



Food Safety Code: Primary Plant Production, Edition 9

System Elements – Key Changes

Edition 8.1		Edition 9	
2.1 Management Commitment	2.1.1 Food Safety Policy (Mandatory) 2.1.2 Management Responsibility (Mandatory) 2.1.3 Management Review (Mandatory) 2.1.4 Complaint Management (Mandatory) 2.1.5 Crisis Management Planning	2.1 Management Commitment	2.1.1 Management Responsibility (Mandatory) 2.1.2 Management Review (Mandatory) 2.1.3 Complaint Management (Mandatory)
Summary of changes: <ul style="list-style-type: none"> • Combined, consolidated, and removed duplication of requirements. • Clarified intent behind the requirement. • Added food safety culture (2.1.1.1 and 2.1.1.2). • Added requirement for substitute for SQF practitioner. • Added requirement site is staffed and organized to meet food safety objectives. • Moved Crisis Management Planning to 2.6.3 Recalls and Withdrawals. 			
2.2 Document Control and Records	2.2.1 Food Safety Management System 2.2.2 Document Control (Mandatory) 2.2.3 Records (Mandatory)	2.2 Document Control and Records	2.2.1 Food Safety Management System (Mandatory) 2.2.2 Document Control (Mandatory) 2.2.3 Records (Mandatory)
Summary of changes: <ul style="list-style-type: none"> • Added requirement for retention periods to consider the shelf life of the product. • Clarified intent behind the requirement. 			



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Edition 8.1		Edition 9	
2.3 Specification and Product Development	2.3.1 Product Development and Realization 2.3.2 Raw and Packaging Materials 2.3.3 Contract Service Providers 2.3.4 Contract Farms/Producers 2.3.5 Finished Product Specifications	2.3 Specifications, Product/Hybrid Development, and Supplier Approval	2.3.1 Plant Variety/Hybrid or Product Development 2.3.2 Specifications (Agricultural Inputs, Packaging, Harvested Product and Contract Services) 2.3.3 Approved Supplier/Input Purchasing Program (Mandatory)
<p>Summary of Changes:</p> <ul style="list-style-type: none"> • Added detail regarding plant variety/hybrid and product development to include development by authorized persons and review when there are changes impacting food safety. • Added process flow to 2.3.1.4. • All specifications summarized under 2.3.2 and includes contract service providers. Contract Service providers were in 2.3.3 and 2.3.4 in Edition 8.1. • Approved supplier moved to 2.3.3 (formerly 2.4.4). 			

Edition 8.1		Edition 9	
2.4 Food Safety Systems	2.4.1 Food Legislation (Mandatory) 2.4.2 Good Agricultural/Aquaculture Practices (Mandatory) 2.4.3 Food Safety Plan (Mandatory) 2.4.4 Approved Supplier Program (Mandatory) 2.4.5 Non-conforming Product or Equipment	2.4 Food Safety System	2.4.1 Food Legislation (Mandatory) 2.4.2 Good Agricultural/Operating Practices (Mandatory) 2.4.3 Food Safety Plan (Mandatory) 2.4.4 Product Sampling, Inspection, and Analysis 2.4.5 Non-conforming Agricultural Inputs and Products 2.4.6 Product Rework 2.4.7 Product Release (Mandatory) 2.4.8 Environmental Monitoring
<p>Summary of Changes:</p> <ul style="list-style-type: none"> • Adds a clarification explaining clauses 2.4.3.1 and 2.4.3.2. • The approved supplier program (2.4.4) from Edition 8.1 was moved to 2.3.3 in Edition 9. • Product sampling now under 2.4.4 (formerly 2.5.4). • Testing and analysis now includes reference to internal as well as external laboratories. Proficiency testing included in 2.4.4.1 (formerly 2.5.4.2). • New requirements in 2.4, Food Safety Systems include: 2.4.6 Product rework; 2.4.7 Product Release; and 2.4.8 Environmental Monitoring for some primary plant production operations. 			



