



Many Auditors, One Standard

Universal guidelines help simplify pest control audit prep

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In a perfect world, every food plant would have just one auditor and a single set of audit standards to follow, right? Imagine it—audit preparation would be like studying for the same test over and over. The questions would never change, and your score would get a little better every time. Of course, in the real world, it's not that simple, for a lot of good reasons. But having multiple auditors with slightly, or sometimes significantly, different requirements can be confusing and can make it harder to maintain the kinds of audit scores your customers would like.

The same challenges apply to pest management professionals who service audited facilities. Given how important it is for our food processing and manufacturing clients to meet stringent pest management protocols at audit, incon-

sistent requirements from one auditor to the next can complicate things considerably.

That's why the National Pest Management Association (NPMA) compiled a universal set of pest management standards for food plants in 2007 and updated them recently. Drafted by a group of nationally recognized professionals representing most of the major food safety auditors—including AIB International, ASI, NSF-Cook & Thurber, Silliker, and Yum! Brands—the NPMA's guidelines meet or exceed the pest management requirements of all the

major auditors. In short, the guidelines take the guesswork out of preparing for the pest management component of your next audit, both for you and for your pest management provider.

Four Major Categories

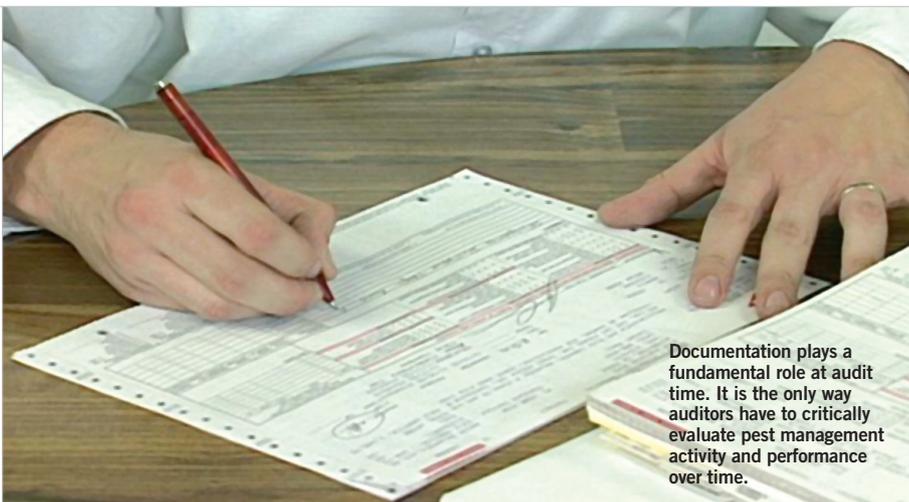
The universal standards cover four major categories of the typical pest management program in a food plant. The first category is personnel, which covers background checks, uniform and vehicle requirements, minimum training standards, and so forth. This category has implications not only for food safety but also food security. In this day and age, food security concerns are on the front burner for auditors.

Next are the pest management protocols themselves, which naturally form the core of the standards. The final two categories are communications and recordkeeping, which outline the pest management documentation required for audit. This written information plays a fundamental role at audit time, because it is the only way auditors have to critically evaluate pest management activity and performance over time.

Before highlighting specific pest management guidelines in each category, it's worth noting that the NPMA's complete *Pest Management Standards for Food Plants* document is available online at www.npmapestworld.com through the technical support tab on the left-hand side of the home page. In the meantime, this article will provide overviews of each category's key recommendations. Review these guidelines with your pest management provider to ensure you're prepared for your next audit.

Pest Management Personnel

Most food plants and food safety auditors have criteria for uniforms and other personal identification that outside vendors must follow for the physi-



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cal safety of the visiting technician and the security of the food and food-related products on site. The NPMA addresses the most common requirements in their uniform guidelines to ensure compliance across audits and from one plant to the next. Requirements include:

- shoes with slip-resistant soles (steel-toed if required by the plant);
- socks;
- long pants;
- shirt with short or long sleeves, with company logo or name; and
- bump cap if required by the plant.

Beyond safety training, the universal standards also require food plant technicians to be certified by the applicable regulatory agency and have proof of technical training specific to food plants, including training in current good manufacturing practices.

The universal standards also call for criminal and motor vehicle background checks for any newly hired pest management employee who services a food plant. The background check has to cover the five years immediately preceding the date of hire. Again, such requirements speak to the

ever-present issue of food security in today's environment.

Because requirements for other security measures such as parking, visitor badges, substitute technicians, and personal escorts vary so much from one facility to the next, NPMA's guidelines simply recommend that pest management professionals "understand and comply" with all plant policies of this nature and that each plant provide written copies of approved procedures to every technician who services the plant. In other words, NPMA leaves it to you to decide your security policies but wants to make sure your pest management provider understands them and respects them to the letter.

