

Costco Trigger Questions in the v2.1 PrimusGFS Audit

Explanatory Information

Ver. 1.1 06272014

Costco has designated some of the questions in the PrimusGFS v2.1 audit as “trigger questions” of interest. This means that Costco is notified when a preliminary or final audit report is transferred to the Costco Produce Food Safety Data Site and has down scored trigger questions i.e. trigger questions associated with non-conformances.

A full list of these trigger questions for each PrimusGFS v2.1 module is shown at the end of this document. Below are brief notes for auditees and certification bodies regarding how these trigger questions are applied.

Note that the Costco trigger questions are a separate metric to the official PrimusGFS audit scheme.

A) PrimusGFS v2.1 Auditees Notes

A1) *Not Yet Audited*

Apart from obtaining a passing score in the audit, auditees must try and ensure that they do not incur non-conformances associated with the trigger questions noted at the end of this document.

A2) *Audited and Preliminary Report Issued with Non-Conformances Identified In Costco Trigger Questions*

Auditees who wish to become or remain Costco suppliers must perform corrective actions for these non-conformances associated with Costco Trigger Questions (see listing at the end of this document) irrespective of the module and overall audit scores. These corrective actions are to be recorded in auditees PrimusGFS website account and submitted to the certification body for review as per the usual PrimusGFS audit certification process.

A3) *Audited and Final Report Issued with Non-Conformances Identified In Costco Trigger Questions* – Auditees in this situation have failed to meet Costco’s requirements irrespective of the module, overall audit scores and certification status. Auditees who wish to become or remain suppliers should contact Costco directly (see A5 below) to review their situation and discuss the potential for mitigating actions. This is especially pertinent to auditees who have passed an audit some time ago but have only just become part of the Costco supply chain and had their audit transferred to the Costco data site.

A4) Note that current failed audit alerts that are sent to Costco when data is transferred to their site have been modified so that they will show the trigger question non-conformances. These alerts have been and will continue to be copied to the auditee and PrimusGFS certification body.

A5) If you have any questions please contact your certification body in the first instance. Alternatively you can also contact Toni Roberts troberts@costco.com or Milinda Dwyer mdwyer@costco.com for more information.

B) PrimusGFS v2.1 Certification Body Notes

B1) Please read the previous section PrimusGFS v2.1 Auditee Notes.

B2) If you are aware that your prospective auditee candidate is a direct or indirect Costco supplier please provide your client this explanatory memo as far in advance of their audit as possible.

B3) The Costco PrimusGFS v2.1 Trigger Question program replaces the need for Costco Addenda when using the PrimusGFS v2.1 Audit version only. The Costco Trigger Question program does not apply to PrimusGFS v1.6 (which will cease to be used August 31st 2014).

B4) The Costco PrimusGFS v2.1 Trigger Question must not adversely affect the way your CB performs the certification process including the audit application processes, performing the audits, reviewing corrective actions, making certification decisions and processing of appeals.

B5) Following last point (B4) CB's should not open audits that have been through the final certification decision process i.e. have been certified or not certified, in order for an auditee to specifically update corrective actions to meet the Costco Trigger Question requirements. This would be a breach of the audit certification process.

B6) Note that current failed audit alerts that are sent to Costco when data is transferred to their site have been modified so that they will show the trigger question non-conformances. These alerts have been and will continue to be copied to the auditee and PrimusGFS certification body.

B7) If you have any questions please contact Azzule in the first instance. Alternatively you can also contact Toni Roberts troberts@costco.com or Milinda Dwyer mdwyer@costco.com for more information.

Costco Trigger Questions in the V2.1 PrimusGFS Audit

Module 1, FSMS

Management System	1.01.01	Is there a Food Safety Manual or other documented food safety management system covering the scope of business included in this audit and procedures/instructions for all food safety processes?
Rejection and release of product	1.05.03	Is there a documented product release procedure available?
Rejection and release of product	1.05.04	Are there records of product releases kept on file?

