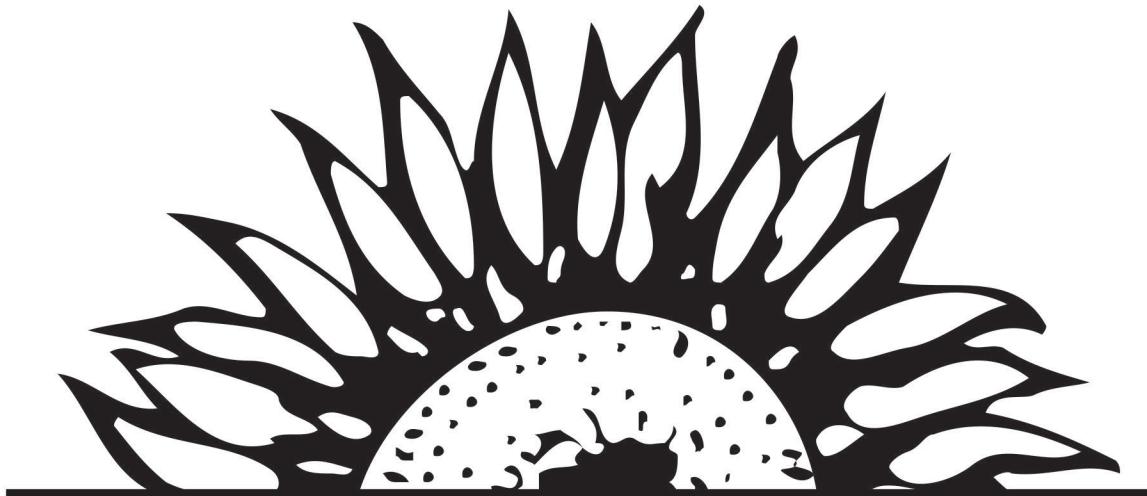


CCOF

Certification Services, LLC

www.ccof.org



PrimusGFS Certification

Program Manual

CCOF CERTIFICATION SERVICES, LLC

877 Cedar Street, Suite 248

Santa Cruz, CA 95060

(831) 423-2263

ccof@ccof.org www.ccof.org

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This manual is provided to all producers seeking CCOF CS PrimusGFS certification to present information regarding the certification process. It contains a detailed description of CCOF CS's PrimusGFS certification program and policies in addition to the rights and responsibilities of CCOF CS certification producers. Please review this manual carefully.

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SECTION ONE: INTRODUCTION TO CCOF'S PrimusGFS PROGRAM

OVERVIEW OF THE CCOF FOOD SAFETY CERTIFICATION PROGRAM

CCOF is a 501(c)5 nonprofit organization dedicated to providing certification services to organic farmers. In order to help organic farmers meet the needs of their buyers and keep pace with the changing face of food safety requirements, CCOF CS is offering PrimusGFS food safety certifications in conjunction with our organic certification programs.

References to "CCOF" in this Manual refer only to CCOF Certification Services, LLC and not to CCOF Inc or the CCOF Foundation. See the CCOF Certification Services Program Manual for a description of the legal structure of CCOF Certification Services, LLC.

CCOF is currently offering PrimusGFS certification to farmers located in the US or Mexico that are also certified organic or have written documentation that they are in transition to organic.

The staff of CCOF works hard to maintain a thorough and service-oriented food safety certification program. All CCOF CS producers benefit from our commitment to service and years of experience in certification activities.

CCOF developed our food safety certification program in early 2013, beginning with offering GLOBALG.A.P. and we are now adding and are provisionally approved to offer PrimusGFS in 2021. The status of approvals and accreditation by the ANSI National Accreditation Board (ANAB) and Azzule Systems for the PrimusGFS food safety programs are made available on their respective websites.

About PrimusGFS

PrimusGFS is a Global Food Safety Initiative (GFSI) recognized audit Certification Program for the certification of produce sector products. Depending on the operation being audited, PrimusGFS audits include Food Safety Management Systems (FSMS), Good Agricultural Practices (GAP's), Good Manufacturing Practices (GMP's) and Hazard Analysis Critical Control Points (HACCP).

PrimusGFS is owned and managed by Azzule Systems. PrimusGFS audits are performed by Certification Bodies (auditing companies) that are approved by the PrimusGFS Certification Program and seeking a scope extension to be accredited under ISO/IEC 17065 to perform PrimusGFS audits.

Azzule Systems, which is a member of the Primus Group, Inc. owns the PrimusGFS auditing standard. Azzule systems has offices worldwide, including:

- Santa Maria, California, United States (Headquarters)
- Viña del Mar, Valparaíso, Chili
- Culiacán, Sinaloa, México

PrimusGFS has been designed with a HACCP-based approach that includes measures that need to be taken, following the 7 Codex Alimentarius HACCP principles. This allows the producers to assess their operations' risk and implement parameters and corrective and preventative actions to maintain their food safety program.

GFSI Benchmarking

Certain PrimusGFS certification programs are "benchmarked" by the Global Food Safety Initiative (GFSI). This means that they are generally accepted by retailers, processors and other buyers of food products worldwide as being legitimate food safety certification programs. GFSI is an international, non-governmental organization founded in 2000 based in France. See <https://mygfsi.com/> for more information about GFSI and the benchmarking process.

HOW TO USE THIS MANUAL

This manual contains information about the CCOF PrimusGFS Certification Program, and only details areas of this program that differ from the other CCOF certification programs. This Manual is not meant to stand alone and must be used in conjunction with the CCOF Certification Services Program Manual. Areas where the CCOF PrimusGFS certification program process differs from that described in the CCOF Certification Services Program Manual, including additions, deletions, or modifications, are listed below.

This Manual does not contain all the PrimusGFS production requirements. The standards and questions for each scope and subscope of production are available on the PrimusGFS website or by requesting them from CCOF. Because the standards differ depending on the scope (Farm, Indoor Agriculture, Harvest Crew, Facility, HACCP, Preventative Control),



there is no one document that describes all the scopes for all operations. Information about the various standards, scopes and subscopes can be found on the PrimusGFS website at www.primusgfs.com.

This document is not intended as a substitute for a complete reading and understanding of the PrimusGFS General Regulations, relevant Appendixes, Guidance documents, and checklists that may be downloaded free of charge at www.primusgfs.com. The General Regulations explain the PrimusGFS certification system and the process to obtain certification. They also intend to establish communication mechanisms, duties and obligations of the Standard Owner, of Certification Bodies (CBs) like CCOF, and of applicants seeking to gain certification of their operation(s).

CCOF operates in accordance with ISO/IEC 17065; therefore, CCOF cannot provide consultation services to our clients.

It is important that you carefully review the CCOF Certification Services Program Manual, this Manual, and the appropriate PrimusGFS General Regulations, appendixes, standards, and certification criteria found in the checklists.

