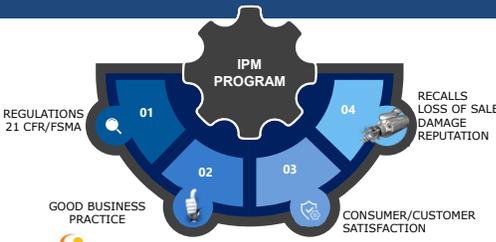




BY PETER POTERES
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THURSDAY JUNE 27TH, 2019

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WHY DO WE NEED AN IPM PROGRAM?



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REGULATION

FDA Code of Federal Regulations (CFR):
Title 21 – Food And Drugs

Glanbia abides by 21 CFR Part 111 cGMP's for Dietary Supplements (111.15 Subpart C – Physical Plant and Grounds): (d) Pest control

NOT ALLOW	EXCLUDE	PROTECT
(1) You must not allow animals or pests in any area of your physical plant. Guard or guide dogs are allowed in some areas of your physical plant if the presence of the dogs will not result in contamination of components, dietary supplements, or contact surfaces	(2) You must take effective measures to exclude pests from the physical plant and to protect against contamination of components, dietary supplements, and contact surfaces on the premises by pests	(3) You must not use insecticides, fumigants, fungicides, or rodenticides, unless you take precautions to protect against the contamination of components, dietary supplements, or contact surfaces

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REGULATION

FDA Code of Federal Regulations (CFR): Title 21 – Food And Drugs

FSMA	REPLACEMENT	HACCP TO HARPC
<p>The FDA Food Safety Modernization Act (FSMA), was passed by Congress with the intent of building a safety net that would provide protections at all points along the global food-supply chain – from farm to table. The act was signed into law in 2011.</p>	<p>FDA announced replacement of 21 CFR Part 110 Food GMPs with the new regulation 21 CFR Part 117 Current Good Manufacturing Practices, Hazard Analysis, and Risk-Based Preventive Controls for Human Food. Full replacement of 21 CFR Part 110 was completed by end of 2016.</p>	<p>FSMA changed the food safety philosophy from HACCP (Hazard Analysis of Critical Control Points) to HARPC (Hazard Analysis Risk-Based Preventive Controls): Basically more proactive in food safety prevention instead of after they occur.</p>



CONSUMER / CUSTOMER

Protecting our consumers is our duty and is our top priority!

- We are in business today because of our customers and as a result we take customer satisfaction very seriously.
- There will be absolutely "zero" compromise when it comes to food safety.
- Manufacturers have a responsibility to the consumer of providing the highest quality wholesome product without contaminates.
- Manufacturers need to have a robust consumer complaint program.



TYPICAL FOOD PROCESSING PESTS

Common pests requiring control in the food processing industry include but certainly are not limited to the following:

Cockroaches, food infesting beetles (i.e. carpet, red flour, confused, warehouse and drugstore)	Indian Meal Moths, weevils, booklice & mites, social insects (ants, bees, etc.)	Occasional invaders (i.e. crickets, pill bugs, etc.), mice, voles, rats, birds and other animals (i.e. bats, snakes, etc.)
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GLANBIA IPM PROGRAM

Example: Survey the plant property/geographic area/plant exterior



GPN 948 Manufacturing Plant

One of our plants is located next to an open field, new construction, a rail line and the railroad extension property which is always overgrown.



Solution

We worked with McCloud to extend our exterior perimeter bait traps and in some areas catch traps at this physical area.



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Other Key Elements

Develop a schedule	Monitor receipt of materials/Never accept infested goods	Maintain control of incoming equipment
<p>A schedule should be developed to determine the frequency of pest-control inspections for the areas surveyed. Inspections should be planned with and include the PCO. Documented inspection reports should be on file for review with in-house IPM expert and PCO. At Glanbia we conduct weekly inspections. Our program includes inspections of ILS, pheromone traps, interior catch traps and exterior bait stations. All activity is tracked and charted for trend identification.</p>	<p>One of the more common methods for entry of insects and rodents into a facility is through receipt of incoming goods. Pests can be on or in packaging, on pallets, in food or even in the vehicle delivering the material. We utilize a very detailed documented inspection program.</p>	<p>Most companies watch incoming food materials very carefully but are less diligent about incoming equipment. Equipment is often stored under very poor conditions and can carry insects and rodents into a plant.</p>



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Other Key Elements

Implement current good manufacturing practices (cGMP)	Institute a robust training program at the facility	Institute monitoring audits
<p>cGMP's & sanitary practices prevent the attraction of pests, eliminate harborage/breeding areas, support exclusion and prevent the introduction of pests into a facility. cGMP's practices help prevent foreign object contamination, reduce bacterial load, prevent chemical contamination of products and help control or eliminate pest populations. cGMP's are mandated by federal law. They are also incorporated in local and state laws and are an integral part of company policy.</p>	<p>The most effective way to empower people is through knowledge. The ultimate IPM program will have the entire workforce in a facility understand enough about pest management/pest identification to become advocates and participants in the overall process of maintaining a pest free environment.</p>	<p>Compliance Audits, Pest Management Audits, Employee Sighting Log, Chemical & Mechanical Monitoring, Pesticide Usage Log and Incoming/Outbound Transportation Inspections. At Glanbia, we want our PCO spending more time doing more inspecting/auditing and less time checking equipment.</p>



GLANBIA IPM PROGRAM

Institute monitoring audits



- Compliance Audits
- Pest Management Audits
- Employee Sighting Log
- Chemical & Mechanical Monitoring
- Pesticide Usage Log
- Incoming/Outbound Transportation Inspections



“Find a Better Way”
Is one of our values at Glanbia



We want our PCO spending more time doing inspections/audits and less time checking equipment.



QUESTIONS?



Thank you!!!
Peter Poteres
GLANBIA PERFORMANCE NUTRITION
GLOBAL VP OF QA