Guidance Document

British Retail Consortium (BRC) Global Standard for Food Safety Issue 8



The following document has been created to offer guidance and support to BPCA members whose services are subject to the standards laid down by the British Retail Consortium (BRC) in Issue 8 of the Global Standard for Food Safety.
Issue 8 is available to download for free at brcbookshop.com.

4.14 Pest management

The BRC Global Standard for Food Safety issue 8 states, "[t]he 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.

"Pest management programmes shall comply with all applicable legislation."

Clause 4.14.1

"If pest activity is identified, it shall not present a risk of contamination to products, raw materials or packaging.

"The presence of any infestation on site shall be documented in pest management records and be part of an effective pest control programme to eliminate or manage the infestation so that it does not present a risk to products, raw materials or packaging."

BPCA members should ensure that any pest activity and pest anagement treatments are carefully documented to reflect the level of pest activity on site.

It should be clearly recorded if pest activity is proving a risk to production and treatment processes should reflect the severity of activity.

The site should have responsibility for the safety of its product, but obviously the site will need the support and guidance of the pest contractor should pest issues be reported.

This clause also describes the importance of good record keeping and documented pest management programmes. Site folders for your customers will provide accurate details of pest occurrences so ensure you have good records.

BPCA **Guidance On-Site Folder Contents** guides you and explains the contents required so be sure to utilise it.

Clause 4.14.2

"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.

"The frequency of inspections shall be determined by risk assessment and shall be documented. The risk assessment shall be reviewed whenever:

- **there are changes to the building or production processes which could have an impact on the pest management programme**
- **there has been a significant pest issue.**

"Where the services of a pest management contractor are employed, the service scope shall be clearly defined and reflect the activities of the site. Service provision regardless of the source shall meet with all applicable regulatory requirements."

BPCA members should consider the breeding cycles of commensal rodents and pest insect species that may threaten a particular site when carrying out the risk assessment.

It is not advised that less than eight visits per annum be considered, but more visits may be desirable.

The service contract should contain a clear specification of the service standards and requirements, and should also contain clear terms and conditions.

BPCA can support with site-specific risk assessments.

A useful article can be viewed at **bpca.org.uk/News/considering-your-site-specific-pest-risk-assessments/197580** to help you formulate this important document to go in your site folders.

Clause 4.14.3

"Where a site undertakes its own pest management, it shall be able to effectively demonstrate that:

- **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 management 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."**

If a site does provide its own pest management, they may still require services such as 'in-depth' visits, biologist visits, bird management work, training and other specialist work.

Clause 4.14.4

"Pest management documentation and records shall be maintained. At a minimum, this shall include:

- **an up-to-date plan of the full site, identifying pest control devices and their locations[...]"**

The site plan will require input from the site to ensure it is up to date. Annual reviews will ensure site plans remain current.

Reference can be made in treatment reports to confirm that the plan is current. Site plans can be electronic or hand written, and should have a suitable key to indicate monitoring points such as coloured dots or appropriate printed symbols.

- **"identification of the baits and/or monitoring devices on site[...]"**

Wall stickers should be used to indicate the location of internal monitoring points, but a corresponding number will not be required on monitors where they are securely tethered close to the wall sticker.

- **"clearly defined responsibilities for the site management and the contractor[...]"**

Policies and responsibilities should be clearly defined in the contract at the beginning of the service.

For example, who has the responsibility for removing rodent droppings in treatment areas? Who is responsible for carrying out the recormendations?

- **"details of pest control products used, including instructions for their effective use and action to be taken in case of emergencies [...]"**

This information can be supplied by ensuring copies of product data sheets are available in the pest anagement file. Copies should be available from your manufacturer or distributor.

- **"any observed pest activity [...]"**

Pest controllers should encourage clients to have a designated contact with responsibility for pest anagement and for contacting the pest management contractor (refer to **4.14.11** below).

Site logs for pest activity can be very beneficial for contractors when responding to a report of pest activity.

- **"Details of pest control treatments undertaken.**

"Records may be on paper (hard copy) or controlled on an electronic system (eg an online reporting system)."

Pest management reports should contain clear details of the type of visit and activity that has been carried out. Visit summary sheets should be maintained in the pest control folders and follow up visits should be clearly documented. A treatment report MUST be completed and left in the pest anagement folder for every visit carried out.

Not only can BPCA **Guidance On-Site Folder Contents** help you but, we have various templates to go within the site folder such as:

- Staff reporting sheets
- Details of visits,
- Bait location lists.

Clause 4.14.5

"Bait stations or other rodent monitoring or 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.

"Any missing bait stations shall be recorded, reviewed and investigated."

Having a bait/monitoring point check list accompanied by corresponding wall stickers will help you keep track of your monitoring, bait and trap points.

It is important this is kept up to date and your visits include this quality check as auditors will always look to see such lists are up to date, correct and concise.

Remember to justify the use of toxic baiting points with a corresponding risk/environmental assessment as per the **CRRU guidance**.

Clause 4.14.6

"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."

Glue board fly units are always useful in situations where there is a contamination risk.

Auditors will usually like to see fly catch analysis records, something the BPCA Technical team will be able to help you with.

Consideration must be given to the position of any electric fly killing devices.

Attention must also be brought to the current location of fly control units.

If units are dangerous to service or not located in a suitable area to capture target pests then relocation should be discussed with the site contact, as relocation will improve fly capture rates and increase protection of the food product.

Clause 4.14.7

"The site shall have adequate measures in place to prevent birds from entering buildings or roosting above loading or unloading areas."

This service is unlikely to be provided by the site itself.

It is an opportunity to note potential bird ingress points, roosting areas or area of low pressure such as flat roofs overlooking, for example, bin areas.

