of analysis) provided is traceable to each material used. (e.g., CoA is traced to each lot of crop treatment used). Tests should include microbiological analyses. As minimum, for non-synthetic crop treatments (e.g., compost teas, fish emulsions, fish meal, blood meal, "bio fertilizers") and for animal based compost microbial testing should include Salmonella spp., E. coli O157:H7, and Listeria monocytogenes at Negative or <DL and include fecal coliforms/gram at < 1000 MPN of total solids and any other pathogens appropriate for the source of material using approved sampling and testing methods (e.g., AOAC and an accredited laboratory). All local and national legislation should also be followed. Where legally allowed, a reduced sampling rate is possible if the material is produced by the auditee (e.g. mushroom growing operations with in-house compost production) and has been through a validated physical/chemical/biological process to inactivate human pathogens (Salmonella spp., E. coli O157:H7, Listeria monocytogenes) and show fecal coliforms/gram <1000 MPN. The auditee has the test analyses that show that the material is safe and proper process control records (e.g., time/temperature records and calibration records, such as, temperature probe) are maintained and available during the audit. Validation studies used must be applicable to the situation at hand and care should be taken not to over extrapolate. The grower should have proof that compost suppliers have cross contamination SOPs and temperature/turning logs. Sampling Plan Options below may be used to determine the definition of lots produced. There should be an indication from the supplier/producer of how lots are determined (i.e. from the information here or from another method). The sampling plans below are taken from current regulations in the state of California (related to bio-solids) and recognized manure-based compost guidelines included under the Leafy Greens Marketing Agreement.	If a farm is applying untreated animal manure in the production/growing area, the interval between application and harvest must be at least 120 days (or greater if more strigent laws are applicable to the farm). If a reduced harvest interval is followed and/or depending on the product being grown, the auditor may ask for the evidence of the Certificate(s) of Analysis (CoA) that covers pathogen testing, relevant supplier documentation for cross contamination SOPs, and temperature/turning logs. This requirement may be non-applicable if the farm provides evidence potential risks are reduced.
Agronomic Inputs (Untreated animal manure)	2.08.03f	Are there Certificate(s) of Analysis (CoA), letters of guarantee or other documents from the supplier(s) that cover heavy metal testing?	Certificate(s) of Analysis (CoA), letters of guarantee or some other documents from the supplier(s) that covers heavy metal testing should be available. Concerns are for heavy metals that may affect human health (e.g., Cadmium (Cd) Arsenic (As), Chromium (Cr), Lead (Pb), Mercury (Hg), Nickel (Ni), and Vanadium (V).). See Section 17868.2. Maximum Metal Concentrations for reference levels for an example of local State laws. All local and national legislation should also be followed. http://www.calrecycle.ca.gov/laws/Regulations/Title14/ch31a5.htm	If a farm is applying untreated animal manure in the production/growing area, the interval between application and harvest must be at least 120 days (or greater if more strigent laws are applicable to the farm). If a reduced harvest interval is followed and/or depending on the product being grown, the auditor may ask for the Certificate(s) of Analysis (CoA), letters of guarantee, or other documents from the supplier(s) that covers heavy metal testing. If the interval of application and harvest is at least 120 days (or greater if more stringent laws are applicable to the farm), the farm should have atleast the Certificate(s) of Analysis (COA), specification or other related documents available stating the components of the material (lot) applied. The documents provided should include sufficient identification information that would make it possible to trace back to the source if needed.

