

The Pest Control Requirements of the BRC Global Standards for Food Safety, and Storage and Distribution

Introduction

This guide was updated to reflect changes made in Issue 8 of the BRC Standard for Food Safety, published in August 2018. It provides our interpretation and guidance concerning the pest control requirements, and best practice, for both Issue 8 of the BRC Global Standard for Food Safety and the Storage and Distribution Standard (Issue 3).

Food Safety (Issue 8)

Sections of specific relevance to pest management are summarized below: Those points where a change has been made from Issue 7 are shown in red.

2.2	Prerequisite programmes
2.2.1	The company shall establish and maintain environmental and operational programmes necessary to create an environment suitable to produce safe and legal food products. Pest management is listed as one of these pre-requisites.
3.5	Supplier approval and performance monitoring
3.5.3.1	There shall be a documented procedure for approval and monitoring of suppliers of services. Pest control is listed as one such service.
3.5.3.2	Contracts or formal agreements shall exist with the suppliers of services which clearly define expectations and ensure potential food safety risks associated with the service have been addressed.
4.1	External Standards
4.1.2	The external areas shall be maintained in good order. Where grassed or planted areas are located near buildings , they shall be regularly tended and well maintained.
4.1.3	The building fabric shall be maintained to minimise potential for product contamination (e.g. elimination of bird roosting sites, sealing gaps around pipes to prevent pest entry, ingress of water and other contaminants).
4.3	Layout, product flow and segregation
4.3.5	Temporary structures constructed during building work or refurbishment shall be designed and located to avoid pest harbourage and ensure the safety and quality of products
4.4	Building fabric
4.4.6	Where suspended ceilings or roof voids are present, adequate access to the void shall be provided to facilitate inspection for pest activity, unless the void is fully sealed.
4.4.7	Where there is a risk to product, windows and roof glazing which is designed to be opened for ventilation purposes shall be adequately screened to prevent the ingress of pests.
4.4.9	Doors shall be maintained in good condition: <ul style="list-style-type: none"> • External doors and dock levellers shall be close fitting or adequately proofed. • External doors to open product areas shall not be opened during production periods except in emergencies. Where external doors to enclosed product areas are opened, suitable precautions shall be taken to prevent pest ingress.

4.9.3.1	Glass or other brittle materials shall be excluded or protected against breakage in areas where open products are handled or there is a risk of product contamination.
4.12	Waste/ Waste Disposal
4.12.2	<p>Internal and external waste collection containers and rooms housing waste facilities shall be managed to minimise risk. These shall be:</p> <ul style="list-style-type: none"> • Clearly identified • Designed for ease of use and effective cleaning • Well maintained to allow cleaning and, where required, disinfection • Emptied at appropriate frequencies
4.14	Pest Management
<p>The whole site shall have an effective preventive pest management programme in place to minimise the risk of infestation and resources shall be available to respond rapidly to any issues which occur to prevent risk to products.</p>	
4.14.1	<p>If pest activity is identified it shall not present a risk of contamination to products, raw materials, or packaging.</p> <p>The presence of any infestation on site shall be identified in pest management records and be part of an effective pest control programme to eliminate or manage the infestation such that it does not present a risk to products, raw materials, or packaging.</p>
4.14.2	<p>The site shall either contract the services of a competent pest management organisation, or have appropriately trained staff, for the regular inspection and treatment of the site to deter and eradicate infestation.</p> <p>The frequency of inspections shall be determined by risk assessment and shall be documented. The risk assessment shall be reviewed whenever:</p> <ul style="list-style-type: none"> • There are changes to the building or production processes which could have been impact on the pest management programme. • There has been a significant pest issue. <p>Where the services of a pest control contractor are employed, the service scope shall be clearly defined and reflect the activities of the site.</p> <p>Service provision regardless of the source shall meet with all applicable regulatory requirements.</p>
4.14.3	<p>Where a company undertakes its own pest control, it shall be able to effectively demonstrate that:</p> <ul style="list-style-type: none"> • Pest management operations are undertaken by trained and competent staff with sufficient knowledge to select appropriate pest control chemicals and proofing methods and understand the limitations of use, relevant to the biology of the pests associated with the site • Staff undertaking pest control activities meet any legal requirements for training or registration • Sufficient resources are available to respond to any infestation issues. • There is ready access to specialist technical knowledge when required. • Legislation governing the use of pest control products is understood and complied with • Dedicated locked facilities are used for the storage of pesticides
4.14.4	<p>Pest management documentation and records shall be maintained. This shall include as a minimum:</p> <ul style="list-style-type: none"> • An up-to-date plan of the full site, identifying numbered pest control device locations • Identification of the baits and/or monitoring devices on site • Clearly defined responsibilities for site management and for the contractor

