

Introduction

The company has established, documented and implemented a pest prevention system, which is maintained as part of the Good Manufacturing Practices to ensure the safe production of products.

Procedure

The company operates a proactive system for the prevention of contamination of products by pests and ensures there are effective controls and processes in place to minimise pest activity. This includes ensuring an integrated pest prevention system is effectively implemented. This procedure is used in conjunction with written Good Manufacturing Practices and HACCP plans to ensure adequate pest control. The Hazards Associated with pests are the contamination of food by bacteria from pests and their droppings and also unwanted contamination of food with pests' bodies, eggs, hairs or droppings. At the factory design stage measures are taken to reduce the risk of contamination by aiming to restrict the access of pests on site.

Raw materials, packaging and finished products are stored so as to minimise the risk of infestation. Where stored product pests are considered a risk, appropriate measures are included in the control programme. All incoming goods are inspected for pest infestation. Process equipment handling raw materials vulnerable to infestation is identified and scheduled inspection undertaken. All buildings are required to be adequately proofed as described in QM 13.2 Construction of Premises and Equipment. Waste is managed as per procedures QM 13.8 Waste Disposal to prevent the accumulation of debris and waste on site to prevent the attraction of pests. In order to prevent risk of contamination no animals are allowed on site.

The company employs a Pest Control Association registered pest control contractor to implement a pest prevention programme and maintain the site free from pest contamination. The contract agreement defines:

- company and contractor key contact personnel
- description of contracted services and how they will be completed
- term of the contract
- equipment and material storage specifications
- a complete inventory of pesticides (must be approved by the regulatory authority for use in a food facility) including safety data sheets detailing the safe use and application of baits and other materials such as insecticide sprays or fumigants
- emergency call out procedures
- records to be maintained
- requirement to notify facility of any changes in service or materials used
- Authorised service personnel including evidence of competency by exam from a recognized organization or regulatory authority

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- Raw material warehouse
- Maintenance workshop
- Finished product warehouse
- Areas with the potential for rodent access due to traffic
- Overhead areas when roof rat activity is evident
- High traffic areas
- Doors that open to the exterior of the facility

Interior rodent monitoring devices identify and capture rodents that gain access to the facility. Toxic baits are not used for interior monitoring. Bait are not used inside material or food packaging storage areas or processing areas, indicator baits that conform to local regulations are used inside processing areas. Interior monitoring devices are placed along perimeter walls at a distance of 10m and secured in position. Spacing is reduced and the number of traps is increased when there are increased pest activity levels. Interior monitoring devices are inspected at least weekly.

Interior monitoring devices include:

- Mechanical traps
- Glue boards
- Gassing traps
- Live cage traps
- See-saw tubes
- Electrocution traps
- Extended trigger traps that send alert e-mails or text messages

Electronic Flying Insect Killing Units (EFKs)

EFKs assist in the identification and monitoring of flying insects. For food safety reasons all EFKs have shatter-resistant tubes and are positioned at least 3 m from food packaging contact surfaces, exposed products, packaging, and raw materials in food handling areas. EFKs are installed away from entrance areas in a way that does not attract insects to the facility. EFKs are used to monitor flying insect activity at locations that are likely to allow access to the facility. All units are checked weekly to ensure they are working. Each unit is serviced quarterly by the pest control contractor, the service includes:

- Emptying collection trays and analysis of contents
- Cleaning the units
- Repairs
- Reporting volume and type of insects caught including trends
- Annually tube change at the beginning of the active season.

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Pest Control Reporting

Records of all Monitoring devices are maintained, including services performed, to ensure that devices are properly placed and inspected to allow trend analysis of activity.

Pest Control Contractor reports include:

- Signs of pest activity
- Proofing requirements
- Actions required by site
- Type of Pest
- Pesticide or material applied
- Pesticide registration number
- Rate of application or percent of concentration
- Specific location of application
- Method of application
- Amount of pesticide used at the application site
- Next action/follow up date
- Date and time
- Signature of pest controller

Temporary placement of any pest monitoring devices for short-term monitoring is documented in pest control action reports.

The Field Biologist conducts a quarterly assessment of the facility including catch trap analysis. The assessment evaluates all areas inside and outside the facility. Assessment results and recommendations are documented and reviewed with the Technical Manger with a view to improving and updating the pest control procedures. During the assessment the Field Biologist measures the effectiveness of the program to verify the elimination of applicable pests.

All personnel are trained to avoid contact with pest control devices and materials and that only authorised personnel are permitted to handle pesticides at induction. Personnel are required to inform management immediately if such contact is made and then take the appropriate hand washing and change of protective work wear measures.

All personnel are trained to identify potential issues caused by pests at induction. A pest control reporting procedure is in place such that any incident or sign of pest activity is immediately reported to the Technical Manager and any potential product affected is quarantined. The Technical Manager ensures that the identified pest activity does not present a risk of contamination to food products, raw materials or packaging.

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Food packaging products, raw materials or packaging that are found to be contaminated by pest activity are disposed of, and the source of pest infestation investigated and resolved. Records are kept by the Technical Manager of the disposal, investigation, and resolution.

The Technical Manager maintains a log of pest sightings and the action taken by the pest controller. The log is maintained in the pest control file and includes:

- Date
- Time
- Type of pests observed
- Actions taken
- Person taking the action and signature

The log is used to identify and eliminate areas where pest activity is observed and to document corrective Actions taken. In the event of an infestation the Technical Manager identifies, evaluates and authorises the release of any potential product affected by the pests. The Field Biologist reviews the log each quarter to identify trends in pest activity. A report of findings is submitted to the Technical Manager for review.

The pest control contractor provides reports for all visits and advises on any trends and corrective actions. Department Managers are allocated corrective or preventative actions which must be completed within the agreed timescale.

Verification of Pest Control Activities

The Technical department and line management are required to conduct documented audits including pest control throughout the site at monthly intervals. Monthly Hygiene and housekeeping audits include inspection for signs of pest activity and also any pest proofing issues requiring attention. Pest Control activities are also verified by quarterly field biologist inspection reports.

The Technical Manager regularly reviews the results of pest control inspections in order to assess and analyse trends and consider the need for further prevention measure or corrective actions. This review is carried out as a minimum annually but also in the event of an infestation.

Responsibility

The Technical Manager is responsible for managing Pest Prevention on site, liaison with the Pest Control Contractor and maintenance of the Pest Control File.



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