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Irrigation/Water Use	2.09.01a 2.09.02a 2.09.03a 2.09.04a 2.09.05a 2.09.06a 3.10.01a 3.10.02a 3.10.03a 3.10.04a 3.10.05a 3.10.06a	Are generic E. coli tests conducted on the water (taken from the closest practical source of use) at the required and/or expected frequency? A ZERO POINT (NONCOMPLIANCE) DOWN SCORE IN THIS QUESTION RESULTS IN AUTOMATIC FAILURE OF THIS AUDIT.	Microbial water testing, including generic E. coli, should occur for all water sources used for any growing activities like crop protection/fertilizer and frost or freeze prevention programs. Water samples should be taken from as close to the point of use as is practical. At least one sample per distribution system is required. If there are multiple sampling points in a distribution system, then samples are taken from a different location each test (randomize or rotate locations). For farm and indoor agriculture operations, one sample per water source is collected and tested prior to use if >60 days since the last test of the water source. Additional samples are taken at least monthly during use of the water source. A less frequent testing is acceptable if supported by a valid documented risk assessment although there should be at least one water test per season. Where there are more stringent federal, national or local requirements, these requirements should be followed. If a risk assessment is used to define the frequency, it should include at a minimum the water source, method of application (edible product contact vs non- edible product contact), reference or evidence to the microbial historical data of the water source, and its vulnerability to contamination. A vulnerable water source is one for which there is a potential risk of contamination by fecal matter (e.g. animals grazing upstream of a river abstraction point, overloading of a sewage treatment plant by storm water) or other potential risk factors. As examples, vulnerable sources may be surface water (rivers, lakes, natural ponds), reservoirs supplied by well water or rain water, groundwater collected from shallow wells. Other sources may be vulnerable under specific circumstances and the degree of vulnerability should be established by the grower's risk assessment. In the event the risk assessment indicates contamination risks, the operation should implement adequate measures to prevent and/or mitigate product contamination. References: https://extension.psu.edu/safe-uses-of-agricultural-water https://gaps.cornell.edu/educational-materials/decision-trees/agricultural-water-production/	As described in the expectations and guidelines for this requirement, the intent is for water samples to be taken from as close to the point of use as is practical. This practice provides a sample that is a better representation of the water distribution system directly prior to being applied to the crop.
Pesticide Usage	2.10.02 3.11.02	Do records show that pesticides and their use are in compliance with all requirements of label direction, national (e.g., EPA) registration and any federal, state or local regulations and guidelines? ANY DOWN SCORE IN THIS QUESTION RESULTS IN AN AUTOMATIC FAILURE OF THE AUDIT.	All pesticides must be registered for such use, as required by prevailing regulation, and used in accordance with label directions. N/A is allowed only when registration/authorization information does not exist for pesticides to be used on target crops in the country of production.	Application records show all pesticides applied during the growth cycle are officially registered by the country of production for the target crop (e.g. EPA in the US, COFEPRIS in Mexico, SAG in Chile, Pest Management Regulatory Agency [PMRA] in Canada). Application records show that pesticides used during the growth cycle are applied in accordance with label directions and any federal, state or local regulation. In countries where there is an authorization program in place (e.g. SENASICA in Mexico), this is acceptable provided the program is operated by the government and considers at a minimum the target crop, pesticide commercial name and active ingredient, formulation, dosage, pre-harvest intervals and target pest. In operations applying pesticides "authorized" by the government, where use directions are not in the label, application records should show the "authorization program" use/application directions for pre-harvest intervals are followed.

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Pesticide Usage	2.10.03 3.11.03	Where products are destined for export, do records show that only pesticides approved for use in destination market(s) are used and are in compliance with all requirements of label direction, national (e.g., EPA) registration and any federal, state or local regulations and guidelines? Corrective actions are required if a non-compliance. If corrective actions are not provided and acceptable by the certification body a failure of the audit is scored.	All pesticides must be registered for such use in the destination market, as required by prevailing regulation, and used in accordance with label directions. (i.e. application rates, intended purpose, worker protection standards, personal protection equipment, container storage, disposal). The grower should provide documented evidence that they are complying with the expectations regarding crop protection products of the country of origin and proof of those expectations. That evidence may be in the form of: chemical records, application methods, rates and dosage, compliance with pre-harvest intervals, or any other relevant information. This question is Not Applicable if the product is sold only in the country of production (domestic market). Non-compliance (0 points) if: • There is a single incidence of pesticides not being used in accordance with the country of destination regulatory or label requirements. • Automatic failure if corrective actions are not provided and accepted by the certification body.	Where products are destined for export, the operation should have documented evidence about the MRL requirements for each country of destination for each pesticide (active ingredient) applied during the growth cycle. If there is no MRL defined by the country of destination for any active ingredient applied, the operation should have documented evidence of the applicable regulations in that country (e.g. default MRL, Codex Alimentarius, non-detectable, etc.). In the case where the MRLs have been standardized or harmonized for a group of countries (i.e. European Union) it is acceptable that the operation demonstrate compliance by referencing the "list" of MRLs issued from the formal body that represents those countries for this purpose. **This question is Not Applicable if the product is only sold in the country of production (domestic market).**