CCOF Certification Services Program Manual

The CCOF Certification Services Program Manual includes information about CCOF organizational structure, history, contact information and other certification programs and the certification process. Additionally, it contains CCOF's procedures and policies on: Enforcement, Complaints and Investigations, Monitoring the Marketplace, Testing of Products, Use of Contractors, Confidentiality and Public Information, Equality, Impartiality, Standards of Behavior, Governing Law, Consent to Jurisdiction, Indemnification, and Limitation of Liability.

ACRONYMS & GLOSSARY

PrimusGFS maintains their own Glossary of terms that are specific to the certification scheme, and we encourage producers to use the Glossary provided by PrimusGFS as a reference. While the certification CCOF is offering is to PrimusGFS version 3.2, the Glossary has not yet been updated by PrimusGFS and we are therefore referencing Glossary version 3.1. Review the Glossary document on their website: <http://primusgfs.com/pgfs-v3-1/>.

PrimusGFS CERTIFICATION AND ASSESSMENT SERVICES OFFERED

CCOF offers various levels of certification and assessment under PrimusGFS "Certification", which means that your farm, harvest crew, or facility receives a certificate from CCOF verifying compliance with the PrimusGFS certification and production standards. "Pre-Assessment" means that CCOF inspects your farm or facility to the production standards but shall not make a decision on whether your farm or facility complies, and no certificate is issued. Contact CCOF if you would like a Pre-assessment. Some buyers require full certification, while others may only require an assessment and will review the report themselves to make the decision about whether to buy your products directly. CCOF can try to help you understand which level of certification or assessment you need, but it is critically important that you talk with your buyers and potential retailers, distributors, wholesalers, etc. to determine which program you need to enroll in.

For ease and clarity, this manual refers only to "Certification". If your operation is seeking only an assessment, sections relating to certification shall not apply.

CCOF Program Offerings

The main objective is to accomplish third party verification by CCOF for the relevant food safety practices associated with each of their different production stages, by establishing a minimum acceptable condition for the performance of the applicants. For this, the PrimusGFS audit has defined seven fundamental areas that a company in the food sector should consider (as applicable) in the production and/or manufacturing of their Products:

- **Food Safety Management System (FSMS):** Applicable for all production areas.
- **Good Agricultural Practices (GAPs):**
 - Farm
 - Indoor Agriculture
 - Harvest Crew
- **Good Manufacturing Practices (GMP):**
 - Storage and Distribution
 - Cooler and Cold Storage
 - Packinghouse
 - Processing
- **Hazard Analysis Critical Control Points (HACCP):** Required for all GMP operations
- **Preventative Controls (PC):** Voluntary and applicable to GMP operations only.



An explanation of the requirements for each of these areas is provided in the current normative documents of the PrimusGFS standard:

- PrimusGFS General Regulations (and Appendixes)
- PrimusGFS Checklists
- PrimusGFS Questions and Expectations (which are checklist questions with descriptive explanations of what is expected for each question in the checklist).

Primus may periodically issue additional normative documents or updated revisions of current normative documents (e.g., in response to factors such as significant food safety issues, new regulatory requirements, significant changes made to GFSI benchmarking requirements, etc.).

Scopes of Certification (as defined by GFSI)

PrimusGFS defines the food safety requirements for managing the production, handling, processing, and storing of food in the following scopes:

Within PrimusGFS, there are a wide variety of processes that could be audited. Therefore, CBs should select their auditors based on their knowledge and skill sets related to the process(es) being audited. CBs also need to have technical reviewers/certification decision-makers who are qualified and experienced to review and/or make the certification decision for the process(es) being audited.

Scope	Category name	Operation Type(s)	Examples of products
BI	Farming of Plants (other than grains and pulses)	<ul style="list-style-type: none"> • Farm • Indoor Agriculture • Harvest Crew 	<p>Growing or harvesting of plants (other than grains and pulses) including horticultural products and hydrophytes for food.</p> <p>On farm storage of plants (other than grains and pulses), including horticultural products and hydrophytes for food).</p>
BII	Farming of Grains and Pulses	<ul style="list-style-type: none"> • Farm • Indoor Agriculture • Harvest Crew 	<p>Growing or harvesting of grains and pulses for food.</p> <p>On farm storage of grains and pulses for food.</p>
BIII	Pre-process handling of plant products, nuts and grains	<ul style="list-style-type: none"> • Storage and Distribution Center • Cooling/Cold Storage • Packinghouse 	<p>Activities on harvested plants, including horticultural products and hydrophytes for food, that keep the products whole and integral.</p> <p>De-shelling of nuts; drying of grain; grading of fruit and vegetables; storage.</p> <p>Cleaning, washing, fluming, sorting, grading, trimming, bundling, cooling, hydro-cooling, waxing, drenching, packing, re-packing, staging, storage, loading and/or any other handling activity that does NOT significantly transform the product from its original harvested form.</p>
CII	Processing of perishable plant products	<ul style="list-style-type: none"> • Processing 	<p>Production of plant products, including fruits and fresh juices, vegetables, grains, nuts, pulses, and perishable pet food from plant products only.</p> <p>Washing, slicing, dicing, cutting, shredding, peeling, grading, pasteurization, cooking, chilling, juicing, pressing, freezing, packed in modified atmosphere, packed in vacuum packing or any other activity that significantly transforms the product from its original whole state.</p>



Scope	Category name	Operation Type(s)	Examples of products
CIII	Processing of perishable animal and plant products	<ul style="list-style-type: none"> Processing 	Production of mixed animal and plant products, including ready to eat and perishable pet food. Mixing, cooking, chilling, freezing, packing in modified atmosphere, packed in vacuum packing. (e.g., ready to eat salads with grilled chicken or other meat, frozen foods with both plant and animal ingredients, etc.).
CIV	Processing of ambient stable products	<ul style="list-style-type: none"> Processing 	Production of food products from any source that are stored and sold at ambient temperature, including canned food and ambient stable pet food. Aseptic filling, baking, bottling, brewing, canning, cooking, distilling, drying, extrusion, fermentation, freeze drying, pressing, frying, hot filling, irradiating, milling, mixing and blending, packing in modified atmosphere, packed in vacuum packing, pasteurizing, pickling, roasting, salting and refining.
G	Storage and Distribution services for food	<ul style="list-style-type: none"> Storage and Distribution Center 	Storage, distribution, and/or logistics operations for the storage and transport of perishable or non-perishable food, feed, and packaging. Note: any packing with labeling activities are excluded.

Legislation

Food Safety legislation differs from one country to another. PrimusGFS has been developed to ensure that where laws, specific industry guidelines and/or best practice recommendations exist, these practices and parameters are used as a reference for the applicant's conformance, establishing minimum acceptable criteria for food safety certification.

ELIGIBILITY FOR ENROLLMENT

To qualify for enrollment in the CCOF PrimusGFS program, operations must meet the following criteria. Each of these is described in more detail below.

- Location
- Organic certification or proof your operation is in Transition to organic (attestation or written proof from your organic certifier)
- Scope of certification
- Single legal entity

Location

CCOF is currently approved to provide PrimusGFS in the US and Mexico. If you are located elsewhere in North America (such as Canada), and you would like to enroll your farm in the CCOF PrimusGFS program, contact us.

