

Industries Eye on Prevention

Pamela Peckman – Industrial Fumigant Company
Presented at IAOM 's 2017 Summer Meeting

Today's Topic

Pest Prevention!

2017 NPMA/CEPA Global Food Safety Summit

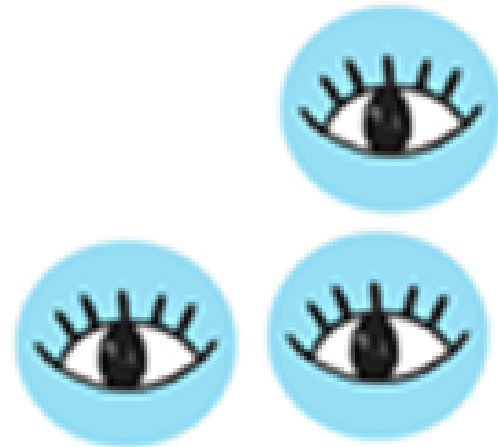
National Pest Management Association (NPMA)

Confederation of European Pest Management (CEPA)

 3rd Party Auditors

 Food Industry Consultants & PMP

 Food Industry Managers



A Century Ago....



Source: <http://www.fda.gov/AboutFDA/WhatWeDo/History/Overviews/ucm056044.htm>

What changed...and what has not

Inspection, Compliance, and Response

– From “credible and verifiable information” to “reason to believe”

- The SAHCODHA threshold
 - Records are subject to review
 - Similar products will be suspect

What changed...and what has not

From Reaction to Prevention

From 402(a)(3) to 402(a)(4)

(3) A food **shall** be deemed to be adulterated if it consists in whole or in part of any filthy, putrid, or decomposed substance, or it is otherwise unfit for food.

(4) A food **shall** be deemed adulterated if it has been prepared, packed, or held **under insanitary conditions** **whereby it may** have become contaminated or whereby it **may** have been rendered injurious to health.

“May” explained...

- § 117.37 Sanitary facilities and controls
 - **Pest control.** *Pests must not be allowed in any area of a food plant. **Effective measures** must be taken to exclude pests from the manufacturing, processing, packing, and holding areas and to protect against the contamination of food on the premises by pests.*

So, what are effective measures?

So, where are we?

Top IPM Findings			
	IN	S	U
Standard	%	%	%
Pest habitat	12.28	43.06	34.78
Interior rodent monitoring devices	11.92	-	7.25
Pesticide application documentation	-	13.89	-
Pesticide control	-	5.56	26.09
Facility assessment	7.65	-	-
Bird Control	5.69	5.56	8.70
Signed contracts	6.76	-	-
IPM program	-	5.56	-



IN = Improvement Needed

S = Serious

U = Unsatisfactory

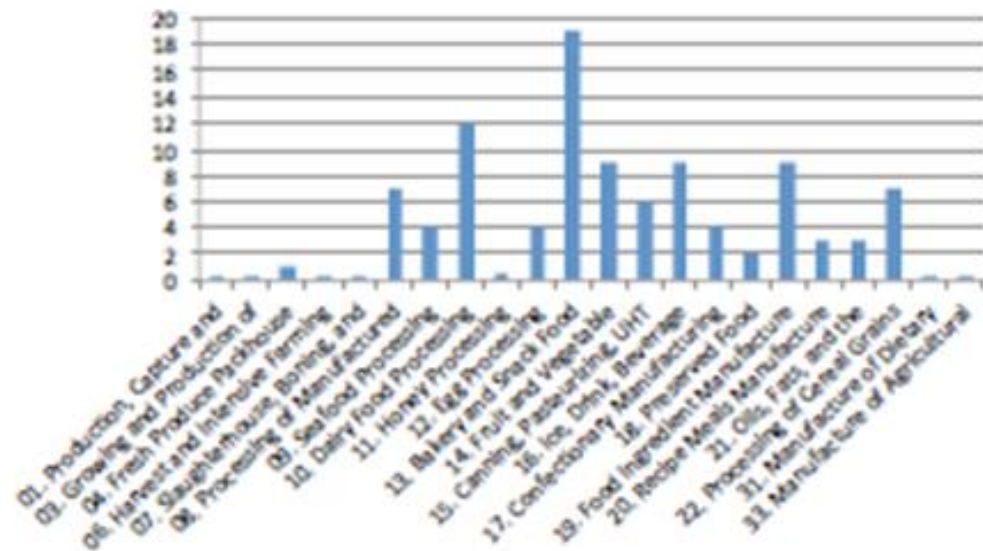
Slide courtesy of AIB

Out of total Findings August 1, 2015-July 31, 2016

Current State

Non-conformance evidence:

- Gaps with dock doors and access doors
- Doors left open
- Screens missing in doors and exhaust fans
- Missing and/or damaged seals
- Fly activity
- Lack of pest control devices in key areas
- Harborage areas in the exterior
- Damaged pest stations
- No annual review of the full program
- Evidence of activity



One Goal

Focus on the Risk

- Follow the intent behind the Code requirements. Focus on improving the food safety system, not just meeting the Code requirements.

Prevention vs. Reaction

- Identify the prevention strategies to prevent pest activity. Doors, seals, screens, etc. are to be in place and maintained.

Unpredictability

- Change up the habit for different results. Challenge the program by including different people, sites, or times.

Collaboration

- Work with industry to identify best practices. Create training, informational webinars to share with sites and auditors.

ONE GOAL:

- Pest free facilities
- Safer supply chain



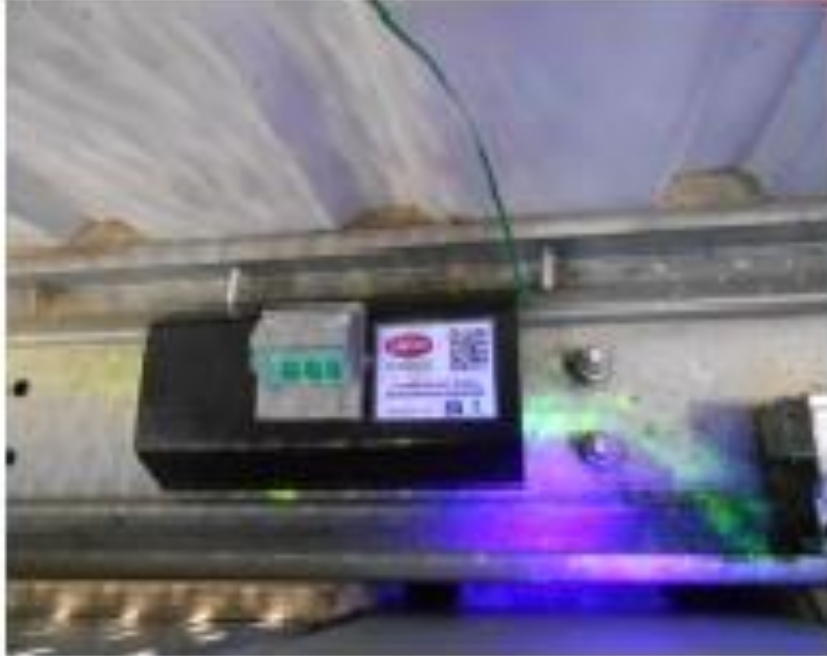
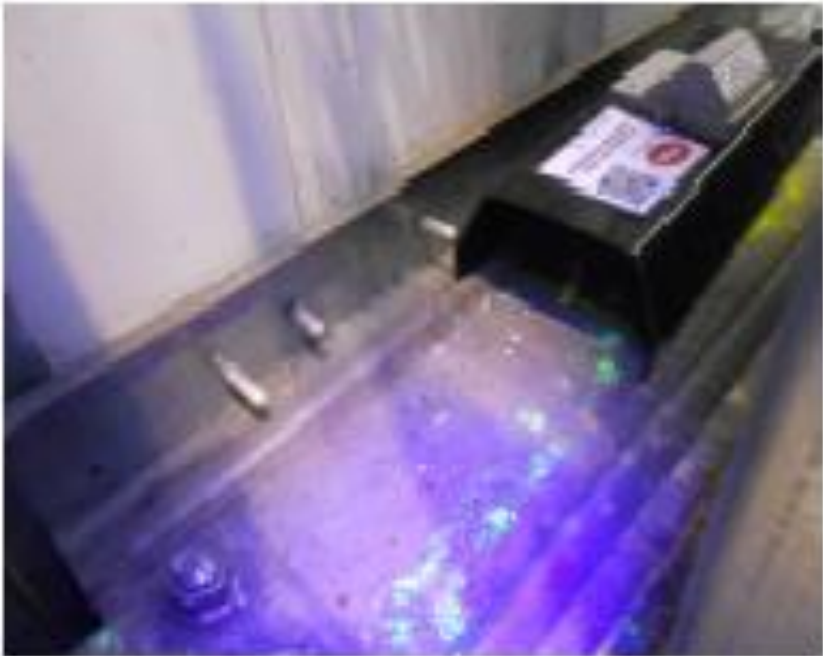
Rodent Management



