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
The “teeth” of FDA’s food safety law

- Prevention is not new, but Congress has given the FDA authority to use the criteria more broadly and assertive
  - Documentation review
  - Product detention
  - Recalls
  - Import prohibition
  - Injunctions
  - Litigation / criminal prosecution
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?

<table>
<thead>
<tr>
<th>Top IPM Findings</th>
<th>IN</th>
<th>S</th>
<th>U</th>
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</thead>
<tbody>
<tr>
<td>Standard</td>
<td>%</td>
<td>%</td>
<td>%</td>
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<tr>
<td>Pest habitat</td>
<td>12.28</td>
<td>43.06</td>
<td>34.78</td>
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<tr>
<td>Interior rodent monitoring devices</td>
<td>11.92</td>
<td>-</td>
<td>7.25</td>
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<tr>
<td>Pesticide application documentation</td>
<td>-</td>
<td>13.89</td>
<td>-</td>
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<tr>
<td>Pesticide control</td>
<td>-</td>
<td>5.56</td>
<td>26.09</td>
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<td>Facility assessment</td>
<td>7.65</td>
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<td>-</td>
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<td>Bird Control</td>
<td>5.69</td>
<td>5.56</td>
<td>8.70</td>
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<td>Signed contracts</td>
<td>6.76</td>
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<tr>
<td>IPM program</td>
<td>-</td>
<td>5.56</td>
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</tbody>
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IN = Improvement Needed  
S = Serious  
U = Unsatisfactory  

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

Slide courtesy of AIB
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

Slide courtesy of LeAnn Chuboff, SQFI
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

Slide courtesy of LeAnn Chuboff, SQFI
Rodent Management

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

From John Simmons
Acheta Consulting 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
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

Food Industry Input
How does your facility deal with repeat issues??
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.