Organic Certification (or Verification of Transitional Status) Required

CCOF only provides PrimusGFS services to operations who have certified organic production or to those who are verified as in transition to organic. The organic certification may be issued by CCOF or by another accredited certification agency. The organic certification may be through one of the CCOF organic certification programs (USDA National Organic Program, Canadian Organic Regime). An operation certified organic by another certifier to a standard that is USDA, EU or Canada compliant or equivalent may also enroll in the CCOF PrimusGFS certification program.

CCOF is offering PrimusGFS certification to both the organic and non-organic portions of an operation, so long as some part of the operation is certified organic.

Single Legal Entity

Each legal entity is required to have its own PrimusGFS certification with CCOF. While multiple sites (fields) may be certified under one farm, multiple farms or businesses may not be certified under one certificate. On the CCOF PrimusGFS Certification Contract, you are asked for the name and legal description of your business entity.



CHANGING CERTIFIERS AND SWITCHING BETWEEN AUDITING SCHEMES

Transferring CBs: in the case that the organization is changing CBs, the applicant is responsible for submitting the request to switch CBs in the PrimusGFS system. Once the transfer is complete, the Corrective Action Report(s) from the prior audit(s) will be provided to the new CB via email from Azzule Systems. Note: Applicants cannot transfer CBs with audits in progress with their current CB.

Switching between Auditing Schemes (from GLOBALG.A.P. to Primus): If it becomes known that an applicant is switching from another GFSI recognized certification program, CCOF shall request the organization's audit history including both announced and unannounced audits and any additional information necessary to evaluate this applicant. If accepted the applicant must complete the entire certification process. If for any reason CCOF rejects the applicant, they shall inform the applicant in writing with the reason for the rejection. CCOF shall forward that notification to Azzule Systems as well.

WORKING WITH CONSULTANTS

CCOF has a list of agricultural consultants and food safety advisors on our webpage and other consultants are available throughout the industry. List available at www.ccof.org/certification/help/consultants-ag-advisors.

POLICIES

All the Policies from the CCOF Certification Services Program Manual apply to producers enrolled in the CCOF PrimusGFS program, including Use of Contractors, Confidentiality and Public Information, Equality, Impartiality, Standards of Behavior, Governing Law, Consent to Jurisdiction, Indemnification, and Limitation of Liability. CCOF CS maintains confidentiality during the data use and data release of information obtained during the course of certification per PrimusGFS General Regulations, including all Appendixes.

PrimusGFS CCOF NAMES AND SEALS

Use of Logo and Trademark

- a. The PrimusGFS trademark and logo may only be used with Azzule Systems permission.
- b. CCOF must always obtain the PrimusGFS logo from Azzule Systems. This will ensure that it contains the exact corporate color and format.
- c. CCOF is responsible for controlling certified operations' use of the PrimusGFS trademark and logo. The rules for the use of the logo and trademark will be defined in the License Agreement signed between the Azzule Systems and CCOF (exhibit C of CCOF license agreement) and in the Sub-License Agreement signed between CCOF and each organization. Infringement of the rules by either CBs or organizations could lead to sanctions.
- d. Organizations can only use the trademark and/or logo when there is a valid PrimusGFS certificate linked to that organization, and when the organization makes it clear which operations are certified. The logo can only be used for business to business communications.
- e. PrimusGFS approved CBs can use the trademark and/or logo for promotion of their accredited PrimusGFS certification activities in business-to-business communications and on their accredited PrimusGFS certificates.

FEES

CCOF is committed to maintaining stable certification fees and being transparent about the costs of certification. Payment of fees does not guarantee the issuing of the certificate. The CCOF PrimusGFS Program has the following Annual Fees as a guidance, however, specific fees are subject to the unique customers. Contact CCOF today for your custom quote at foodsafety@ccof.org.

Guidance on our Annual Certification and Inspection Fees for all PrimusGFS Certifications:

PrimusGFS fees will include the following guidelines, however be sure to contact CCOF for a custom quote as cost estimates may change depending on your unique situation. Below are the fee guidelines:

- One-time **application** fee of \$50 (paid to Azzule Systems)
- **Annual** certification fee of \$350
- **Flat rate inspection** (audit) fees:
 - **Farm/Ranch Audit:** \$850 per ranch (each ranch gets its own report and certificate)
 - **Each additional Farm/Ranch:** \$650 for each additional farm/ranch.



- **Harvest Crew Audit:** \$450 per harvest crew (each crew receives their own report and certificate)
 - **Each additional Harvest Crew:** \$250/each
- **Cooler Audit:** \$1,500 per site
 - **Each additional Cooler:** \$1300/each
- **Packinghouse Audit:** \$2,000 per site.
 - **Each additional packinghouse:** \$1,800/each
- **Azzule Audit Uploads and Transfers** (these are fees paid directly to Azzule Systems and are collected by CCOF and paid on your behalf):
 - PrimusGFS Audit Report Entry Fee (*per operation audit entry; also applicable to Pre-Assessment, and Surveillance reports*) - \$40
 - PrimusGFS Posting Fee (*payment due at certification decision per operation to post status on PrimusGFS website and Supply Chain Systems*) - \$15
 - PrimusGFS Electronic Certificate Fee (*payment due at certification decision per operation*) - \$12
- **Inspection Travel Expenses:** Varies. CCOF makes every attempt to assign an inspector in your region or one that will be in your region to split costs with other operations. Early application is key to cost efficient inspection planning.

CCOF CS clients are responsible for all incurred inspection costs from the point CCOF CS assigns the inspector. This includes preparation, planning, and any purchased tickets or travel expenses incurred. Clients wishing to eliminate inspection expenses must withdraw from certification in writing upon first contact from the inspector.

CCOF CS is committed to assigning and executing inspections in the most efficient manner possible. CCOF CS assigns inspectors to operations according to the inspector's qualifications and to minimize travel costs and save time. Cooperation with inspection assignments is necessary for inspections to be scheduled efficiently. If a client fails to comply with an inspection date set according to the inspector's schedule, additional time and travel charges may accrue. Clients who withdraw after the inspection is assigned may be billed for any expenses incurred.

If an inspection is cancelled by the operation within 3 business days of the scheduled date, CCOF CS charges for time and expenses incurred by the inspector after initial contact regarding scheduling, plus a \$75 penalty. Additionally, the producer may be responsible for any additional cancellation fees as noted by the inspector. At the second request to schedule an inspection, the producer has five working days to respond or else CCOF CS may bill a \$50 penalty.

Additional Fees

See the CCOF Certification Services Program Manual for a detailed summary of additional fees for specific services. These fees include: Rush Review, late/no response fees, reproduction services hourly rates, etc.