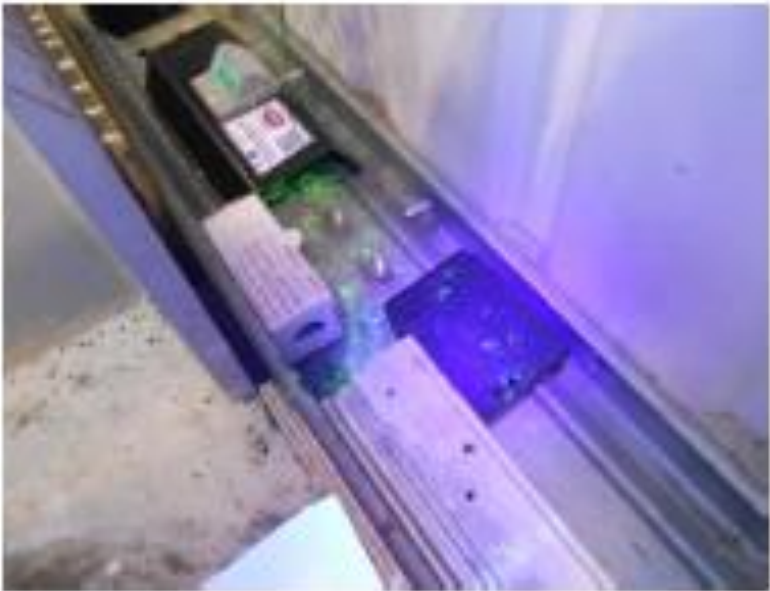
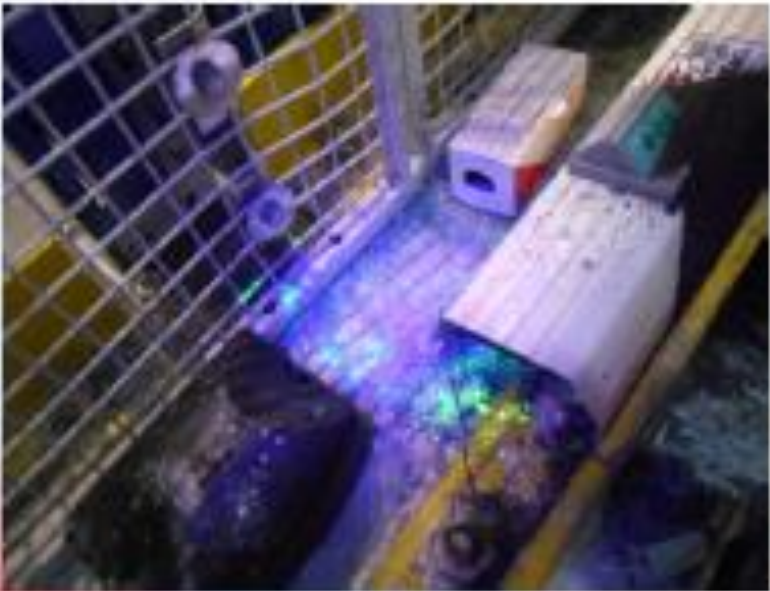
From John Simmons
Acheta Consulting LTD – UK

At each location we placed:

- A plastic bait station with non-toxic paste bait
- A cardboard bait station with non-toxic paste bait
- A plastic trapping station containing a break-back trap baited with a commercial rodent 'attractant' (Provoke)
- A GTO detector, on upturned guttering, with non-toxic bait and UV tracking dust underneath