Clearly, food security is a top priority for the auditors who developed the guidelines, but the NPMA recommendations also set a high bar for personal safety training. They require that pest management companies have a written safety plan and document training for every employee who works in a food plant. This is no small order. The following is just a partial list of what these safety plans must include:

- respiratory protection training if products requiring a respirator are used;
- pesticide safety training, including understanding of proper disposal of products and containers;
- emergency response procedures in case of chemical spills;
- fall prevention guidelines;
- ladder safety and transportation guidelines;

- warnings of potential crushing hazards;
- shoe safety requirements; and
- hazard communication protocols.

Beyond safety training, the universal standards also require food plant technicians to be certified by the applicable regulatory agency and have proof of technical training specific to food plants, including training in current good manufacturing practices (GMPs). Does your provider have proof of such training? It's worth asking to be sure you're not surprised at audit time.

Look Back Before Looking Forward

They say history repeats itself, but when there's a pest problem in your plant, no one wants a repeat. Looking back at your past pest management records is extremely important when developing a customized pest management program. The NPMA recommends that your provider inspect the entire site and interview key plant contacts about past pest activity and pest management work. Have you had a pest problem at your facility? If so, where? What treatment methods were used? And so forth.

Your provider should also check for areas prone to pests, the "hot spots" around your facility. Following are the NPMA's recommendations on the most common pests found in food processing settings.

Rodents: Once your provider completes the site analysis, consult an NPMA matrix for recommendations regarding service frequency and bait station spacing to help prevent rodents. This aspect is dynamic and is based on history and intensity of rodent infestation. Work with your pest management professional to make ongoing adjustments as needed. The universal standards mandate at least a quarterly audit.

Insects: Your pest management professional should inspect for insects on at least a monthly basis and make recommendations accordingly. For stored-product pest prevention,

the NPMA recommends pheromone traps, which lure pests to a sticky trap using synthetic versions of the pests' own biological pheromones. Should you suspect an infestation, the bottom line from a food safety standpoint is that you must immediately isolate any infested materials. From a business standpoint, you want to keep

Additional information on bird control can be found on www.pest-world.org in the NPMA resource center.

No matter the pest, promptly report any signs of pest activity to your provider. Constant monitoring and maintenance are the keys to making pest problems a thing of the past.



Consult a National Pest Management Association matrix for recommendations on service frequency and bait-station spacing to help prevent rodents. Placement will be based on history and intensity of rodent infestation.

product loss to a minimum. If stored-product pests are found, always determine the source before acting; this step will help reduce product loss and save money.

NPMA guidelines recommend using fly lights, which trap and monitor flying insects. Fly lights must be checked weekly for potential infestations. Sticky traps should be monitored monthly, and the sticky material should be replaced during each visit.

The guidelines recommend insect growth regulators, or IGRs, to help reduce adult populations of crawling insects. Regardless of the treatment method, make sure to use products labeled for use at your facility to prevent food contamination.

Birds: Birds can contaminate your plant's product and create hazardous conditions. Your provider should alert you to any areas susceptible to bird infestations, and you should approve any wire, net device, or material used to prevent roosting.

Communication, Record-Keeping

Everyone knows how important good communication is to any relationship, whether it's with your family, friends, or customers. But if you think of your pest management provider as "just another vendor" who comes and goes with little interaction from you, think again. As with any relationship, you can't underestimate the importance of good communication with your provider.

First, strike the word "vendor" from your vocabulary altogether. Your pest management professional should be your partner, with whom you work closely to prevent pests. Remember, your provider should be your biggest ally when it comes to preparing you for audits.

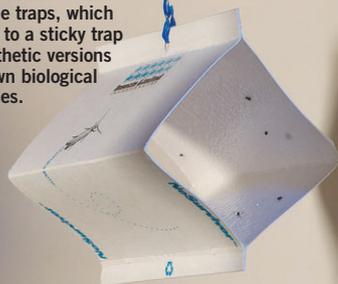
There are three key takeaways from the NPMA's guidelines on communication and record-keeping:

- The NPMA recommends pest control documentation that includes material safety data sheets, a

logbook of all pest sightings and treatments, and copies of pest management technicians' licenses and insurance.

- Your pest management provider should keep all records and documents, making them available to you within a reasonable time. You may keep these records electronically; back-up copies should be kept at your pest control company's office. Remember, documentation—the more detailed, the better—will need to be ready at audit time.
- Your pest control provider should conduct an annual educational training session for plant personnel. Getting your staff on board with your pest management efforts is crucial to the success of your program, but if they don't know what to look for, how can you expect them to participate? If

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you haven't had staff training on integrated pest management in the past year, talk to your pest management provider about holding a staff training session soon.

Conduct regular inspections and foster an open dialogue with your pest management professional. Come audit time, you'll be glad you did. And let's be honest, it's no fun to celebrate success alone.

Fall Back on Partnership

Preparing for the pest management portion of your audit can be a daunting task, but with these new guidelines, you and your provider can determine the best plan for your facility. The universal guidelines are designed to help you perform better on your pest control audits, regardless of which auditor you use. But remember, they are just guidelines, not a silver bullet. Every plant is different and requires a customized program, as well as ongoing evaluation and maintenance.

Lean on your provider, your partner in pest management, who is trained and licensed to help you every step of the way. Working together, you might even look forward to your next audit. ■

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