	<ul style="list-style-type: none"> • Details of pest control products used, including instructions for their effective use and action to be taken in case of emergencies • Any observed pest activity • Details of pest control treatments undertaken <p>Records may be on paper (hard copy) or controlled on an electronic system, (e.g. an online reporting system)</p>
4.14.5	<p>Bait stations or other rodent control devices shall be appropriately located and maintained to prevent contamination risk to product. Toxic rodent baits shall not be used within production or storage areas where open product is present except when treating an active infestation. Where toxic baits are used these shall be secured.</p> <p>Any missing bait stations shall be recorded, reviewed, and investigated.</p>
4.14.6	<p>Insect -killing devices, pheromone traps and / or other insect monitoring devices shall be appropriately sited and operational. If there is a danger of insects being expelled from a fly-killing extermination device and contaminating the product, alternative systems and equipment shall be used.</p>
4.14.7	<p>The site shall have adequate measures in place to prevent birds from entering buildings or roosting above loading or unloading areas.</p>
4.14.8	<p>In the event of infestation, or evidence of pest activity, immediate action shall be taken to identify at-risk product and to minimise the risk of product contamination. Any potentially affected products should be subject to the non-conforming product procedure.</p>
4.14.9	<p>Records of pest management inspections, pest proofing and hygiene recommendations and actions taken shall be maintained. It shall be the responsibility of the site to ensure all of the relevant recommendations made by their contractor or in-house expert are carried out in a timely manner.</p>
4.14.10	<p>An in-depth, documented pest control survey shall be undertaken at a frequency based on risk, but as a minimum at least annually, by a pest control expert to review the pest control measures in place. The survey shall:</p> <ul style="list-style-type: none"> • Provide an in-depth inspection of the facility for pest activity. • Review the existing pest control measures in place and make any recommendations for change. <p>The survey shall be timed to allow access to equipment for inspection where a risk of stored product infestation exists.</p>
4.14.11	<p>Results of pest management inspections shall be assessed and analysed for trends on a regular basis. At a minimum, results of inspections shall be analysed;</p> <ul style="list-style-type: none"> • annually or, • in the event of an infestation. <p>The analysis shall include results from trapping and monitoring devices to identify problem areas. The analysis shall be used as a basis for improving the pest management procedures.</p>
4.14.12	<p>Employees shall understand the signs of pest activity and be aware of the need to report any evidence of pest activity to a designated manager.</p>

Comments concerning the changes within Issue 8

Little has really changed. The principal change is replacement of the term 'pest control', by 'pest management'. The original terminology does, rather confusingly, still appear in several places, and it is not entirely clear why this change has been made, though it is certainly the case that pest management is the term that the industry prefers to use these days. Management implies a more holistic approach to managing the environment in order to prevent problems, rather than simply controlling pests when infestation does arise.