*****If you wish to add fields, products, crews, coolers, or facilities to your certification, notify CCOF as soon as possible to avoid extra costs associated with follow-up inspections.***

SECTION TWO: THE CERTIFICATION PROCESS

Certification is an annual cycle which includes an on-site inspection. The onsite inspection is conducted to evaluate the production activities of the farm or facility and evaluate compliance with the PrimusGFS Control Points and Compliance Criteria (CPCC).

The certification process generally follows the same pattern outlined in the CCOF Certification Services Program Manual. Exceptions are described on the following pages. This manual must be used in conjunction with the CCOF Certification Services Program Manual for complete information.



APPLICATION & REGISTRATION

Application and Review

Any operation seeking enrollment in the CCOF PrimusGFS program can obtain a CCOF PrimusGFS application package from CCOF by mail or email, or it can be downloaded directly from the CCOF website at www.ccof.org/food-safety. The application package for CCOF PrimusGFS certification contains at least the following items:

- CCOF PrimusGFS Certification Contract
- PrimusGFS Sublicense Certification Agreement
- CCOF PrimusGFS Certification Program Manual (this document)
- PrimusGFS Fee Schedule

Applicants should also review the following documents, available on the PrimusGFS website: <http://primusgfs.com/>. CCOF can provide copies of these documents upon request.

- PrimusGFS General Regulations v3.2
 - Appendix 1 – Remote Activities Guidance
 - Appendix 2 – Remote Certification Guidance during COVID-10 – Pandemic
 - Appendix 3 – Guidance for Closure of NCs and CAs
 - Appendix 4 – Scope Education and Work Experience
 - Appendix 5 – Certificate Required Information
 - Appendix 6 – International Accreditation Forums
- Checklist and Interpretation Guidelines for the appropriate Modules v3.2:
 - Module 1 – Food Safety System Management (FSMS)
 - Module 2 – Farm – Good Agricultural Practices (GAPs)
 - Module 3 – Indoor Agriculture – GAPs
 - Module 4 – Harvest Crew – GAPs
 - Module 5 – Good Manufacturing Practices (GMPs) Requirements
 - Module 6 – Hazard Analysis and Critical Control Points (HACCP)
 - Module 7 – Preventative Controls Program
- PrimusGFS GLOSSARY

Instructions and information to help complete the application are at www.ccof.org/food-safety. If you need additional assistance, please contact the CCOF office.

Due to the complexity of the registration, review, inspection, and compliance review process, CCOF recommends that you **begin the application process with CCOF at least 12 weeks prior to harvest** or facility operations (packing, storing, etc.) Note that the onsite inspection must occur during the harvest or packing of the crop(s) for which you are seeking PrimusGFS certification. Provide as much detail as possible. This helps the certification process move forward in a timely manner. Be sure to keep a copy of all of the forms inspectors submit to CCOF.

Applicants must provide CCOF with the scope of their operations that they want certified. This information should at least include: Organization details; contact information; details about the operation(s) to be included in the scope of certification. For field operations, each site is called either a “Farm” or “Indoor Agriculture” and the application should detail the different sites to be certified. There is also a “Harvest Crew” option if that is to be audited, in addition to a field operation, facility operation, or as a stand-alone audit. For Facility operations, each site can either be called a “Storage & Distribution Center”, “Cooling/Cold Storage”, “Packinghouse” or “Processing”.

Field operation products covered in the scope of certification:

The commodities must be present in the field at the time of the audit. **Where a commodity is not present at the time of the audit, but the operation wishes to include in the certification scope of their audit, it may be considered if the commodity is considered to have similar growing processes as to what is going to be audited, and the same personnel involved.** If it is a Harvest Crew audit, the products need to have similar harvesting processes. The auditor will indicate on the audit report what products were observed at the time of the audit, similar products not observed at the time of the audit and the products that were not similar and not seen at the time of the audit. The auditor is to include specific details in the audit scope and throughout the audit report related to which products were observed at the time of the audit, as well as which records were reviewed.



If the commodity was not grown by the field operation during the previous growth cycle (12 months), they cannot be considered in the audit scope. Records of production of the additional products should be available for review.

Facility operation products covered in the scope of certification:

The operation must be running, and the commodities included in the scope of certification must be present in the operation at the time of the audit. The auditor must review all operational steps at the time of the audit. **If the certain steps are not taking place at the time of the audit, the operation will not be able to be certified.** If there is any doubt as to whether all operational steps are included in the audit, the auditor should consult with CCOF technical team. If there is any doubt regarding this, Azzule Systems should be contacted. Where a commodity is not present at the time of the audit, but the operation wishes to include it in the certification scope of their audit, it may be considered if the products have similar production processes as to the products that are going to be audited, and the same personnel is involved. The auditor will indicate on the audit report what products were observed at the time of the audit, similar products not observed at the time of the audit and products that were not similar and not seen at the time of the audit. The auditor is to included specific details in the audit scope and throughout the audit report related to which products were observed at the time of the audit, as well as which records were reviewed.

Process description(s) or flow charts, with step-by-step details of the production process and the equipment used must be available for review at the time of the audit. If the commodity was not included in the facility's operation during the previous production cycle (12 months), it cannot be considered in the audit scope.

Applicants must also notify CCOF of:

- The desired audit period based on the seasonality of the crop and the validity of the current audit certificate.
- Country of destination per commodity (if known, should be included on the application).
- The auditee has the option to choose to schedule the audit(s) as announced or unannounced.
 - However, per GFSI requirements, unannounced certification audits must be conducted on certified organizations participating in a GFSI recognized program following this cycle and will be managed by CCOFs:
 - Farm, Harvest Crew, Indoor Agriculture, Cooling and Cold Storage, and Packinghouse (GFSI Scope BI, BII, BIII) Certification bodies perform 10% unannounced per year
 - Processing and Storage and Distribution (GFSI scopes CII, CIII, CIV, G) One (1) unannounced audit is required every three (3) years for each certified organization
 - The following rules apply to unannounced:
 - The unannounced audit(s) should be performed using the current PrimusGFS checklist.
 - The unannounced audit(s) should be scheduled based upon the seasonality of the applicant's production following iv and v above. The applicant will have a choice to select "blackout" date periods within the application.
 - The audit reports and certificates will display information the audit was conducted as unannounced.

Application Review

CCOF will review your application for completeness and ensure all the above mentioned criteria are met and we will upload your information into the Azzule database (if you haven't already); CCOF will issue an Application Accepted letter; and CCOF will then assign your application to an auditor who will contact you to schedule the inspection.

Complaint Log Requirement¹

The operation must keep a record of all complaints received that relate to a product's compliance with the CCOF PrimusGFS manual. A record of all complaints must be made available to CCOF CS when requested. The record must show that appropriate action is taken with respect to each received complaint.

ANNUAL INSPECTION AND INSPECTION CYCLE

Each producer or facility undergoes one announced inspection at the initial assessment, and thereafter one per year.

¹ ISO/IEC 17065 Guide 4.1.2.2.j & ISO/IEC 17021 9.9.2.f
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Every year, the operation must conduct a Self-Assessment (described above). Once the Self-Assessment has been completed CCOF conducts an onsite inspection of the operation, including each crop and facility.

