



13 September 2019

National Food Strategy Team
Department for Environment, Food and Rural Affairs
Area SE, 2nd Floor
Seacole Building
2 Marsham Street
London
SW1P 4DF

RE: National Food Strategy - Call for Evidence

Dear Mr Dimbleby

I write to you in regards to your call for evidence for the production of a National Food Strategy, which you have been commissioned to conduct on behalf of Defra's Secretary of State. I write on behalf of the British Pest Control Association (BPCA).

BPCA represents over 700 member companies with a professional interest in pest management. We're committed to protecting human health and safety through the use of adequate pest management. We whole-heartedly support the production of a National Food Strategy that deals with food "from farm to fork" as set out in your consultation documentation.

We believe our members and the wider pest management community have a particular interest and expertise in:

- Delivering safe, healthy, affordable food
- Supporting a humane agriculture sector
- Restoring and enhancing the natural environment.

Pests, food and our role

Protecting human health is one of the primary functions of the professional pest management community.

Insects, rodents and birds have the potential to contaminate food at any stage in the farm to fork journey with their excreta, hairs or body parts.

Flies are attracted to our food sources and feed by vomiting saliva onto the food surface and sucking up the resulting liquid, thereby spreading pathogens.

Many of these pathogens can spread diseases such as Weil's disease, Salmonella, Cryptosporidiosis, E.Coli, Ornithosis, Staphylococcus aureus, Listeria, Toxoplasma gondii and Hantavirus.

Farms, grain stores, warehouses, supermarkets and restaurant storage areas can all become feeding sites for rodents if pest-proofing and monitoring aren't being actively managed.

Hazard Analysis and Critical Control Point (HACCP) procedures specifically talk about effectively managing the risks of pest-based contamination. Pest management is part of the Good Manufacturing Practices (GMP) for food businesses.

When an end-user discovers an infestation, businesses face a reputational cost. The world is more connected than ever, and evidence of pest contamination can be devastating, particularly for small businesses and their reputation.

Even if an infestation is identified before the food makes its way to the consumer, the ruined stock has an impact on the overall cost of production, which must then be passed on to the consumer. Rodenticides are available to purchase to control rodent infestations. When an untrained person uses such poisons, there is the potential for secondary poisoning of non-target species, contamination of the environment, and potentially rodent carcasses contaminating food.

Pests and food today

To meet the requirements set out under the Health and Safety at Work Act 1974, the Food Safety Act 1990 and the Food Hygiene (England) Regulations 2006, all businesses involved in food need to protect people from pests.

Ultimately all organisations involved in food production and distribution have the same aim when it comes to pest management; never to sell foodstuffs that have been contaminated by pests.

Legislation and policy rightfully make clear that food companies must have systems and processes in place to manage and prevent infestations.

While the requirement for pest management around food is well established, the definition of what is adequate, effective or best practice does not exist in Government policy or current legislation.

UK food businesses have two options for protecting food from pests:

1. They can carry out pest management themselves
2. They can subcontract their responsibilities to a pest management company.

This raises a few problems:

1. To stop food contamination pest activity needs to be prevented and monitored in-house
2. For management to be successful, all workers who come into contact with food need to have a degree of pest awareness knowledge
3. Untrained individuals are using pesticides and poisons
4. While HACCP suggests all in-house pest management work should be independently verified, we have no definition of *who* should be conducting those independent verifications

5. We have no standardised definition of what a pest management company is, or what makes a pest management professional, defined in policy or legislation.

Our suggestions

You say you're looking for ideas, big and small. We have four small ideas that would have big consequences for the nation's food.

We believe a National Food Strategy should:

1. Encourage in-house pest monitoring

We believe all businesses who have contact with our food should commit to protecting it in-house. Trained and competent employees should take an active pest management approach, contacting pest management companies for support and situations where infestations are established.

2. Mandate pest awareness training

All staff who work around food should be taught how to spot basic signs of pest infestations and be able to monitor for these. The principles for pest prevention should be part of the training plan for all workers around food, much in the same way we teach food hygiene and health & safety.

3. Require independent verification of pest prevention management by a pest management company

A professional pest management company is more than capable of verifying the quality of pest management, prevention and monitoring work being undertaken. They can also take action in situations where prevention has failed, and an infestation has been established.

4. Accurately define a pest management company and recommend their use when a contractor or independent verification is required

We define a professional pest management company as:

- Appropriately insured (including employers liability, public and products liability)
- A company audited to the British and European Standard for Pest Management; EN 16636
- A company that understands and abides by industry codes of best practice
- Only employs qualified staff that are also on a continuing professional development scheme to control and manage pests.

BPCA consider this to be the minimum requirement for a professional pest management company operating in the UK.

Pest professionals use chemicals as a last resort for controlling acute infestations. Due to the inherent risk to the environment and non-target species, all chemical control work should be handled by a professional.

Thank you for the opportunity to contribute to the consultation. The BPCA team and its members are here to protect the nation's food from pest damage. Please feel free to call on us to answer any of your questions or clarify anything in our letter.

We look forward to seeing your National Food Strategy and hope the pest management community can be an integral part of it.

Yours sincerely



Ian Andrew
Chief Executive Officer
British Pest Control Association