

General Description of Changes to Module 5

1. Changes to question numbers
2. Removed requirement for worker identification (5.05.13 in v3.1) and storage enclosed requirement (5.03.02 in v3.1)
3. Removed requirement to have SDS on file (5.11.01 in v3.1) and sanitation check of truck trailer (5.17.06 in v3.1)

PrimusGFS v3.2 Summary of Changes

Q #	New #	v3.2 Question	v3.2 Expectation	v3.2 Interpretation Guideline
5.01.01	5.10.05	No change in v3.2	No change in v3.2	No change in v3.2
5.01.02	5.01.01	No change in v3.2	Chemicals are stored in a clean, designated (with a sign), secure (locked) area, and away from food and packaging materials and separated from the production areas. Spill controls should be in place for opened in use containers. Access to chemicals needs to be controlled, so that only workers who understand the risks involved, and have been trained properly, are allowed to access these chemicals.	Total compliance (15 points): Chemicals are stored in a clean, designated (with a sign), dedicated, secure (locked) area, away from food and packaging materials and separated from the production areas. Storage area is maintained clean and sanitary. Access to chemicals needs to be controlled, so that only workers who understand the risks involved and have been trained properly are allowed to access these chemicals. All chemical containers should have legible labels of contents; this includes chemicals that have been decanted from master containers into smaller containers. Where chemicals are stored, adequate liquid containment (spill controls) techniques need to be employed (secondary containment, absorbent materials, angled sealed floors, spill kits etc.). Chemical storage should be designed to help contain spills and leaking containers. Large volumes (e.g. 55-gallon drums) in use next to a wash line should be secured in some way (e.g. anchored, chained) and on spill containment. Empty containers should be stored and disposed of safely. Liquid should not be stored above powders. Minor deficiency (10 points) if: • Single/isolated instance(s) of chemicals not properly stored. • Single/isolated instance(s) of improperly labeled or unlabeled chemical containers. • Single/isolated instance(s) of empty containers either not being stored properly or disposed of properly. • The chemical storage area is not marked to indicate its use. • Single isolated instance(s) of chemicals being used without proper attention to chemical spillage. Major deficiency (5 points) if: • Numerous instances of improperly stored chemicals. • Numerous instances of improperly labeled or unlabeled chemical containers. • Chemical storage is segregated in an enclosed, designated area, but not locked. • Chemical storage area(s) has inadequate liquid containment systems. • Numerous instances of empty containers either not being properly stored or disposed of properly. • Numerous instances of chemicals being used without proper attention to chemical spillage. Non-compliance (0 points) if: • Failure to properly store chemicals. • There is no designated area for chemicals. • There is a designated area for chemicals, but it is not an enclosed or locked area. • Spilled chemicals found in the chemical storage areas (not cleaned up properly)

Q #	New #	v3.2 Question	v3.2 Expectation	v3.2 Interpretation Guideline
5.01.03	5.01.02	Are "food grade" and "non-food grade" chemicals used appropriately, according to the label and not commingled?	All chemicals applied should be approved by the prevailing authority for their designated use and used according to label instructions. Only food grade lubricants should be used anywhere near product and packaging materials. "Food grade" and "non-food grade" materials should be stored in separate designated areas and adequately labeled. Grease guns and containers should be labeled adequately. Access to non-food grade materials should be limited to those with knowledge of the correct use of chemicals.	Total compliance (10 points): Food grade chemicals, including lubricants, greases, etc., are used in all product/packaging contact areas. All chemicals applied should be approved by the prevailing authority (e.g., US: EPA/FDA, Canada: CFIA/Environment Canada, Chile: SAG/Ministerio de Salud, Mexico: COFEPRIS) for their designated use and used according to label instructions. Only food grade lubricants should be used anywhere near product and packaging materials. Food grade chemicals should be stored apart from non-food grade items to eliminate confusion between types, and adequately labeled. Non-food grade chemicals also include cleaning chemicals and paint, for example use of domestic polishes which are not intended for food contact surfaces and have strong fragrances should not be used on food contact surfaces; office cleaning materials, restroom cleaning material should be stored separately from production cleaning materials. Grease guns and containers should indicate which are for food grade greases and which are for non-food grade use. Non-food grade material use, where required should not be used in food contact areas and be limited to workers who know how to use the chemicals to avoid contamination issues. Non-food grade materials should not be found in the growing/storage areas (unless stored securely, with access to entrusted workers only). Chemicals should be used according to label instructions e.g. following correct dilutions, H1 designation on lubricants, etc. Any chlorine bleach that is used for making a sanitizing solution, must be of sufficient purity to be categorized as a “food grade” substance. Some commercially available household chlorine bleaches contain fragrances, thickeners and/or other additives not approved for food use. These products are not suitable for making sanitizing solutions. If any chemicals are used to alter or buffer the pH of a sanitizing solution these should also be “food grade.”

Q #	New #	v3.2 Question	v3.2 Expectation	v3.2 Interpretation Guideline
5.01.04	5.01.03	No change in v3.2	Highly visible and understood signs supporting appropriate Good Manufacturing Practices (GMP's) (e.g., no eating, chewing, drinking or smoking, hand washing requirements, any specific clothing requirements, etc.) should be posted visibly and in the language of the workers (picture signs are allowed) to remind them of proper practices. Signs should especially be located at the entrance(s) to the production/storage areas, restrooms and break areas.	Total compliance (10 points): Signs for proper GMP's need to be posted visibly and in the language of the workers (picture signs are allowed) to remind them of proper practices. Signs should be posted in the following areas: • Before entering areas that require hair nets and smocks (PPE), including production and storage areas. • Before areas that prohibit food consumption, drinking, tobacco products, chewing gum. • Bathrooms and break-room(s) should have hand-washing signs as reminders to wash hands before eating, returning to work, after using the toilet. Signage reminding workers and visitors of GMP rules around the site are very useful (but should not cause down score) such as additional PPE rules, hand dip/gel use (where relevant), not allowing personal items in the production areas, etc. Minor deficiency (7 points) if: • The signs are not in the workers' language (pictures are acceptable) • Single/isolated instance(s) of required signs not being in position. Major deficiency (3 points) if: • Numerous instances of required signs not being in position. Non-compliance (0 points) if: • Fundamental failure to place signs in the required positions.
5.01.05	5.01.04	No change in v3.2	No change in v3.2	No change in v3.2
5.02.04		No change in v3.2	All areas should be free of recurring/existing external pest activity. Evidence (e.g., activity/tracks, feces) of rodents, animals (e.g., dogs and/or birds) in active areas outside the facility is an indication of a pest pressure on the whole building. All possible measures should be taken to avoid attracting pests to the facility perimeter.	No change in v3.2

Q #	New #	v3.2 Question	v3.2 Expectation	v3.2 Interpretation Guideline
5.02.06		Are pest control devices located away from exposed raw materials, work-in-progress, ingredients (including water and ice), finished goods and packaging, and poisonous bait stations are not used within the facility?	Pest control devices should be located away from exposed food products, packaging materials, or equipment to prevent any physical or microbial contamination. Poisonous bait stations should not be located within the facility. No bait should be found outside of bait stations.	Total compliance (10 points): Pest control devices should be located away from exposed food products, packaging materials or equipment to prevent any physical or microbial contamination. Poisonous bait stations should not be located within the facility. Care should be taken to place pest control devices in such a manner that they do not pose a threat of contaminating product, packaging or raw materials. This includes the following restrictions: • Poisonous bait stations and other pesticides should only be used outside the facility. • There should be no domestic fly sprays used within the production and storage areas. • Block bait or soft, pouch-style bait as opposed to grain and pellet bait should be used (except for the external use of National Organic Program approved materials).

Q #	New #	v3.2 Question	v3.2 Expectation	v3.2 Interpretation Guideline
5.02.07		No change in v3.2	All pest control devices should be maintained clean, in working order and replaced when damaged so that they will accomplish their intended use. Date of inspections should be posted on the devices (unless barcode scanned), as well as kept on file.	Total compliance (5 points): All pest control devices should be maintained clean, in working order and replaced when damaged in order to accomplish their intended use. Date of inspections should be posted on the devices (unless barcode scanned) as well as kept on file. For digital monitoring systems, auditors should review time-stamped digital monitoring records and periodic physical inspection records to ensure program is working as intended. The following criteria should be met: • If non-toxic glue boards are used, they should be located inside a trap box or PVC piping, etc., and changed frequently ensuring that the surface has a shiny glaze with no build-up of dust or debris. • If cardboard traps are used (interior and dry areas only) they should be in good repair and marked as monitored (see below). • If mechanical wind-up traps are used, they should be wound. Winding is checked by triggering the spring device to operate the trap. The trap should be rewound after testing. • Approximately 10% of the traps, glue boards and bait stations should be checked by the auditor. • Record of service verification such as stickers, cards or bar codes should be on the inside of the station and on bottom of glue boards requiring the station to be opened to record data (date and initial of inspector) or to scan. External labeling is allowed on traps with a clear window on top. • Bait and other poisons should be controlled and applied by a licensed applicator (see 5.12.01). • Bait in bait stations should be secured inside the bait station on a rod above the floor of the station, or the bait station is designed so bait cannot be removed by a rodent or “float away” in a heavy rain. Bait stations should be tamper resistant. A key should be made available at the time of the audit. • No bait stations should be missing entire bait. • No old or moldy bait observed. • Bait stations and traps should not be fouled with weeds, dirt, and other debris. • External pest control devices should be checked at least monthly – these checks to be recorded. • Internal multiple-catch devices should be checked at least weekly – these checks to be recorded. • Any snap traps used should be inside stations and should be checked at least weekly – these checks to be recorded.

Q #	New #	v3.2 Question	v3.2 Expectation	v3.2 Interpretation Guideline
5.02.08		No change in v3.2	The distance between devices should be determined based on the activity and the needs of the operation. As a reference, the following guidelines can be used to locate traps. Inside pest control: mechanical traps every 20-40 ft (6-12 m). Outside building perimeter: mechanical traps and/or bait stations every 50-100 ft (15-30 m). Interior and exterior devices should be placed on both sides of doorways. Land Perimeter (if used): within 50 ft (30 m) of buildings and at 50-100 ft (15-30 m).	Total compliance (5 points): The distance between devices should be determined based on the activity and the needs of the operation. As a guide (i.e. not expecting the use of tape measures) to number and placement of traps and bait stations: • Multiple catch traps or glue boards in stations or PVC pipes should be positioned between 20 to 40 feet (6 to 12 meters) intervals around the inside perimeter of all rooms. Spacing might be affected by the structure, storage and types of activities occurring. • Snap traps in stations may be used if necessary in certain areas e.g., in areas with high dust levels (e.g., potatoes, onions), covered breezeways or box mezzanines where large traps or glue boards are not practical. Snap traps in stations should be positioned between 20 to 40 feet (6 to 12 meters) intervals though spacing may be affected by the structure, storage and types of activities occurring. • Inside the facility, traps should be placed within 6 feet (about 2 meters) of both sides of all outside exit/entry doors. This includes either side of the pedestrian doors. Effort should be made to avoid placing traps on curbing. • Trapping inside Cold Storage and Cooler operations is mandatory. Trapping inside cold rooms within packinghouse and processors is recommended, but it is left to the auditor's discretion to review the risks (doors that open to the outside, proofing issues, potential for rodents to be harbored in the materials being stored). • Bait stations or multiple-catch traps should be positioned between 50-100 feet (15-30 meters) intervals around the exterior of the building perimeter and within 6 feet (about 2 meters) of both sides of all outside exit/entry doors, except where there is public access (public access is defined as access easily gained by the general public such as parking lots or sidewalks, school areas or areas of environmental concern). Device placement might be affected by the structure, external storage and type of area (urban, rural etc.). • Bait stations (where used) should be positioned within 100 feet (30 meters) of structures. This may impact fence line/property boundary baiting i.e. bait stations must be within 100 feet (30 meters) of buildings and at 50-100 feet (15-30 m) intervals. If an exterior fence line/property perimeter program is utilized at distances greater than 100 feet (30 m) from buildings, then non-bait traps (e.g. multiple-catch traps) should be positioned at 50-100 feet (15-30 m) intervals along perimeter. Auditor should check label for bait and ensure compliance to distance requirements on label. • Outside packaging and any outside food storage should be protected by an adequate number of pest control devices. https://www.epa.gov/rodenticides/restrictions-rodenticide-products#types http://npmapestworld.org/default/assets/File/2016%20Pest%20Management%20Standards%20for%20Food%20Processing-Electronic.pdf

Q #	New #	v3.2 Question	v3.2 Expectation	v3.2 Interpretation Guideline
				Minor deficiency (3 points) if: • Single/isolated instance(s) of devices positioned at longer intervals than mentioned above. • Single/isolated instance(s) of devices missing or not within 6 feet (about 2 meters) of exit/entry doors. • No bait stations along facility property fence line (auditor discretion on necessity for fence line trapping). • Devices not located in a single area that should be covered e.g. coolers (see text above), break area, etc. Major deficiency (1 point) if: • Numerous instances of devices positioned at longer intervals than mentioned above. • Numerous instances of devices missing or not within 6 feet (about 2 meters) of exit/entry doors. • Devices not located in more than one area that should be covered e.g. packing areas and coolers, building perimeters (see text above). • No exterior devices. Non-compliance (0 points) if: • Device positioning is such that the number of devices is nowhere near adequate in terms of spacing and coverage of entry points, e.g. one or two traps to cover a large production area. • Devices not located in numerous areas that should be covered e.g. packing areas and coolers (see text above).
5.02.09		No change in v3.2	All devices should be clearly identified (e.g. numbered) to facilitate monitoring and maintenance. All internal rodent devices should be located with wall signs (that state the trap number and also that they are pest control device identifier signs).	Total compliance (5 points): The devices are numbered and a coding system is in place to identify the type of device on a map. Auditor should check that the trap map numbering and trap positions, match reality. All internal rodent devices, should be located with a wall sign (that states the device number and that it is a pest control device identifier), in case they are moved.

Q #	New #	v3.2 Question	v3.2 Expectation	v3.2 Interpretation Guideline
5.02.10		Are all pest control devices effective and bait stations secured?	All devices should be correctly orientated with openings parallel with and closest to walls. Bait stations should be locked and tamper resistant in some way (e.g., locks, screws, etc.). Bait stations should be secured to prevent removal.	Total compliance (5 points): All devices should be correctly orientated with openings parallel with and closest to wall. Bait stations should be secured to minimize movement of the device and be tamper resistant. Bait stations should be secured with a ground rod, chain, cable or wire, or glued to the wall/ground, or secured with a patio stone to prevent the bait from being removed by shaking, washed away, etc. Bait stations should be tamper resistant through the use of screws, latches, locks, or by other effective means. Note – only devices containing bait are required to be secured. Live traps used indoors are not required to be secured to the ground; auditee may use metal “sleeves” or similar solutions to prevent displacement, crushing by forklifts, etc. Glue boards should be inside a device (e.g. trap box, PVC pipe, etc.) rather than loose on the floor. Auditor discretion applies to traps placed on curbing. Minor deficiency (3 points) if: • Single/isolated instance(s) of bait stations not being secured. • Single/isolated instance(s) of devices “out of position” or incorrectly orientated. • Lacking wall signs for external traps that are secured to a patio block. Major deficiency (1 point) if: • Numerous instances of bait stations not being secured. • Numerous instances of devices “out of position” or incorrectly orientated.