Module 2, GAP

Ground History	2.03.04b	Is the fecal matter found in the audited area, a systematic event (not sporadic)? A 'YES' ANSWER TO THIS QUESTION RESULTS IN AUTOMATIC FAILURE OF THE AUDIT.
Fertilizer/Crop Nutrition	2.07.01	Is untreated human sewage sludge used in the growing cycle? A 'YES' ANSWER TO THIS QUESTION RESULTS IN AUTOMATIC FAILURE OF THE AUDIT.
Fertilizer/Crop Nutrition	2.07.03c	Is there a Certificate(s) of Analysis (COA) from the biosolid supplier(s) certifying compliance with prevailing national/ local standards and guidelines (microbiological analysis)? A 'NO' ANSWER TO THIS QUESTION RESULTS IN AUTOMATIC FAILURE OF THE AUDIT.
Fertilizer/Crop Nutrition	2.07.03e	Are biosolids being applied to crops where the country of production regulations/guidelines ban the use such materials e.g. Leafy Green Commodity Specific Guidelines in California? A 'YES' ANSWER TO THIS QUESTION RESULTS IN AUTOMATIC FAILURE OF THE AUDIT.
Fertilizer/Crop Nutrition	2.07.04d	Are untreated animal manures being used where the country regulations/guidelines ban the use such materials (e.g., Californian Leafy Green Commodity Specific Guidelines)? A 'YES' ANSWER TO THIS QUESTION RESULTS IN AUTOMATIC FAILURE OF THE AUDIT.
Irrigation / Water Use	2.08.01b	Are microbiological tests, including generic E.coli conducted on the water? If No, go to 2.08.01d.
Irrigation / Water Use	2.08.01f	If unsuitable or abnormal results have been detected, have documented corrective measures been performed?
Irrigation / Water Use	2.08.02a	Are microbiological tests, including generic E.coli conducted on the water? If No, go to 2.08.02c.
Irrigation / Water Use	2.08.02e	If unsuitable or abnormal results have been detected, have documented corrective measures been performed?
Irrigation / Water Use	2.08.03e	Are microbiological tests, including generic E.coli conducted on the water? If No, go to 2.08.03g
Irrigation / Water Use	2.08.03i	If unsuitable or abnormal results have been detected, have documented corrective measures been performed?
Irrigation / Water Use	2.08.04e	Are microbiological tests, including generic E.coli conducted on the water? If No, go to 2.08.04g

Irrigation / Water Use	2.08.04i	If unsuitable or abnormal results have been detected, have documented corrective measures been performed?
Irrigation / Water Use	2.08.05f	Are microbiological tests, including generic E.coli conducted on the water? If No, go to 2.08.05h
Irrigation / Water Use	2.08.05j	If unsuitable or abnormal results have been detected, have documented corrective measures been performed?
Irrigation / Water Use	2.08.06c	Are microbiological tests, including generic E.coli conducted on the water? If No, go to 2.08.06e
Irrigation / Water Use	2.08.06g	If unsuitable or abnormal results have been detected, have documented corrective measures been performed?
Irrigation / Water Use	2.08.07e	Are microbiological tests, including generic E.coli conducted on the water? If No, go to 2.08.07g
Irrigation / Water Use	2.08.07i	If unsuitable or abnormal results have been detected, have documented corrective measures been performed?
Crop Protection	2.09.04	Is there documentation that shows the individual(s) making decisions for crop protection applications are competent?
Crop Protection	2.09.05	Is there documentation that shows employees who handle crop protection materials are trained or are under the supervision of a trained individual?
Crop Protection	2.09.06	Are there up to date records of all crop protection products applied during the growing cycle? A 'NO' TO THIS QUESTION RESULTS IN AUTOMATIC FAILURE OF THE AUDIT.
Crop Protection	2.09.07a	Does the growing operation have the information available for the plant protection products registered and/or authorized for use for the target crops in the country of production? A 'NO' ANSWER TO THIS QUESTION RESULTS IN AUTOMATIC FAILURE OF THE AUDIT.
Crop Protection	2.09.07b	Are crop protection applications restricted by the guidelines established by the product label, manufacturer recommendation, or by prevailing national/ local standards and guidelines? A 'NO' ANSWER TO THIS QUESTION RESULTS IN AUTOMATIC FAILURE OF THE AUDIT.
Crop Protection	2.09.07c	Where harvesting is restricted by pre-harvest intervals (as required on the crop protection chemical product labels, manufacturer recommendations and/or by prevailing national/ local standards) is the grower adhering to these pre-harvest interval time periods? A 'NO' ANSWER TO THIS QUESTION RESULTS IN AUTOMATIC FAILURE OF THE AUDIT.
Crop Protection	2.09.08	If applicable, for those plant protection products that are not registered for use on target crops in the country of production, if the country has no or a partial legislative framework to cover plant protection products, can the grower show that they have registration information, label information, MRL tolerances, etc. for the country of destination? A 'NO' ANSWER TO THIS QUESTION RESULTS IN AUTOMATIC FAILURE OF THE AUDIT.
Crop Protection	2.09.09	Is there evidence available that the grower is taking all the necessary measures to comply with the country(ies) of destination expectations regarding crop protection products used (e.g. registration information, label information, MRL tolerances or any other guidelines applicable)? A 'NO' ANSWER TO THIS QUESTION RESULTS IN AUTOMATIC FAILURE OF THE AUDIT.
Field Employee Hygiene (Applies to on-the-farm or greenhouse workers not the harvesting workers)	2.10.03	Does the growing operation have documented and implemented procedures describing the disposition of product that has come into contact with blood or other bodily fluids? A 'NO' ANSWER TO THIS QUESTION RESULTS IN AUTOMATIC FAILURE OF THE AUDIT.
Field Employee Hygiene (Applies to on-the-farm or greenhouse workers not the harvesting workers)	2.10.06	Are there operational toilet facilities provided? If NO, go to 2.10.07. A 'NO' ANSWER TO THIS QUESTION RESULTS IN AUTOMATIC FAILURE OF THE AUDIT.