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2.5 SQF System Verification	2.5.1 Validation and Effectiveness (Mandatory) 2.5.2 Verification Activities (Mandatory) 2.5.3 Corrective and Preventative Action (Mandatory) 2.5.4 Product Sampling, Inspection and Analysis 2.5.5 Internal Audits (Mandatory)	2.5 SQF System Verification	2.5.1 Validation and Effectiveness (Mandatory) 2.5.2 Verification Activities (Mandatory) 2.5.3 Corrective and Preventative Action (Mandatory) 2.5.4 Internal Audits and Inspections (Mandatory)
Summary of Changes: <ul style="list-style-type: none"> Added detail to where deviations from food safety requirements may occur. 			
2.6 Product Identification, Trace, Withdrawal and Recall	2.6.1 Product Identification (Mandatory) 2.6.2 Product Trace (Mandatory) 2.6.3 Product Withdrawal and Recall (Mandatory)	2.6 Product Traceability and Crisis Management	2.6.1 Product Identification (Mandatory) 2.6.2 Product Withdrawal and Recall (Mandatory) 2.6.3 Crisis Management Planning
Summary of Changes: <ul style="list-style-type: none"> Added Crisis Management Planning to 2.6.3 (formerly 2.1.5). Emphasized labeling requirements and checks during operations to ensure that the correct product is in the correct package and with the correct label. Procedures shall be implemented to ensure that label use is reconciled, and any inconsistencies investigated and resolved. 			



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2.7 Food Defense and Food Fraud	2.7.1 Food Defense Plan (Mandatory) 2.7.2 Food Fraud	2.7 Food Defense and Food Fraud	2.7.1 Food Defense Plan (Mandatory) 2.7.2 Food Fraud (Mandatory)
Summary of Changes: <ul style="list-style-type: none"> Consolidated to include all food defense and food fraud (from approved supplier) 			
2.8 Allergen Management	2.8.1 Allergen Management for Primary Production (Mandatory)	2.8 Allergen Management	2.8.1 Allergen Management (Mandatory)
Summary of Changes: <ul style="list-style-type: none"> Added a requirement that the allergen management program include a list of allergens applicable in the country of production and country of destination, if known. 			
2.9 Training	2.9.1 Training Requirements 2.9.2 Training Program (Mandatory) 2.9.3 Instructions 2.9.4 HACCP Training Requirements 2.9.6 Refresher Training 2.9.7 Training Skills Register	2.9 Training	2.9.1 Training Requirements 2.9.2 Training Program (Mandatory)
Summary of Changes: <ul style="list-style-type: none"> Training consolidated down to two sections - 2.9.1 Training Requirements and 2.9.2 Training Program. Added clarification about the training program elements needed to assure competent personnel. 			

Edition 8.1		Edition 9	
7.1 Site Requirements	2.7.3 7.1.1 Property Location I	18.1 Premises – Exterior, Buildings and Interior	18.1.1 Premises Exterior 18.1.2 Growing Areas 18.1.3 Insect and Pest Proofing
<p>Summary of Changes:</p> <ul style="list-style-type: none"> Added requirements similar to GOP’s for packhouses. 			
7.2 Buildings, Storage and Equipment	7.2.1 Field and Storage Buildings 7.2.2 Greenhouses, Hydroponics, and Mushrooms 7.2.3 Controlled Temperature and Atmosphere Storage 7.2.4 Storage of Dry Ingredient, Packaging and Utensils 7.2.5 Farm Machinery, Conveyors, Harvesting Rigs Construction and Storage 7.2.6 Vehicles, Equipment and Utensils 7.2.7 Maintenance 7.2.8 Calibration of Equipment 7.2.9 Pest Prevention 7.2.10 Animal Control 7.2.11 Cleaning and Sanitation	18.2 Equipment and Maintenance	18.2.1 Product Handling Equipment and Utensils 18.2.2 Equipment Maintenance and Repair 18.2.3 Maintenance Personnel and Contractors 18.2.4 Calibration
<p>Summary of Changes:</p> <ul style="list-style-type: none"> Consolidated all requirements for equipment and maintenance and modeled after restructuring in GOP’s for packhouses. 			