Pesticide Usage	2.10.04 3.11.04	Where products are destined for export, are there records showing that pre-harvest intervals and application rates are sufficient to meet MRL entry requirements of the country of export? Records show any non-compliant product is diverted to a market where it meets requirements. Corrective actions are required if a non-compliance. If corrective actions are not provided and acceptable by the certification body a failure of the audit is scored.	Maximum Residue Limits (MRL) tests should be performed. The auditor should review those to ensure it meets MRL entry requirements in the country of destination or the Codex Alimentarius Commission if the country of destination/market follows this MRL compliance. Records show that any non-compliant product is diverted to a market where it meets the requirements. This question is Not Applicable if the product is sold only in the country of production (domestic market). Reference: http://www.fao.org/fao-who-codexalimentarius/codex-texts/dbs/pestres/en/ Non-compliance (0 points) if: • There is a single incidence of pesticide application records not complying with the pre-harvest intervals and application rates. • There is a single incidence of MRL testing that exceeds the country of destination requirements without corrective actions being taken. • Automatic failure if corrective actions are not provided and accepted by the certification body.	Maximum Residue Limits (MRLs) analysis should be performed when the MRLs of the destination countries are lower (stricter) than the country of production. MRL test results and records should demonstrate that products/crops meet MRL regulations in those intended markets and any non-conforming product is diverted from those markets. The auditor should review MRL laboratory reports to ensure MRL entry requirements are met for the country of destination or the applicable regulation in the country of destination when there is no MRL set for any active ingredient, (e.g. the Codex Alimentarius Commission, default MRL, under the limit of detection [LOD], etc.). MRL laboratory reports should be traceable to the operation and consider at least the active ingredients applied during the growth cycle. Other alternative or complementary methods to demonstrate MRL compliance for an active ingredient include: i) Documented analysis of degradation curves and corresponding dosage and/or pre-harvest intervals modifications. Degradation curves used as reference shall be issued/provided by the manufacturer of the pesticide or country of production government and correspond to the degradation of the pesticide active ingredient in the agroclimatic zone where the pesticide was applied. ii) Industry guidelines (e.g. “Agenda de Pesticidas” From ASOEX Chile). iii) Reduced sampling programs for multiple operations under similar pesticide application regimes is acceptable if the sampling program is representative of all the operations considered. Following a procedure for when and where to pull samples for MRL testing based on risk considering factors such as active ingredients applied, timing of the application and harvest, pre-harvest intervals, dosage, etc., is an ideal practice. **This question is Not Applicable if the product is only sold in the country of production (domestic market).**

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Pesticide Usage	2.10.05 3.11.05	For those pesticides that are not registered for use on the target crops in the country of production or if the country does not have, or has a partial legislative framework to cover pesticides, can the grower show that they have registration information, label information, MRL tolerances, etc. for the country of destination? Corrective actions are required if a non-compliance. If corrective actions are not provided and acceptable by the certification body a failure of the audit is scored.	Total compliance (15 points): Grower should be aware of the crop protection products registered and/or authorized by a government agency for use in the target crops in the country of production. Where the country of production does not have or has partial legislation covering pesticides, and if the use of pesticides that are registered for the target crop in another country (extrapolation) is not prohibited, the grower must have information for the pesticides in the country(ies) of destination. The information must show: registration for the specific crop, product labels, Maximum Residue Limit (MRL) tolerances and may also include banned chemical lists, and any other relevant guidelines or legislation. If there is no information available for pesticides used that are not registered in the country of production, or its use based on registration, label and other legislation of the destination country, extrapolation is prohibited by the country of production, and an automatic failure will be scored. This question is Not Applicable if the product is sold only in the country of production (domestic market).	SCORE THIS QUESTION NOT APPLICABLE. This question should always be scored not applicable because: 1)This question does not apply if products are sold only in the country of production. 2) If products are sold or intended to be sold in a foreign country, this question is no longer applicable because pesticide regulations for foreign countries are now covered under other questions (Supplemental Interpretation/Expectation for questions 2.10.03 and 2.10.04 (Farm) and 3.10.03 and 3.10.04 (Indoor Agriculture)).
General Regulations	Section 8.8c	All auditors must pass the GFSI knowledge exam (s) for Pre and/or Post Farm Gate prior to approval for their respective auditing scope. Currently approved auditors shall have passed the exam by December 2021. i. PrimusGFS and the other GFSI benchmarked scheme owners have an agreement in place to mutually recognize passing exam results.		GFSI is no longer requiring the GFSI Knowledge Exam as a pre-requisite for auditor approvals. Quote from GFSI: "Version 2020 will be amended to remove the Requirements for the GFSI Knowledge Exam and as such the Exam will be required to be removed to obtain recognition to Version 2020 of the GFSI Benchmarking Requirements." This change is effective immediately and affects all current and new auditors.