PrimusGFS V4.0

Public Stakeholder Consultation

Where to provide feedback:
GFSIBM@theconsumergoodsforum.com

Before: 24 December 2026 at midnight CET

PrimusGFS V4.0

GFSI Benchmark Assessment Report

Final Version: 17 . 04. 2026

Application information

Assessment team and date

Certification programme Name(s)	PrimusGFS v4.0
Certification programme owner name and address	3030 Industrial Parkway Santa Maria, CA, USA
Certification programme owner name, email, contact number	Azzule Systems de Mexico S de RL de CV adriana.camacho@azzule.com; al@primuslabs.com +52 55 45630015 & 805.922.0055
Date of previous application if applicable	
Benchmark Leader name and contact details	Emma Skouse
GFSI Senior Technical Manager name	Karla Mijatovic
Observers name	NA
Interpreter's name (if applicable)	NA
Date of this office assessment	30/09 & 01/10/2026
Language (e.g. English or other)	English

Scopes included in this application

GFSI Scopes		Scopes applied for
AI	Farming of Animals for Meat/ Milk/ Eggs/ Honey	
AII	Farming of Fish and Seafood	
BI	Farming of Plants (other than grains and pulses)	
BII	Farming of Grains and Pulses	
BIII	Pre-process Handling of plant products	
C0	Animal Conversion	
CI	Processing of perishable animal products	
CII	Processing of Plant Perishable Products	
CIII	Processing of Animal and Plant Perishable Products (Mixed Products)	
CIV	Processing of Ambient Stable Products	
D	Production of Feed	
E	Catering	
FI	Retail / Wholesale	
FII	Food Broker / Agent	
H	Provision of Food Safety Services	
G	Provision of Storage and Distribution Services	
I	Production of Food Packaging	
JI	Hygienic Design of Food Buildings and Processing Equipment (for building constructors and equipment manufacturers)	
JII	Hygienic Design of Food Buildings and Processing Equipment (for building and equipment users)	
K	Production of (Bio) Chemicals (Additives, Vitamins, Minerals, Bio-cultures, Flavourings, Enzymes and Processing aids)	

Executive summary and recommendation to the GFSI Steering Committee

Executive summary

Overview of the Assessment Process

PrimusGFS applied for recognition against the GFSI Benchmarking Requirements (BMR) Version 2024 for scopes BI, BII, BIII, CII, CIII, CIV & G. The benchmarking process was conducted as an integrated assessment to ensure a seamless transition from v2020.1 to v2024.

The purpose of the GFSI assessment was to evaluate the PrimusGFS Standard (v4), issued by the CPO (owned by Azzule Systems de Mexico S de RL de CV), in compliance with the GFSI Benchmarking Requirements 2024 version.

Desktop Review & Technical Verification

The benchmarking cycle commenced with a comprehensive preliminary Desktop Review of the PrimusGFS Standard, (Version 4) and associated documentation, completed remotely by the BML (Benchmark Leader) Emma Skouse (ES) in October 2026, and was based on the review of the evidence provided by the Certification Programme Owner in the self-assessment excel files for GFSI part II and III to cover the scopes of recognition applied (BI, BII, BIII, CII, CIII, CIV & G), ensuring that it contained sufficient objective evidence to proceed to the onsite assessment phase.

All findings raised, concerning the request for additional information, have been communicated in writing with the CPO. The assessment identified one (1) non-conformity related to Certification Bodies Personnel (clause 4.12). The CPO was offered a call to discuss the findings, however they did not feel this was necessary, and instead submitted further supporting evidence to address the findings. The findings raised were discussed during the Office Visit on 30th September and 1st October 2026 and subsequently closed out during the office visit.

Office Visit and Findings

An Office Visit (OV) was conducted on 30th September and 1st October 2026 by Benchmark Leader (ES).

The office assessment proceeded according to a predefined agenda (Office Assessment Plan),

with no critical findings or other obstructing issues identified at this stage. The office assessment was carried out in person and achieved the main purpose to verify the implementation and alignment of the new requirements and the Certification Programme Owner's Integrity Programme through sampled record reviews.

Validation of Corrective Actions (18 November 2026)

Following the Office Visit, there was one (1) miss alignment identified which has now been closed; therefore, the CPO will be recommended for public consultation directly as no further corrective actions are due. The GFSI Senior Technical Manager Karla Mijatovic (KM) will conduct a final technical validation of the information presented including the corrective actions closed for the desktop review and acknowledgement of no finding raised at the office visit on 30th September and 1st October 26.

Verification of Root Cause Analysis (RCA): completed 18/11/2026

Validation of Evidence: completed 18/11/2026

Final Approval: The Senior Technical Manager officially accepted the close-out of all findings from the Self assessments and all documented reviews with one (1) finding for the office visit, confirming that the PrimusGFS v4.0 is now in full conformity with BMR v2024 as of Nov 18, 2026.

Conclusion

The benchmarking process encountered no significant complexities that would impede recognition. The Senior Technical Manager concludes that the assessment was transparent, evidence-based, and compliant with GFSI protocols. The report is now deemed validated for the 4-week public stakeholder consultation.