Recommendations and surveys for bird proofing should be well documented and kept in the site folder for auditor reference and records.

Clause 4.14.8

"In the event of infestation, or evidence of pest activity, immediate action shall be taken to identify at-risk products and to minimise the risk of product contamination. Any potentially affected products should be subject to the non-conforming product procedure."

Immediate action will necessitate contacting the pest management provider with details of the pest problem.

Emergency callout time frames should have been agreed between the site and the contractor, and the site should ensure that a responsible, pest aware person informs the pest contractor directly if an in house service is not provided.

Although it is the responsibility of the site manager to carry out non-conforming product procedures, the pest controller should make it an important part of their visit to identify any current or potential for product damage or contamination via pest activity.

Feeding this information back to the site manager and recording it will highlight any relevant procedure required is a valuable service to provide your client.

Clause 4.14.9

"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 that all of the relevant recommendations made by its contractor or in-house expert are carried out in a timely manner"

The person responsible for the 'in-depth' inspection survey should have the responsibility to inform the customer contact if recommendations have not been completed, or if actions are not being signed

off on the documents in the report folder.

Pest management operators should be trained to handle pest control products. The person responsible for the 'in-depth' inspection survey would normally be expected to be more senior in terms of experience/knowledge than the regular service person as the objective is to provide a more in-depth inspection service and review the existing pest management measures.

We would expect the competencies to be reviewed by the auditor based on the outcomes ie where infestation is identified by the auditor and missed by the pest control company questions would be asked about competencies, adequacy of contract etc.

The treatment report form should be comprehensive and include all recommendations.

Be sure to make this information clear. It'd be a good idea to have a separate form within your site folder labelled 'recommendations and actions'.

When you find a recommendation, note it in your standard report form and also report it into the separate 'recommendations and actions' form.

Having a column for indication as to when they are completed can also be great records for when the auditors arrive and assist you in getting them done.

Clause 4.14.10

"An in-depth, documented pest management survey shall be undertaken at a frequency based on risk, but at least annually, by a pest control expert to review the pest management measures in place. The survey shall:

- **provide an in-depth inspection of the facility for pest activity**
- **review the existing pest management measures in place and make any recommendations for**
- **change.**

"The survey shall be timed to allow access to equipment for inspection where a risk of stored product insect infestation exists."

The decision on the frequency of the pest management surveys shall be agreed by the pest management company based on risk factors such as site pest activity history, type of products manufactured and activity level at the site.

Where production occurs only seasonally there may not be a benefit in carrying out surveys outside of production seasons.

The frequency for in-depth inspections is a minimum of one per annum.

This frequency will not be suitable for many BRC sites, and frequency should be agreed between the site and the contractor, and shall be based on risk of pest's activity and product contamination.

Where pests such as stored product insects are a consideration access to machinery and production areas must be investigated in the site pest assessment.

Where appropriate in-depth inspection may require access to areas outside of standard production times.

The in-depthsurvey should be carried out by someone who is not the current 'technician' and serve as a quality assurance visit.

There is no mention of what qualification is expected for the surveyor/quality assurance officer but, the BPCA Certified Technical Inspector, or Field Biologist qualification will help to differentiate the levels of inspection.

Speak to the BPCA Technical team for guidance and verbal support.

Clause 4.14.11

"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:

- **annually or**
- **in the event of an infestation.**

"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."

A properly maintained departmental checklist for rodent monitoring points would be satisfactory as a basis for reviewing trends in rodent activity. Members are advised to retain at least the previous 12 months records in the current file to allow auditors to view trending history.

Pest controllers must also ensure that they draw

out relevant information from catch tray analysis and use it as a pest management tool.

For example, the presence of wasps and night flying moths in catch trays will indicate proofing defects that should be reported upon by the contractor/in house provider.

Clause 4.14.12
"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."

It is vitally important that sites that manufacture product to the BRC Standard have a pest reporting policy in place that clearly designates who pest activity should be reported to.

This/these representatives have the clear responsibility to inform the pest management contractor at the earliest opportunity to allow fast and effective pest management. These pest control 'champions' may have a higher level of training in pest related matters than other staff members and are likely to be the same individual as the pest contractor's main site contact.

Training for site representatives should be accessed from a reputable source eg the BRC, current pest anagement contractors, or trade bodies within the pest industry such as BPCA.

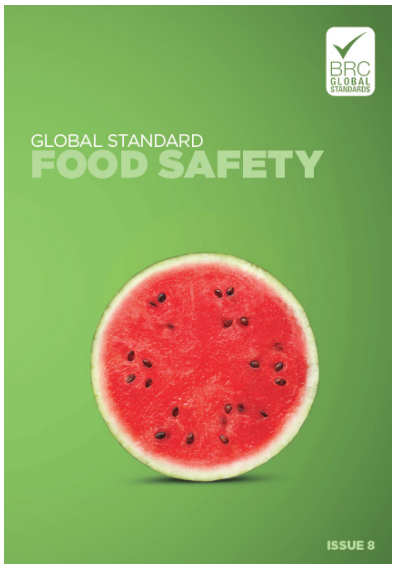
This is an opportunity to provide training to your client and his or her employees on what to look for in terms of pests. Not only is it a requirement within this issue 8 but, it is also a valuable tool to help you identify problem areas.

These employees are always on site a lot more than you so their eyes and ears are very useful.

Ensure you have a staff reporting form within your folder so that you can keep track of any reported sightings or issues. At the start of each visit you should always look to see if anything has been reported.

This training can either be part of a contract/ tender or, be an added service as and when your customer may need it.

BPCA can always assist you in training groups of people so be sure to speak with the technical team to see how we can help.



For further advice and support, please contact the BPCA Technical team.

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