CCOF may also conduct unannounced inspections at any time (see below). All CCOF inspections, both announced and unannounced, are conducted by a qualified inspector, and are based on the relevant checklist for the scopes and subsopes of certification that the operation has requested.

CCOF uses a crop's harvest season anniversary date to organize the renewal process and we will send renewal notifications at 90, 60, and 30 days prior to the anniversary of the expected harvest date. For example, if strawberry harvest starts in the beginning of April every year the anniversary date will be April 1st.

If a producer does not commit to renewal 30 days prior to the harvest season anniversary date, CCOF is required to shorten the certificate expiration date to ensure one audit and certificate is not used for more than one harvest season or growing cycle. If a producer elects to discontinue with the certification for the next cycle or does not respond to renewal notices, CCOF is required to make sufficient provisions to avoid situations where one certificate could be used to cover more than one harvest season and growing cycle of the same annually harvested crop, e.g. by shortening the certificate expiration date.

*Example: Harvest season for blueberries is the entire month of October of 2019. The first inspection takes place during the harvest and the certificate is issued November 1st of 2019, with an expiration date of November 1st 2020. Since this certificate could cover the October 2020 harvest and **if the producer does not commit to a subsequent reinspection the next year via CCOF's renewal notices, we are required to shorten the validity of the certificate to ensure the one certificate cannot be used for both the 2019 and 2020 harvest seasons or growing cycles.***

ON-SITE INSPECTIONS

Inspection (Audit) Duration and Frequency

- a) CCOF will be responsible for evaluating whether an operation meets the requirements for PrimusGFS and consequent certification. CCOF will be responsible for defining the audit duration and frequency for an operation.
- b) The audit duration should be approximated by CCOF when scheduling audits, and adjusted by the auditor, considering the following information:
 1. Type of operation(s)
 2. Number of operation(s)
 3. Size of the operation(s)
 4. Number of workers
 5. Number of products and similarity of production process(es)
 6. Complexity of the production and/or handling process(es)
- c) The audit duration will be recorded per organization and the operations included in the certification process. The audit duration includes the time required to perform the documentation review (including Module 1) and the visual inspection for each operation included in the certification scope. The following guidelines are provided as an estimate of expected audit durations:
 1. GAP Audits (GFSI scopes BI, BII, BIII) – minimum of 0.5 days
 2. GMP Audits
- d) (GFSI scopes CII, CIII, CIV) – minimum of 2 days
- e) (GFSI scope G) – minimum of 1 day
 1. The times for both the documentation review and the visual inspection should be reflective of the size of the operation and the types of processes audited.
 2. Any deviations from the minimum expected audit duration shall be properly justified and shall be included in the Audit Executive Summary/scope. Reasons for a deviation may include scope, operation size, operational process reduction on-site, a halt in the audit process by the organization, re-evaluation of the operation, etc.
- f) Audit duration includes the time from the opening meeting to the closing meeting (where the non-conformances found during the audit are reviewed). The timeframes shall be indicated in the audit report.
- g) The subsequent audit shall be scheduled 12 months from the date of the previous audit and not from the previous certificate issue date.



- h) This frequency may be modified due to factors, such as:
 1. Modification of the scope and/or operation's location during the certificate validity.
 2. Seasonality of the products.
 3. An extension lasting an additional 3 months from the current certificate expiration date may be granted by CCOF that made the certification decision. There must be justifiable circumstances that are documented.
 4. Quantity and type of non-conformances detected at the time of the audit (e.g., a re-audit or a re-visit may be required to receive certification).
 5. Additional visits may be required due to insufficient corrective action evidence.
- i) These or other situations must be assessed and documented by CCOF, who will determine the audit frequency required for each applicant, and document justification for any modification.

Audit Execution

- a) The audit shall be performed using the most recent version of the PrimusGFS normative documents.
- b) The PrimusGFS Standard is divided into seven Modules:
 1. Module 1 – Food Safety Management System (FSMS)
 2. Module 2 – Farm
 3. Module 3 – Indoor Agriculture
 4. Module 4 – Harvest Crew
 5. Module 5 – Facility
 6. Module 6 – Hazard Analysis Critical Control Point (HACCP)
 7. Module 7 – Preventive Control (PC)
- c) Each module is divided into sections, with specific questions related to the section topics.
- d) Audits will cover the seven modules for certification.
 1. Module 1 is required for all certifications.
 2. Module 2 is required for farm operations.
 3. Module 3 is required for indoor agriculture operations.
 4. Module 4 is required for harvest crew operations. Harvest crews can be audited as stand-alone or in conjunction with a farm, indoor agriculture, or facility operation.
 5. Module 5 is required for all facility operations. Depending on the type of facility, there may be individual questions in the Module that are not applicable.
 6. Module 6 is required for all facility operations. Some sections of module 6 may not be applicable. Applicability should be determined based on the outcome of the documented hazard analysis of all steps of each process. This HACCP Module is based on the 7 Codex Alimentarius HACCP principles and the 12 HACCP implementation steps. In all cases, the HACCP process and system must be in conformance with all existing legal requirements.
 7. Module 7 is optional to all facility operations. This module includes specific language found in the U.S. Food and Drug Administration (FDA) Food Safety Modernization Act (FSMA) Preventive Controls for Human Food Rule and is included to serve as a guide for Preventive Controls for Human Food compliance.
- e) The scope of certification should be clearly defined prior to the audit to determine the modules to be audited. Ownership of the different areas, locations, activities, or crops of the company applying for certification are elements to consider when deciding what types of operation(s) will be included in the scope. That decision should be made by the applicant organization. The auditor must perform the audit based on the defined scope. A scheduled Pre-assessment audit cannot be converted into a certification audit once the audit has begun or post audit, i.e. during on-site documentation review or visual inspection.
- f) An auditor should not be assigned to audit the same organization for more than three consecutive years at a maximum. The fourth consecutive audit should only occur with justifiable reasons, i.e. auditor availability, auditee location.

Remote Audit Activities

- a) CCOF can perform aspects of the audit remotely per the guidance of PrimusGFS General Regulations Appendix 1 Remote Activities Guidance. Please refer to the Appendix 1 for more details.



- b) Additionally, in extreme and very rare cases where an onsite audit cannot occur due to Covid-19 travel restrictions or other unusual events, CCOF may conduct a 100% remote audit per the Appendix-2 of the PrimusGFS General Regulations, **however, this audit and the certificate will NOT be considered GFSI benchmarked and should be avoided at all costs.** For further information, please consult Appendix-2 and contact CCOF for a discussion on options. Note: CCOF reserves the right to not allow or engage in a 100% remote audit.

GRANTING CERTIFICATION

Individual Question Conformance

- a) To verify conformance, the PrimusGFS Checklist and the PrimusGFS Questions and Expectations shall be used.
- b) There are information gathering questions included throughout the audit that are worth zero points each. For scored questions, each question of the PrimusGFS Checklist has a possible score assigned to it.
- c) The auditor must evaluate and answer each one of the questions that applies to the operation being audited.