Edition 8.1		Edition 9	
7.3 Personal Hygiene (NOTE: in Edition 9, Personal Hygiene is now 7.4)	Section 7.3 was Personal Hygiene in Edition 8.1. It has been moved to 7.4 in Edition 9.	18.3 Cleaning and Pest Prevention	18.3.1 Pest Prevention 18.3.2 Cleaning
<p>Summary of Changes:</p> <ul style="list-style-type: none"> • Equipment maintenance moved to 18.2. • Modeled after GOP's for packhouses. 			
7.3 Personnel Hygiene and Welfare	7.3.1 Personnel Practices 7.3.2 Sanitary Facilities and Hand Washing 7.3.3 Protective clothing 7.3.4 Jewelry and Personal Effects 7.3.5 Visitors 7.3.6 Amenities	18.4 Personnel Practices, Hygiene and Welfare	18.4.1 Personnel Practices 18.4.2 Sanitary Facilities and Handwashing 18.4.3 Protective Clothing 18.4.4 Visitors 18.4.5 Personnel Amenities (change rooms, toilets, lunchrooms/breakrooms)
<p>Summary of Changes:</p> <ul style="list-style-type: none"> • All requirements for personnel consolidated into 18.4 (e.g. some moved from harvesting practices) • Sanitary facility requirements modelled after GOP's for packhouses • Visitor cross contamination risks included from module 7 GAP's 			

Edition 8.1		Edition 9	
7.4 Harvesting, Field Packaging, and Product Handling Practices	7.4.1 Pre-Harvest Assessment 7.4.2 Foreign Matter and Glass Procedures 7.4.3 Field Packing Personal Practices	18.5 Harvesting and Packaging Practices	18.5.1 Growing and Harvesting Operations 18.5.2 Foreign Material, Glass, and Other Hazard Control 18.5.3 Shipping and Receiving
<p>Summary of Changes:</p> <ul style="list-style-type: none"> • Requirements have been consolidated and/or aligned under appropriate headings. For example, former 7.4.1.2 and 7.4.1.3 about knives and containers used in harvesting are now found in 18.5.1 on harvesting practices. • Added employee movement and flow requirements from module 7 GAP's • Added requirement that employee supervision is recorded and linked to corrective actions if needed. • Consolidated all foreign materials requirements in 18.5.2 and modelled after GOP's for packhouses • Former 7.6.2 on Transport has been added to 18.5 as clause 18.5.3 and expanded to include securing vehicles from tampering and types of records to be maintained. 			
7.5 Water Management	7.5.1 Water Systems 7.5.2 Irrigation Water 7.5.3 Treatment of Irrigation Water 7.5.4 Water System Risk Assessment 7.5.5 Water Management Plan 7.5.6 Corrective Actions 7.5.7 Ice 7.5.8 Harvest Assessment Water/Ice	18.6 Water Management	18.6.1 Water Systems 18.6.2 Water Management Plan
<p>Summary of Changes:</p> <ul style="list-style-type: none"> • Aligned with GOP's for packhouses including water use controls in 18.6.2. • Includes water storage risk and hazard controls from module 7 GAP's. 			

Edition 8.1		Edition 9	
7.6 Storage and Transport	7.6.1 Storage of Hazardous Chemicals, Toxic Substances, and Petroleum Products 7.6.2 Transport	18.7 Storage	18.7.1 Ambient/Dry Storage 18.7.2 Controlled Temperature and Atmosphere Storage
<p>Summary of Changes:</p> <ul style="list-style-type: none"> Consolidated to storage of inputs and products only and aligned with GOP's for Packhouses. Moved agricultural chemicals and hazardous chemicals to 18.8.1. 			
7.7 Soil Management	7.7.1 Fertilizer Management 7.7.2 Soil Amendments 7.7.3 Purchasing Chemicals 7.7.4 Agricultural Chemicals	18.8 Fertilizers, Agriculture and Hazardous Chemicals, and Soil Amendments	18.8.1 Storage of Agricultural Chemicals, Soil Amendments, and Toxic Substances 18.8.2 Purchasing Chemicals 18.8.3 Soil Amendments 18.8.4 Agricultural Chemicals
<p>Summary of Changes:</p> <ul style="list-style-type: none"> All chemical storage requirements consolidated to 18.8.1 and included compliant labelling from module 7 GAP's Purchasing referenced with Supplier Approval Program including compliance with commodity specific uses from module 7 GAP's. Soil Amendment and Agricultural Chemicals specific to use and application. 			
7.8 Waste Disposal	7.8.1 Dry, Liquid and Unsanitary Waste Disposal	18.9 Waste Disposal	18.9.1 Waste Management
<p>Summary of Changes:</p> <ul style="list-style-type: none"> Clarification added to the Waste systems and containment as per module 7 GAP's. 			