Pest Management Key To FSMA Compliance

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As every member of the food manufacturing industry knows, the Food Safety Modernization Act (FSMA) is a first of its kind legislative mandate, aimed at enhancing the safety of the U.S. food supply. The legislation aims to ensure food safety by shifting the focus of federal regulators from responding to contamination to preventing it.

Original final rules were set for June 2015, but a recent agreement between the Food and Drug Administration (FDA), the Center for Food Safety (CFS) and the Center for Environmental Health set a staggered schedule for the following regulations:

- Preventative controls for human and animal food (Aug. 30, 2015)
- Imported food and foreign suppliers and produce safety (Oct. 31, 2015)
- Food transportation (March 31, 2016)
- Intentional adulteration of food (May 31, 2016)

The first deadline regarding preventative controls is one of the biggest changes to current food safety laws. Food facilities will be required to evaluate their operations, implement and monitor effective measures to prevent contamination, and develop an action plan that can be implemented to counter the contamination. One of the best ways facilities can comply with this new rule is to implement a rigorous pest management program.

There is no doubt that proper pest prevention and management has always been an important part of food safety, especially in food processing facilities. However, as pest problems have been traced to some recent food contamination cases, it is clear that facilities simply must include pest management as part of their overall operations programs. As a result of FSMA, the FDA has much more authority and oversight, and will be more proactive in taking action against plants that violate regulations. Lack of pest management programs, and also inadequate programs, can be a serious pitfall for food manufacturing facilities.

Why Pest Control Matters

According to the Centers for Disease Control and Prevention (CDC), about 48 million Americans get sick, 128,000 are hospitalized and 3,000 die each year from foodborne diseases. One of the largest and most expensive food recalls in the nation occurred in January 2009, when FDA officials learned that Peanut Corporation of America (PCA), headquartered in Lynchburg, Va., had shipped peanut-based products contaminated with *Salmonella*bacteria 12 times in 2007 and 2008 from its Blakely, Ga. facility. These actions represented a clear and significant violation of food processing standards.

Plant inspections revealed mold growing on ceilings, rainwater leaking into the production areas, large gaps providing easy access for rodents and the presence of dead cockroaches throughout the plant. What made the case even worse is that federal investigators discovered emails between company executives, which revealed their knowledge of these conditions and the positive tests for *Salmonella* over a two-year period. Both cockroaches and rodents are known vectors of *Salmonella*, which can be found in rodent droppings and on the legs and bodies of cockroaches, easily contaminating areas around them.

PCA's actions led to a major national *Salmonella* outbreak that ultimately caused more than 700 cases of*Salmonella* poisoning in 46 states, resulting in nine deaths. As this national nightmare unfolded, PCA was forced to file for bankruptcy amid a series of lawsuits. In February 2013, the U.S. Department of Justice filed a 76-count indictment of former PCA officials, with a trial scheduled in July 2014.

Clearly, the case of PCA illustrates one of the most egregious violations of food safety regulations, especially as it became clear company officials knowingly sold contaminated product.

Plant shutdowns and fines can cause irreparable damage to a brand's reputation. Full compliance with FSMA, including pest management, is the best way manufacturers can protect food safety and quality, as well as the brand.

Implementing the Right Pest Control Program

As a result of FSMA, the FDA will have more access to facilities, allowing the agency and its third-party auditors to conduct unannounced inspections. This provision alone is reason enough for plants to ensure they have a regular pest management program in coordination with a qualified professional pest management company. Signs of pest infestation are not always obvious, but can easily be uncovered by professional inspectors who are trained to look for such violations.

A strong pest management program should include regular inspections and reporting (at least once a month), proactive pest-proofing measures and an immediate action plan to put in place when faced with a potential infestation. Manufacturers and plant managers must choose the right pest professional to help them stay in compliance — a decision that cannot be made on price alone. It is important to have a solid understanding of the new FSMA regulations, pest infestation risks and fines. Decision makers should consult with several pest management companies with extensive experience in the food manufacturing arena before proceeding, and take all their programs and services into consideration. With increased FDA enforcement authority and higher fines, the consequences of a pest-related FSMA violation are simply too great.

The Bottom Line

In addition to ensuring compliance with FSMA, facility managers must always consider the well being of the public. For these reasons, pest management, now

more than ever, is a necessity within this industry. The goal of FSMA is to decrease the incidence of foodborne illness, especially cases that result from contaminated food manufacturing facilities. Food facilities have a direct role in ensuring the safety of the U.S. food supply, and by implementing proper pest management programs to protect the public from the harmful effects of pests and rodents, the negative media attention directed at this issue will begin to subside and the public's confidence in the food industry will continue to grow.

It is far easier to prevent pest infestations and be a model in the industry than to scramble in response a problem and salvage a company's reputation.

About the Authors

Missy Henriksen is vice president of public affairs and Dr. Jim Fredericks is chief entomologist and director of technical services for the National Pest Management Association *[1]. The NPMA, a non-profit organization with more than 7,000 members, was established in 1933 to support the pest management industry's commitment to the protection of public health, food and property. For more information about pests and prevention tips, please visit* *www.PestWorld.org* [2]*.*

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