The possible answers to the questions in each Module are listed below:	
Answer	Criteria used
Total conformance	To meet the question and/or conformance criteria in full.
Minor deficiency	To have minor deficiencies against the question and/or conformance criteria. To have single or isolated non-severe deficiencies (usually up to three) against the question and/or conformance criteria. To have covered most of the question conformance criteria, but not all.
Major deficiency	To have major deficiencies against the question and/or conformance criteria. To have numerous non-severe deficiencies (usually more than three) against the question and/or conformance criteria. To have single or isolated severe deficiencies against the question and/or conformance criteria. To have covered some of the question conformance criteria, but not most of it.
Non-conformance	To have not met the question and/or conformance criteria requirements at all. Having fundamental deficiencies against the question and/or conformance criteria (severe or non-severe issues).
Non-applicable	The requirement described in the question is not applicable for the operation being audited. Justification should be provided in the auditor's comments. Be aware that there are some questions that do not allow answering non-applicable.

Table 2: PrimusGFS Scoring Criteria

- d) Each question in the PrimusGFS Checklist should be looked at individually and answered according to the auditor's observations during the audit.
- The amount of deficiencies and the risks associated should be considered when assigning the severity of the finding, which can be a Minor Deficiency, Major Deficiency or Non-Conformance. When no deficiencies are found, a Total Conformance is given. When the requirement is not applicable for the operation being audited, a Non-applicable answer is given. Some general statements for the scoring decisions are described in the table above (Table 2). These statements are superseded by the criteria described in the question's expectations and users should be aware that some questions do not follow these general statements (e.g., automatic failure questions).

Scoring System

- a) Each question in the PrimusGFS Checklist has a possible score assigned to it. Depending on the answer given, the score obtained will be defined.



- b) Each scored question has a certain amount of points that can be obtained depending on the conformance assigned to it. The scoring system for each question is described in the table below (Table 3):

Scoring System				
<i>Possible answer</i>	<i>Possible Points for the question</i>			
	15 points	10 points	5 points	3 points
Total conformance	15 points	10 points	5 points	3 points
Minor deficiency	10 points	7 points	3 points	2 points
Major deficiency	5 points	3 points	1 point	1 point
Non-conformance	0 points	0 points	0 points	0 points

Table 3: Scoring System

- c) It is important to note that for all questions answered Non-applicable, the points assigned to that question will be taken out of the total possible score, so calculations are not affected by those answers.

Scoring Calculation per Module and per Operation

- a) There will be two types of scoring calculations for each audit:
1. Module Score, which is calculated for each one of the modules audited.
 2. Overall Total Score, which is calculated for each audited operation.
- b) The Module Score is calculated for each one of the modules included in the audit, considering the total sum of points obtained in each module divided by the total points possible, represented in a percentage. See Table 4 below for a diagram of the scoring calculation structure.
- c) The Overall Total Score is calculated for each operation considering the total sum of points obtained in the entire audit, divided by the total points possible for the entire audit, represented as a percentage. See Table 4 below for a diagram of the scoring calculation structure.
- d) For all audits, the Overall Total Score calculated in the preliminary stage will need to be $\geq 85\%$ to proceed to the subsequent certification decision phase. If the preliminary overall total score is $<85\%$ then the audit is “not certified.” The applicant organization will still be able to submit corrective actions, but they will not be calculated to achieve certification. If the preliminary score is $\geq 85\%$ but $<90\%$, corrective actions will be required to become certified.

Module 1		Farm Modules		Facility Modules		OPERATION
Food Safety Management System		Farm (2) / Indoor Farming (3) / Harvest Crew (4)		Facility (5) / HACCP (6) / Preventive Control (7)		
Total sum of the points obtained for each one of the questions applicable in this module	+	Total sum of the points obtained for each one of the questions applicable in this module	Or	Total sum of the points obtained for each one of the questions applicable in this module	=	Total points obtained in the complete audit for the operation
÷		÷		÷		÷
Total sum of possible points for each applicable question in this module	+	Total sum of possible points for each applicable question in this option	Or	Total sum of possible points for each applicable question in this option	=	Total points possible in the complete audit for the operation
=		=		=		
Module Score for Module 1		Module Score for applicable Modules		Module Score for applicable Modules		Overall Total Score for the operation

Table 4: Scoring Calculation Structure



- e) The scores shall be displayed in rounded down whole number percentages.
- f) This calculation should be repeated for each operation included in the certification scope.

Automatic Failure

- a) There are certain questions in the PrimusGFS checklist that if down scored will result in an automatic failure and an overall score of 0% for the corresponding module.
- b) These questions are identified with a phrase similar to: “ANY DOWN SCORE IN THIS QUESTION RESULTS IN AN AUTOMATIC FAILURE”.
- c) Applicant should be immediately informed of the automatic failure by the auditor during the audit.

Special Circumstances

- a) Automatic Failure
 - 1. CCOF reserves the right to fail the audit due to special circumstances. Some examples include deliberate illegal activities, physical acts/threats to an auditor, attempted bribery, falsified records, etc., or finding serious food safety issues during the audit.
- b) Corrective Actions
 - 1. CCOF reserves the right to consider all information provided by the organization, as corrective action evidence, to affect other questions in the audit in addition to the one being reviewed.
- c) Certification Decision
 - 1. CCOF reserves the right to consider all information gathered during the certification process to make the decision as to whether they will grant certification for each specific operation or a whole organization.
- d) Suspension/Revocation of Certification
 - 1. CCOF reserves the right to consider all information related to the certified organizations and operations to suspend or revoke current certificates, if they represent a serious food safety issue or if illegal activities are detected.
- e) Significant Events for Certified Organizations and their Operations
 - 1. All certified organizations shall inform their corresponding CB and PrimusGFS at PrimusGFS@azzule.com about any food safety related prosecution, significant regulatory food safety non-conformity, product recall related to food safety or any other issues that could bring the Standard into disrepute. CBs shall ensure the integrity of certification after notification and consider the need to suspend or revoke certification. CBs should correspond these significant events to Azzule Systems within seven days of the occurrence.
- f) Cause for Early Re-evaluation of a Certified Organization
 - 1. The certified organization shall inform CCOF of any significant changes, which could affect the safety of product. This includes any ownership and/or management changes, and any changes made to the process, machines, or production practices.
 - 2. If CCOF has any reason to believe that there could be compliance issues in relation to the certification requirements, a re-evaluation shall be performed to verify conformance with the PrimusGFS normative documents or the license agreement. Examples of compliance issues may include potential critical nonconformities related to changes of the PrimusGFS normative documents between version changes, complaints against the certified organization, etc. The re-evaluation may include an on-site re-visit to verify that the organization is in compliance with the PrimusGFS compliance criteria.