Q #	New #	v3.2 Question	v3.2 Expectation	v3.2 Interpretation Guideline
5.03.01		No change in v3.2	All raw materials, products and packaging should be stored off the floor (i.e. on racks, pallets, shelves, etc.). Materials should be properly protected during storage to prevent contamination (e.g., away from chemicals, battery chargers, etc.). Raw materials, finished product and packaging materials should be stored in separate areas to prevent cross contamination. When separate room storage is not possible, the auditor should assess the risks, especially with respect to cross contamination. Special attention should be given to ice storage and where relevant allergen storage.	Total compliance (15 points): All raw materials, products and packaging should be stored off the floor (i.e. on racks, pallets, shelves, etc.). Materials should be properly protected during storage to prevent contamination (e.g., away from chemicals, battery chargers, etc.). Raw materials, finished product and packaging materials should be stored in separate areas to prevent cross contamination. When separate room storage is not possible, the auditor should assess the risks, especially with respect to cross contamination. When assessing raw contamination of finished goods, the auditor should assess the level of risk e.g. how “processed” are the finished goods, what kind of packaging is used etc. Raw unprocessed items should not be able to contaminate finished washed/processed items. Packaging storage, especially dust from cardboard storage should not contaminating produce items. If mixed food items are stored on site then there should be controls to prevent contamination issues e.g. raw eggs should not be stored above raw produce, glass items should be kept in a separated area and always stored near ground level. Wet product is not stored above product – this especially important where iced product is being stored in conditions where the ice is thawing and dripping. Ice should be manufactured, stored and handled in a manner that eliminates contamination issues; attention to ice tools and how salt for ice making is being stored and handled. Condensate is scored in 5.09.05.
5.03.02		Question removed		
5.03.03	5.03.02	No change in v3.2	No change in v3.2	Total compliance (5 points): Only food, food contact products and items related to the process are stored in the facility’s storage areas. Examples of items that do not belong include household items such as exercise equipment, carpets, jet skis, tires, etc. These items have the potential to be areas of pest harborage. Sanitation chemicals and maintenance equipment storage should have their own dedicated storage areas away from food and related items.
5.03.04	5.03.03	No change in v3.2	No change in v3.2	No change in v3.2

Q #	New #	v3.2 Question	v3.2 Expectation	v3.2 Interpretation Guideline
5.03.05	5.03.04	No change in v3.2	Raw products, work in progress, ingredients, finished goods, and food contact packaging and food contact surfaces should be free from spoilage, adulteration and/or gross contamination (21 CFR 110.3g, 21 CFR 117.3). If legislation exists, then the contamination should be viewed against this legislation (e.g., USDA Grading Standards often include decay tolerances). Spoilage and adulteration would include any physical, chemical or biological contamination including blood and bodily fluids. Measures should be taken to prevent any known or reasonably foreseeable hazard (e.g., Clostridium botulinum in mushrooms). Ice should be made from potable water. This question is designed to allow an auditor to halt an audit when finding gross contamination issues. **ANY DOWN SCORE IN THIS QUESTION RESULTS IN AN AUTOMATIC FAILURE OF THE AUDIT.**	Total compliance (15 points): Raw products, work in progress, ingredients, finished goods, food contact packaging and food contact surfaces should be free from spoilage, adulteration and/or gross contamination (21 CFR 110.3g, 21 CFR 117.3). If legislation exists, then the contamination should be viewed against this legislation (e.g., USDA Grading Standards often include decay tolerances). Spoilage and adulteration would include any physical, chemical or biological contamination including blood and bodily fluids. Measures should be taken to prevent any known or reasonably foreseeable hazard (e.g., Clostridium botulinum in mushrooms). This question is designed to allow an auditor to halt an audit when finding gross contamination issues (note pests are covered by 5.02.01 and 5.02.02). Where an issue is observed by an operator in the normal process, auditor should observe the actions of the operator before scoring. Auditors should use their discretion and decide whether the frequency of the contamination warrants an automatic failure. Examples include pieces of glass, one piece of rodent bait, paint on product or packaging, flakes of rust, etc. Is the issue widespread or a one-off issue? There is no adulteration of ice permitted. Water used for ice for product cooling should be potable. Ensure that ice production and storage areas are inspected. Water directly sourced from rivers, canals, ponds, etc., (i.e. surface water) used to cool, wash, make ice or other product contact use without proper treatment i.e. filtration and/or anti-microbial treatment and proper testing (see 5.16.04) is not considered potable (US EPA drinking water microbiological specification (chemical if appropriate) https://www.epa.gov/dwstandardsregulations and for the purposes of this audit is considered to be adulterated. Use of waste process discharge water from a surface source (e.g. discharged into a pond then re-used as process water) should not be considered suitable for product contact use and for the purposes of this audit is considered to be adulterated.
5.03.06	5.03.05	No change in v3.2	No change in v3.2	No change in v3.2
5.03.07	5.03.06	No change in v3.2	No change in v3.2	No change in v3.2

Q #	New #	v3.2 Question	v3.2 Expectation	v3.2 Interpretation Guideline
5.03.08	5.03.07	No change in v3.2	All materials should be rotated using First in First Out (FIFO) policy / procedure to ensure items are used in the correct order they are received and within their allocated shelf-life. Materials should be clearly marked or labeled with some kind of rotation coding that is understood by all workers, in order to ensure FIFO and effective traceback/recall procedures. Proper rotation of materials can prevent stock losses due to pest infestation, decomposition, mold and other problems associated with prolonged storage.	Total compliance (5 points): All materials should be rotated using FIFO (First In First Out) policy/ procedure to ensure items are used in the correct order they are received and within their allocated shelf-life (this does not apply to commodities that undergo ripening treatments or where rotation is dictated by the initial quality inspection). Materials should be clearly marked or labeled with some kind of rotation coding that is understood by all staff, in order to ensure FIFO and effective traceback/recall procedures. Packaging rotation might be affected by market forces. Having a “Just In Time” ordering policy and thereby having very limited stock volumes, is acceptable as a replacement for FIFO if it can be proven e.g. the auditor can see that hardly any stock is maintained. “Just In Time” ordering policy does not replace the need to tag materials as per question 5.03.06.
5.03.09	5.03.08	No change in v3.2	Products should be stored at the appropriate temperatures. This might mean that the operation has several cold store chambers set at different temperatures.	Total compliance (10 points). All products should be stored at the appropriate temperatures. Products should be stored in separate chambers if they require different optimum storage temperatures. Check the area/chamber thermometers and thermostats and compare the reading against the types of products being stored in the area. Holding temperatures in refrigerated storage rooms should not exceed 41 ºF (5 ºC) for microbiologically sensitive raw materials, ingredients or products including an animal food that is raw or heat treated; a plant food that is heat-treated or consists of raw seed sprouts, cut melons, cut leafy greens, cut tomatoes or mixtures of cut tomatoes that are not modified in a way so that they are unable to support pathogenic microorganism growth or toxin formation, or garlic-in-oil mixtures that are not modified in a way so that they are unable to support pathogenic microorganism growth or toxin formation.

Q #	New #	v3.2 Question	v3.2 Expectation	v3.2 Interpretation Guideline
	5.03.09 New Question	Is any packaging being stored outside, being stored protected?	Packaging should be stored off the ground (on pallets, racks, etc.) and protected from dust, leaks and other contaminants. Neither, food contact packaging (including RPCs if used as primary packaging) nor non-food contact packaging e.g. cardboard outers should be stored outside. If done, any outside stored packaging materials should be covered with a waterproof and dust proof shroud (often made of plastic material) and included under a pest control program. N/A if no packaging is being stored outside.	Total compliance (10 points): Packaging should be stored off the ground (on pallets, racks, etc.) and protected from dust, leaks and other contaminants. Neither food contact packaging (including RPCs if used as primary packaging) nor non-food contact packaging e.g. cardboard outers should be stored outside. If done, any outside stored packaging materials should be covered with a waterproof and dust proof shroud (often made of plastic material) and included under a pest control program. N/A if no packaging is being stored outside. Minor deficiency (7 points) if: • Single/isolated instance(s) of evidence of dust and/or leaks on packaging which does not pose an immediate threat of product contamination. • Non-food contact packaging is stored outside, with shroud and storage area is included in the pest control program. Major deficiency (3 points) if: • Numerous instances of dust and/or leaks on packaging which does not pose an immediate threat of product contamination. • Food contact packaging is stored outside (covered with shroud) and storage area is included in the pest control program. • Non-food contact packaging is stored outside, is not shrouded, with or without pest control. Non-compliance (0 points) if: • Widespread evidence of dust and/or leaks on packaging which has the potential for product contamination. • Food contact packaging items are stored outside, without shrouds, with or without pest control. • Any observation of direct gross widespread contamination of product, ingredient or packaging materials (revert back to Q 5.03.04, automatic failure).

Q #	New #	v3.2 Question	v3.2 Expectation	v3.2 Interpretation Guideline
5.04.01		No change in v3.2	Incoming raw materials should not be a source of contamination to work-in-progress and/or finished goods. Raw product should not be allowed to touch processed product; production (product handling) areas should be physically separated from storage areas. Raw product handlers should not contaminate finished/processed product - clear controls required. Separate coded utensils required for finished/processed products relative to raw products. Forklift truck should either be dedicated to one area or the wheels are cleaned when going from raw to processed goods areas. Utensils, cleaning implements, internal vehicles etc. should not be vectors for cross contamination	Total compliance (15 Points): Incoming raw materials should not be a source of contamination to work-in-progress and/or finished goods. Raw products should not come into contact with processed products, especially processed products that have been washed, cut or thermally treated. Production (product handling) areas should be physically separated from storage areas. In some cases, a physical barrier between production and storage areas might be required – this will depend on the type of product being produced and the items being stored. For example, cardboard should not be stored in a fresh-cut-processing area. Another example would be storing raw material near where finished fresh-cut product is being stored. There should be plenty of space and separation to help avoid cross contamination issues. Workers who handle raw products should not then handle finished/processed goods without first ensuring that they are free of raw material contaminants. This should include hand washing, glove change etc., but might also include changing into a new set of garments; ideally workers should be dedicated to handling raw or finished/processed goods, but not both within a shift. Utensils, cleaning implements, internal vehicles etc. should not be allowed to be vectors for cross contamination; ideally dedicated coded equipment should be provided for raw and processed goods. Failing this, there should be equipment sanitation steps between uses. Anti-microbial washes (often found in fresh cut operations) are not kill steps with respect to products, though they do reduce microbial loading when properly maintained. Refer to 5.09.07 for drainage flow and discharge.
5.04.02		No change in v3.2	Ceilings and/or any overhead fixtures above storage are free from condensation or dust. Ladders or walkways (catwalks) above exposed product or packaging material have kick plates at least 3.5 inches (8 cm) high and are covered in some way that protects the product or food contact surfaces underneath. Drips or condensate (e.g., from roof, fixtures, ducts, pipes, etc.) should not contaminate food, food contact surfaces or packaging material. Adequate measures should be in place to protect from condensate.	Total compliance (15 points): Ceilings and/or any overhead fixtures above lines and storage are free from condensation or dust. Ladders or walkways (catwalks) above exposed product or packaging material have kick plates at least 3.5 inches (8 cm) high and are covered in some way that protects the product or food contact surfaces underneath. Drips or condensate (e.g., from roof, fixtures, ducts, pipes, etc.) should not contaminate food, food contact surfaces or packaging material. Adequate measures should be in place to protect from condensate. Condensate is scored in 5.09.05.

Q #	New #	v3.2 Question	v3.2 Expectation	v3.2 Interpretation Guideline
5.04.03	5.04.04	Where facilities are not completely enclosed, are there measures in place to mitigate potential hazards?	Production areas are enclosed (walls and roof) with doors either closed or pest protected in some way (e.g., strip curtains, air curtains, speed doors, etc.) or other mitigating measures (e.g. equipment cleaned prior to use, covering equipment, no product storage, etc.); auditor discretion applies. Walls can be solid, fine mesh or any other pest proof material, with openings that should be no greater than 1/8 inch (3 mm) or smaller. N/A if facilities are fully enclosed.	Total compliance (15 points): Production areas should all be enclosed (walls and roof) with doors either closed or pest protected in some way (e.g., strip curtains, air curtains, speed doors, etc.) or other mitigating measures (e.g. equipment cleaned prior to use, covering equipment, no product storage, etc.); auditor discretion applies. Walls can be solid, fine mesh or any other pest proof material, with openings that should be no greater than 1/8 inch (3 mm). Dust and pest proof wall materials are required for processing operations. N/A if facilities are fully enclosed. Minor deficiency (10 points) if: • Single/isolated instance(s) of an open door that is not protected to mitigate risks in some way. • Measures in place do not adequately control risk (e.g. mesh size greater than 1/8 inch (3 mm)). Major deficiency (5 points) if: • Numerous instances of open doors that are not protected to mitigate risks in some way. • One or more open walls not protected to mitigate risks in some way. Non-compliance (0 points): if one of the following: • Fundamental failure to mitigate risks.
5.04.04	5.04.03	No change in v3.2	No change in v3.2	No change in v3.2
5.04.05		No change in v3.2	Re-work product should be labeled or tracked properly to avoid mistaking it for other products and maintaining traceability. Re-work should be handled to prevent contamination from the environment or from other products.	No change in v3.2

Q #	New #	v3.2 Question	v3.2 Expectation	v3.2 Interpretation Guideline
5.04.08		No change in v3.2	No change in v3.2	Total compliance (10 points): Foreign material control method(s) are in place where needed. These systems should be frequently checked (recorded) to ensure that they are working correctly with a functioning rejection device (e.g., belt, air jet, etc.). Discovery of foreign material issues should be recorded along with relevant corrective actions (might be recorded in the NUOCA Log). Where necessary, foreign material control systems should be tested to ensure they are operating properly. The frequency and types of testing are established in a written program and the frequency is adhered to by QA personnel and documented. Foreign material controls include detectors, traps, visual, sieves, filters and magnets. Also check that the rejection system/mechanism is being tested as well e.g. rejection arm timing, alarm system, etc. Continuous visual inspection is acceptable for whole products. Metal detection should be used for all products that have been cut/sliced i.e. processed. Metal detectors should be tested at least hourly, including pre-start, at a product change and at a lot change/end of production run. At least ferrous, non-ferrous and stainless steel (usually 316) test pieces should be used separately to test the metal detectors – other specific metal test pieces should be considered if the plant equipment is made out of other materials. Where available, customer specifications should be used. Test pieces should be placed as close to the aperture center as possible; embedding test pieces in the product is an ideal method. Discovery of foreign material issues should be recorded along with relevant corrective actions. The auditor should have the auditee check metal detector(s) sensitivity while touring the facility.

Q #	New #	v3.2 Question	v3.2 Expectation	v3.2 Interpretation Guideline
5.04.09		No change in v3.2	The strength (concentration, pH, etc.) of anti-microbial chemicals should be checked on a regular basis and recorded. All test solutions/strips should be within date code, appropriate for the concentrations used and stored correctly. If an ORP meter controls the pumps that are injecting the anti-microbial and/or buffer, free chlorine levels should be verified by an independent method (e.g., titration. appropriate test strips) in order to verify injector readings.	Total compliance (15 points): The strength of anti-microbial chemicals (product and cleaning) should be checked using an appropriate method for the anti-microbial in use (e.g., chemical reaction-based test, test probe, or as recommended by disinfectant supplier). Water samples for testing should be taken from, and/or probes located in, areas farthest from the antimicrobial injection/addition site. Any water treatment at source (e.g. well, canal) should be monitored. Solutions that are too weak will be ineffective, while those too strong may be harmful to workers or product. Where necessary, pH of solutions should also be checked. Methods include, dip sticks, test strip papers, conductivity meters, titration, color comparison methods e.g. tintometers, etc. All test solutions/strips should be within date code, appropriate for the concentrations used and stored correctly (especially light and temperature sensitive materials). If an ORP meter controls the pumps that are injecting the anti-microbial and/or buffer, free chlorine levels should be verified by an independent method (e.g., titration, appropriate test strips). Probe sensors should be properly located, have periodic cleaning and calibration and may become temporarily saturated by over-injection of anti-microbial or buffer. The auditor should have the auditee check the strength of anti-microbial chemicals while touring the facility. Minor deficiency (10 points) if: • Single/isolated instance(s) of a method not being used correctly. • Single/isolated instance(s) of a testing procedure being used that is not appropriate for the concentration and/or sanitizer in use. • Single/isolated instance(s) of out of date verifying chemicals being used. Major deficiency (5 points) if: • Numerous instances of a method not being used correctly. • Numerous instances of a testing procedure being used that is not appropriate for the concentration and/or chemical in use. • Numerous instances of out of date verifying chemicals being used. • ORP meter used to control pumps injecting anti-microbial and or/buffer without an independent method to verify readings. Non-compliance (0 points) if: • Equipment to monitor anti-microbial chemical concentrations is not available, not operational or is not being used correctly.

Q #	New #	v3.2 Question	v3.2 Expectation	v3.2 Interpretation Guideline
5.04.11		No change in v3.2	Hand washing stations should be designated and used only for hand washing, have water of suitable temperature and pressure and be maintained in good working order with proper drainage. They should be properly stocked with liquid unscented/non-perfumed, neutral or antiseptic soap. Single use paper towels should be used and units properly located; hot air driers are acceptable if properly located. There should be an adequate stock of soap and paper towels.	Total compliance (15 points): Hand washing facilities should be designated and used only for hand washing (no storage, food handling, etc.), have water of suitable temperature and pressure and be maintained in good working order with proper drainage. Hand washing stations should be properly stocked with liquid unscented/non-perfumed, neutral or antiseptic soap; scent should rinse away with the foam leaving no lingering fragrance on hands. Single use paper towels should be used and units properly located; hot air driers are acceptable if properly located (hot air driers should not be located within production areas since they create aerosols). There should be an adequate stock of soap and paper towels. Hand washing stations should be maintained in good working order with proper drainage and warm water (> 100 oF, 38 oC) available for use. Discharge water from sinks should not run directly onto the floor. Care should be taken to ensure that hand wash water temperatures are not too hot when using pre-set mixer faucets (taps). Hands-free operations are an optimum system for food establishments. Cleanliness of hand wash stations is scored in 5.08.10. United States Department of Labor 29 CFR 1910.141(c)(1)(i): Toilet Facilities https://www.osha.gov/pls/oshaweb/owadisp.show_document?p_table=STANDARDS&p_id=9790 Minor deficiency (10 points) if: • Single/isolated instance(s) of hand washing stations not in working order. • Only cold water is available at hand washing stations. • Single/isolated instance of water being too hot. • Single/isolated instance(s) of water pressure not being adequate. • Single/isolated instance(s) of soap with a lingering fragrance being used. • Single instance of hand washing station not designated or being used for another purpose. Major deficiency (5 points) if: • Numerous instances of hand washing stations not in working order. • Numerous instances of water pressure not being adequate. • Numerous instances or widespread use of soap with a lingering fragrance being used. • Using terry cloth re-useable towels or roller towels. • No paper towels are provided or hot air driers are located within production areas. • Numerous instances of hand washing stations without warm water available or where water is too hot. • More than one instance of a hand washing station not designated or being used for another purpose. Non-compliance (0 points) if: • No soap is provided. • There are no functioning hand wash stations. • Any observation of direct gross widespread contamination of product, ingredient or packaging materials (revert back to Q 5.03.04, automatic failure).

