FSMA IPM — A Match Made in Common Values

By ZIA SIDDIQI, Ph.D., B.C.E., Director of Quality Systems, Orkin, LLC

With the new rule under the Food Safety Modernization Act (FSMA) going into effect in less than 60 days, it has become obvious that the FDA is seeking to revamp food safety in the United States, as well as regulate imported food from around the globe. The food manufacturing, processing and distribution channels have changed immensely since the Food, Drug, and Cosmetic Act was passed in 1938, rendering its statutes and regulations insufficient for the current food manufacturing environment.

Before FSMA, actions were mostly reactive, typically seen in the event of an issue or outbreak. With this approach, bacteria such as *E. coli*, *Listeria* or *Salmonella* were able to grow, evolve and thrive, unchecked in several environments and conditions. That reactive mentality not only allowed diseases to grow and spread within food supplies, but also led to widespread illness and, in some cases, death. In fact, an American processing plant was required to close its operations in 2009 after a large Salmonella outbreak riddled its food supply. No measures were taken to recall or withhold shipments of the contaminated food, and among other initiatives, FSMA was created to prevent a reoccurrence of that crisis.

This new rule under FSMA, which focuses on preventive and risk-based regulations to thwart any potential food safety issues, requires written and detailed food safety plans. Prevention is the key facet of the new rule, emphasizing the need to review the entire supply chain for any potential defects in the process. Prevention includes identifying, establishing, monitoring and documenting counteractive efforts to determine the most efficient means of addressing and alleviating any food supply

threats.Pestmanagement also plays an integral role in those efforts, helping to prevent food safety problems by preventing pests. Just as street signs help to steer drivers away from having accidents, FSMA aims to confront food safety issues before they occur.

Integrated Pest Management (IPM) is designed to provide facility managers with a variety of measures and best practices to deter pests from settling inside food processing plants. These measures are based in science and rely on the biology, habitats and patterns of pests and rodents to increase efficacy — an approach that the FDA used to develop its recommendations for the new FSMA rule.

So, FSMA and IPM are not so different in their core ideals. IPM grounds itself in preventive and proactive strategies, including facility maintenance and sanitation, to help secure a facility from pest activity and infestations. The approach also focuses on identifying potential areas of concern, establishing preventive measures, documenting and observing the measures, addressing and evolving the approach, and analyzing and tracking results. Since pests and rodents can carry a variety of disease-bearing bacteria and parasites, having an IPM plan in place will help facilities to be prepared once FSMA's regulations are put into effect.

A comprehensive IPM program utilizes an array of non-chemical measures — such as insect traps, pheromone traps, positive air pressure and heat treatments — to discourage pests from seeking shelter in your food storage and processing areas. The use of non-chemical measures is integral to IPM, as there are strict standards on chemicals and products that can be used in functioning areas. Once the program is established, IPM relies on constant evaluation and management of its efforts, which help to ensure its methods are functioning as intended and that problems are detected and addressed immediately.

Since the FSMA rule will soon become the standard in food safety, schedule a meeting with a pest management provider to discuss an IPM plan for your facility. Your pest management provider will assist you in conducting an inspection and determining a plan that is a match for your facility and its needs. Marrying FSMA's requirements with IPM's core values will help establish proactive practices geared to prevent food safety hazards. Here are some best practices you can discuss with your pest management provider.

Exclusion: As part of facility maintenance procedures, ensure that exterior walls and entry points are inspected for any openings that pests can use as access to the interior. Repairing cracks and crevices, as well as covering openings through windows and doors, is important to ensure the integrity of the structure is maintained. Use weather-resistant sealant and caulk to close any holes and cracks. In addition, install weather stripping or door sweeps to keep gaps around windows and doors to a minimum.

Sanitation: A strict sanitation regimen is vital to prevent food and waste buildup that can attract pests to your facility. Make sure your sanitation plan calls for immediate removal of food and liquid spills throughout the building, especially in employee break areas. Also make sure all dumpsters are placed as far away from

the building as possible and that a schedule is set for them to be sanitized with organic cleaner. Consider using the same organic cleaner to wipe greasy buildup away from drains and pipes around your facility as well.

Staff Training: Once the elements of an IPM program are in motion, it's important that all staff members are aware of their role in the pest management plan. Consider working with your pest management provider to schedule an IPM staff training session.

By inserting elements of IPM into your food safety plan, newly mandated by the FSMA rule requirements, your facility will be one step closer to meeting FDA standards. Get ahead of the game and start as soon as you can.

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