Other points worthy of specific note:

- A clause in Issue 7 specifically mentioned EFK bulbs as a potential source for glass contamination. This has been removed, but new clause 4.9.3.1 still covers this issue.
- There has been some minor wording change within clause 4.14.3. However, it is worth highlighting that there were previously no statutory training or licencing/certification requirements for general pest control activities within the UK. This has now changed, with rodenticide labels requiring that users have received recognised training in safe use through the Campaign for Responsible Rodenticide Use (CRRU). As a result, this clause has more significance in the UK than it perhaps had previously.
- An additional sentence within clause in 4.14.4 recognises the increased use of electronic reporting systems and maintenance of pest control records electronically.
- The scope of clause 4.14.6 has been widened to include insect (rather than just fly) killing devices. It has also been extended to include non-pheromone insect monitoring devices. All are to be appropriately sited and operational.
- 4.14.7 is a new clause relating to a requirement for preventing birds from entering buildings or roosting above loading and unloading area.

Storage and Distribution (Issue 3)

4	Site and building standards
4.1	Location, perimeter and grounds
4.1.1	Consideration shall be given to local activities and environment, which may have a potentially adverse impact and measures shall be taken to prevent product contamination. Where measures have been put into place to protect the site from any potential contaminants, these shall be regularly reviewed to ensure they continue to be effective.
4.1.2	All grounds within the site shall be finished and maintained to an appropriate standard.
4.1.3	A clean and unobstructed area shall be in place along external walls of buildings used for the storage of products.
4.4	Fabrication – product intake, handling, storage and dispatch areas
4.4.1	Wall, floors, ceiling, and pipework should shall be maintained in good condition and shall be capable of being kept clean.
4.4.5	Building voids shall be accessible for inspection and, where appropriate, cleaning.
4.4.7	All bulbs and strip lights that are vulnerable to breakage, including those on electric fly killer units, shall be protected by shatterproof plastic diffusers, sleeve covers or a shatterproof protected coating. Where full protection cannot be provided, the glass-management systems shall take this into account.
4.4.9	Buildings shall be suitably proofed against entry of ALL pests. This shall include as appropriate: <ul style="list-style-type: none"> ▪ the screening of windows that are designed to be open for ventilation ▪ the provision of external doors that are close-fitting or adequately proofed ▪ where external doors to storage areas are kept open, the adoption of suitable precautions to prevent pest ingress ▪ the fitting of screens and traps to drains to prevent pest entry ▪ the protection of canopies from bird roosting and nesting
6	Facility management
6.4	Housekeeping and hygiene
6.4.2	Cleaning practices shall be completed so as to maintain a suitable environment for the storage and distribution of products. Practices shall minimise risk of contamination to the product.
6.5	Waste and waste disposal
6.5.2	External waste collection containers and compactors shall be managed in such a manner as to contain products and not attract pests. Containers holding food products or packaging shall be covered or closed.
6.6	Pest Control
6.6.1	If pest activity is identified it shall not present a risk of contamination to products. The presence of any infestation on site shall be documented in pest control records and be part of an effective pest management programme to eliminate or manage the infestation so that it does not present a risk to products.
6.6.2	The company shall either contract the services of a competent pest control organisation, or shall have trained personnel, for the regular inspection and treatment of premises, in order to deter and eradicate infestation.

6.6.3	Where the services of a pest control contractor are employed, the service contract shall be clearly defined and reflect the activities on site.
6.6.4	The location of all pest control measures shall be identified on a plan/diagram of the site.
6.6.5	Results of pest control inspections shall, on regular basis, be assessed and analysed for trends.
6.6.6	Detailed records shall be kept of the pest control inspections, recommendations and necessary actions undertaken.
6.6.7	All products shall be stored so as to minimise the risk of infestation. Where stored-product pests are considered a risk, appropriate measures shall be included in the control programme.
6.6.8	Documentation shall detail the safe use and application of baits and other materials such as insecticide sprays and fumigants.
7	Good operating practices
7.1	Receipt of goods
7.1.2	There shall be a procedure for inspection of loads on arrival to ensure that products are free from pest infestation, contamination or damage and are in a satisfactory condition.
7.2	Product handling
7.2.4	Products shall be stored off the floor either on pallets or racking.
8	Personnel
8.1	Training and competency
8.1.1	All personnel, including temporary personnel and contractors, shall be appropriately trained prior to commencing work and adequately supervised throughout the working period.
8.1.2	The company shall have documented training procedures and documented training records to demonstrate that the training is appropriate and effective.
8.1.3	Where personnel are engaged in the activities relating to critical control points (CCPs), they shall receive specific training relevant to the CCPs. Where personnel carry out activities which could affect product safety, legality and quality, the company shall ensure that personnel have been trained in the best-practice operating principles for the particular task.