Recommendation to the GFSI Steering Committee

Results of assessment and office visit

Time and location details

	Location	People present GFSI, consultant, CPO. Names and roles	Date and time
Self-assessment review	remote	Emma Skouse (BML)	4 days completed 07-11/09/2026
Review calls	Online conference	Not required	
Office visit	3030 Industrial Parkway Santa Maria, CA, USA	Adriana Camacho Al Quaglino Diana Hernandez	29/09 – 01/10/2026

Overview of Certification Programme

PrimusGFS is a food safety certification programme developed and owned by Azzule Systems, with origins in 1998 through PrimusLabs' audit and laboratory data activities and formally established under Azzule in 2008. The programme was developed to meet the need for a standardized, science-based scheme aligned with Global Food Safety Initiative (GFSI) requirements and to support global market access. It operates in global markets, primarily within the fresh produce sector, and across the food supply chain, including primary production, post-harvest operations, processing, and distribution. Its mission is to enhance food safety through preventive, risk-based approaches, and its objective is to support compliance, transparency, and continuous improvement.

General compliance, strengths and weaknesses

The PrimusGFS v4.0 is reviewed at least every 4 years, or sooner if changes occur in industry, normative documents, legislation, etc. by technically competent internal and external representatives. There are around 255 Stakeholders. Request feedback from Stakeholders via online form on CPO website. Feedback is reviewed by the audit developer and one of the 2 consultants. Summary then passed to the CPO team and answer questions if necessary or make pertinent changes.

The programme has strong oversight of Certification Body activities through Certification Body office visits, comprehensive desktop reviews and discussion of Certification Body performance against specified Key Performance Indicators and witness audits of auditors.

The review of the self-assessment documents and corresponding submitted evidence was carried out by the Benchmark Leader during the office visit on 30th September and 1st October 2026.

During the office visit, carried out in person, the Benchmark Leader interviewed the Certification Programme managers, reviewed documents, performance data and sampled certification records. The Integrity programme process was discussed and evaluated.

Changes made to the certification programme following the GFSI assessment

The CPO PrimusGFS, following the GFSI assessment, has supplied the corrective action plan containing the revised requirements.

The first and final corrective action plan was received on 22nd October 2026 with evidence.

The new version is not yet live – it is not planned to be made live until recognition is achieved and therefore notification to stakeholders for amends has not been necessary.

List of findings

Note; This finding was raised at the office visit.

Element reference	Non-conformity	Partly / no	Corrective action	Recommendation from Benchmark Leader	Decision from GFSI Senior Technical Manager
4.12	PrimusGFS v4, section 8 CB Personnel Requirements, subsection 8.11 Auditor Qualification Maintenance covers the requirements. Please send Annual Desk review checklist and communication to CBs for verification. Annual Desk review checklist is not relevant to this clause. Communication to CBs is still required.	Partly	The General Regulations v4.0 require auditors to maintain and update their knowledge and competence through continued training relevant to PrimusGFS requirements, food safety, regulatory developments, and their approved audit scopes. Sep 25.2026. General Regulations Section 8.5 of the General Regulations now states: Consultant experience may count if the role demonstrates food safety responsibilities equivalent to two years of full-time work at a site. Auditor competency requirements are evaluated independently of the Desk review. Communication was sent to all CBs on Oct 26 2026 strengthen the requirement for auditors to be regularly trained and evaluated on	PrimusGFS v4, section 8 CB Personnel Requirements, subsection 8.11 Auditor Qualification Maintenance covers the requirements Please send Annual Desk review checklist and communication to CBs for verification. Annual Desk review checklist is not relevant to this clause. Communication to CBs is still required. ES 30/09/2026. Communication to CBs	Accepted. The corrective action effectively addresses the gap in CB communication and enforcement. While the CPO already had normative requirements in place (PrimusGFS v4, Section 8.11), the issuance of the formal communication on 16/10/2026— complete with a dedicated Training log and Auditor Continued training support tool— provides the necessary objective

			their understanding of the Certification Programme. Additionally, ongoing auditor training and qualification maintenance will be addressed during the PrimusTEC meeting scheduled for November 19, 2026. This meeting is one of three held each year as part of our annual communication programme with Certification Bodies (CBs). Each approved CB must be represented by its manager, a designated backup, or both.	seen, dated 16/10/2026 with Training log and Auditor Continued training support tool, along with instructions on how this should be managed going forward. CLOSED. ES 23/10/2026	evidence, therefore fully aligning with the BMR 2024 requirements. Validated by KM 18.Nov.2026

Root Cause Analysis (RCA) Summary

Finding 1: *PrimusGFS v4, section 8 CB Personnel Requirements, subsection 8.11 Auditor Qualification Maintenance covers the requirements. Please send Annual Desk review checklist and communication to CBs for verification. Annual Desk review checklist is not relevant to this clause. Communication to CBs is still required.*

Root Cause: *The communication to all Certification Bodies had already been issued; however, a copy of the email was not provided at the time of the initial assessment review. The supporting evidence was subsequently submitted to GFSI for verification.*

RESULTS OF THE PUBLIC STAKEHOLDER CONSULTATION

List of findings – public stakeholder consultation

GFSI Benchmarking Requirements version 2024		Stakeholder Consultation Comments	CPO Answer	Recommendation from Benchmark Leader	Decision from GFSI Technical Manager