Q #	New #	v3.2 Question	v3.2 Expectation	v3.2 Interpretation Guideline
5.04.12		No change in v3.2	No change in v3.2	Total compliance (15 points): Toilet facilities should be available to all workers and visitors, and are adequate in number and location: • Toilet facilities should be located within a reasonable distance from the workers' workstation. • Toilet facilities should be readily available to male and female workers. The number of facilities provided for each sex should be based on the number of workers of that sex. • Where there are single-occupancy rooms, separate toilet rooms for each sex are not required (sufficient toilets available). • There should be sufficient toilets for the workers. Please use this table as a guide: • Where toilet facilities will not be used by women, urinals may be provided instead of toilets, except that the number of toilets in such cases should not be reduced to less than 2/3 of the minimum specified. • Each individual toilet facility should be able to be locked from inside. • Each toilet facility should be maintained, well lighted and ventilated to outside air. • In the toilet room, the floor and sidewalls should be watertight. The sidewalls should be watertight to a height of at least five inches. • The floors, walls, ceiling, partitions and doors of all toilet rooms should be made of a finish that can be cleaned easily. • Doors should not open directly into areas where food is exposed to airborne contamination, i.e. storage, processing and packing areas. Use of double doors or having a positive airflow system is accepted. • Toilet paper should be available to each person and stored in such a way as to prevent contamination. • Adequate trash disposal should be available within restrooms. Restrooms should have hand washing facilities with: • Unscented/non-perfumed, neutral or antiseptic soap; scent should rinse away with the foam leaving no lingering fragrance on hands. • An adequate supply of soap and paper towels. • Proper drainage and warm water (> 100oF, 38oC) available for use. • If hand washing stations within toilet facilities are the only stations provided, then requirements for 5.04.11 apply. • Cleanliness of toilet facilities is scored in 5.08.10. Minor deficiency (10 points) if: • One of the above criteria is not met. • Operation has door(s) opening into the production areas, i.e. not located in the amenity area or office area and are self-closing (e.g., use a spring-loaded door). Major deficiency (5 points) if: • Two of the above criteria are not met. • Operation has door(s) opening into the production areas, i.e. not located in the amenity area or office area and are not self-closing (e.g., use a spring-loaded door).

Q #	New #	v3.2 Question	v3.2 Expectation	v3.2 Interpretation Guideline
				Non-compliance (0 points) if: • Failure to provide sufficient or adequate restroom facilities. • Three of the above criteria are not met. • Any observation of direct gross widespread contamination of product, ingredient or packaging materials (revert back to Q 5.03.04, automatic failure).
5.04.13		Are secondary hand sanitation stations adequate in number and location, and are the stations maintained properly?	Secondary hand sanitation is required for items that may be potentially "ready-to-eat" (e.g., herbs, tomatoes, edible flowers, etc.). Secondary hand sanitation (hand dips, gels or sprays) does not replace hand washing requirements (lack surfactant qualities). Secondary hand sanitation stations should be unscented/non-perfumed, have 60% to 95% ethanol or isopropanol and conveniently located in traffic zones but should not be obstructive. Units are ideally touch-free. Strength checks do not need to be performed for commercially purchased sanitizers that have been purchased already mixed.	Total compliance (5 points): In processing, packing and repackaging areas, the use of (non-perfumed) secondary hand sanitation stations is the last activity a worker performs before taking their position on the line. Secondary hand sanitation is required for fresh-cut operations and for operations producing items that may be potentially "ready-to-eat" (e.g., herbs, stone fruit, tomatoes, citrus, edible flowers, etc.). Note that citrus peel is often used in drinks, used for zesting, etc. Secondary hand sanitation (hand dips, gels or sprays) does not replace hand washing requirements (lack surfactant qualities). Secondary hand sanitation stations should be unscented/non-perfumed, have 60% to 95% ethanol or isopropanol (benzalkonium chloride is also acceptable) and conveniently located in traffic zones but should not be obstructive. Units are ideally touch-free. Hand dips (if used) should contain a food grade sanitizer at a determined concentration. Refer to hand sanitizer manufacturer label for dilutions. Hand dips should be regularly monitored (recorded anti-microbial strength checks) to ensure their effectiveness with corrective actions recorded (e.g. dip solution replenishment and anti-microbial additions). Hand gel and spray stations should be well stocked with a sanitizer approved for direct hand to food contact and regularly monitored (recorded checks) to ensure availability with corrective actions recorded (e.g. pack replenishment); use of a refill alert type dispenser is ideal practice. Dispensers should be located a sufficient distance from production line to prevent accidental product contamination. The auditor should check that gel pack type stations are stocked and have the auditee check the strength of anti-microbial chemicals in hand dips while touring the facility. Records are scored in 5.13.06.

Q #	New #	v3.2 Question	v3.2 Expectation	v3.2 Interpretation Guideline
5.04.14		No change in v3.2	Foot (boot) stations (foamers, foot dip mats, baths, sprays) should be located in areas when crossing into a "clean" zone from an area of potential contamination (e.g., from outside into the packing zone). Stations should be regularly monitored for volume and concentration (recorded anti-microbial strength checks) and the dip solution regularly changed to ensure their effectiveness throughout the production period with corrective actions recorded (e.g. dip solution replenishment and anti-microbial).	Total compliance (3 points): Foot (boot) stations (foot dip mats, baths, sprays) should be located in areas when crossing into a “clean” zone from an area of potential contamination (e.g., from outside into the packing zone, from raw storage into packing, from bathrooms into processing, etc.). Foot dips are required in processing operations. They are not required in packinghouses, but may be considered as an additional control. Foot dips should contain a food grade sanitizer at a determined concentration. Refer to sanitizer manufacturer label for dilutions. Foot dips should be regularly monitored for volume and concentration (recorded anti-microbial strength checks) and the dip solution regularly changed to ensure their effectiveness throughout the production period with corrective actions recorded (e.g. dip solution replenishment and anti-microbial). Dry products should be EPA registered and applied as per the label instructions (label dosage directions should be followed for EPA registered floor sanitizers) and regular renewal should be monitored. The auditor should have the auditee check the strength of anti-microbial chemicals while touring the facility. Records are scored in 5.13.06. Workers should be using the foot dips as they enter the processing areas.

Q #	New #	v3.2 Question	v3.2 Expectation	v3.2 Interpretation Guideline
5.04.16		Are re-usable containers cleanable and clearly designated for the specific purpose (trash, raw product, finished product, re-work, ice, etc.) such that cross contamination is prevented?	All re-usable containers should be able to be cleaned (smooth, non-porous, non-toxic) or used with a clean liner to protect against contamination. Cleaning type and frequency should be determined based on the products and processes involved. Bins, boxes, hoppers, barrels, baskets, etc. used for the storage of raw materials, work in progress, ingredients, finished goods or packaging should be kept in a clean state. In-house re-usable containers should be identifiable (color-coded or labeled in the language understood by the workers) so that their designated purpose can be easily known.	Total compliance (5 points): All re-usable containers should be able to be cleaned (smooth, non-porous, non-toxic) or used with a clean liner to protect against contamination. Bins, boxes, hoppers, barrels, baskets, etc. used for the storage of raw materials, work in progress, ingredients, finished goods or packaging should be kept in a clean state. In-house re-usable containers should be identifiable (color-coded or labeled in the language understood by the workers) so that their designated purpose can be easily known. Returnable plastic containers (RPCs) (e.g., CHEP, IFCO) should be treated like single service containers and only used for product (score in 5.04.15). If the trash container is the only re-used container on site and is a specific and unique design, so that it cannot be mistaken for another use, then it should not be down scored. Minor deficiency (3 points) if: • Single/isolated instance(s) of a dirty re-usable container (there is no direct product contamination). • Single/isolated instance(s) of inferior materials e.g. porous material construction, wood, non-food grade materials). • Single/isolated instance(s) of a re-usable container not labeled or color-coded. Major deficiency (1 point) if: • Numerous instances of dirty re-usable containers (there is no direct product contamination). • Numerous instances of inferior materials e.g. porous material construction, wood, non-food grade materials). • Numerous instances of re-usable containers not properly labeled or color-coded. Non-compliance (0 points) if: • Condition and/or design of re-usable containers will not allow for effective cleaning under normal conditions. • Re-usable containers are used for multiple purposes without the containers being labeled or color-coded. • Any observation of direct contamination of product, ingredients or packaging material – revert to 5.03.04, automatic failure.
5.04.17		No change in v3.2	Thermometers, pH meters, ATP systems, etc., should be working correctly. Where necessary, equipment should be calibrated.	No change in v3.2

Q #	New #	v3.2 Question	v3.2 Expectation	v3.2 Interpretation Guideline
5.05.03		Are workers who are working directly or indirectly with food, free from signs of boils, sores, open wounds and are not exhibiting signs of foodborne illness?	No change in v3.2	Minor deficiency (7 points) if: • A single instance of a worker with exposed boils, sores, exposed infected wounds, foodborne illness or any other source of abnormal microbial contamination. There is not a threat of product or packaging contamination. Major deficiency (3 points) if: • More than one instance of workers with exposed boils, sores, exposed infected wounds, foodborne illness or any other source of abnormal microbial contamination. There is not a threat of product or packaging contamination. Non-compliance (0 points) if: • One or more workers are observed working in contact with food, food contact surfaces or packaging that has or have exposed boils, sores, infected wounds, showing signs of food borne illness or any other source of abnormal microbial contamination that is a hazard. • The auditor should consider whether this is adulteration and whether to apply Q 5.03.04 and score an automatic failure.
5.05.04		Are workers wearing effective hair restraints that contain all hair?	Wearing effective hair restraints (i.e. hair nets, beard nets), is required in all operations where product is exposed, including with products that require cooking prior to consumption. Hair restraints prevents hair from falling into the product and prevents workers from unintentionally touching hair, then touching product. Baseball caps and head coverings are allowed in packinghouses, only if they are clean and worn with a hair net covering them that is clearly visible and restrains all hair. Wearing effective hair restraints is required in all operations where product is exposed.	Total compliance (5 points): Workers (includes maintenance workers and visitors) should be wearing appropriate hair restraints (hairnets, beard nets and moustache covers where appropriate) that fully contain all hair. Wearing effective hair restraints (i.e. hair nets, beard nets) is required in all operations where product is exposed, including with products that require cooking prior to consumption. Hair restraints are not required when there is no exposed product (e.g. cross docking, storage and distribution center). Baseball caps and head coverings are allowed in packinghouses, only if they are clean and worn with a hair net covering them that is clearly visible and a hair net restrains all hair. Bobby pins, hairgrips should not be worn outside hair nets. Long hair should be tied back for safety reasons, using a band of some type (not metal clips or pins). Hair restraints should a) stop hair falling onto the product and b) prevent workers from touching their hair and then the product.
5.05.05		Is jewelry confined to a plain wedding band and watches, studs, false eyelashes, etc., are not worn?	No change in v3.2	No change in v3.2

Q #	New #	v3.2 Question	v3.2 Expectation	v3.2 Interpretation Guideline
5.05.06		No change in v3.2	Outer garment policy should consider potential for cross contamination, customer requirements, production risk, product type, etc. Outer garment policy should consider potential for cross contamination, customer requirements, production risk, product type, etc. Outer garments include where applicable: smocks, aprons, sleeves, gloves, boots, etc. Workers should not wear personal clothes with sequins, pom-poms, fur, etc. No sleeveless tops without an over garment. Where dedicated protective clothing is not required/worn, it must be clear that outer street clothes are clean and not a potential source of contamination.	Total compliance (5 points): If the operation has taken a decision to establish an outer garment policy based on risks this should consider the following: customer requirements, national and local legal requirements, potential cross contamination and foreign material risks, etc. Suitable protective outer garments are required for workers handling processed products, washed packinghouse products (after the washing step) that are potentially ready-to-eat (e.g., tomatoes, leafy greens, etc.), and in packinghouses that overwrap potentially RTE product. Outer garments include where applicable: smocks, aprons, sleeves, gloves, boots, etc. For example, smocks worn in processing operations (excluding non-RTE items such as dry beans and pulses), aprons (minimum) in packinghouses after wash step and where potentially ready-to-eat product is being overwrapped. Sleeves are required to prevent product contact with clothing. Items should be laundered in-house or by contract laundering agency. Individual workers should not take garments home for cleaning. Where items are laundered in-house the auditee should have documented SOP and GMP rules about how these garments are cleaned. If workers sleeves come into contact with washed ready-to-eat products, then protective waterproof sleeve covers should be used. Glove policy should be clear to workers – auditors will establish policy before making scoring decisions and note this policy for the audit report. Gloves are not allowed to replace handwashing requirements. Gloves should be changed after break periods, using toilet facilities, any activity other than handling of food items or when gloves are soiled, torn or otherwise contaminated. If re-useable gloves are used, then they should be made of material that can be readily cleaned and sanitized, clean gloves should be issued at least daily and as needed throughout the day and stored properly in-between uses. Gloves should not be taken home for cleaning. Where gloves are used they should be non-latex (e.g. vinyl, nitrile, etc.) – see 5.05.03. This includes gloves in first-aid kits. Where dedicated protective clothing is not required/worn, it must be clear that outer street clothes are clean and not a potential source of contamination. Workers should not wear personal clothes with sequins, pom-poms, fur, etc. No sleeveless tops without an over garment.
5.05.09		Are worker personal items being stored appropriately (i.e. not in the production or material storage area)?	No change in v3.2	No change in v3.2

Q #	New #	v3.2 Question	v3.2 Expectation	v3.2 Interpretation Guideline
5.05.11		No change in v3.2	No change in v3.2	Total compliance (10 points): Fresh potable water meeting the quality standards for drinking water should be provided in all places of employment for drinking, following local and national laws. The term “potable” meaning that the water is of drinking water quality (e.g., the EPA Drinking Water Standard or equivalent). Auditors should verbally verify the source of the water at the time of the audit. Portable drinking water dispensers should be designed, constructed and maintained in a sanitary condition, capable of being closed, and equipped with a tap. The water should be dispensed in single-use drinking cups or by fountains. Common drinking cups and other common utensils are prohibited. If there is evidence (i.e. visual observation or documentation) the water is coming from a questionable source, the auditor should review water quality test results.
5.05.12		No change in v3.2	There should be no items stored in pockets above the waist. Items in pockets and otherwise unsecured have the potential to fall into the product.	No change in v3.2
5.05.13		Question removed		
5.05.14	5.05.13	No change in v3.2	First aid kit(s) should be adequately supplied to reflect the kinds of injuries that occur (including any chemicals stored on-site) and should be stored in an area where they are readily available for emergency access. Date-coded materials should be within dates of expiration. Bandages used in food facilities should be blue in color for easy visual detection with a metal strip in operations where metal detectors are expected, and ideally waterproof. Gloves should be worn over all band aids on hands.	Total compliance (5 points): First aid kit(s) should be adequately supplied to reflect the kinds of injuries that occur (including any chemicals stored on-site) and should be stored in an area where they are readily available for emergency access. Date-coded materials should be within dates of expiration. Bandages used in food facilities should be blue in color for easy visual detection with a metal strip behind the wound pad for detection in operations where metal detectors are expected, and ideally waterproof. In facilities that handle only whole product, blue bandages without a metal strip are acceptable (inclusion of a metal strip is preferred). For facilities handling products that may be perceived as blue e.g. blueberries, use of band aids that are not blue are permitted if of a color contrasting to product and equipment. Gloves should be worn over all band aids on hands. Auditors should verify by checking the first-aid kit(s).
5.06.02		No change in v3.2	Flaking paint, corrosion, rust and/or unhygienic materials should not be present on any non-food contact surfaces. Where possible, equipment framework is not penetrated by bolts or studs.	No change in v3.2