Surveillance Audits

- a) Surveillance Audits Performed by CCOFs
 - 1. Each CB must have a surveillance program in place for their certified organizations. The surveillance audits must be performed using the PrimusGFS checklist the chosen organization(s) is certified against. The selected organization with certified operation(s) must reach the required scoring as a certification audit to maintain their certification.
 - i. The surveillance audits should be conducted using the checklist to which the organization obtained certification, unless otherwise directed by Azzule Systems. Selection shall be based upon a risk assessment approach considering factors such as compliance history, product type(s), process complexity, appeals, complaints, or any other factors CCOF determines necessary. E.g., Geographical location may also be considered to the extent that if 50% of the



certifications are from Country “A”, then approximately 50% of the surveillance audits shall be conducted in Country “A” and so forth.

2. CCOF will notify the organization’s chosen operation(s) of the surveillance audit no sooner than 48 hours prior to the day of the audit.
3. The organization can only reject a surveillance audit one time with justifiable reasons. If rejected on the second attempt, this will result in a suspension of all current audit certificates.
4. Surveillance audits are not an approved substitute for the unannounced audits required by PrimusGFS.

b) Surveillance Audits Performed by Azzule Systems

1. As part of the PrimusGFS Integrity Program, Azzule Systems will perform sporadic auditor assessments. The purpose is to ensure that qualified auditors are performing the audits properly according to the PrimusGFS standard.
 - i. The audited operations will be required to accept the PrimusGFS representative(s) on-site during the audit.
 - ii. The PrimusGFS representative conducting the auditor assessment on-site will have no say during the audit nor will they point out any deficiencies to the auditor at the time of the audit.
2. Azzule Systems will also have the option to perform auditee assessments, which will consist of Azzule Systems performing an on-site audit for a certified operation. These surveillance audits will be performed using the current PrimusGFS checklist or the version the certified organization is certified against, and the selected organization with certified processes must reach the same scoring as a certification audit (mentioned in the Evaluation section of this document) in order to maintain their certification.
 - i. By performing these audits, Azzule Systems will be able to verify auditor performance (based on the prior audit report) to what was observed at the time of the certification audit.
 - ii. The audited operations will be required to accept a second person(s) on-site during the audit.

Requirements for Audit Reports

- a) The audit report will always be issued from the PrimusGFS database.
- b) After each audit, the auditor must enter the information into the PrimusGFS database to generate a preliminary audit report within 15 calendar days.
- c) The audit report will be written in the language that the applicant requests (English and Spanish are currently the only languages available in the PrimusGFS database).
- d) Every audit report shall at least include:
 1. Name of CCOF
 2. Name of the applicant organization
 3. Details about the operation under certification
 4. Audit duration (date and time) (start and finish of the documentation review and of the visual inspection/walkthrough)
 5. Name and version of the PrimusGFS normative documents used for certification
 6. Audit executive summary/ scope – details of the process under certification. The executive summary should reflect what is observed at the time of the audit including a description of the growing/harvesting/packing/processing process. This executive summary is mandatory even in the absence of non-conformances. If there are additional products that an operation produces during other times of the year, it can be acknowledged in the executive summary/scope, but the auditor should mention the process was not observed at the time of the audit.
 7. Product(s) observed during audit, product(s) not observed but of similar risk type to the products observed, and product(s) not observed and not of a similar risk type to the product(s) observed. The GFSI scope code, following Section 7 Certification Scopes as defined by GFSI, should also be recorded, although not currently included on the published version of the report.
 8. Names of personnel involved in the audit from the applicant organization
 9. Auditor name
 10. Audit scoring summary
 11. Answers and comments for each of the questions in the PrimusGFS checklist. These will be responded to, based on guidance from Azzule Systems.



12. Labeled as unannounced if the audit was performed as unannounced.
 13. Shippers (customers of the auditee) designated during the application process (if applicable)
 14. Any other additional information required by Azzule Systems (e.g., GPS points, GFSI scope, etc.).
- e) Additionally, every audit will generate a non-conformance report that will give a summary of all the non-conformances found in the audit, with the corresponding comments and details for each non-conformance.

Non-conformances & Corrective Actions

- a) In order for the audit to move to the certification phase, all identified non-conformances must have corrective actions verified and closed out by the certification body.
Note: Non-conformances in this section also includes Major and Minor deficiencies.
- b) The corrective actions must be submitted into the PrimusGFS database within 30 calendar days from the original audit date.
- c) The submission of corrective actions does not guarantee that the score will increase, but should demonstrate that the organization has taken or will take the corrective actions and/or preventive measures to control the identified non-conformance.
- d) Note that with an overall preliminary audit score of less than 85% or an automatic failure, the organization can submit corrective actions for CCOFs review, but accepted corrective actions do not change the final score. (See Section 13 for further information on the certification requirements.)
- e) The corrective actions from the organization should include at a minimum: the determination of cause(s) (i.e., root cause analysis), any action plan(s) to address immediate issue(s) regarding the non-conformance, the corrective actions taken, and the development of preventive actions to help avoid future occurrences if necessary.
- f) If a corrective action is not able to be completed during the corrective action timeframe, the organization should submit the corrective action plan, the evidence of intent to complete, and a timeframe for completion and/or a documented risk assessment with the mitigation measures in place that shows the identified issue or non-conformance is controlled.
- g) Corrective action evidence can be in the form of documents, records and/or photographs and it must show that the non-conformance has been adequately addressed.
- h) CCOF has the right to determine if an on-site assessment or remote assessment with the use of ICT is necessary to be performed to the audited organization to verify corrective actions for any non-conformance found.
- i) CCOF will have 15 calendar days to review the corrective action evidence to determine if actions taken are sufficient to control the risk(s), and notify the organization if it was accepted or rejected and close out the non-conformance(s).
- j) If time allows (within the 30-calendar day corrective action timeframe), when corrective action evidence is rejected by CCOF, the organization can re-submit additional evidence to close out the non-conformance.
- k) Once the organization has responded to CCOF regarding the non-conformances and CCOF has reviewed all corrective actions submitted, CCOF will close out the corrective action phase in the PrimusGFS system, which will allow for the certification decision to be made.

CERTIFICATION DECISION

Certification Body

- a) CCOF shall make the certification decision and issue the final audit report no more than 45 calendar days from the audit date.
- b) The audit report shall be technically reviewed by the authorized CB representatives to make the decision of whether or not to grant certification. These CB representatives shall be impartial and technically capable of reviewing the outcome of the audit reports to ensure compliance with the PrimusGFS requirements, including (but not limited to):
 1. Certification scope in the application matches the report scope and has been thoroughly evaluated by the auditor (operation, products, etc.)
 2. Percentage Scores by module and for overall total score
 3. The appropriate corrective actions have been taken to resolve any outstanding non-conformances.