Guidance

BRC also publish a document intended specifically to provide guidance relating to best practice in pest control practices. This guidance was published to accompany Issue 5 and we understand that at this time there are no plans to update it.

Guidance provided is summarised below in italics, with our suggestions relating to food manufacturing and warehousing sites in the middle and right-hand columns respectively.

BRC guidance	Our advice concerning compliance: Food manufacturing	Our advice concerning compliance: Warehousing
<p><i><u>Contractors should:</u></i></p> <ul style="list-style-type: none"> • <i>Be members of a national trade association.</i> • <i>Provide evidence of relevant experience</i> • <i>Be able to detail their resources for routine work and emergency cover</i> • <i>Detail who will service the site and explain how new personnel will be introduced.</i> 	<p>Membership of a relevant trade association (BPCA or NPTA within the UK) should be confirmed by the membership certificate being present in the pest control documentation.</p> <p>Other points should be detailed within the contractor's proposal when tendering for the work.</p>	<p>As for food standard.</p>
<p><i><u>Qualifications of pest control personnel:</u></i></p> <ul style="list-style-type: none"> • <i>Minimum of RSPH/BPCA Level 2 for UK pest control technicians.</i> • <i>Membership of a CPD scheme is highlighted as an advantage</i> • <i>Relevant health and safety, and food hygiene, qualifications are also beneficial</i> • <i>Higher level experience and qualifications are also highlighted as being desirable for Inspectors and Field Biologists.</i> 	<p>Technicians will obviously need the basic pest control qualification, but Level 2 Food Safety and the SPA Food and Drink Safety Passport are also desirable. For technical inspectors and field biologists a higher level pest control qualification, such as BPCA's Certificated Inspector or Certificated Field Biologist is also desirable.</p> <p>All technical personnel should be members of a recognised CPD scheme.</p>	<p>As for food standard.</p>
<p><i><u>The contract</u></i></p> <ul style="list-style-type: none"> • <i>The number and type of routine visits should be based on risk assessment.</i> • <i>Call-out response times should be agreed based on the pest species and area affected.</i> • <i>At least two Field biologist inspections per annum should be included.</i> 	<p>These criteria are fairly self-explanatory, but the document does include an example of a 'risk matrix' outlining different response criteria for different pest species in areas of the site with varying risk profiles.</p>	<p>A formal pest risk assessment is recommended for determining what level of pest control is appropriate for the site. However, 8 routine inspections per annum should be considered the minimum for a food storage warehouse.</p>