Q #	New #	v3.2 Question	v3.2 Expectation	v3.2 Interpretation Guideline
5.06.03		No change in v3.2	No change in v3.2	Total compliance (15 points): Equipment should be made of appropriate materials for current use that can be easily cleaned (smooth, non-porous, non-toxic, no dead spots) and maintained in an acceptable condition. Equipment should be designed to allow access to all areas and there should be no debris trapping areas that cannot be easily cleaned, including hollow structures on supports, rollers, racks, etc. There should be no metal-to-metal contact that results in grinding and therefore potential metal contamination. There should be no “bobbly”, debris trapping welds that are hard to clean. Equipment should be mounted off the floor at least 6 inches (15 cm) to allow for cleaning and adjacent wall areas should be accessible. Non-compliance (0 points) if: • Condition and/or design of equipment will not allow for effective cleaning under normal conditions. • Widespread proof of poor design and installation making it difficult to access equipment or surroundings for cleaning. • Widespread poor welding, rough surfaces, poorly designed equipment that traps debris.
5.06.04		No change in v3.2	All cold rooms should have thermometers appropriately placed to monitor the temperature accurately within the area. The monitoring thermometers should be independent from the thermostat probe.	Total compliance (5 points): Independent thermometers or temperature recorders should be present in all coolers and freezers and placed to accurately record temperature. Thermometers should be separated from the thermostat probes, since there is always a chance that the thermostat system might go down and/or the probes themselves might be incorrect. If multiple probes are in a room with a system able to detect an out-of-calibration, broken or down probe and able to see the other probes in the room are in working order then this is also acceptable. Not applicable if cooler and/or freezers are not used. Minor deficiency (3 points) if: • Single/isolated instances of thermometer(s) not present or not properly located in coolers or freezers. • Only have a single thermostat probe. Major deficiency (1 point) if: • Numerous instances of thermometers not present or not properly located in coolers or freezers. Non-compliance (0 points) if: • No thermometers present in coolers or freezers.
5.07.02		No change in v3.2	Unsanitary non-food contact surfaces (zone 2, zone 3) can indirectly lead to contamination of the product. Food debris, bio films, excessive dust, etc., should be cleaned off equipment and facility surface in order to reduce the overall facility bio-burden.	No change in v3.2

Q #	New #	v3.2 Question	v3.2 Expectation	v3.2 Interpretation Guideline
5.07.03		No change in v3.2	All storage containers should be cleaned and sanitized as frequently as necessary in order to prevent contamination. Cleaning type and frequency should be determined based on the products and processes involved. Containers should be kept covered and protected during storage.	Total compliance (10 points): Bins, boxes, hoppers, barrels, baskets, etc. used for the storage of product, or ingredients should be kept in a clean state. Cleaning type and frequency should be determined based on the products and processes involved (cross reference with Master Sanitation Schedule). The storage of these items should ensure that they remain clean and uncontaminated (e.g., covered clean).
5.08.03		Are floor drains covered, do they appear clean, free from odors, in good repair, and flow in a manner that prevents contamination (e.g., from high to low risk areas, from high risk directly to drain system)? **Point change 5 to 10**	No change in v3.2	Total compliance (10 points): • All facility floor drains, including covers and internal channels are clean, and free of decayed/old material. • Drains flow from high risk to low risk areas, from high risk directly to drain system. • All facility floor drains are free of odors. • There is no overflow or excessive standing water in the floor drains. • Drains in processing plants, packinghouses with washing steps and high humidity coolers should be cleaned daily. Daily drain cleaning should also occur at coolers that use hydro-vacuum, dry vacuum, ice injectors, and humidifiers, where storage areas are often wet and/or humid, and also any coolers that while not having this sort of cooling equipment, do store products at high humidity. • Drains should have smooth walls and bases that allow free flow of water without catching debris, and also aid cleaning of the drains. • Water from refrigeration drip pans is drained and disposed of away from product and product contact surfaces.
5.08.05		No change in v3.2	No change in v3.2	Minor deficiency (3 points) if: • Single/isolated instance(s) of improperly maintained plastic strip curtain. • Single/isolated instance(s) of strip curtains mounted touching the floor. Major deficiency (1 point) if: • Numerous instances of improperly maintained plastic strip curtains. • Numerous instances of strip curtains mounted touching the floor. Non-compliance (0 points) if: • Widespread failure to maintain strip curtains in a good condition. • Widespread failure to mount strip curtains off the floor.

Q #	New #	v3.2 Question	v3.2 Expectation	v3.2 Interpretation Guideline
5.08.06		Is personal protection equipment (PPE) for the sanitation crew in good condition and stored to prevent cross contamination to raw products, work in progress, ingredients, finished goods or packaging?	The sanitation crew should have access to appropriate safety equipment to avoid any health problems from the chemicals that they use during the cleaning process. All safety equipment should be stored to prevent contamination to raw products, work in progress, ingredients, finished goods or packaging.	Total compliance (3 points): Safety equipment (Personal Protective Equipment (PPE) provided for the sanitation crew should not be a potential source of contamination. Safety equipment storage is organized and segregated from food and packaging materials to prevent contamination. Safety equipment is stored separately away from personal clothing. Access to sanitation equipment should be restricted to trained workers. Safety equipment should be stored securely to prevent unauthorized use. Safety equipment is in good repair.

Q #	New #	v3.2 Question	v3.2 Expectation	v3.2 Interpretation Guideline
5.08.07		No change in v3.2	No change in v3.2	Total compliance (5 points): There should be an adequate supply of cleaning equipment (per procedures employed). Cleaning equipment should be free of debris, cleaned and stored correctly between uses. Cleaning equipment should be stored away from the food and operational areas in a designated storage area. Cleaning equipment is stored to prevent it becoming a source of cross contamination for the product, materials, packing equipment, and in general, for the complete operation. Brooms, mops, etc., should be stored off the floor and “head down” in order to avoid them being contaminated by any accidental spills and prevent them from being harborage areas for pests and ensure debris does not contaminate the handle. Squeegees used for cleaning and condensate control during production should be stored in dedicated sanitizer solutions and these solutions should be at the correct dilution and part of the sanitizer monitoring system. Auditors should spot check solution strength during the audit. Equipment used for different types of cleaning should not be stored touching each other (see next question). Minor deficiency (3 points) if: • Single/isolated instance(s) of the issues mentioned above. • Single/isolated instance(s) of cleaning equipment that is kept in areas where it may represent a potential risk to contaminate product, materials or equipment. • Single/isolated instance(s) of cleaning materials temporarily unavailable. Major deficiency (1 point) if: • Numerous instances of the issues mentioned above. • Numerous instances of cleaning equipment that is being stored in a way that may represent a risk for product, materials or equipment. • Numerous cleaning materials unavailable. Non-compliance (0 points) if: • Widespread failure to properly store cleaning equipment. • Very poor availability of cleaning materials. • Any instance of cleaning tool dips not at the correct dilution and part of the sanitizer monitoring system.
5.08.08		No change in v3.2	Cleaning equipment used for production areas need to be separated (physically and visually) from cleaning equipment used in non-production areas in order to prevent cross contamination from occurring. Sometimes even within production areas, there is a need to differentiate equipment even further (e.g., segregating flooring cleaning materials from equipment cleaning materials).	Total compliance (10 points): Cleaning equipment should be “area specific”. Coding should prevent cross contamination. Separation of restroom (toilet facility), outdoor, maintenance and production brushes, mops, etc., is most important. Coding should be made clear to all workers (e.g. using posters). If allergens are used, separated coded equipment for allergen management should be considered. Sometimes there is a need to segregate equipment within a production area e.g. equipment used on the floor versus equipment used on the machinery.

Q #	New #	v3.2 Question	v3.2 Expectation	v3.2 Interpretation Guideline
5.08.10		No change in v3.2	No change in v3.2	Non-compliance (0 points) if: • Failure to properly maintain areas. • Widespread observation of soiled toilet tissues being placed in trash cans. • Single instance of soiled toilet tissues being left on the restroom floor.
5.09.01	5.10.01	No change in v3.2	There should be a site map(s) or similar document(s) (photograph, drawing) that accurately shows the facility building(s), location of permanent water fixtures (well, mains) and water systems, including any holding tanks and water captured for re-use. Storm water, waste water, septic systems, effluent lagoons or ponds, surface water bodies are also identified.	Total compliance (5 points). There should be a site map(s) or similar document(s) (photograph, drawing) that accurately shows the facility building(s), location of permanent water fixtures (well, mains) and water systems, including any holding tanks and water captured for re-use. Storm water, wastewater, septic systems, effluent lagoons or ponds, surface water bodies are also identified.
5.09.02	5.10.02	No change in v3.2	There should be a facility floor plan(s) (map, drawing) indicating production areas, storage areas, water fixtures and drainage, layout of equipment and traffic flow patterns of equipment and workers. The flow pattern for food products, waste material, workers and equipment should prevent raw materials and waste from coming in contact with the finished product. Flow is ideally in one direction and follows a logical sequence from raw material handling to finished product storage.	Total compliance (5 points). There should be a facility floor plan(s) (map, drawing) indicating production areas, storage areas, water fixtures and drainage, layout of equipment and traffic flow patterns of equipment and workers. The flow pattern for food products, waste material, workers and equipment should prevent raw materials and waste from coming in contact with the finished product. Flow is ideally in one direction and follows a logical sequence from raw material handling to finished product storage.
5.10.01	5.09.01	No change in v3.2	No change in v3.2	No change in v3.2

Q #	New #	v3.2 Question	v3.2 Expectation	v3.2 Interpretation Guideline
5.10.02	5.09.02	Has the operation eliminated or adequately controlled any potential metal, glass or brittle plastic contamination issues?	All foreign material risks must be either removed and/or accounted for and controlled. Examples include metal filings (maintenance), office windows, PC screens, brittle plastic from any source, staples, etc.	Total compliance (10 points): No metal, glass or plastic issues noted (excluding issues noted under specific questions already noted within this audit). This question is designed to allow the auditor to underline potential foreign material contaminants to the auditee that are not covered by other more specific questions within the audit. Examples include: pins in sign boards within the facility, using “snappable” blades instead of one-piece blades, noting broken and brittle plastic issues on re-useable totes and finding uncontrolled glass items like coffee pots, computer screens, clock faces, eye glasses, office window glass, brittle plastic from any source, staples, etc. in production areas. Plastic coated shatterproof light bulbs are also acceptable without further protection. Auditors should take precaution not to bring glass items into the facility during inspections. If a glass or brittle plastic item cannot be replaced immediately or glass is necessary, e.g. a high-pressure gauge, then use of a glass register might be considered, see question in 5.14.13. Minor deficiency (7 points) if: • Single/isolated instance(s) of potential foreign material contaminants observed. • Single/isolated instance(s) of glass or brittle plastic item noted in the production/storage areas, but is not accounted for on the glass register. Major deficiency (3 points) if: • Numerous instances of potential foreign material contaminants observed. • Numerous glass or brittle plastic items noted in the production/storage areas, but are not accounted for on the glass register. • Single instance of a broken glass or brittle plastic item found within the facility. Non-compliance (0 points) if: • Widespread failure to control potential foreign objects on site. • More than one instance of a broken glass or brittle plastic item found within the facility. • Any incident of direct product contamination with a foreign material like glass, metal or plastic constitutes a health hazard and is viewed as adulteration. Revert to Q 5.03.04.
5.10.03	5.09.03	No change in v3.2	Wood is a porous material and can harbor bacteria. It cannot be cleaned or sanitized effectively. Wooden materials can also splinter and pose a risk of physical contamination. Wet and high humidity areas should not be constructed of wood.	No change in v3.2
5.10.04	5.09.04	No change in v3.2	No change in v3.2	No change in v3.2

Q #	New #	v3.2 Question	v3.2 Expectation	v3.2 Interpretation Guideline
5.10.05	5.09.05	No change in v3.2	Ventilation systems (cooling, heating and air handling) should be sufficient to control condensation, mold, dust, odors and vapors so that conditions do not exist where raw materials, work in progress, ingredients or packaging materials may be contaminated. Ventilation equipment should be balanced to provide an adequate air exchange rate to prevent condensation on walls, ceilings or other surfaces in production areas. Ideally, positive air pressure is employed in processing operations.	Total compliance (10 points): The ventilation system (cooling, heating and air handling) should be sufficient to control condensation, mold, dust, odors and vapors so that conditions do not exist where raw materials, work in progress, ingredients or packaging materials may be contaminated or tainted. Ventilation equipment is balanced to provide an adequate air exchange rate to prevent condensation on walls, ceilings or other surfaces in production areas. Ideally, positive air pressure is employed in processing operations. Where condensation is not adequately controlled by ventilation or is considered inevitable, action should be taken to ensure raw materials, work in progress, ingredients, finished products or packaging materials are not located below areas where condensate may drip. Where this is not possible facilities should control such condensation by cleaning and sanitizing the surfaces as often as needed in accordance with the facility's SSOPs. Where condensation has formed to such an extent on surfaces (that are not being cleaned and sanitized) that raw materials, work in progress, ingredients, finished product or packaging materials may become or are becoming contaminated the condensation is considered to be an adulterant (scoring reverts to Q 5.03.04), and creating insanitary conditions. For example, heavily beaded condensation drips from a ceiling of a processing area that is not regularly cleaned and sanitized in accordance with the facility's SSOP's. Another example, condensate from a cooler ceiling drips onto exposed product, condensate from refrigeration unit surfaces (which have not been cleaned and sanitized) drips onto exposed product or onto product boxes.
5.10.06	5.09.06	No change in v3.2	Floor surfaces should be impervious to water, non-absorbent, clean easily and resist to wear and corrosion. Exposed aggregate is hard to clean and will get progressively worse. Floors should be free of wide and/or deep cracks.	No change in v3.2
5.10.07	5.09.07	No change in v3.2	Drains should be constructed and located in such a manner that they provide adequate drainage in all areas where floors are subject to flood-type cleaning or where normal operations release or discharge water or other liquid waste on the floor. Drains should flow from processed to raw to avoid contamination in processing plants. Facilities that are washing product should have adequate drainage. Discharge water from sinks should not run directly onto the floor. Not applicable in dry facilities with no drains.	No change in v3.2

Q #	New #	v3.2 Question	v3.2 Expectation	v3.2 Interpretation Guideline
5.10.08	5.09.08	Are closed doors and windows to the outside pest-proof?	Doors, windows, louvers and screens should be maintained, doors should fit tightly with a maximum allowable gap of 1/8 inch (3 mm). Special attention should be given to the maintenance of weather strips. Air curtains and self-closing devices where used, should be operating properly. Personnel doors to the outside should be loaded so that they close properly.	Total compliance (10 points): All doors, windows, louvers and screens to the outside should be designed and properly fitted out to prevent the ingress of rodents and insects into the facility. Doors should have no gaps greater than approximately 1/8 inch (3 mm). If doors, windows or louvers have screens, the openings should be no greater than 1/8 inch (3 mm). Gaps are often at bottom of doors and also at the top of roller doors. Air curtains are acceptable, provided they are operating properly. Personnel doors to the outside should be loaded so that they close properly. Rule of thumb is that if you can see daylight gaps, then further investigation is required. If doors are maintained open during production with no protection (e.g. air curtain, screen, etc.) they cannot be considered pest proof (scored in 5.03.02/5.04.03.)
5.10.09	5.09.09	In temperature controlled environments, are docks enclosed and dock doors fitted with buffers/shelters to seal against trucks? **Point change 3 to 5**	Buffers around dock doors should seal against trucks to maintain temperature management. This question should be scored for operations that are handling time/temperature control for safety items. In operations where goods are not time/temperature control for safety, then this question is only scored if the raised dock doors, levelers and buffers are fitted.	Total Compliance (5 points): This question should be scored for operations that are handling time/temperature control for safety items. In operations where goods are not time/temperature control for safety, then this question is only scored if the raised dock doors, levelers and buffers are fitted. Examples of time/temperature control for safety food includes an animal food that is raw or heat treated; a plant food that is heat-treated or consists of raw seed sprouts, cut melons, cut leafy greens, cut tomatoes or mixtures of cut tomatoes that are not modified in a way so that they are unable to support pathogenic microorganism growth or toxin formation, or garlic-in-oil mixtures that are not modified in a way so that they are unable to support pathogenic microorganism growth or toxin formation. Product assessment is required for food where because of pH or Aw or the interaction of pH and Aw the growth or toxin formation of pathogenic microorganisms are reasonably likely to occur. Refer to Food Code. FDA Food Code 2017: Chapter 1 – Purpose and Definitions https://www.fda.gov/media/110822/download 21 CFR 117.206, https://www.accessdata.fda.gov/scripts/cdrh/cfdocs/cfCFR/CFRSearch.cfm?fr=117.206 Minor deficiency (2 points) if: • Operation handling time/temperature control for safety goods that do not use a dock buffer system (or equivalent temperature management system). Counter measures in place. Major deficiency (1 point) if: • Operation handling time/temperature control for safety goods that do not use a dock buffer system (or equivalent temperature management system). Limited counter measure in place. Non-compliance (0 points) if: • Operation handling time/temperature control for safety goods that do not use a dock buffer system (or equivalent temperature management system). No counter measures in place.