Calculation of Scores

- a) Based on the outcome of the final audit report, the scores should be calculated and analyzed for each operation to determine if they comply with the minimum score for certification.
- b) The certification decision shall be based on a combination of conformance scores: The Overall Total Score and the Module Scores.
 - 1. The Overall Total Score must be at least 90% to achieve certification.
 - 2. Each one of the Module Scores for the operation must be a minimum of 85% to be certified. All Overall Scores for all audits must be $\geq 85\%$ in the preliminary stage to be certified. If the preliminary score is less than 85%, a not certified decision is made. Another audit will be necessary to receive certification.

Issuing Certification

- a) Certification will be issued to each operation individually that complies with the minimum scoring criteria. In the case of an organization having more than one operation included in the same application, the calculations should be made separately for each operation and one certificate should be issued to each operation that complies with the scoring requirements.
- b) The PrimusGFS certification is only valid for certified audited operations.
- c) PrimusGFS is valid for a maximum period of 12 months from the certification date.
- d) The certificate must be issued from the PrimusGFS system.

SANCTIONS

Sanctioning of CBs

- a) Suspension of an approved PrimusGFS CB - A CB shall be suspended if:
 - 1. CCOF's ISO/IEC 17065 accreditation has been suspended
 - 2. CCOF does not pay the agreed upon fees
 - 3. CCOF improperly uses the PrimusGFS or GFSI logo or trademark
 - 4. An issue is discovered by the PrimusGFS Integrity Program
 - 5. CCOF does not abide by the requirements of the General Regulations, License Agreement, or other PrimusGFS requirements.
- b) Revocation of an approved PrimusGFS CB - A CB shall have its approval revoked if:
 - 1. Evidence of fraud is found
 - 2. CCOF declares bankruptcy
 - 3. A suspension related issue is not adequately resolved
- c) Any change in the status of CCOF will be reflected on the PrimusGFS website.

Sanctioning of Certified Organizations

- a) If CCOF finds a non-conformance with a certified organization's PrimusGFS Documentation that is found to be a food safety issue and an immediate threat to the public, a sanction (suspension or revocation) shall be issued.
- b) All sanctions shall be in writing, and include the nature of the non-conformance, the time frame for resolution (if applicable) and provisions for escalation of sanctions if the non-conformance is not corrected within the specified period.
- c) Only CCOF may lift a suspension sanction after sufficient corrective actions have been submitted, with verification either through written or visual evidence and/or an on-site visit.
- d) CCOF can issue the sanction to an entire certified organization or narrow it down to one or more specific operations within the scope of the current certification.
- e) There are two types of possible sanctions for organizations:
 - 1. Suspensions - an organization's certification shall be suspended if:
 - i. A non-conformance is found to be a food safety issue and an immediate threat to the public.
 - ii. If the re-certification audit results in an automatic failure, while the organization still has a valid certificate.
 - iii. If a critical food safety issue is detected during an audit (e.g., automatic failure, special circumstance, etc.), then CCOF should consider suspending existing certificates related to this new observation(s).
 - iv. An organization does not pay the agreed to fees.
 - v. If an organization rejects a surveillance audit on the second CB notification.



- vi. The organization improperly uses the PrimusGFS or GFSI logo or trademark.
- vii. An organization is involved with an illegal activity or a serious food safety issue.
- 2. Revocations - an organization's certification shall be revoked if:
 - i. Evidence of fraud is found
 - ii. A suspension related issue is not adequately resolved
 - iii. The organization declares bankruptcy
 - iv. An organization that has had its certification revoked shall not be accepted for certification in the PrimusGFS program for a period of six months after the date of revocation.
- f) CCOF shall always notify Azzule Systems in a timely manner and in writing of any sanction applied to a certified organization, as well as update the system to reflect those changes.
- g) Azzule Systems has a list that contains all suspended operations (those suspended after receiving certification), and those operations "not certified due to special circumstances" where the operation was "not certified" based on reasons other than score, which is available to CBs.

Distribution of Audit Reports

- a) CCOF must provide and make available the information for each certification process, including but not limited to, audit details, outcome, and the certification status to Azzule Systems by using the PrimusGFS system or by any other means established by Azzule Systems.
- b) The documented audit reports generated by CCOF during the certification process for each operation, including those submitted through the PrimusGFS database, should be provided to the applicant, CCOF and Azzule Systems.
- c) Ownership of the audit report, determination of details made available and authorization for access shall remain with the applicant. CCOF shall ensure appropriate confidentiality is in place and in conformance with all GFSI and ISO/IEC 17065 Guidelines. Except where required, upon request, by GFSI, law, and the normative documents, CCOF shall not release any applicant certification activity information to any outside party without the applicant's authorization. CCOF shall document all communications between CCOF and applicant, whereby the applicant authorizes the release of certification information to an outside party.

Extension of Scope Certification

- a) An organization's certified operation can apply for an extension of scope to their current certification for:
 - 1. Increased growing area of an already certified operation, if the operation has "like commodities" in terms of risk, along with justifiable circumstances.
 - 2. Adding products to already certified operations, with justifiable circumstances.
 - 3. If products are approved and added to the current report, the product(s) will be added to the "similar product(s) not observed" or "product(s) applied for but not observed" categories. Only the "similar product(s) not observed" will be included on the certificate.
- b) Justifiable circumstances will be reviewed at CCOF level and include all relevant information, such as: similarity (risks, processes, location and personnel) between new products and already certified products, and any additional information CCOF considers as part of their risk assessment. CCOF will have to review all information before a decision regarding a request for extension of scope of increased growing area and/or adding new commodities is granted.
- c) CCOF will determine if there is a need to visit to the organization to increase the growing area, adding of commodities to already certified operations and/or adding a new process to the certificate (e.g., a new packing line, automated chopper, etc.).
- d) In the case of adding a new operation to an already certified organization, the organization may be required to have a full new audit including the FSMS and all relevant modules for that particular operation (if the audit for the new operation takes place greater than 30 days after the original audit date). This is required because the FSMS procedures may have changed since the original audit and/or the implementation of FSMS procedures may be different relative to previous operation audits.

ANNUAL RECERTIFICATION

To continue certification, producers must pay the annual certification fees and submit the Continuation of Certification Contract. If both of these steps are not completed, CCOF changes the PrimusGFS product status to "Certificate not

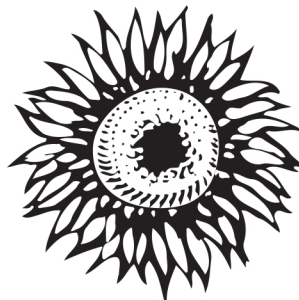


renewed or re-registered”, and CCOF allows the PrimusGFS certificate to expire without moving forward with a renewal inspection or certification.

Once CCOF CS has received annual fee payment and the completed Continuation of Certification Contract, CCOF notifies the producer that the certification renewal is complete and we begin to assign the inspection.

Certificate extensions can be granted per the PrimusGFS General Regulations, but can only be processed once the next cycle’s renewal contract has been completed and fees for next cycle have been paid. However, if a producer undergoes an extension and then fails to obtain an inspection within their extended period, CCOF is required by PrimusGFS to issue a suspension that will remain in the PrimusGFS system.





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