Field Employee Hygiene <i>(Applies to on-the-farm or greenhouse workers not the harvesting workers)</i>	2.10.07	Is there evidence of human fecal contamination in the growing area(s)? A 'YES' ANSWER TO THIS QUESTION RESULTS IN AUTOMATIC FAILURE OF THE AUDIT.
Harvesting Employee Activities & Sanitary Facilities <i>(Applies to harvesting workers)</i>	2.12.01	Does the harvesting operation have written and implemented policies and procedures regarding employees with open sores and/or wounds and for dealing with employees who appear to be physically ill, or who become ill while working?
Harvesting Employee Activities & Sanitary Facilities <i>(Applies to harvesting workers)</i>	2.12.08	Are there operational toilet facilities provided? A 'NO' ANSWER TO THIS QUESTION RESULTS IN AUTOMATIC FAILURE OF THE AUDIT. If No, go to 2.12.09
Harvesting Employee Activities & Sanitary Facilities <i>(Applies to harvesting workers)</i>	2.12.09	Is there evidence of human fecal contamination in the harvesting area? A 'YES' ANSWER TO THIS QUESTION RESULTS IN AUTOMATIC FAILURE OF THE AUDIT.
Harvesting Employee Activities & Sanitary Facilities <i>(Applies to harvesting workers)</i>	2.12.10	Are operational hand washing facilities provided? If No, go to 2.12.11. A 'NO' ANSWER TO THIS QUESTION RESULTS IN AUTOMATIC FAILURE OF THE AUDIT.
Harvesting Employee Activities & Sanitary Facilities <i>(Applies to harvesting workers)</i>	2.12.13	If observed, are all commodities that come in contact with blood and/or other bodily fluids destroyed? A 'NO' ANSWER TO THIS QUESTION RESULTS IN AUTOMATIC FAILURE OF THE AUDIT.
Harvesting Employee Activities & Sanitary Facilities <i>(Applies to harvesting workers)</i>	2.12.13a	Does the harvesting operation have written and implemented policies and procedures in place for all commodities that come in contact with blood and other bodily fluids, stating that they must be destroyed? Are these policies and procedures available to harvest crew workers?
Harvest Practices	2.13.01b	Is the fecal matter found in the audited area, a systematic event (not sporadic)? A 'YES' ANSWER TO THIS QUESTION RESULTS IN AUTOMATIC FAILURE OF THE AUDIT.
Harvest Practices	2.13.03b	Is packing material free from evidence of pest activity, foreign materials and other signs of hazardous materials? A 'NO' ANSWER TO THIS QUESTION RESULTS IN AUTOMATIC FAILURE OF THE AUDIT.
Harvest Practices	2.13.03c	Is packed product free from evidence of pest activity, foreign materials, hazardous materials and any adulteration issues? A 'NO' ANSWER TO THIS QUESTION RESULTS IN AUTOMATIC FAILURE OF THE AUDIT.
Harvest Practices	2.13.03d	Is product and packing material free from exposure to the ground and or any handling contamination?
Harvest Practices	2.13.10a	Are there up to date records of all crop protection products applied in the field to the harvested product? A 'NO' ANSWER TO THIS QUESTION RESULTS IN AUTOMATIC FAILURE OF THE AUDIT.
Harvest Practices	2.13.10c	Has the growing operation have the information available for the plant protection products registered and/or authorized for use in the post-harvest period for the target crops in the country of production? A 'NO' ANSWER TO THIS QUESTION RESULTS IN AUTOMATIC FAILURE OF THE AUDIT.
Harvest Practices	2.13.10d	Are applications or treatments to the harvested product restricted by the guidelines established by the product label, manufacturer recommendation, or by prevailing national/local standards and guidelines? A 'NO' ANSWER TO THIS QUESTION RESULTS IN AUTOMATIC FAILURE OF THE AUDIT.
Harvest Practices	2.13.10e	If applicable, for those plant protection products that are not registered for use in the post-harvest period on target crops in the country of production, if the country has no or a partial legislative framework to cover plant protection products, can the grower show that they have registration information, label information, MRL tolerances, etc. for the country of destination? A 'NO' ANSWER TO THIS QUESTION RESULTS IN AUTOMATIC FAILURE OF THE AUDIT.
Harvest Practices	2.13.10f	Is there evidence available that the grower is taking all the necessary measures to comply with the country(ies) of destination expectations regarding the post-harvest treatments used (e.g. registration information, label information, MRL tolerances or any other guidelines applicable)? A 'NO' ANSWER TO THIS QUESTION RESULTS IN AUTOMATIC FAILURE OF THE AUDIT.