Q #	New #	v3.2 Question	v3.2 Expectation	v3.2 Interpretation Guideline
5.10.10	5.09.10	No change in v3.2	No change in v3.2	No change in v3.2
5.10.11	5.09.11	No change in v3.2	Walls should be free of holes, crevices and cracks to prevent pest infestations. If pipe holes are needed, they should be protected to avoid pest entry. Vents and air ducts should also be protected. Mesh size should be no greater than 1/8 inch (3 mm) to limit insect entry.	No change in v3.2
5.10.12	5.09.12	No change in v3.2	No change in v3.2	No change in v3.2
5.10.13	5.09.13	No change in v3.2	No change in v3.2	No change in v3.2
5.10.14	5.09.14	No change in v3.2	No change in v3.2	No change in v3.2
5.10.15	5.09.15	No change in v3.2	No change in v3.2	No change in v3.2
5.10.16	5.09.16	No change in v3.2	No change in v3.2	No change in v3.2
5.10.17	5.09.17	No change in v3.2	No change in v3.2	No change in v3.2
5.10.18	5.09.18	No change in v3.2	No change in v3.2	No change in v3.2
5.10.19	5.09.19	No change in v3.2	Back siphonage protection prevents potable water from coming into contact with unsafe water and potential contamination of the distribution system.	No change in v3.2

Q #	New #	v3.2 Question	v3.2 Expectation	v3.2 Interpretation Guideline
5.10.20	5.09.20	Where there is an on-site laboratory, is it completely enclosed and separated from production and storage areas?	On-site laboratories should not be a source of possible contamination. Pathogen analysis should ideally be contracted to an external testing laboratory. Any facility doing on-site testing which includes an “enrichment step” is covered under this question. N/A if there is no on-site laboratory.	Total compliance (5 points): To prevent possible contamination from the laboratory, on-site laboratories should be separated from production and storage areas, vented directly to the outside and under negative pressure. Any facility doing on-site testing which includes an “enrichment step” is covered under this question. Pathogen analyses should ideally be subcontracted to an external testing laboratory. All toxic supplies should be properly labeled; laboratory and laboratory supplies should be restricted to designated personnel only. All waste (including bio hazardous waste) should be properly and safely disposed of, including spent media, laboratory consumables, etc. If retorts are used, then full monitoring and calibration service records should be available for review. Where applicable, any national or local regulations regarding the use of on-site labs are to be followed, including any special licensing requirements and regulatory inspections/accreditation. Inspection and accreditation records are to be available for review. Where there is not an on-site laboratory, score N/A.
5.11.01		Question removed		
5.11.02	5.11.01	No change in v3.2	No change in v3.2	No change in v3.2
5.11.03	5.11.02	No change in v3.2	No change in v3.2	No change in v3.2

Q #	New #	v3.2 Question	v3.2 Expectation	v3.2 Interpretation Guideline
5.11.04	5.11.03	Are there specific Standard Operating Procedures (SOPs) for the monitoring of anti-microbial parameters in single pass and/or recirculated/batch water systems, changing of recirculated/batch water systems (e.g., dump tanks, flumes, hydro vacuums, hydro coolers, etc.) and for monitoring pH and water temperature (where applicable)?	Product contact water systems should have SOPs that that describe how they are managed, including the water change frequency (recirculated/batch water systems), anti-microbial(s) used, pH monitoring (if required), their concentration(s). monitoring method(s) and frequency and corrective action procedures. The anti-microbial monitoring frequency should be sufficient to demonstrate the required concentration is maintained throughout the time the system is operated. Methods and monitoring procedures for measuring build-up of organic material (soil and plant debris) in recirculated and batch water systems should be described. Water should be changed when it is dirty and ideally when switching product types. If product(s) immersed in water are known to be susceptible to infiltration, the SOP should include water and product temperature parameters and monitoring frequency. There should be sufficient validation to support the anti-microbial concentration used, the water changing frequency (if less than daily) and water testing frequency. Measuring total chlorine is not acceptable for recycled/batch water systems. For chlorine systems, the concentration should be ≥10ppm free chlorine. Lower concentrations should be properly justified with supporting documents, rationale and evidence. Other anti-microbials include peracetic acid, chlorine dioxide, etc. See 5.13.03, 5.13.04 and 5.13.05 for record keeping expectations.	Total compliance (10 points): Water systems should have specific SOPs that describe the process of performing and recording anti-microbial strength testing in water systems (including parameters, testing frequency, methodology and corrective action requirements), methods and monitoring procedures for measuring build-up of organic material (turbidity) in recirculated and batch water systems and monitoring pH and water temperature (if applicable). Water should be changed when it is dirty and ideally when switching products. There should be documentation that validates the water changing frequency and water testing frequency. Minimum frequency for water changing is at least daily; records of changes are kept. Water may be used for longer if a validated regeneration system (e.g., a water pasteurization/filtration system) is being used. The water temperature should be appropriate for the products and processes being performed. Measuring total chlorine is not viewed as acceptable for recycled water systems. Single pass systems must have a stated anti-microbial level. For chlorine, the criteria should be ≥10ppm free chlorine. Lower concentrations should be properly justified with supporting documents, rationale and evidence. Note, US (NOP) regulations allow for chlorine use in wash water at levels sufficient to control microbial contaminants and higher than 4 ppm free chlorine, where there is a final through rinse with potable water to meet their ≤4 ppm free chlorine product contact requirement. Other anti-microbials include peracetic acid, chlorine dioxide, etc. See 5.13.03, 5.13.04 and 5.13.05 for record keeping expectations. This question is not applicable in dry operations. Reference: https://www.canr.msu.edu/news/turbidity_in_post_harvest_wash_water_monitor_and_change_when_needed Gomez-Lopez, V.M., Lannoo A.S., Gil, M.I. Allende, A., 2014. Minimum free chlorine residual level required for the inactivation of Escherichia coli O157:H7 and trihalomethane generation during dynamic washing of fresh-cut spinach. Food Control 42, 132-138. Haute, S.V., Luo, Y., Bolten, S., Gu, G., Nuo, X., 2020. Survival of Salmonella enterica and shifts in the culturable mesophilic aerobic bacterial community as impacted by tomato wash water particulate size and chlorine treatment. Food Microbiology 90, 103070. https://www.ams.usda.gov/rules-regulations/organic/handbook/5026 Minor deficiency (7 points) if: • Single/isolated instance(s) of errors or omissions within the SOPs for water monitoring and changing. • Single/isolated instance(s) of errors or omissions in the validation documentation for water monitoring and changing. Major deficiency (3 points) if: • Numerous instances of errors or omissions within the SOPs for water monitoring and changing. • Numerous instances of errors or omissions in the validation documentation for water monitoring and changing.

Q #	New #	v3.2 Question	v3.2 Expectation	v3.2 Interpretation Guideline
				Non-compliance (0 points) if: • SOPs for water monitoring and changing do not exist. • SOPs do not address the frequency of water monitoring and changing. • Water changing is occurring less than daily and there is not a validated regeneration system used. • There is no validation documentation for water monitoring and changing frequency.
5.12.01		Is the pest control program properly documented, detailing the scope of the program, target pests and frequency of checks, including a copy of the contract with the extermination company (if used), Pest Control Operator license(s)/training (if baits are used), and insurance documents?	There should be a documented pest control program in place detailing the scope of the program, target pests and frequency of checks. If performed in-house, the pest-control operators or equivalent should be registered, licensed or have documented formal training (if regulation does not require certification or registration). Note that the person's training and/or license should specify structural pest control or equivalent. Any substitute operator's license credentials should also be on file. If the service is contracted, the pest control contract service/company should be licensed in structural pest control, insured and the contract should be documented (quoting the scope of the program, types of pests it covers and frequency of visits). The program should include requirements for at least annual pest control survey based on preventive IPM practices of interior and exterior areas.	Total compliance (15 points): There should be a documented pest control program in place detailing scope of the program, target pests and frequency of checks. If performed in-house, the pest-control operators or equivalent should be registered, licensed or have documented formal training (if regulation does not require certification or registration). Note that the person's training and/or license should specify structural pest control or equivalent or have documentation to show that license includes structural pest control training if not specified on license. Any substitute operator's license credentials should also be on file. If the service is contracted, the pest control contract service/company should be licensed in structural pest control, insured and the contract should be documented (quoting the scope of program, types of pests it covers and frequency of visits). The program should include requirements for at least an annual pest control survey based on preventive IPM practices of interior and exterior areas. Insurance document should ideally name the auditee as "additional insured". When licensing legislation does not apply (e.g., in certain countries), there should be evidence of on-going training. Auditors should check documentation for expiry dates. National Pest Management Standards, Pest Management Standards for Food Plants http://npmapestworld.org/default/assets/File/2016%20Pest%20Management%20Standards%20for%20Food%20Processing-Electronic.pdf

Q #	New #	v3.2 Question	v3.2 Expectation	v3.2 Interpretation Guideline
5.12.03		No change v3.2	Service reports from the contract pest control company should be available for review if pest control is contracted out. In-house inspection records should be available for review if pest control is conducted in-house. Records should include services performed, date of service, chemicals used, signs of activity, and corrective actions, and trend reports. Trained pest control operator(s) should be doing periodic assessments and feedback to company about findings beyond just a checking of stations/traps.	Total compliance (10 points): Service reports from the contract pest control company should be available for review if pest control is contracted out. In-house inspection records should be available for review if pest control is conducted in-house. Records should include services performed, date of service, chemicals used (see below), signs of activity with corrective actions, and trend reports. Trained pest control operator(s) should be doing periodic assessments and feedback to company about findings beyond just a checking of stations/traps. Match Pest Control Operator (PCO) signature on service logs with licenses/certificates on file. Records should show when electric fly killing unit bulbs are changed. Where the contracted pest control has left their client details of an issue or a recommendation (e.g., excessive gap at the bottom of a door), then the client should acknowledge the issue(s) and note corrective action completion(s) where relevant. Specimen labels for chemicals used are scored under 5.11.01. Where chemicals are used, records should detail: • Product name of materials applied • The EPA or product registration number (as required by law) • Target pest • Rate of application (percent of concentration) • Location or site of application • Method of application (if applicable) • Amount of pesticide used • Date and time of application • Signature of applicator • Corrective actions • Trend reports Minor deficiency (7 points) if: • Single/isolated instance(s) of missing or incomplete information/records e.g. pest activity, trap replacement, trend reports, etc. • Single/isolated instance(s) where contracted pest operators action points have not been acknowledged and completed. • Single/isolated instance(s) of not noting chemical use details. Major deficiency (3 points) if: • Numerous instances of missing or incomplete information/records e.g. pest activity, trap replacement, trend reports, etc. • Numerous instances where contracted pest operators action points have not been acknowledged and completed. • Numerous instances of not noting chemical use details. Non-compliance (0 points) if: • No service reports. • Fundamental failure to maintain service reports. • Fundamental failure to record chemical use details. • Fundamental failure to complete corrective actions • There are no records of IPM survey observations within the last 12 months.

Q #	New #	v3.2 Question	v3.2 Expectation	v3.2 Interpretation Guideline
5.13.03		Are there records for the necessary process monitoring activities (e.g., pH, water temperature vs. product temperature, metal detection, X-ray, labeling, heating processes, reduction/kill step processes, postharvest pesticides (e.g. fungicides), control of water activity, drying, etc.), showing, for example, monitoring frequencies, results and where necessary the corrective actions?	Records should show process control parameters are being met and detail corrective actions (where necessary). Processes include sterilizing, irradiating, pasteurizing, cooking, blanching, freezing, refrigerating, controlling pH, or controlling aw, postharvest treatments. Any process &/or chemicals used should meet existing legal requirements (including residue levels), used as per label requirements and meet export requirements (as applicable). Corrective actions should also include root cause analysis and preventive actions (where relevant). Any processes and/or chemicals used should meet existing legal requirements (including residue levels), used as per label requirements, and meet export requirements (as applicable). See 5.13.04 regarding anti-microbial use. There may be some overlap with preventive controls and/or HACCP topics.	Total compliance (10 points): There should be appropriate logs in use for all process monitoring activities, including postharvest treatments. Processes include sterilizing, irradiating, pasteurizing, cooking, blanching, freezing, refrigerating, controlling pH, or controlling aw. Any process and/or chemicals used should meet existing legal requirements (including residue levels), used as per label requirements and meet export requirements (as applicable). These may be combined on a single log or on multiple logs. The records should show process control parameters are being met and detail corrective actions when the process is outside the established limits. Corrective actions should also include root cause analysis and preventive actions (where relevant). If monitoring is not continuous, then the amount or frequency of monitoring should be sufficient to verify the process is in control; auditee should be able to support monitoring frequency being used. Any issues with monitoring frequency of foreign material control systems should be scored in Q 5.04.08. Where produce is immersed in water and has been shown to be susceptible to microbial infiltration from water, the water temperature differentials should be controlled in accordance with current regulation, industry guidelines or best practices. For example, for tomatoes FDACS, USDA and the University of FloridaGAPs require postharvest water to be maintained at temperatures at least 10ºF (5.6ºC) above the fruit pulp temperature, and water temperature should be monitored at least hourly. Note, product washing, metal detection, etc., are often detailed further in the HACCP and/or Preventive Controls section Minor Deficiency (7 points) if: • Single/isolated instance(s) of omissions or incorrect data in the records and corrective action details. • Single/isolated instance(s) of omissions or errors in the frequency of monitoring. • Single/isolated instance(s) of incorrect parameters being monitored. Major Deficiency (3 points) if: • Numerous instances of omissions or incorrect data in the records and corrective action details. • Numerous omissions or errors in the frequency of monitoring. • Numerous instances of incorrect parameters being monitored. • No supporting documentation of the monitoring frequency being used. Non-compliance (0 points) if: • No records. • Monitoring frequency is insufficient to verify the process is in control. • Monitoring parameters in use are insufficient to verify the process is in control. • Failure to maintain records properly. • Any observation of process and/or chemicals not meeting existing legal requirements (including residue levels), not used per label or not meeting applicable export requirements resulting in direct gross widespread contamination of product, ingredient or packaging materials (revert back to Q 5.03.04, automatic failure).

Q #	New #	v3.2 Question	v3.2 Expectation	v3.2 Interpretation Guideline
5.13.04		No change in v3.2	Product contact water and ice production systems using anti-microbial agents should have records showing that the strength of the solution is within stated parameters. Recirculated/batch water systems should be checked by measuring the "free anti-microbial" as opposed to bound microbial (i.e., testing for free chlorine as opposed total chlorine); pH should be measured when using hypochlorite (5.13.03). Where out of specification results are recorded, there should be corrective action records, including root cause analysis and preventive actions (where relevant).	Total compliance (10 points): Product contact water and ice production systems using anti-microbial agents e.g. hypochlorite (chlorine), aqueous chlorine dioxide, peroxyacetic acid (PAA), ozone should have records showing that the strengths of the solutions are within parameters. Recycled/reused water systems (e.g., flumes, wash/dump tanks, ice injectors, hydrovacuums, etc.) and single pass systems (e.g., spray bars) should be using an approved anti-microbial. Recirculated/batch water systems should be checked by measuring the "free anti-microbial" as opposed to bound microbial e.g. testing for free chlorine as opposed to total chlorine; pH should also be measured (5.13.03) when using sodium/calcium hypochlorite. In single pass systems it is acceptable to measure total chlorine (as per legislation). See links below for data and research on threshold levels for free and total chlorine, chlorine dioxide, peroxyacetic acid (PAA) and pH level parameters. Other anti-microbials e.g. ozone, electrolyzed water, etc., should meet manufacturer recommendations (auditee should have proof of parameter derivation) and be approved for use in wash water. Frequency of checks should be relative to the stability of the system, but at least pre-start, then at a frequency that ensures the availability of the anti-microbial is adequate while the system is running. As a minimum guide, a fresh-cut facility should be checked every 30 minutes, whereas whole washed product water anti-microbial levels should be checked hourly. Corrective actions should also be recorded. These steps may be covered in a HACCP plan (sanitizing of flume water). Operations should not rely solely on ORP readings to manage chlorine levels and should verify free chlorine levels by another method (e.g. titration, appropriate test strips). Any water treatment (e.g. chlorine, reverse osmosis, UV light, active carbon) at the source (e.g. well, canal) should be monitored and records available. Where out of specification results are recorded, there should be corrective action records, including root cause analysis and preventive actions (where relevant). Minor deficiency (7 points) if: • Single/isolated instance(s) of records showing solution strength out of parameters without adequate documented corrective actions. • Single/isolated instance(s) of errors or omission in the records. • Single/isolated instance(s) of total chlorine being recorded when free chlorine should have been used e.g. in chlorinated recycled water systems • Single/isolated instance(s) of checks not carried out at the required frequencies. Major deficiency (3 points) if: • Numerous instances of records showing solution strength out of parameters without adequate documented corrective actions. • Numerous instances of errors or omission in the records. • Numerous instances of total chlorine being recorded when free chlorine should have been used e.g. in chlorinated recycled water systems. • Numerous instances of incorrect parameters being stated.

