



On spec!

Navigating the maze of food manufacturing standards



Paul Westgate

Working in the food manufacturing sector can be one of the most demanding areas in which to provide successful pest control. Not only are pest controllers faced with challenges from their client's operation and its associated pests, but there's also the need to comply with the requirements set-out by third party audit bodies. Paul Westgate from Sussex-based Westgate Pest Control looks at some of the recent changes to third-party specifications and their possible implications for pest controllers.

There are numerous third-party specifications and, whilst it would, of course, be preferable to pest controllers (and to most manufacturers) if one universal specification was in place, it is unlikely that this will ever come to fruition. (See the report from the Global Summit page 23 to 25 in this issue.) Food manufacturing remains a competitive marketplace with companies striving to provide better and safer products to their customers and all looking for extra

competitive advantage.

The first half of 2015 has seen a flux of new specifications. In the first quarter amended specifications have come from BRC, Marks & Spencer (M&S), Tesco and Waitrose. One of the first challenges to the pest controller on the ground is to obtain notification of these new changes. Ensuring key communications are established with food manufacturing clients is often the best way to unearth a 'newly modified' standard.

Summarised below are the major changes to these specifications and key points for pest professionals to consider to ensure they, and their clients remain compliant.

BRC version 7

The BRC standard is generally not as prescriptive as some of the multiple retailers' standards. It relies on a tailored, risk assessed system for the delivery of pest control. Version 6 sections (4.13) will be replaced with Version 7 sections (4.14) from 1 July 2015.

So, what's changed?

- A specification overview statement has been added (4.14.1). This sets out the need to protect products, raw materials and packaging along with the need for a robust, well documented pest control process;
- If in-house pest control is conducted under (4.14.3) a requirement is now prescribed for site staff to demonstrate they 'meet any legal requirements for training or registration';
- An amendment in (4.14.5) removes the wording 'secured in place' and including 'all rodent monitoring devices'. The main objective of this

Specifications galore!

- Organic certification bodies such as the Soil Association and Organic Farmers and Growers place emphasis on the reduction and restriction of pesticide use and, in some cases, restrictions on use of glue boards.
- Independent audit bodies such as the British Retail Consortium (BRC), SALSA, AIB International have their own detailed standards.
- Many supermarket chains have, in some cases even more detailed specifications, Waitrose, M&S and Tesco all have extensive manufacturing standards that any company manufacturing these branded products must adhere to.
- Other supermarket chains such as Co-op, ASDA and Morrison's have their own manufacturing standards, although these are more in line with the BRC.
- Specifications also exist for other large companies looking to protect their supply chain.

clause, to prevent contamination from pest control hardware, however remains. To continue to reduce risk, the securing of baits should remain best practice;

- Additional detail in (4.14.7) relates to the course of action to take in the event of a pest problem. Call-out times should be established and the provision for the site to have a 'pest aware' person to inform the pest contractor directly is detailed;
- Clause (4.14.9) changes the typically 'quarterly' need for an in-depth survey (field biologist inspection) to 'as a minimum annually'. The clause is still to be based upon risk and it is anticipated that for the majority of food manufacturers a quarterly frequency would be necessary. There are also new details on the scope of the survey. Having only one field biologist inspection will not provide an overview of the site over the seasons and may mean issues are missed;
- A new clause (4.14.11) outlines the need for site employees to understand and be aware of pest activity and of the need to report pest activity.

Whilst there are no radical changes to this specification it continues to be based on risk assessments which should evolve and be well documented. An increased focus on training and pest awareness for on-site staff should be an addition welcomed by pest controllers.

Support from on-site staff is a critical component to ensure the pest free status of facilities. Having some audit pressure from this standard should help to drive home this message. Opportunities to provide pest awareness sessions may be increased. These are useful tools to cement relationships and ultimately improve service delivery.

Tesco

V6 was bought into effect from 3 March 2015. It replaces V5, which had been in place since 2012. The standard has been condensed and presented in a more manageable structure. Pest control is detailed in Section 24.

The standard remains one of the most demanding specifications in place and aims to 'minimise the risk of infestation to the site and contamination of the product, protecting the business and the brand'.

The standard contains differing levels of clauses, some elements are required, others are an aspiration, or an example of 'what

good looks like'. The latter two are not requirements but best practice and items that may be looked upon favourably by auditors.

So what's changed?