On site storage	2.15.04	Has the operation implemented a pest control program in the storage area? If answer is NO, skip the rest of the subquestions.
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Module 2, GMP

Pest Control	2.17.01	Are products or ingredients free of insects/rodents/birds/reptiles/mammals or any evidence of them? ANY DOWN SCORE IN THIS QUESTION RESULTS IN AUTOMATIC FAILURE OF THE AUDIT.
Pest Control	2.17.02	Are packaging supplies free of insects/rodents/birds/reptiles/mammals or any evidence of them? ANY DOWN SCORE IN THIS QUESTION RESULTS IN AUTOMATIC FAILURE OF THE AUDIT.
Pest Control	2.17.03	Are plant and storage areas free of insects/rodents/birds/reptiles/mammals or any evidence of them?
Pest Control	2.17.05	Does the operation have a pest control program? ANY DOWN SCORE IN THIS QUESTION RESULTS IN AUTOMATIC FAILURE OF THE AUDIT.
Storage Areas & Packaging Materials	2.18.05	Are raw products, work in progress, ingredients (including ice), finished goods and food contact packaging within accepted tolerances for spoilage or adulteration? ANY DOWN SCORE IN THIS QUESTION RESULTS IN AUTOMATIC FAILURE OF THE AUDIT.
Employee Practices	2.20.03	Is there no sign of any employees with boils, sores, open wounds or exhibiting signs of foodborne illness working in direct and indirect food contact?
Equipment	2.21.01	Are food contact equipment surfaces free of flaking paint, corrosion, rust and other unhygienic materials (e.g. tape, string, cardboard, etc.)?
Operation Monitoring Records	2.27.07	Is there a daily pre-operation inspection log?
Maintenance & Sanitation Files	2.28.05	Are there written cleaning procedures (Sanitation Standard Operating Procedures) for the facility and all equipment?
Maintenance & Sanitation Files	2.28.08	Is there a routine program and written procedure to validate sanitation effectiveness using ATP bioluminescence?
Testing/ Analyses Records	2.30.01	Are there records of routine equipment microbiological testing?
Testing/ Analyses Records	2.30.02	Are there records of routine environmental microbiological testing?
Allergen Control	2.32.01	There are no allergen risks handled or stored within production and storage areas?

Module 3, HACCP

Development of the HACCP Plan	3.02.01	Has a documented hazard analysis for the process been conducted, showing the various types of hazard, their likelihood of occurrence and their associated severity? ANY DOWN SCORE IN THIS QUESTION RESULTS IN AUTOMATIC FAILURE OF THE AUDIT.
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Execution of the HACCP plan on the Plant Floor	3.03.05	Are corrective actions detailed in writing when the failure of a CCP occurs?
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