Q #	New #	v3.2 Question	v3.2 Expectation	v3.2 Interpretation Guideline
				• Numerous instances of checks not carried out at the required frequencies. • No supporting documentation of the monitoring frequency being used. Non-compliance (0 points) if: • Water/ice testing is not being recorded. • Recorded solution strengths consistently out of parameters i.e. an unstable system (even if documented corrective actions exist). • Fundamental errors and omissions in the records. • Total chlorine has been recorded throughout the system, when free chlorine should have been recorded e.g. in chlorinated recycled water systems. • Frequencies of checks consistently do not meet requirements of prior to start up and throughout the production runs. • No evidence of water anti-microbial parameters has been stated/ incorrect parameters being used. • Single pass water system is in use without anti-microbial being used. The auditor should consider whether to apply Q 5.03.04 and score an automatic failure in view of the risk of cross contamination. • Recycled/reused water system is in use without an anti-microbial being used. The auditor should consider whether to apply Q 5.03.04 and score an automatic failure in view of the risk of cross contamination.
5.13.05		Are there records of monitoring for build-up of organic material (turbidity) and changing of recirculated and batch water systems (e.g., dump tanks, flumes, hydro vacuums, hydro coolers, etc.)?	There should be records of visual monitoring and/or testing and changing of recirculated and batch water systems. Frequency is at least daily, when it is dirty and ideally when changing products. Water may be used for longer if a validated regeneration system (e.g., a water pasteurization/filtration system) is being used.	Total compliance (5 points). There should be records of visual monitoring and/or testing and changing of recirculated and batch water systems during production that are consistent with procedures in 5.11.03. Water should be changed at least daily, when it is dirty and ideally when switching products. Water may be used for longer if a validated regeneration system (e.g., a water pasteurization/filtration system) is being used.

Q #	New #	v3.2 Question	v3.2 Expectation	v3.2 Interpretation Guideline
5.13.06		No change in v3.2	The log should include target anti-microbial concentration (ppm) and frequency of verification should be sufficient to ensure adequate anti-microbial strength throughout production. Where hand gel or spray stations are used, there should be monitoring logs indicating that stations are regularly checked to confirm units are stocked and operational.	Total compliance (3 points): The company should have a log sheet for evaluating the hand and/or foot and/or tool dip (where appropriate) stations' solution strength at mixing and at a frequency sufficient to ensure adequate anti-microbial strength throughout production. The log sheet should include target antimicrobial concentration (ppm) and frequency of verification. The figures recorded must match the type and graduation of the testing system being used. An omission would include where an out of spec concentration is recorded but there is no record of corrective actions. Foot dips are required in processing audits operations (see 5.04.14). Any operation with hand, foot or tool dips is required to keep monitoring records (uncontrolled dips are a hazard). Where hand gel or spray stations using prepared solutions are used, there should be monitoring logs indicating stations are regularly checked to confirm units are stocked and operational.
5.13.09	5.10.03	No change in v3.2	A documented risk assessment should be performed for the facility to identify and control any food safety hazards relevant to the facility location and adjacent land use (e.g., animal activity, industrial activity, waste, sewage and septic systems, water treatment sites (settling ponds, land applications, etc.) or any other potential sources of contamination). All national and local laws pertaining to land use and on-site water treatment systems should be followed. Where necessary, for waste water treatment areas, there should be applicable permits on file and evidence of regulatory and/or third party inspections. The risk assessment should be reviewed at least annually and when a significant facility location/adjacent land change occurs including flooding and earthquake events that may impact sewage or septic systems.	Total compliance (10 points): There should be a documented risk assessment for the facility to identify and control any food safety hazards relevant to facility location and adjacent land use e.g. animal activity, industrial activity, waste, sewage and septic systems, waste water treatment sites (settling ponds, land applications, etc.) or any other potential sources of contamination. All national and local laws pertaining to land use and on-site water treatment systems should be followed. Where necessary, for wastewater treatment areas, there should be applicable permits on file and evidence of regulatory and/or third-party inspections. The risk assessment should be reviewed at least annually and when a significant facility location/adjacent land change occurs including flooding and earthquake events that may impact sewage or septic systems.

Q #	New #	v3.2 Question	v3.2 Expectation	v3.2 Interpretation Guideline
5.13.10	5.10.04	No change in v3.2	There should be a backflow prevention device on main water lines entering the facility. There should be a record provided by a trained inspector verifying the proper operation of the principle backflow prevention system on an annual basis (unless there is a stated expiration on the certificate). This question is not applicable if the facility has no water supply.	Total compliance (3 points): There should be a backflow prevention device on main water lines entering the facility and backflow prevention devices on individual water lines within production areas. A trained inspector (e.g., appropriately certified plumber) should verify the principle backflow prevention system annually (unless there is a stated expiration on the certificate). Certificate should indicate name of tester, their certificate number, location information for assembly, type of assembly, pressure across check valve(s), relief valve pressure, and whether unit passed or failed the test. Wells are also required to have backflow prevention devices to prevent cross connection or backflow during pump priming or maintenance. This question is still applicable even if local and/or national legislation does not require this type of inspection/testing. This question is not applicable if the facility has no water supply. If the valve type is one that cannot be inspected or tested, then the auditee should have documentation supporting this on–site e.g. valve manufacturer's documentation.
5.13.11	5.13.09	No change in v3.2	There should be records of the internal audits performed, meeting the frequency defined in the internal audit program. The records should include the date of the audit, name of the internal auditor, scope of the audit, justification for answers, detailing any deficiencies found and the corrective actions taken. An audit checklist (ideally PrimusGFS) should be used that covers all areas of the PrimusGFS audit, including production area, storage, worker amenities, external areas, worker practices, production processes, etc. No down score if another audit checklist is used, as long as all areas are covered. See 1.04.01 for specific details.	Total compliance (15 points): There should be records of the internal audits performed at each operation, with the frequency defined in the internal audit program. Frequency depends on the type and size of the operation; auditor's discretion. Processing plants should have at least a monthly frequency. Packinghouses, coolers and storage operation ideally have a monthly frequency, but at least a quarterly frequency. The records should include the date of the audit, name of the internal auditor, justification for the answers, and detail any deficiencies found and the corrective action(s) taken. An audit checklist (ideally PrimusGFS) should be used that covers all areas of the PrimusGFS audit, including production area, storage, worker amenities, external areas, worker practices, production processes, etc. No down score if another audit checklist is used, as long as all areas are covered. See 1.04.01 for specific details.

Q #	New #	v3.2 Question	v3.2 Expectation	v3.2 Interpretation Guideline
5.14.01		Does the facility have a preventative maintenance program that includes a schedule and completion records?	No change in v3.2	Minor deficiency (7 points) if: • Single/isolated instance(s) of incomplete records. • Single/isolated instance(s) of pieces of equipment missed off the schedule. • Only pre-season maintenance is being done in a short-season operation of less than 3 months. Major deficiency (3 points) if: • Numerous instances of incomplete records. • Numerous instances of pieces of equipment missed off the schedule. • Only pre-season maintenance is being done in a short-season operation of more than 3 months. Non-compliance (0 points) if: • Appropriate frequencies are not documented and followed to ensure equipment is being routinely inspected. • No program.
5.14.02		No change in v3.2	A log of maintenance for unscheduled repair work and request orders is necessary to track improperly working equipment, building repairs and similar issues not covered under the preventative maintenance program. Repair activities also have the potential to create unintended hazards if not properly conducted. Tracking these activities help with product contamination investigation as well as to improve preventative maintenance.	Total compliance (10 points): A log of maintenance for unscheduled repair work and request orders is necessary to track improperly working equipment, building repairs and similar issues not covered under the preventive maintenance program. Repair activities also have the potential to create unintended hazards if not properly conducted. Tracking these activities help with product contamination investigation as well as to improve preventative maintenance. Records may include: date/ time, targeted equipment/ area, reason for service required, who is requesting, who is being informed, observations; date & signature when repair is completed.
5.14.03		No change in v3.2	No change in v3.2	Total compliance (5 points): The company keeps records of all maintenance work and signature of a designated worker to confirm that the equipment has been sanitized after maintenance work has been completed and before being used again. If the equipment has been worked on in the production area (as opposed to being transferred to the maintenance shop), then the area surrounding the recently maintained equipment should also be sanitized (records of this sanitation should be maintained). This information may be included on maintenance logs viewed in 5.14.01 and 5.14.02.

Q #	New #	v3.2 Question	v3.2 Expectation	v3.2 Interpretation Guideline
5.14.04		No change in v3.2	A master sanitation program should be in place that covers all areas of the facility, including production areas, storage areas, break areas, restrooms, maintenance and waste areas. Within these areas, areas such as walls, floors, light covers, overhead pipes, etc. should be included. List should include equipment (e.g., production equipment (food contact and non-food contact), pallet jacks, fork lifts, carts, floor scrubbers, trash cans, cooling equipment (evaporators, cooling coils, drip pans, etc.), lift trucks and company owned trailers, etc.). The master sanitation schedule should include a detailed list of areas and equipment to be cleaned as well as the frequency.	Total compliance (10 points): The company should have a master sanitation program that covers the entire area of the facility including equipment (e.g., production equipment (food contact and non-food contact), pallet jacks, fork lifts, carts, floor scrubbers, trash cans, cooling equipment (evaporators, cooling coils, drip pans, etc.), lift trucks and company owned trailers, etc.). The schedule should state what is to be cleaned and when (how often). Areas should include where applicable, processing, packing, product storage, dry storage, maintenance areas, waste areas, restrooms and break areas. Within these listings there should be details like floors, walls, light covers, pipes, ceilings, evaporators, cooling coils, drip pans, drains, drain lines and reservoirs, named equipment and equipment parts and surfaces; including internal transport vehicles (forklifts, Bobcats, floor cleaners, pallet jacks, etc.). Floor cleaners should be kept in good condition and cleaned in order to prevent cross contamination. Where relevant, the brushes and fixtures on the floor cleaner may need to be changed or cleaned when moving from one risk area to another. In-house delivery and shuttle trucks should be included in sanitation schedules, have SSOPs and cleaning records. Infrequent schedules i.e. weekly and above, are usually created for several reasons e.g. cleaning areas and equipment that are not cleaned daily, using a different cleaning technique/chemical than what is used on a daily schedule and/or doing a more “in depth” clean on equipment. Note that all cleaning mentioned on the schedule should be covered somewhere in the cleaning procedures and also on the sanitation logs. Schedule should be kept on file in an easily retrievable manner. Master sanitation schedule should include what is to be cleaned and when, i.e.: • List of areas, equipment, internal transport vehicles, in-house delivery trucks, etc. • Frequency of cleaning (daily, weekly, monthly, quarterly, annually, etc.) See Preventive Controls module regarding sanitation preventive controls (where relevant).
5.14.06		No change in v3.2	Sanitation logs should be on file that cover all areas of the facility (e.g., production areas, storage areas, break areas, restrooms, maintenance, etc.), detailing walls, floors, overhead and all equipment (e.g., production equipment (food contact and non-food contact), pallet jacks, forklifts, carts, floor scrubbers, trash cans, cooling equipment, lift trucks, company owned trailers, etc.). Logs should include: date, list of areas/equipment that were cleaned and sanitized, and the individual accountable who signed-off for each completed task. Logs should be consistent with the master sanitation schedule.	Total compliance (10 points): The company has sanitation logs that cover all areas of the facility (e.g., production areas, storage areas, break areas, restrooms, maintenance, etc.), detailing walls, floors, overhead and all equipment (e.g., production equipment (food contact and non-food contact), pallet jacks, forklifts, carts, floor scrubbers, trash cans, cooling equipment, lift trucks, company owned trailers, etc.). Logs are kept on file in an easily retrievable manner. The logs should be cross-checked against the master sanitation program (5.14.04). Logs of infrequent cleaning should be checked. Logs should include: • Date • List of areas/equipment that were cleaned and sanitized • The individual accountable who signed-off for each task completed • Verification of task completed • Any deviations against the set SSOPs

Q #	New #	v3.2 Question	v3.2 Expectation	v3.2 Interpretation Guideline
5.14.07		No change in v3.2	Where cleaning and sanitizing chemicals are mixed on-site, there should be records of verification of the anti-microbial concentrations. The strength of cleaning chemicals should be checked using an appropriate method for the anti-microbial in use. Frequency of checks should correspond with the SSOP, but at least at mixing and then at a frequency that ensures the availability of the anti-microbial is adequate while the cleaning operation is being done. Corrective actions should be recorded.	Total compliance (5 points). Where cleaning and sanitizing chemicals are mixed on-site, there should be records of verification of the anti-microbial concentrations. The strength of cleaning chemicals should be checked using an appropriate method for the anti-microbial in use (e.g., chemical reaction-based test, test probe, or as recommended by disinfectant supplier). Refer to 5.04.09 for actual method used. Solutions that are too weak will be ineffective, while those too strong may be harmful to employees, product or equipment. Methods include, dip sticks, test strip papers, conductivity meters, titration, color comparison methods (e.g., tintometers, etc.). Frequency of checks should correspond with the SSOP, but at least at mixing and then at a frequency that ensures the availability of the anti-microbial is adequate while the cleaning operation is being done. Corrective actions should also be recorded. N/A if no mixing is taking place on-site e.g. where pre-mixed chemicals are bought and used.
5.14.08		Are there documented procedures and completion records for clean-in-place (CIP) activities (e.g., cleaning re-circulating water systems such as washing flumes, ice injectors, hydrocoolers, chilled water systems, ice makers, etc.), where applicable?	No change in v3.2	The chemical label details, equipment manufacturer's instructions and company safety rules are to be followed. Records of CIP cleaning should be maintained. *Clean In Place (CIP) – an equipment cleaning procedure that occurs with all the equipment left "in place" and a cleaning program of some kind occurs. This procedure is sometimes part of larger procedure where equipment is partially cleaned in some way while still assembled and then broken down for a deeper clean before being assembled again and then "flushed" through (clean in place) by the circulation or flowing by mechanical means through a piping system of a detergent solution, water rinse and sanitizing solution onto or over equipment surfaces that require cleaning. CIP does not include the cleaning of equipment such as blades, slicers or mixers that are subjected to in-place manual cleaning without the use of a CIP system.

Q #	New #	v3.2 Question	v3.2 Expectation	v3.2 Interpretation Guideline
5.14.09	5.14.12	No change in v3.2	Rapid post sanitation checks (e.g., ATP (adenosine tri phosphate)) testing provides an instant indication of the hygiene status of food contact equipment and facility surfaces after cleaning and/or prior to start up. Measuring ATP, for example, detects food residues, bacteria, yeast, mold - either living or dead (i.e. all organic matter) to give a measure of cleaning effectiveness. Procedures for use and disposal should be documented, in line with any manufacturer recommendations and should detail sampling strategy, standardized sampling technique, including location of sample and time of sampling, and there should be clear threshold parameters. The procedure should address justification for the number of sites and sampling frequency. Records of routine testing (at least daily in processing operations and weekly in others as applicable) and corrective actions should be maintained.	Total compliance (15 points): Rapid post sanitation checks (e.g., ATP (adenosine tri phosphate)) testing provides an instant indication of the hygiene status of product contact surfaces after cleaning and/or prior to start up by measuring the ATP from food residues, bacteria, yeast, mold - either living or dead (i.e. all organic matter) so giving a measure of cleaning effectiveness. There should be a procedure detailing sampling strategy, standardized sampling technique including location of sample and time of sampling and there should be pass/fail parameters. The procedure should address justification for the number of sites chosen and frequency of sampling. The detection of non-specific ATP provides a reliable quick indicator of cleaning efficiency and hygienic status (therefore a good pre-operational tool) but for the purpose of this audit, it is not a replacement for specific microbiological testing or for ensuring that the allergen specific proteins have been removed from a production surface. This question application is similar to that laid out in 5.16.01 and operations may choose to include ATP program details with 5.16.01 documentation. If there are no food contact surfaces, or products/processes are deemed not applicable using the 5.16.01 criteria and Appendix I, then N/A may be scored. Procedures for use should be documented, validated for use with product being run in line with any manufacturer recommendations and should detail sampling strategy, standardized sampling technique, including location of sample and time of sampling, and there should be clear threshold parameters that are logically derived and appropriate for the product/process. Records of routine testing (at least daily in processing operations and weekly in others as applicable) and corrective actions should be maintained. The "Environmental Monitoring Program Sampling & Testing Guide" chart (Appendix I) outlines the minimum ATP sampling and testing frequency expected based on product and processes.
5.14.10	5.14.09	No change in v3.2	It is important to include drains in the cleaning schedule to prevent cross contamination. Drains in wet storage and production areas should be cleaned daily and sanitized regularly to prevent harmful bacteria from growing.	Total compliance (10 points): There is a log that indicates that floor drains are cleaned on a daily basis in wet storage and production areas. Auditors should use their discretion when auditing dry facilities, but the minimum drain cleaning frequency should be weekly.