- Ideally the site now should undertake six monthly review meetings and, if a major incident occurs, a review by someone 'independent' of the site should be considered (24.1);
- The follow-up process has changed from the previously heavily prescribed format, which stated 'follow-ups every other day for three clear visits for internal rodent activity'. The new requirement sees follow-up visits based upon risk, ensuring it is 'appropriate for the infestation, but as a minimum should be for two consecutive clear visits' (24.2). The decision about the frequency of these follow-ups should be based on risk, documented and agreed between the parties;
- Additional documentation is detailed in (24.4), with the need to repeat any outstanding recommendations from previous reports being prescribed;
- Section (24.8) details an aspiration that the site will use sticky board EFK units, along with some basic advice on reducing risk during insecticidal treatments;
- Inclusion in section (24.9) that windows leading into areas 'directly connected' to production areas to be proofed. Another opportunity for pest controllers?

Gone is the need to be shadowed by the site contact during the visits/treatments although the need to effectively communicate findings is still vital to providing success.

The key elements of the specification remain in place since the last revision, including controls based upon risk, comprehensive provision of supporting documentation and the placement of EFK's and pheromones so as not to present risk to product.

The major amendment to the follow-up process should be greatly beneficial to pest control providers who can now devise their own structured follow-up for sites and pest species without being restricted by set dates which, in many cases, were never 'fit for purpose' to achieve control.

M&S (2015)

New guidelines issued in January 2015 saw very little change to an already comprehensive specification which has been in place since September 2012.

The only amendment has been the inclusion

of an essential requirement for all M&S suppliers stipulating that: 'pest free status must be the objective through prompt and effective action using the minimum amount of pesticide'.

The follow-up process of three consecutive clear inspections, every other day, followed by a further inspection one week (seven days later), the need for six monthly review meetings and specific paperwork, such as recording of baits checked during biologists' inspections along with many other specific criteria remain in place from the 2012 version.

Waitrose (V3)

Waitrose's food manufacturing standard is still relatively new, having been initially launched in December 2013. V1 was quickly superseded in February 2014 and in January 2015 the current V3 came into force.

What's changed?

- The scope (2.0) of the policy has been extended to include satellite warehouses and third-party warehousing of finished product;
- A documented copy of the site management's and contractor's responsibilities should now be produced (4.2.1). This must detail the responsibility for removal of old pest evidence (droppings etc.) as in (4.3.9);
- Specific reference to rework material, its storage and handling and the need to remove standing water has been added (4.2.6 - 7);
- A requirement for documented records of the 'pest free status' of any re-commissioned/secondhand equipment being bought into the factory has also been added (4.2.12);
- The recommended annual frequency of visits remains at eight routine and four field biologist inspections. Where risk assessment identifies a higher need, the number of visits should be increased (4.3.1);
- The standard now specifies that service providers shall be part of a national trade association as laid out in (4.3.4). In V2 the membership of NPTA was acceptable but this has now been removed and reference to CEPA, presumably the new CEPA certified standard, included;
- A welcome change is the removal of the somewhat confusing schematic for rodent escalation protocol in

appendix 1. A standard follow-up process for internal rodent activity of alternate day inspections, until three clear inspections have occurred, with a further visit a week later, is now in place;

- The provision relating to night routine has been amended to include the phrase 'where the site is subject to ongoing pest activity' as opposed to the previous requirement to have two of the eight routine visits conducted at night (4.4.4);
- Paperwork system requirements have been increased in (4.7.1) to include a summary of all visits, annual site risk assessments for frequency of visit, temporary monitoring plans and product labels;
- The surviving appendix sections remain largely as per V2 with minor word changes for the rodent section. There is some additional guidance for EFK placement and the timings of tube changes within the control of flying insects section;
- Further guidance for the control of stored product insects is provided with a steer towards seldom used equipment

and older stock holdings. A new section on insects in general is also included which focuses on raw material and sample storage areas;

- Bird scaring devices are also added for consideration to the control of bird's appendix.

The major change, which will be of significant benefit to pest controllers, is the removal of the complex follow-up and escalation protocol. The simplified follow-up process, in line with M&S although strenuous, is certainly more achievable.

The change in wording for the provision of night routines will also offer a welcome relief for both factory managers and pest controllers, although the benefit of such inspections should not be underestimated.

With these revisions, the specification remains stringent but much more workable.

Conclusion

As with all elements of successful pest control, the formation and maintenance of strong relationships between pest professionals and on-site personnel is the key component in ensuring successful pest control provision and compliance.

Understanding the audit process, the challenges it brings and a sound knowledge of the various specifications will help to develop these relations further. The difficulties of working to spec are numerous and at times can be frustrating, in particular where a site works to multiple standards.

The specifications are detailed and hard work to deliver successfully, they require time and resource to achieve compliance, but they can also provide on-going business opportunities for pest controllers whether that be for training client staff or from extra pest management work.



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