

### Introduction

The company has established, documented and implemented a pest control system for the site, which is maintained as part of the operational programmes in order to meet the requirements of the Food Safety Quality Management System and 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 procedure is used in conjunction with written Prerequisites 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 5.2 Infrastructure and Work Environment Prerequisites. Waste is managed as per procedures QM 5.9 Waste Disposal and QM 6.12 Waste Management 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 control 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

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Authorised By: Managing Director



- 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 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

The contracted service provides:

- monthly site visits and inspections including service records describing current levels of pest activity and recommendations for taking Corrective Actions.
- inspections including the periphery and internal and external buildings
- the provision of a plan/diagram of the site showing the location of all pest control monitoring and prevention measures
- flying insect controls including fly killing units
- emergency 24 hour call-out service
- quarterly biologist inspection reports, visit and trend reports with recommendations
- a current copy of the certificate of insurance that specifies the liability coverage
- Spill control materials and procedures
- Material Safety Data Sheet information to ensure proper usage of pesticide chemicals.

Both the contract and service agreement information are held in the Pest Control File which is managed by the Technical Manager who has overall responsibility for pest control on site.

Before agreeing to a contract the Technical Manager verifies that the pest control contractor is qualified. Copies of training records and qualifications are held in the pest control file for each person who performs pest management services on site. At the start of the contract a detailed survey of the entire facility is completed by a qualified Field

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Biologist and the results are documented and used to determine placement of monitoring devices.

### Exterior Bait Stations

Exterior rodent bait stations are set up to deter rodents from entering the facility. Based on the detailed facility survey, exterior bait stations are placed along the foundation walls on the exterior of the facility and along the site boundaries. Exterior bait stations containing rodenticides are tamper resistant, anchored in place, locked, and labelled. All exterior bait stations are inspected at least monthly. The bait stations are checked more often when activity levels increase. Baits are secured inside bait stations, in good condition, and replaced as needed. Bait stations are placed at intervals of 15 m although areas of high rodent activity may have a higher concentration of bait stations.

### Interior Monitoring

Based on the detailed Field Biologist survey, interior monitoring devices are placed in strategic sensitive areas specific to the rodent species, and other areas of pest activity, including:

- 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 and non-toxic baits are not used for interior monitoring. 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
- Electrocutation 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 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.

All EFK services records are kept in the pest control file, the Technical Manager uses the EFK service information to identify and eliminate the source of insect activity.

### Pheromone Traps

Pheromone traps are used to assist in the identification of stored product insect pests in areas prone to this type of infestation.

Pheromone traps are inspected quarterly by the pest controller who reports the types and quantities of insects found. The Technical Manager uses the information to identify and eliminate the source of activity.

### Bird Control

Bird control is applied as part of the pest control measures to prevent contamination of food products. Buildings are design so as not to offer attractive roosting areas and bird deterrent measures including spiking and nets are used where appropriate.

### Elimination of Pest Habitat

The Field Biologist identifies any possible pest habitat around the site in the quarterly inspections. The Technical Manager takes actions to remove or eliminate favourable conditions for pests including eliminating any rodent burrows, rodent runs and areas that provide harbourage or may attract rodents or other pests to the site or outside grounds.

### Pesticide Management

Pesticides are controlled as described in QM 5.4 Storage Facilities QM 6.9.1 and Chemical and Physical Contamination Control Policy.

Pesticides are stored in a locked storage area and are properly ventilated. Pesticide containers and application equipment are labelled and only used for each specific pesticide as per the label. Pesticides are applied and stored according to label directions. Empty pesticide containers are disposed of according to label directions and regulatory requirements, unused obsolete pesticides are secured until collected by the pest control contractor and disposed of as per regulatory requirements.

Pesticides are approved by the Technical Manager before use. Pesticides are only handled and used by authorised personnel as defined in the pest control contract and service agreement.

### 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.

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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.

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 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 Control on site, liaison with the Pest Control Contractor and maintenance of the Pest Control File.



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### References

Pest Control File