BRC guidance	Our advice concerning compliance: Food manufacturing	Our advice concerning compliance: Warehousing
<p><u>Inspection dates</u></p> <ul style="list-style-type: none"> • <i>Technician and Biologist visits should not be carried out simultaneously.</i> • <i>They should be spaced equally in time.</i> • <i>Week commencing due dates should be provided.</i> • <i>Specific dates should be confirmed in advance of the inspection.</i> 	<p>We have always regarded simultaneous routine and technical inspections as bad practice, but have never had any official guidance to back this up; until now!</p> <p>Provision of w/c due dates is a recommendation new to Issue 5. It is good practice to have these as they allow both site management and the pest control contractor to verify that visits are completed in a timely manner.</p>	<p>Although Biologist inspections are not a requirement, most risk assessments will suggest a need for these visits. BRC guidance recommends a minimum of 2 biologist inspections per annum in food sites, and we recommend the same for warehouse contracts.</p>
<p><u>Routine (technician) inspections</u></p> <ul style="list-style-type: none"> • <i>The need for liaison with the site contact, both before and after inspection, is emphasised.</i> • <i>Site personnel should accompany the technician or Field Biologist at least once a year on their inspection of the site.</i> • <i>The need for technicians to be more than simply bait-box checkers is highlighted.</i> • <i>The technician should keep the report file current, and records of visits should include:</i> <ul style="list-style-type: none"> ○ <i>Details concerning the type of visit;</i> ○ <i>Number and date of visit, and the technician's name;</i> ○ <i>Details of infestations found;</i> ○ <i>Details of pesticides used, including names, quantities and locations of use;</i> ○ <i>Proposed dates for any future works required, for example follow ups;</i> ○ <i>Corrective actions undertaken;</i> ○ <i>Corrective actions recommended;</i> ○ <i>Signature of the technician and site contact.</i> 	<p>Nothing radically different from previous BRC requirements and nothing which contractors should not already be doing.</p>	<p>As for food standard.</p>
<p><u>Field Biologist inspections</u> <i>This, more comprehensive, inspection, should include:</i></p> <ul style="list-style-type: none"> • <i>A review of the adequacy of the current pest control system.</i> 	<p>Again, there is nothing here that should be difficult for any contractor to comply with. However, attention is drawn to the fourth bullet point, which very few field biologist reports currently include, most being just a list</p>	<p>As for food standard.</p>

BRC guidance	Our advice concerning compliance: Food manufacturing	Our advice concerning compliance: Warehousing
<ul style="list-style-type: none"> • Recommendations concerning alternative proactive pest management practices. • Recommendations concerning improvements in site standards. • A summary of pest evidence seen; this should include reference to areas inspected, even where no problems have been found. • A review of the currency of all pest control related documentation. 	<p>of issues requiring attention by site personnel.</p> <p>The typed reports should provide a detailed overview of the pest infestation status of the site, and highlight defects relating to hygiene, proofing and storage which could adversely impact on pest control.</p> <p>Official BRC guidance on the field biologist service is available by clicking here.</p>	
<p><u>Action to be taken when an infestation occurs</u> The following guidance is provided:</p> <ul style="list-style-type: none"> • Take any immediate action deemed necessary to reduce risk. • Call the service provider and agree the response time. • Determine the follow up procedure; for rodents this would be a minimum of 5 to 7 days. • Search for, collect and dispose of rodent carcasses. • Control of insect infestation will be based on risk to product. Monitors may prove useful in determining this. 	<p>There is nothing here that should cause difficulty, and the minimum follow up schedule is far less demanding than most food sites will already have in place.</p> <p>NOTE: Follow up requirements may be dictated by retailer codes of practice; M&S or Tesco for example.</p>	<p>As for food standard.</p>
<p><u>Monitoring</u></p> <ul style="list-style-type: none"> • Moth traps; the need for siting these in areas used for storage of dried foods is highlighted. Use of colour-coded lures, with three-month renewal periods is mentioned. • Insect monitors; use of these in sites vulnerable to crawling insect pest activity is recommended. Siting with rodent baits is discouraged, as the target insects are more often associated with machinery or stored goods. Instead they should be located in, or close to, likely insect harbourages. Regular renewal (generally at least monthly) of glue-pads is highlighted. 	<p>Nothing radical concerning moth traps, though the need to properly document lure renewal, which colour-coding will help to do, is new to Issue 5.</p> <p>The recommendation to site insect monitors in locations where insect activity might be expected (around plant footings for example) is an excellent development, and one which most contractors would fall foul of, as insect traps are usually sited alongside rodent baits, along wall-floor junctions.</p>	<p>Moth monitoring in warehouses handling dried food products is very strongly recommended.</p> <p>Crawling insect monitors in warehouses are generally most effective when sited on racking footings rather than around wall-floor junctions.</p>
<p><u>Documentation</u> The following should appear within this:</p> <ul style="list-style-type: none"> • A specification detailing service contract. • Contact details. 	<p>There is much here that has not previously been requested by BRC, and how closely their auditors stick to these suggestions will be interesting to see.</p>	<p>As for food standard.</p>