Q #	New #	v3.2 Question	v3.2 Expectation	v3.2 Interpretation Guideline
5.14.11	5.14.10	Are there records showing filters in air conditioning, evaporative coolers, ventilation and air filtration units are regularly cleaned and replaced?	Records should be made available to verify that filters in air conditioning, ventilation and air filtration units serving production (product handling) areas are regularly cleaned and replaced. Records might include in-house sanitation records, maintenance records and/or contractor records/invoices.	Total compliance (5 points). Records should be made available to verify that filters in air conditioning, evaporative coolers, ventilation and air filtration units serving production (product handling) areas are regularly cleaned and replaced. Records might include in-house sanitation records, maintenance records and/or contractor records/invoices.
5.14.12	5.14.11	No change in v3.2	No change in v3.2	No change in v3.2
5.14.13		No change in v3.2	There should be a documented site glass management procedure including company glass and brittle plastic policy, glass and brittle plastic breakage procedure and glass register if necessary (a no glass policy in production, storage or maintenance areas should be the target). If certain glass and brittle plastic items are allowed, a glass register should describe each item, location and quantity; items should be checked on a routine basis. Clean-up procedure after glass or brittle plastic breakage should indicate what equipment to use and include boot and tool checks/decontamination procedures to ensure broken glass or brittle plastic is not unintentionally transported out of the area.	Total compliance (10 points). There should be a written glass and brittle plastic policy and procedure, which should state: • Where glass or brittle plastic is prohibited and where glass or brittle plastic is allowed. • Policy should state how workers should report missing or broken spectacles or contact lenses and to whom they report the issue. • If certain glass or brittle plastic items are allowed, then a glass register should exist describing each item, location and quantity. The glass register should only list items that could not be replaced with a less dangerous material. The glass register should not be abused by allowing glass items on site that are usually viewed as poor GMP e.g. allowing glass drinking bottles into production areas, unprotected glass light bulbs. Glass register items should be checked on a routine basis (at least monthly) to ensure they are not damaged/cracked etc. Checks should be documented. • Glass breakage procedure including requiring recording what happened, recording what happens to potentially affected product, recording future preventative actions and especially where to record the incident details e.g. in the NUOCA log. • Clean-up procedure after glass or brittle plastic breakage should indicate what equipment to use and include boot and tool checks/decontamination procedures to ensure broken glass or brittle plastic is not unintentionally transported out of the area. • A no glass policy in production, storage or maintenance areas should be the target.

Q #	New #	v3.2 Question	v3.2 Expectation	v3.2 Interpretation Guideline
5.15.01		No change in v3.2	All new workers (including workers in departments such as production, storage, maintenance, etc.) should be GMP trained on employment in the language understood by the workers, with records of this training being maintained. Training should include the importance of recognizing food safety and/or hygiene issues with co-workers and visitors, correcting problems and reporting problems to a supervisor. All workers should be issued a list of GMP rules in the relevant languages and confirm by signing they understand and agree to abide by the company's food safety policy rules regarding personal hygiene/GMPs and health requirements. Training provided and associated records should meet local and national regulations.	Total compliance (10 points): The company has logs of GMP orientation (new hire) training with the topics covered, trainer name and materials used and given to new hires. Training should be given prior to new hires starting to work (including workers in departments such as production, storage, sanitation, maintenance, sales team, etc.) in the language understood by the workers. Materials to be given to new hires after training should be in the relevant language(s) and cover key GMP rules including hand washing, eating/drinking, smoking, specific clothing rules, cosmetic use rules, foreign material issues (including jewelry, no sequins, studs, false finger nails, finger nail polish, false eyelashes, eyelash extensions, badges, etc.), cuts/wounds and illness rules, etc. Food safety training should be given to all workers working in the production and storage areas; this includes temporary workers and agency workers. Training should also include the importance of recognizing food safety and/or hygiene issues with co-workers and visitors, correcting problems and reporting problems to a supervisor. All workers should be requested to read (in the relevant language), confirm they understand and agree to abide by the company's food safety policy rules regarding personal hygiene/GMPs and health requirements (e.g. they are free from diseases that might be a food safety cross contamination risk). A copy of the signed food safety policy should be kept on file and a copy given to the worker. Training provided and associated records should meet local and national regulations. Minor Deficiency (7 points) if: • Single/isolated instance(s) of errors and omissions in the records or food safety hygiene and health policy. • Up to three points missing off the GMP rule requirements listing. • Training does not include the importance of recognizing food safety and/or hygiene issues with co-workers and visitors and/or correcting problems and reporting problems to a supervisor. • Training materials and/or food safety policy are not in the relevant language(s). • Training occurring but relevant materials are not being given to the trainee after the training. • Training occurring, not before starting to work but within the first week. • Single/isolated instance(s) of workers not being trained or not signing a document stating that they will comply with the operations' personal hygiene and health policies Major Deficiency (3 points) if: • Numerous instances of errors and omissions in the records or food safety hygiene and health policy. • Over three points missing off the GMP rule requirements listing (or GMP listing does not exist). • Numerous cases of workers not signing a document stating that they will comply with the operations' personal hygiene and health policies. • Training occurring, not before starting to work but within the first month. • Numerous instances of workers not being trained.

Q #	New #	v3.2 Question	v3.2 Expectation	v3.2 Interpretation Guideline
5.15.03		Are there training logs for the sanitation workers, including best practices and chemical use details?	No change in v3.2	Total compliance (5 points): Sanitation training should ensure that the workers understand the importance of proper sanitation, cleaning efficacy, how to use the cleaning chemicals and how to understand Sanitation Standard Operating Procedures. A job shadowing training program is ideally in place for new sanitation workers with sign off of tasks recorded. Unless sanitation workers attend regular food safety trainings (scored under 5.15.01 and 5.15.02), sanitation training should also include elements of food safety training pertinent to sanitation operations (e.g., hand washing, restroom use, foreign material, etc.). Cross reference with 1.01.04. Training logs should have a clearly defined topic(s) covered, trainer(s) and material(s) used/given. Training would also ideally include worker safety issues (e.g., use of personal protective equipment, accident prevention, what to do in case of an accident, procedures for avoiding electrical hazards when cleaning, etc.). Recorded training should occur at least on a 12-month basis. Minor Deficiency (3 points) if: • Single/isolated instance(s) of logs having errors or incomplete information e.g. missing one of the following: training topic, trainer or material information. • Training has occurred, but on isolated instances full attendance logs have not been kept and/or not all workers were covered. Major Deficiency (1 point) if: • Numerous instances of logs having errors or incomplete information e.g. missing one of the following: training topic, trainer or material information. • Training has occurred but on numerous instances full attendance logs have not been maintained. Non-compliance (0 points) if: • No records or no training has occurred. • Failure to maintain records.

Q #	New #	v3.2 Question	v3.2 Expectation	v3.2 Interpretation Guideline
5.15.04		Are there written and communicated procedures in place that require food handlers to report any cuts or grazes and/or if they are suffering any illnesses that might be a contamination risk to the products being produced, and include return to work requirements? (In countries with health privacy/confidentiality laws, e.g. USA, auditors should check procedure/policy but not the actual records).	No change in v3.2	Total compliance (10 points): There should be documented procedures that are communicated (e.g., worker signature on a training log) to food handlers, requiring them to report any cuts, grazes and/or any illnesses that might be a food safety cross contamination risk. The procedures should indicate return to work requirements for affected workers: to whom the food handlers should report, how the issue is recorded and appropriate actions to be taken for a particular issue. Auditors should not request to review records where countries have laws covering privacy/confidentiality of health records, and therefore, a verbal confirmation that records are kept should be gained. Minor deficiency (7 points) if: • Single/isolated instance(s) of errors or omissions in procedure. • Single/isolated instance(s) of evidence that workers are unaware of the procedure requirements Major deficiency (3 points) if: • Numerous instances of errors or omissions in the procedure. • Numerous instances of workers being unaware of procedure requirements Non-compliance (0 points) if: • There is not a documented procedure in place. • A procedure is in place, but it has not been communicated to food handlers.

Q #	New #	v3.2 Question	v3.2 Expectation	v3.2 Interpretation Guideline
5.15.05		No change in v3.2	There should be records covering instances when workers are found not following food safety requirements. These records should also show corrective actions and evidence that retraining has occurred (where relevant).	Total compliance (3 points): A worker non-conformance should be recorded when workers are found not following food safety requirements. The auditee should have a record for worker non-compliance, corrective actions and evidence that retraining has occurred (where relevant). Auditee records might be viewed as confidential, and therefore, a verbal confirmation should be gained. There might be a tier system, which includes re-training, verbal and written disciplinary actions and allowance for immediate termination for gross misconduct. Minor Deficiency (2 points) if: • Single/isolated instance(s) of follow up/corrective actions not noted. Major Deficiency (1 point) if: • Numerous instances of follow up/corrective actions not noted. Non-compliance (0 points) if: • No records or no or widespread failure to record follow up/corrective actions.
5.15.06		No change in v3.2	All visitors and contractors should sign to say that they will abide by the company rules regarding personal hygiene/GMPs and health requirements (which they have reviewed before entering the food handling areas of the facility).	Total compliance (3 points): All visitors and contractors should sign to say that they understand and will abide by the company rules regarding personal hygiene/GMPs (e.g. hair nets, clothing/smocks, hand washing, jewelry, eating, drinking, smoking, etc.) and health requirements (i.e. they are free from diseases that might be a food safety cross contamination risk). The rules and policies should be clearly stated in the relevant languages and should be reviewed before entering the food handling areas of the facility. This requirement may be included in the visitor sign in/out book. Minor deficiency (2 points) if: • Single/isolated instance(s) of visitor(s) and contractor(s) not signing a log stating that they will comply with the operations' personal hygiene and health policies. • Single/isolated instance(s) of errors or omissions in personal hygiene and health requirements Major deficiency (1 point) if: • Numerous instances of visitors and contractors not signing a log stating that they will comply with the operations' personal hygiene and health policies. • Policy is not in the relevant language(s) of the visitors/contractors. • Numerous instances of errors or omissions in personal hygiene and health requirements Non-compliance (0 points) if: • The company does not have a log for visitors and contractors to sign stating that they will comply with the operations' personal hygiene and health policies. • Personal hygiene and health requirements are not available to review. • Fundamental failure of visitors and contractors to sign a log stating that they will comply with the operations' personal hygiene and health policies.

Q #	New #	v3.2 Question	v3.2 Expectation	v3.2 Interpretation Guideline
5.16.01		No change in v3.2	A written risk-based, scientifically valid microbiological testing program has been developed and is used to verify the effectiveness of cleaning and sanitization programs, monitor the facility environment for microorganisms of human health concern and/or meet customer or other specific requirements. Program should include design (zonal (1-4) approach, food or non-food contact equipment, spent irrigation water, test & hold, water, ice, product, ingredients, etc.), rationale for organisms tested for, procedures for sampling and testing (surfaces, water, product, ingredients, etc.), timing and frequency of testing, the testing methodology, the lab that performs the tests, and acceptable results/threshold levels for each organism. Any hold and release (test and hold) activities should also be recorded. There may be some overlap with preventive controls and/or HACCP and/or Preventive Control topics.	Total compliance (15 points): A written risk-based, scientifically valid microbiological testing program has been developed and is used to verify the effectiveness of cleaning and sanitization programs, monitor the facility environment for microorganisms of human health concern and/or meet customer or other specific requirements. A microbiological testing program can be used to verify that appropriate controls such as GMPs and sanitation programs are in place and working properly. The operations program should be recorded and include: • design and scope such as the zonal (1-4) approach, food or nonfood contact equipment, spent irrigation water, test & hold, water, ice, product, ingredients, etc. • rationale for the organisms chosen to be tested for • procedures for the sampling and testing (i.e., surfaces, water, product, ingredients, etc.) • rationale for timing and frequency of testing • the testing methodology, • lab that performs the tests • the acceptable results/threshold levels for each organism tested • any hold and release (test and hold) activities The "Microbiological Testing Program Minimum Criteria" chart (Appendix I) outlines the minimum environmental and water/ice sampling and testing frequency expected based on product and processes. See specific questions below for expectations regarding other types of testing (compressed air, spent sprout irrigation water, product, raw ingredients, etc.). Rational for sampling and testing frequency: The testing should be performed on sample sites that are chosen based upon microbial risk to the facility's environment and potential for microbial product contamination. Each process should be evaluated in order to identify the actual and potential sources of contamination. The number of samples routinely taken in each site location will vary depending on the classification of the area's risk (i.e., raw or processed product area), design, amount and complexity of equipment and process, and the layout of the handling environment. Site locations should be reassessed and updated based on test results obtained. The records should show evidence that an appropriate number of sampling sites were tested (see 5.16.02). There may be some overlap with preventive controls and/or HACCP and/or Preventive Control topics, see modules 6 & 7. Testing results should be recorded, including the organism tested for, the testing methodology, lab that performed the test, details of the sampling sites, when the test occurred and the results (including units of measure). If any issues are detected, corrective actions should be recorded (see 5.16.08). Minor compliance (10 points) if: • Single instance of missing a component of the program (e.g. design and scope, procedures for sampling and testing, testing methodology, lab information, acceptable results/thresholds, any test and hold activities). • Single instance of missing rationale for organisms chosen to be tested for or rationale of timing and frequency of testing. • Single/isolated instance(s) of an integral part of facility design and/or process being excluded from the program.

Q #	New #	v3.2 Question	v3.2 Expectation	v3.2 Interpretation Guideline
				Major compliance (5 points) if: • More than one instance of missing components of the program (e.g. design and scope, procedures for sampling and testing, testing methodology, lab information, acceptable results/thresholds, any test and hold activities). • More than one instance of missing rationale for organisms chosen to be tested for or rationale of timing and frequency of testing. • Numerous instances of an integral part of facility design and/or process being excluded from the program. Non-compliance (0 points) if: • No written risk-based, scientifically valid microbiological testing program. • Fundamental failure to include numerous aspects of the program. • Fundamental failure to include relevant features of the facility and/or process into the program.
5.16.02	5.16.03	Are there records of environmental microbiological test results and does testing meet the program requirements?	Environmental monitoring testing should be recorded, including organism tested for, the testing methodology, lab that performed the test, details of the sampling sites (zone (1-4), food contact/non-food contact equipment, location), when the test occurred and the results (including units of measure). If any issues are detected, corrective actions should be recorded. Testing should meet written program requirements (5.16.01).	Total compliance (15 points): Environmental monitoring testing should be recorded, including organism tested for, the testing methodology, lab that performed the test, details of the sampling sites (zone (1-4), food contact/non-food contact equipment, location), when the test occurred and the results (including units of measure). If any issues are detected, corrective actions should be recorded. Testing should meet written program requirements (5.16.01).
5.16.03	5.16.04	No change in v3.2	Testing of facility water should be performed on a routine basis to assure it meets the microbial requirements of potable water. Water samples should be taken from within the facility, in order to assess pipes and tanks (a city water result does not take into account the operations pipes and fittings). Well water should (in addition) be tested at source. Testing frequency should be related to the risk assessment of the production. Testing should meet written program requirements (5.16.01).	Total compliance (15 points): There should be microbiological tests on water used in the facility on a routine basis to assure it meets the microbiological requirements of potable water. Testing frequency should be related to the risk assessment of the production. Testing should meet written program requirements (5.16.01) and outlined in the "Microbiological Testing Program Minimum Criteria" chart (Appendix I). For example: • Processors of ready-to-eat products (e.g., baby leaf spinach, sliced apples, etc.) should test at least monthly. • Facilities that have water coming into contact with product (excluding products to be cooked (e.g., potatoes, hard squash)) i.e. wash steps, hydrocooling, etc. should test at least quarterly. • Otherwise, minimum frequency is at least every 12 months (including facilities which have no plumbed water supply and use portable hand wash units).