Source: Dr. John Simmons Acheta Consuting LTD, UK

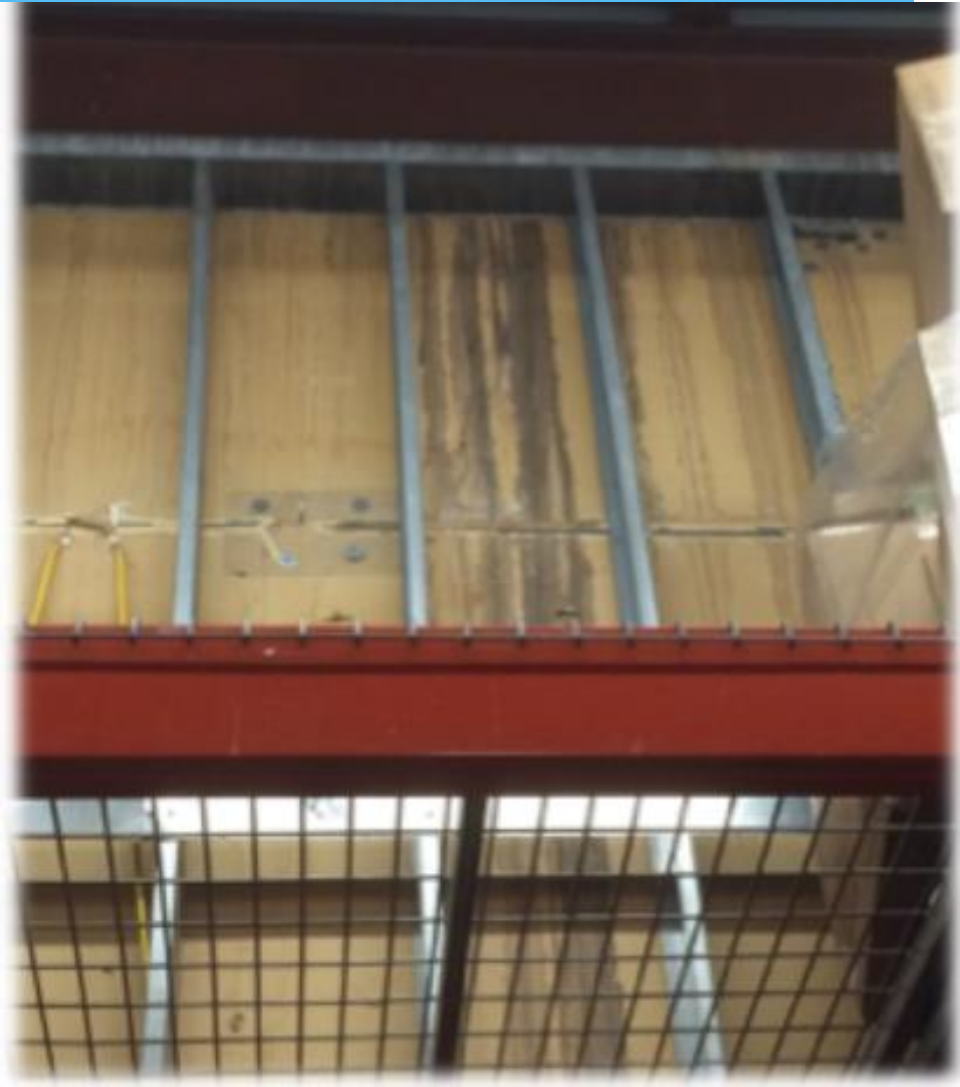


Source: Dr. John Simmons Acheta Consuting LTD, UK

Food Industry Input

Documentation of Pest Issues

- Roof Rats
- Be Tenacious
- Don't be happy with a checkbox approach.
- Would someone 1000 miles away understand what was written.
- Bubble up to person who can make changes
- Collaborate w/ site management



Food Industry Input

What we want in our PMP Providers....

- * Be thorough in your investigation and aggressive in your approach
- * Amount of tenacity
- * Good communication
- * First time fix
- * Work orders closed

Discussion

- * How does your facility deal with repeat issues??

Acknowledgement

Special Thanks for permission to share slide information from the following individuals:

- * LeAnn Chuboff - SQFI
- * John Simmon – Acheta Consulting Ltd
- * Cornelius Hugo – AIB

Any Questions???

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One Focus.
Food Industry
Pest Management.

