WHY DO WE NEED AN IPM PROGRAM?

REGULATIONS
21 CFR/FSMA

GOOD BUSINESS
PRACTICE

CONSUMER/CUSTOMER
SATISFACTION

RECALLS
LOSS OF SALE
GARAGE
REPUTATION

NOT ALLOW
EXCLUDE
PROTECT

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

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

**FSMA**
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.

**REPLACEMENT**

**HACCP TO HARPC**
FSMA changed the food safety philosophy from HACCP (Hazard Analysis of Critical Control Points) to HARPC (Hazard Analysis Risk-Based Preventative Controls): Basically more proactive in food safety prevention instead of after they occur.

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**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.

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**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 flour, warehouse and drugstore)
- Indian Meal Moths, weevils, booklice & mites, social insects (ants, bees, etc.)
- Occasional invaders (i.e. crickets, pot bugs, etc.), mice, voles, rats, birds and other animals (i.e. bats, snakes, etc.)
GLANBIA IPM PROGRAM

- Our IPM program consists of using non-chemical and if needed chemical approaches with the objective to reduce or eliminate pests from our food processing and storage facilities.
- Via design, the Glanbia IPM program goal is to reduce the use of chemicals for pest control. Methodical and thorough application and expansion of the minimum criteria will reduce pest issues and will most likely reduce overall pest control chemical use.

Glanbia defines IPM as containing 4 essential elements

- Minimize pest
- Food
- Shelter
- Water

- Physical barriers
- Raw material inspection

- ITV
- Bio barriers
- Catch traps
- Pheromone traps, etc.

Pesticides, Bait & Rodenticide used as appropriate

AS THE BASE OF A SUCCESSFUL IPM PROGRAM!!!

Other Key Elements

- Locate all facilities, vacant lots, dumpsites and other food processing facilities, construction sites that might present a pest problem within a two to three block radius around the facility.
- Establish relations with neighboring facilities.

An interior IPM survey should be very comprehensive and should involve all of the plant team. The designated plant IPM expert, engineers, sanitation personnel, and all of your McCloud Pest Control team should all be involved.
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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
A schedule should be developed to determine the frequency of pest-control inspections. Inspections should be planned with and include the PCO. Documented inspections should be recorded in a food safety (cGMP) report and PCO. At Glanbia we develop written inspections. Our program includes inspections of ILT’s, pheromones, catch traps and exterior perimeter bait traps and charted for trend identification.

Monitor receipt of materials/never accept infested goods
One of the more common methods for entry of insects and rodents into a facility is through receipt of incoming goods. We screen for insects or rodents when the material arrives and at times even in the vehicle delivering the material. We utilize a very detailed documented inspection program.

Maintain control of incoming equipment
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.

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Other Key Elements

Implement current good manufacturing practices (cGMP)
Compliance Audits, Pest Management Audit, employee training, cleaning and sanitation inspections. Infestation or contamination of products and plant control or eliminate pest populations. Efforts are incorporated in local and state laws and are an integral part of company policy.

Institute a robust training program at the facility
The most effective way to empower people is through knowledge. The process program ensures the employee understands pest control and can identify pest management pest identification to the overall process of maintaining a pest free environment.

Institute monitoring audits
Compliance Audits, Pest Management Audit, employee training, cleaning and sanitation inspections. Infestation or contamination of products and plant control or eliminate pest populations. Efforts are incorporated in local and state laws and are an integral part of company policy.
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