BRC guidance	Our advice concerning compliance: Food manufacturing	Our advice concerning compliance: Warehousing
<ul style="list-style-type: none"> • <i>List of week commencing due dates.</i> • <i>Pest sightings recording log.</i> • <i>Signed and dated site plan, to be reviewed at least annually.</i> • <i>Pest risk assessment, including any follow up matrix.</i> • <i>Inspection reports.</i> • <i>Trend analyses.</i> • <i>Pesticide risk (COSHH) assessments.</i> • <i>Pesticide MSDS's.</i> • <i>Health and safety risk assessments</i> • <i>Operational risk assessments (method statements)</i> • <i>Insurance certificates.</i> • <i>Waste transfer certificates.</i> • <i>Pest control personnel training certificates.</i> • <i>Trade association membership certificate.</i> 	<p>NOTE: Many pest control contractors now provide generic information (such as insurance certificates, training records, MSDS's etc) on-line. Site contacts must have log-in details to access such records during audits.</p>	
<p><u>Trend analysis</u></p> <ul style="list-style-type: none"> • <i>Graphical trending of fly control unit and moth trap catch data is mentioned specifically, though possibilities for trending other pest control data is also mentioned without specifics being given. Rodents would presumably fall into this category.</i> • <i>The potential use of threshold limits as initiators of corrective actions is mentioned.</i> 	<p>Trending graphs are something that BRC auditors have been quite specific about since Issue 5 was released, and they do expect to see these wherever fly control units or pheromone traps are in use. Trending of rodent data presents far greater difficulties and is, we believe, very difficult to do on many sites. It is not being asked for regularly, but certainly may arise in future BRC audits.</p>	<p>As for food standard.</p>
<p><u>Management review</u></p> <p><i>Review meetings should take place at least annually, and should include review of:</i></p> <ul style="list-style-type: none"> • <i>Adequacy of the specification.</i> • <i>Time allocated by the contractor for routine and technical inspections.</i> • <i>Finance allocated by the client for corrective actions.</i> • <i>Time allocated by the client for communication with the contractor.</i> • <i>Recent infestation history of the site.</i> • <i>Risk assessments and pesticide/products usage.</i> <p><i>Plans for the future should also be reviewed, particularly relating to the</i></p>	<p>Review meetings have not previously been highlighted by BRC, though are obviously beneficial to both site management and the contractor. Management review meetings can be used to gauge the contractor's compliance with the contract specification, and allow for a two-way discussion on how the pest control service can be moved forward. We suggest that they be scheduled on a six-monthly basis, with a standard agenda.</p> <p>Minutes should be taken and kept within the pest control file.</p>	<p>As for food standard, though annual review is probably more appropriate than six-monthly.</p>

BRC guidance	Our advice concerning compliance: Food manufacturing	Our advice concerning compliance: Warehousing
introduction of new technologies or control systems.		
<p><u>Internal Audit</u> The client should carry out an internal audit of the pest control system at least annually. This should review:</p> <ul style="list-style-type: none"> • Whether the current contract and specification is adequate. • Whether any changes in the site, processes or raw materials require a change in pest control needs. • The pest control attendance record. • Currency of the documentation. • Whether contact details of the contractor are current. • Action and sign off of points raised by the contractor. • Currency of site plans and checklists. • Whether pesticides being used are appropriate, and if MSDS's are available for all of them. • Bait placement (to be done by accompanying the technician). • Bait condition, security and numbering. • Pest risks associated with adjoining properties. • Adequacy of inspection of machinery and raw materials. <p>Fly unit service; cleaned, contents analysed, protected tubes used and renewed, at least annually, ideally during the Spring.</p>	<p>This should already be a part of the internal audit process, though you may need to fine tune the scope of the audit to accommodate all of the BRC guidance.</p>	<p>As for food standard.</p>

For more information please contact Acheta Consulting Ltd on 01934-853867, or email office@acheta.co.uk

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