

Your ace in the hole

Third-party audits are a serious matter for food processing facilities. Just one low score can cause your customers to lose trust in your business — and if those customers pull their support, you could see a major impact on your bottom line. You don't want to get knee deep in that poker match, right?

The key to achieving high third-party audit scores is simple: pair an Integrated Pest Management (IPM) program with pristine documentation. By implementing both a proactive, comprehensive IPM program and a supplementary documentation process, you can easily focus on preparing for your third-party audit day by day.

IPM is an ongoing practice that incorporates sanitation and facility maintenance to help keep pest activity at food processing facilities to a minimum. Documentation is built into IPM programs to track pest activity trends over time, monitor the results of any corrective actions taken against pests and building deficiencies, and present a wholesome examination of a facility's food safety plan in action. Success on your third-party audit hinges on documentation, and the pest management portion can make all the difference in your score, as it accounts for up to 20%.

In 2013, the U.S. Food & Drug

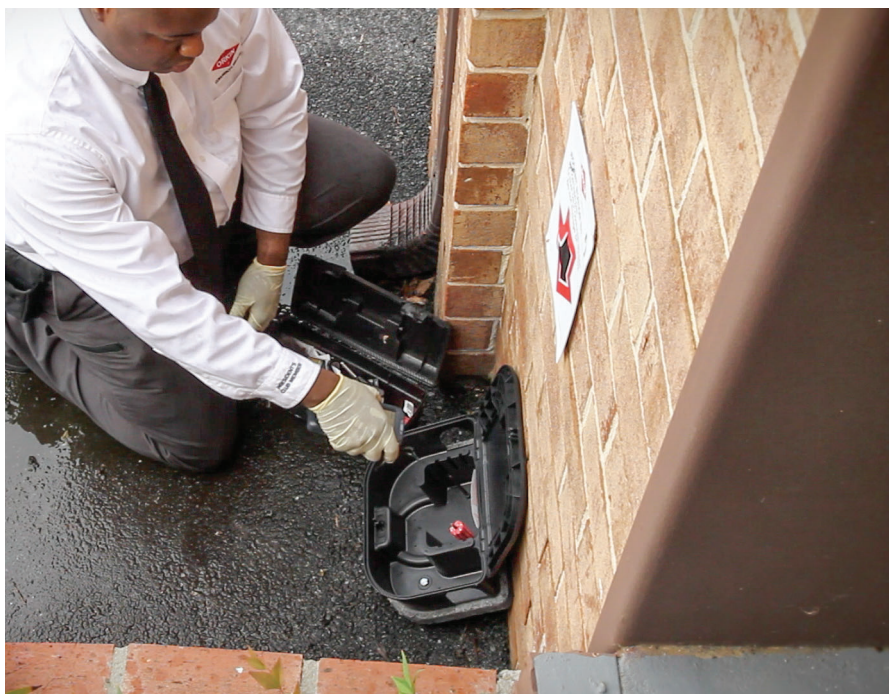
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Pairing an IPM program with pristine documentation will lead to high third-party audit scores

Administration implemented a new rule under the Food Safety Modernization Act (FSMA) that emphasizes prevention and risk-based regulations to stop

food safety issues before they can cause harm to consumers. According to the rule, facilities must:

- Prepare and implement written



Don't use a one-size-fits-all approach to manage pest activity. Work with a pest management provider for a solution that fits your specific problem. Photo courtesy of Orkin.

food safety plans that identify hazards to food safety.

- Specify the steps and processes that will be executed to minimize or prevent those hazards.
- Identify and implement monitoring procedures.
- Keep thorough records of the food safety program.
- Specify actions that will be taken to correct problems that arise.

The entire supply chain is now eligible to be under review for risk-based defects. Taking FSMA into account, food processing facilities have even more reason to strengthen their IPM program and documentation efforts to not only minimize risk to protect their product and consumer base but also be audit-ready at any time.

PUT ALL CARDS ON THE TABLE

You may have vetted your pest management company to ensure your team of pest specialists has the training or certifications required to conduct service treatments, but it won't mean anything to auditors if evidence of those qualifications is not available on-site at your facility. Documents that auditors may require as part of their audit include:

- Photocopies of the valid registration or certification document for each individual who conducts pest management treatments on the property, as is required according to local laws.
- Proof that every pest specialist on the team has successfully completed Integrated Pest Management and Good Manufacturing Practices (GMPs) training.
- Written evidence that members of the pest management team were trained in the proper and safe use of pest management materials.

Alongside the proof of trainings or certifications that your pest management provider has obtained, you must have documentation of services provided to various pest traps and monitors, which may include mouse traps, light traps, pheromone traps or other pest monitoring devices. Additional information you need to incorporate into

your documentation includes the types of insects, as well as the quantities, that are found when the traps are checked. This will help create ongoing data to show pest activity trends.

Don't forget the last necessary part of this documentation: a clear explanation of the corrective actions you took to manage the pest issue, according to what your pest specialist found in your traps. Written documentation of these three steps: a) services performed to the pest control devices and traps b) the results of each trap check and c) the corresponding actions taken to help mitigate pest activity will provide a comprehensive perspective that allows your auditor to see you are carrying out the provisions of your food safety plan correctly.

Finally, nearly all auditors require pest management providers to hold annual assessments at food processing facilities. These annual facility assessments help determine areas of improvement or necessary changes for IPM programs. Similarly to the three-step process that is documented for light traps and pheromone traps, you must ensure that all corrective actions implemented after the assessment are documented, and you must show proof that those actions were actually executed.

If you don't show that those counteractive efforts were executed and completed, you are at risk for losing points on the pest management portion of your third-party audit.

ARE THE CARDS STACKED AGAINST YOU?

If you find yourself in a situation where pests are infesting your facility, your pest management provider should take a scientific approach to the problem and identify the type of pest involved, review biological facts about that pest and create a solution that is tailored to that pest specifically.

In any case where you find pest activity that may be detrimental to your facility's operations, a one-size-fits-all approach is not your ace in the hole. Additionally, use

your pest trend analysis, sanitation issues and building maintenance downfalls to provide a second foundation for corrective actions that help manage insect activity at your facility.

This type of approach is important to your audit success because auditors can deduct points if facilities do not have written documentation of pest sightings and activity, both accompanied by explanations of the corrective actions your pest management provider took as a result.

DON'T JUST FOLLOW SUIT

Most importantly, you must remember that successful IPM programs are dynamic. Instead of being stagnant, your IPM program should change over time based on several factors such as pest trends, severity of the situation, areas of focus within the facility or products that are involved. You must not forget to document any changes you've made to your pest management program — written proof of even the tiniest changes to your pest management services, and reasons for the changes, is required. You may want to also consider including a list of roles and responsibilities for your staff, in comparison to those of your pest management provider's team, so you can easily track changes you make throughout the year.

Remember, procrastination is not a game you want to play when it comes to being ready for your audit. Instead, take preparation day by day and allow yourself enough time to evaluate your IPM program and documentation whenever necessary. If you play your cards right, you'll certainly receive a high score on your third-party audit time after time. **WG**

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