Q #	New #	v3.2 Question	v3.2 Expectation	v3.2 Interpretation Guideline
5.16.04	5.16.05	No change in v3.2	Testing ice helps check both the water microbial potability and ice equipment hygiene. Testing frequency should be related to the risk assessment of the production. Testing should meet written program requirements (5.16.01).	Total compliance (15 points): There should be routine microbiological tests on ice used in the facility. Testing frequency should be related to the risk assessment of the production. Testing should meet written program requirements (5.16.01) and outlined in the "Microbiological Testing Program Minimum Criteria" chart (Appendix I). For example: • Processors of ready-to-eat products that use ice in their process should test at least monthly. • Facilities that have ice coming into contact with product (excluding products to be cooked) (e.g., ice injectors, top icing, etc.) should test at least quarterly. • Otherwise, minimum frequency is at least every 6 months.
5.16.05	5.16.06	No change in v3.2	Compressed air or other mechanically introduced gases used in direct contact with product, product food contact areas and the inside surfaces of packaging should be filtered and testing should verify any contaminants (e.g., microorganisms, particulates, water, oil, etc.) do not compromise product safety. Verification testing should be based on a documented risk assessment and controls in place (e.g., use of the air/gas, risk to the product/food contact surfaces and type of process/product). Testing should meet written program requirements (5.16.01).	Total Compliance (5 points): Compressed air or other mechanically introduced gases (e.g., nitrogen, carbon dioxide) used in direct contact with product, product food contact areas and the interior surface of packaging should be filtered and free of contaminants (e.g., microorganisms, particulates, water, oil, etc.). Oil used in compressors should be food grade (see 5.01.02). Compressors should have high efficiency filters at the compressor inlet and be fitted as close as possible to the point of use to protect against contamination (included as part of the equipment preventative maintenance, see 5.14.01) Testing should be based on a documented risk assessment and controls in place (e.g., use of the air/gas, risk to the product/food contact surfaces and type of process/product). At a minimum, testing should occur once every 12 months. Testing may include microbiological (e.g., total plate count, indicator organisms appropriate to operation) and moisture content (where moisture is a risk to the product e.g., dry operations). Testing should meet written program requirements (5.16.01) and be based on risk associated with the product and process.
5.16.06	5.16.07	No change in v3.2	Testing should be recorded, including organism tested for, the testing methodology, lab that performed the test, details of the sampling sites, when the test occurred, the results (including units of measure) and appropriate corrective actions (where relevant). Product testing may include microbiological, heavy metals, pesticides, dioxins, aflatoxins and other natural toxins, etc. Testing should meet written program requirements (5.16.01).	No change in v3.2

Q #	New #	v3.2 Question	v3.2 Expectation	v3.2 Interpretation Guideline
5.16.07	5.16.02	No change in v3.2	There should be written corrective action procedures detailing actions to take when unacceptable results are received, based on the risk that contamination could result in contaminated food and consumer illness. Procedure should describe the steps to be taken, assign responsibility for taking those steps, steps to ensure the cause is identified (e.g., root cause analysis), how impacted product is handled and corrections to minimize the potential for product contamination. This may include root cause analysis, intensified sampling and testing, review of SOPs, sanitation and maintenance programs, etc.	Total compliance (10 points). There should be written corrective action procedures detailing actions to take when unacceptable results are received, based on the risk that contamination could result in contaminated food and consumer illness that describe the steps to be taken, assign responsibility for taking those steps, and steps to ensure the cause is identified (e.g., root cause analysis), how impacted product is handled and corrections to minimize the potential for product contamination. This may include root cause analysis, intensified sampling and testing, review of SOPs, sanitation and maintenance programs, etc. Minor deficiency (7 points): • Single instance of a missing component in the corrective action procedures. Major deficiency (3 points): • More than one instance of missing components in the corrective action procedures. Non-compliance (0 points): • No corrective action procedures. • Corrective action procedures are inadequate.
5.16.08		No change in v3.2	There should be documented evidence that corrective actions have been taken when required and were adequate for the specific situation, including the disposition of any impacted product (if applicable).	Total compliance (15 points). There should be documented evidence that corrective actions have been taken when required and were adequate for the specific situation, including disposition of any impacted product (if applicable).

Q #	New #	v3.2 Question	v3.2 Expectation	v3.2 Interpretation Guideline
	5.16.09 New Question	Is there a documented training program with training records for the sampling personnel, including aseptic sampling collection techniques, sampling protocols and sample handling?	Personnel should be trained on applicable microbiological sampling techniques as well as ATP bioluminescence and allergen sampling (where relevant). Training should ensure that the sampling personnel are educated in the concepts of aseptic sampling using aseptic techniques, sampling protocols and sample handling including preparation and care of sample(s) for transport to the lab. Training may include a formal training course, directly from laboratory personnel or via an on-line resource. N/A if all sampling is handled by the laboratory service provider.	Total compliance (10 points): Personnel should be trained on applicable microbiological sampling techniques as well as ATP bioluminescence and allergen sampling (where relevant). Training should ensure that the sampling personnel are educated in the concepts of aseptic sampling using aseptic techniques, sampling protocols and sample handling including preparation and care of sample(s) for transport to the lab. A job shadowing training program is ideally in place for new sampling personnel with sign off of tasks recorded. Training may include a formal training course, directly from laboratory personnel or via an on-line resource. Self-recording is acceptable in small operations – auditor discretion applies. Training logs should have a clearly defined topic(s) covered, trainer(s) and material(s) used/given. Training includes collection of samples using sterile materials and utensils, practices and techniques to avoid/prevent contamination of sampling materials or samples, how to identify sampling sites, maintaining sample integrity prior to testing, record keeping, completion of lab chain of custody information and corrective actions. Recorded training should be on file for all sampling personnel. Question may be scored N/A if all sampling is handled by the laboratory service provider. Minor Deficiency (7 points) if: • Single/isolated instance(s) of logs having errors or incomplete information e.g. missing one of the following: training topic, trainer, or material information. • One instance of a key training topic not covered under the training program. Major Deficiency (3 point) if: • Numerous instances of logs having errors or incomplete information e.g. missing one of the following: training topic, trainer or material information. • More than one key training topic not covered under the training program. Non-compliance (0 points) if: • No records or no training has occurred. • No documented training program. • Failure to maintain records.

Q #	New #	v3.2 Question	v3.2 Expectation	v3.2 Interpretation Guideline
5.16.09	5.16.10	Where food safety related testing is being done in-house, is there a laboratory quality assurance manual with protocols and validated testing methods, evidence of training on testing protocols and methods, and relevant supporting documentation?	There should be documented evidence that the in-house laboratory is using the correct methods for testing (e.g., validation for specific applications) and have established protocols to detect errors (e.g., split samples to an external laboratory to verify consistent results and proficiency, result review and sign off) and to initiate corrective actions. There are records showing that workers handling samples have been trained on proper testing protocols and methods.	Total compliance (10 points). There should be documented evidence that the in-house laboratory is using the correct methods for testing (e.g., validation for specific applications), have established protocols to detect errors (e.g. split samples to an external laboratory to verify consistent results and proficiency, result review and sign off) and to initiate corrective actions. There are records showing that workers have been trained on proper testing protocols and methods. Minor deficiency (7 points): • Single instance of a missing test method. • Single/isolated instance(s) of missing validation information for testing method(s). • Single/isolated instance(s) of missing information on training records related to proper testing protocols and methods. Major deficiency (3 points): • More than one instance of a missing test method. • Numerous instances of missing validation information for testing methods. • Numerous instances of missing information on training records related to proper testing protocols and methods. Non-compliance (0 points): • Numerous instances of missing test methods. • No established laboratory quality assurance manual. • The established protocols and/or methods are not being followed. • There are no training records related to proper testing protocols and methods. • There is no validation material to justify the testing methods being used.
5.17.01		No change in v3.2	No change in v3.2	Total compliance (10 points): There should be records which show actual product final temperatures after processing and/or prior to dispatch for temperature sensitive goods (air temperature recordings are not acceptable for this question – see 5.17.03). Examples of temperature sensitive products include an animal food that is raw or heat treated; a plant food that it heat-treated or consists of raw seed sprouts, cut melons, cut leafy greens, cut tomatoes or mixtures of cut tomatoes that are not modified in a way so that they are unable to support pathogenic microorganism growth or toxin formation, or garlic-in-oil mixtures that are not modified in a way so that they are unable to support pathogenic microorganism growth or toxin formation. Product assessment is required for food where because of pH or Aw or the interaction of pH and Aw the growth or toxin formation of pathogenic microorganisms are reasonably likely to occur. Refer to Food Code.

Q #	New #	v3.2 Question	v3.2 Expectation	v3.2 Interpretation Guideline
5.17.03		No change in v3.2	No change in v3.2	Total compliance (5 points): There should be temperature logs or recording thermometer printouts on file. Holding temperatures in refrigerated storage rooms should not exceed 41°F (5°C) for microbiologically sensitive raw materials, ingredients or products including an animal food that is raw or heat treated; a plant food that it heat-treated or consists of raw seed sprouts, cut melons, cut leafy greens*, cut tomatoes or mixtures of cut tomatoes that are not modified in a way so that they are unable to support pathogenic microorganism growth or toxin formation, or garlic-in-oil mixtures that are not modified in a way so that they are unable to support pathogenic microorganism growth or toxin formation. Not applicable if products are held at controlled high ambient temperature e.g. whole tomatoes, bananas, etc. The issue of using an independent probe, separate from the thermostat probes and systems is covered under 5.06.04. Corrective and preventive actions should be recorded (where relevant). * Leafy greens whose leaves have been cut, shredded, sliced, chopped, or torn includes iceberg lettuce, romaine lettuce, leaf lettuce, butter lettuce, baby leaf lettuce (i.e., immature lettuce or leafy greens), escarole, endive, spring mix, spinach, cabbage, kale, arugula and chard; does not include herbs such as cilantro or parsley. Lettuce and other leafy greens cut from their root in the field with no other processing are considered raw agricultural commodities and are not included in the definition of “cut leafy greens” and are therefore not considered a potentially hazardous food requiring time/temperature control for safety (PHF/TCS) food, as defined and applied in the 2013 Food Code.
5.17.04		Is there a documented procedure for checking truck trailer temperature and reviewing sanitary condition of truck trailers prior to loading? **Point change 5 to 10**	There should be a documented procedure to check truck trailer (or other transportation system, e.g., railway carriages) temperature and sanitary condition prior to loading. Checks should include cleanliness, trailer fitness for intended use (design and construction materials), issues from previous loads, pest free, odor free, load segregation, etc. Where relevant, requirements from the organization that has contracted the carrier should be followed, including the use of time temperature recording devices and other requirements.	Total compliance (10 points). There should be a documented procedure to check truck trailer (or other transportation system, e.g., railway carriages) temperature and sanitary condition prior to loading. Checks should include cleanliness, trailer fitness for intended use (design and construction materials), issues from previous loads, pest free, odor free, load segregation, etc. Where relevant, requirements from the organization that has contracted the carrier should be followed, including the use of time temperature recording devices and other requirements.

Q #	New #	v3.2 Question	v3.2 Expectation	v3.2 Interpretation Guideline
5.17.06		Question removed		
5.17.07	5.17.06	No change in v3.2	No change in v3.2	No change in v3.2
5.18.01		Are production and storage areas free of allergen risks (i.e. allergens are not stored or handled)??	No change in v3.2	Total points (0 points): Information gathering question. If the production process includes the handling of allergen containing materials, then the allergen questions below should be completed (applicability of some questions will vary depending on variables, such as process steps and how allergen containing materials are handled). Also, the allergen hazards should form part of the HACCP and/or Preventive Controls programs (see Modules 6 & 7). The key concerning allergens (a.k.a. major 8) in the U.S. are Wheat, Eggs, Milk, Soybeans, Crustaceans (Shellfish), Peanuts, Tree Nuts and Fish. Auditors and auditees should review legislation to see if the country of production or countries being exported to have different allergen listings e.g. mustard, celery and sesame. Other sensitive ingredients that would need investigating further are Sulfites and Artificial Color FDC N°. 5. (See Appendix III for allergen reference per country.) If there is no allergen handling on site then mark this question "Yes", state an explanation and mark the rest of the allergen questions as N/A (with a statement referring back to this question e.g. N/A, see question 5.18.01). This question is not designed to cover allergen containing items found in break room vending machines, personal break food stuffs etc., but ideally auditees should make their workers aware of the potential issues, especially when carrying out hand washing training
5.18.02		No change in v3.2 **Point change 5 to 10**	No change in v3.2	Minor deficiency (7 points) if: • Policy lacks a key element. • Single/isolated instance(s) of errors or omissions in the plan. • Allergen list is missing one allergen handled on site. Major deficiency (3 points) if: • Plan lacks more than one key element. • Numerous instances of errors or omissions in the plan. • Failure to communicate the plan to workers. • Allergen list is missing two allergens handled on site. Non-compliance (0 points) if: • No plan exists. • Allergen list is not current and/or does not reflect allergens being handled on site.

Q #	New #	v3.2 Question	v3.2 Expectation	v3.2 Interpretation Guideline
5.18.04		No change in v3.2	Ideally, facilities have separate production line(s) for allergen containing ingredients. If no separate production line is being used, then procedures should be written so as to prevent allergen cross contamination. These procedures might include the specific order of producing allergen containing products and special sanitation SOPs between allergen and non-allergen production runs. Some allergen testing kits (where available for the particular allergen) are also used in order to check the sanitation after an allergen has been used in a product. Where allergen dust is considered a risk, then practices, such as keeping ingredient bins covered, separate sets of tools for different allergens, consideration of ventilation flows, etc., should be considered.	Total compliance (5 points): Ideally facilities have dedicated equipment and production line(s) for allergen containing ingredients. If no separate production line is being used then procedures should be written so as to prevent allergen cross contamination (e.g., schedule production of non-allergenic items before items with allergens, add allergenic ingredients as late in the process as possible, schedule sanitation immediately after production of foods containing allergens, using separate sets of tools for different allergens). Some allergen testing kits (where available for the particular allergen) are also used in order to check the sanitation after an allergen has been used in a product. Where allergen dust is considered a risk, practices, such as keeping ingredient bins covered, consideration of ventilation flows, etc., should be considered. Allergens should not come into contact with non-allergenic products, especially processed products that have been washed, cut or thermally treated. There should be plenty of space and separation to help avoid cross contamination issues. Workers who handle allergen products should not then handle non-allergen products without first ensuring that they are free of allergen contaminants. This should include hand washing, glove change etc., but might also include changing into a new set of garments; ideally workers should be dedicated to allergen or non-allergen goods, but not both within a shift. Utensils, cleaning implements, internal vehicles etc. should not be allowed to be vectors for cross contamination; ideally dedicated coded equipment and storage areas should be provided for allergen and non-allergen goods. Where dedicated utensils

Q #	New #	v3.2 Question	v3.2 Expectation	v3.2 Interpretation Guideline
5.18.05		No change in v3.2	Utensils, such as shovels, paddles, knives, maintenance tools, etc. should be coded in order to differentiate between items associated with producing different allergen containing products and products that do not contain allergens. Sanitation equipment (e.g., cleaning pads, mops, brushes, etc.) should also be coded and separated between equipment destined to be used on different allergen containing products/processes and nonallergen containing products/processes. Product holding bins, including re-work bins, should be coded in a similar fashion i.e. a separate set of bins for the allergen containing products.	Total compliance (5 points): Utensils, such as shovels, paddles, knives, maintenance tools, etc. should be coded in order to differentiate between items associated with producing different allergen containing products and products that do not contain allergens. Where dedicated utensils and equipment are not possible, items must be cleaned prior to use for non-allergenic materials. Sanitation equipment (e.g., cleaning pads, mops, brushes etc.) should also be coded and separated, between equipment destined to be used on different allergen containing products/processes and non-allergen containing products/processes. Product holding bins, including re-work bins, should be coded in a similar fashion i.e. a separate set of bins for the different allergen containing products, this includes rework bins. Minor deficiency (3 points) if: • Single/isolated instance(s) of utensils or work in progress storage containers not identified (tagged or color-coded) to differentiate between items associated with producing different allergen containing products and products that do not contain allergens Major deficiency (1 point) if: • Numerous instances of utensils or work in progress storage containers not identified (tagged or color-coded) differentiate between items associated with producing different allergen containing products and products that do not contain allergens. • Items are commingled with other goods in such a way that their status is unclear and a potential misuse might occur. Non-compliance (0 points) if: • Utensils or work in progress storage containers are not clearly separated and identified.
5.18.08		No change in v3.2	Worker practices should be adequate to ensure that necessary precautions are being followed to protect against allergen cross-contact and against contamination of food, food-contact surfaces, or food-packaging materials with allergenic substances. Practices may include unique color-code designation for PPE, utensils and supplies, designated process and personnel flow.	Total compliance (5 points). Worker practices should be adequate to ensure that necessary precautions are being followed to protect against allergen cross-contact and against contamination of food, food-contact surfaces, or food-packaging materials with allergenic substances. Practices may include unique color-code designation for PPE, utensils and supplies, designated process and personnel flow.