



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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|---|---|---|---|
| 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 | |
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| 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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| Edition 8.1 | | Edition 9 | |
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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 | |
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| 7.1 Site Requirements | 7.1.1 Property Location I | 7.1 Site Requirements | 7.1.1 Property Location |
| <p>Summary of Changes:</p> <ul style="list-style-type: none"> Added a requirement to maintain records for each production site listing what crops have been grown and harvested on the site. | | | |
| 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 | 7.2 Buildings, Storage and Equipment | 7.2.1 Field and Storage Buildings 7.2.2 Controlled Temperature and Atmosphere Storage 7.2.3 Storage of Agricultural Chemicals, Soil Amendments, and Toxic Substances 7.2.4 Farm Machinery, Product Handling Equipment, and Utensils |

Summary of Changes:

- Requirements have been consolidated and more clearly listed to clarify the intention.
- Section 7.2.3 has been moved from former 7.6.1, outlining chemical storage requirements.
- Several Edition 8.1 – 7.2 sections have been moved to 7.3 in Edition 9: Maintenance; equipment calibration; pest prevention; animal control; and cleaning and sanitation.

| Edition 8.1 | | Edition 9 | |
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| 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. | 7.3 Farm Maintenance, Cleaning, and Pest/Animal Control (THIS IS A NEW SECTION THAT INCLUDES FORMER 7.2 ELEMENTS.) | 7.3.1 Equipment Maintenance and Calibration 7.3.2 Pest Prevention 7.3.3 Animal Control 7.3.4 Cleaning |
| <p>Summary of Changes:</p> <ul style="list-style-type: none"> Former 7.2 Sections are now in 7.3: Equipment Maintenance and Calibration; Pest Prevention; Animal Control; and Cleaning. These sections are similar to what they were in edition 8.1, except that pest prevention training awareness for personnel is part of 2.9, the consolidated section on training program elements. | | | |
| 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 | 7.4 Personal Hygiene | 7.4.1 Personnel Practices 7.4.2 Sanitary Facilities and Handwashing 7.4.3 Protective Clothing 7.4.4 Visitors 7.4.5 Personnel Food, Drink, and Personal Storage |
| <p>Summary of Changes:</p> <ul style="list-style-type: none"> Adds details and examples about appropriate personal hygiene practices. Former 7.3.4 about jewelry and personal effects is now consolidated into 7.4.1.1. Former 7.3.6.3 about availability of drinking water is now in 7.4.1.1. | | | |

| Edition 8.1 | | Edition 9 | |
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| 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 | 7.5 Harvesting, Field Packaging, Product Handling Practices, and Transport | 7.5.1 Growing and Harvesting Inspection 7.5.2 Foreign Matter and Glass Hazard Control 7.5.3 Harvesting and Field Packing Practices 7.5.4 Transport |
| <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 7.5.3 on harvesting practices. • 7.5.1 and 7.5.2 provide examples of the types of inspections needed for foreign material risks. • Former 7.4.3.1 on personnel practices has been included in 7.4 Personal Hygiene. • Former 7.6.2 on Transport has been added to 7.5 as clause 7.5.4 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 | 7.6 Water Management | 7.6.1 Water Systems 7.6.2 Irrigation Water 7.6.3 Water Management Plan |

Summary of Changes:

- Consolidated clauses related to irrigation, risk analysis, and water management from Edition 8.1 and added more clarification about the requirements, control, and documentation.
- Former 7.6.2 on Transport has been added to 7.5 as clause 7.5.4 and expanded to include securing vehicles from tampering and types of records to be maintained.

| Edition 8.1 | | Edition 9 | |
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| 7.6 Storage and Transport | 7.6.1 Storage of Hazardous Chemicals, Toxic Substances, and Petroleum Products 7.6.2 Transport | FORMER 7.6 HAS BEEN CONSOLIDATED INTO CLAUSES 7.2 and 7.5. | 7.2.3 Storage of Agricultural Chemicals, Soil Amendments, and Toxic Substances 7.5.4 Transport |
| <p>Summary of Changes:</p> <ul style="list-style-type: none"> Former 7.6 has been consolidated into clauses 7.2 and 7.5. See these sections for any summary of changes that might have occurred. | | | |
| 7.7 Soil Management | 7.7.1 Fertilizer Management 7.7.2 Soil Amendments 7.7.3 Purchasing Chemicals 7.7.4 Agricultural Chemicals | 7.7 Fertilizers, Agriculture Chemicals, and Soil Amendments | 7.7.1 Purchasing Chemicals 7.7.2 Soil Amendments 7.7.3 Agricultural Chemicals |
| <p>Summary of Changes:</p> <ul style="list-style-type: none"> Some former 7.7.1 requirements on fertilizer management have been moved to clause 7.2.3.4, relating to soil amendments storage. Clause 7.2.3 lists all requirements related to storage of agricultural chemicals, soil amendments and toxic substances. Other 7.7.1 requirements are in Clause 7.7. Edition 9. | | | |
| 7.8 Waste Disposal | 7.8.1 Dry, Liquid and Unsanitary Waste Disposal | 7.8 Waste Disposal | 7.8.1 Waste Handling and Disposal |
| <p>Summary of Changes:</p> <ul style="list-style-type: none"> Clarification added to the Waste disposal section. Chemical waste disposal is covered in 7.2.3.5. | | | |