



# Summary of Changes

## PrimusGFS V4.0

This document provides a preliminary Summary of Changes for PrimusGFS v4.0. It is intended as an informative tool to help stakeholders understand the upcoming updates. PrimusGFS will undergo official GFSI benchmarking later this year, and as a result, version 4 is not yet final, Adjustments may be necessary based on the benchmarking process and could be made before the final release. The final version of PrimusGFS v4.0, along with its mandatory implementation date, is expected in 2026.

PrimusGFS v4.0 incorporates changes based on stakeholder feedback from version 3.2, stakeholders' consultation closed on June 14, 2024, regulatory updates, and Global Food Safety Initiative (GFSI) requirements. These updates include changes in section names, addition of new questions, addition of new requirements to preexisting questions, and multiple clarifications on expectations. PrimusGFS v4.0 introduces key updates designed to align with evolving food safety regulatory requirements and industry best practices.

PrimusGFS v4.0 focuses on enhancing clarity, improving risk management, and ensuring compliance with global food safety regulations, industry requirements, and auditing stakeholder needs.

### Overview

#### Key Figures

- A 6.2% reduction in the total number of questions for all PrimusGFS v4.0 Modules.
- A 20% and 13% reduction in total number of questions for Modules 2 - Farm and 3 -Indoor Agriculture respectively.

#### General Changes

- Overall structure remains similar, with some renaming and reorganization for clarity.
- New sections added to enhance food safety and compliance.
- Certain sections removed or merged to avoid redundancy.
- Various expectations re-worded to enhance clarity

**Module 1: Food Safety Management System (FSMS)**

- (4) New Questions
- Supplier Monitoring/Control → Renamed to Supplier/Service Provider Monitoring & Control

Type of change	Question No.	Description
New questions	<b>1.01.02</b>	Is there an established, implemented, and maintained food safety culture assessment plan that includes at least the following elements: communication, training, employee feedback, and performance measurement on food safety-related activities?
	<b>1.01.06</b>	Is there a documented allergen control program?
	<b>1.04.02</b>	Is there documented evidence of the internal audits performed, detailing findings and corrective actions?
	<b>1.04.08</b>	Is there a documented crisis management plan?
Additional Requirements for Preexisting Question	<b>1.01.02</b>	Where legally required, Lot codes and Key Data Elements (KDEs) should be recorded and linked to enable product tracing according to the FDA Traceability Rule.

**Module 2: Farm**

- (11) New Questions
- A simplified Section 9 – Irrigation Water, eliminates some repetitive questions to improve clarity and efficiency.
- The Pesticide usage section has been divided into two separate sections: Pesticide usage and Pesticide Handling & Application for improved clarity and organization.

Type of change	Question No.	Description
New questions	<b>2.02.10</b>	Has the operation eliminated or adequately controlled any potential sources of contamination (physical, chemical, biological)?
	<b>2.05.02</b>	Are copies of all Safety Data Sheets (SDS) on file and fully accessible with clear indexes?
	<b>2.08.01 - 2.08.03a</b>	Various new requirements on fertilizer use, risk assessments, and amendments.
	<b>2.09.01 -2.09.02 2.09.02a</b>	Documented risk assessment in place and controls implemented for all water sources and distribution systems.
Additional Requirements for Preexisting Question	<b>2.09.02b</b>	Information required for testing results if required in compliance with national (e.g., FDA Produce Safety Rule) or local requirements, or applicable guidelines.

### Module 3: Indoor Agriculture

- (5) New Sections Added:
  - Maintenance & Sanitation
  - Operational Practices
  - Receiving & Shipping
  - Testing (only applicable for CEA operations (Controlled Environment Agriculture) indoor vertical farms and high-tech greenhouse producers growing fruits and vegetables in a highly controlled indoor production environment.

Type of change	Question No.	Description
New questions	N/A	47 new questions (12 information gathering questions with no score and some questions specific to CEA operations) covering pest usage and handling, chemical use, sanitation, water testing, and indoor agricultural best practices. The total number of questions in this section was reduced by 13%.

### Module 4: Harvest Crew

- (2) New Questions
- Some expectations have been re-worded to place a stronger focus on harvest equipment.

Type of change	Question No.	Description
New questions	4.05.05	Are copies of all Safety Data Sheets (SDS) on file and fully accessible at all times?
	4.07.02	Are cleaning and sanitation logs on file for transport vehicles?

### Module 5: Facility

- (1) New Questions

Type of change	Question No.	Description
New questions	5.16.04	Is there a written program describing microbiological and chemical testing requirements?
Additional Requirements for Preexisting Question	5.04.07	Traceability lot codes must meet local and national regulatory requirements such as the FDA Traceability Rule (if applicable).

### Module 6: HACCP

- No major changes or new questions.
- Some expectations have been re-worded to align vocabulary with Codex and GFSI requirements.

Type of change	Question No.	Description
Rewording	N/A	Vocabulary to be aligned with the latest version of the Codex Alimentarius General Principles of Food Hygiene.

### Module 7: Preventive Controls

- (3) New Questions
- Sections and expectations have been renamed to align vocabulary with FSPCA Preventive Controls terminology:
  - Development of the Preventive Controls Program → Development of the Food Safety Plan
  - Execution of the Preventive Controls Program → Execution of the Food Safety Plan.

Type of change	Question No.	Description
New Questions	7.02.11	If any preventive control has been identified, does the operation have a documented recall plan?
	7.02.12	Is there documented evidence that the food safety plan (primary documents in the preventive controls food safety system) has been verified on-site?
	7.04.01	Preventive controls plan must be reanalyzed at least every three years or whenever significant changes occur.
Expectation Clarifications	N/A	Multiple clarifications in the expectations of existing questions.

## Conclusion

The updates in PrimusGFS v4.0 enhance food safety standards by integrating new requirements, refining existing expectations, and ensuring compliance with evolving regulations. These changes provide greater clarity, improve operational efficiency, and align with global Food Safety Good Practices.

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