# Case for Change for the development of a food-safe pest control management program

#### Administrative information

**Name of IRC**: Meat Industry Reference Committee

**Name of SSO**: Skills Impact

***Introduction***

This Case for Change provides evidence of industry and regulatory support for the development of new Units of Competency and a Skill Set within the *AMP Australian Meat Industry Training Package*.

Over the past few years the National Meat Industry Training Advisory Council Limited (MINTRAC) has received requests to explore the feasibility of developing meat processing specific training for Pest Control. From July - December 2016 this matter was listed for discussion in the state-based Training and MI&QA Network meetings. These informal discussions indicated that there was a genuine interest in exploring this matter further. Primary focus was on the monitoring responsibilities. It was also clear that there were significant regulatory differences between States, and that this would need to be considered.

A Discussion Paper (Stage 2) was developed and feedback (17 written responses) was received from January – June 2017. In addition, the matter was listed for general discussion at the Training and MI&QA Network meetings during this period. The need for this development was also raised in the *Meat Processing IRC Skills Forecast and Proposed Schedule of Work 2017-2020*, which was provided to the Australian Industry and Skills Committee in April 2017.

The analysis of the outcomes of the discussion paper resulted in a series of recommendations, listed below, as well as the identification of options for the implementation of these recommendations.

The Meat Industry Reference Committee has noted that there is potential to use this Skill Set and Units of Competency with other industry sectors and this will be considered during the development.

#### Why develop these units and Skill Set?

Pest control programs in food processing operations should be food-safe, effective, fully documented and regularly reviewed. They must strictly follow guidelines and regulations as specified in each State.

It is essential that processing personnel analyse or review any trouble areas, service histories and records of all materials used on the premises. Many times, this will be the most important information that third-party auditors will examine.

Pest control in the future will continue to be technology driven. Automation, such as rodent stations which can be checked via portable scanners, is also increasingly impacting the industry.

#### Outcomes of research and consultation carried out as part of this case for development

MINTRAC has already undertaken a considerable amount of research in this area. A discussion paper, discussed within the industry during the first half of 2017, confirmed the need for a Skill Set focussed on monitoring by QA staff, with only one responder stating that no training development was required.

The responses confirmed that pest control monitoring was the primary requirement and focus required. While most responders outsourced their pest control programs, several responders indicated that they managed their own programs and that operator training was also required.

The workers primarily involved in monitoring were the QA staff, although several confirmed that all staff were involved in identifying pest activity. Several mentioned that the QA Manager needed skills to develop a pest control program and to understand the workings and required elements of a pest control program on their plant. Some also indicated that yardmen and security had pest control monitoring responsibilities. Only one site had a dedicated pest and vermin officer.

Most saw the proposed Skill Set as sitting as a Certificate III level, and needing to include core skills such as hygiene and sanitation, WHS and general understanding of the meat industry. Other areas considered essential were:

* the connection between why pest control is important and what the effects to product/premises are if poor pest control
* understanding the basic biology and ecology of pests likely to be encountered
* communication within the site and with the pest control company
* chemical safety
* determining roles of company personnel and pest control contractors
* recording and presenting data
* complying with QA and HACCP requirements
* how to develop an SOP for Pest Control
* understanding regulatory requirements.

There was a suggestion to create a new Unit: ‘*Overview pest control in a meat processing premises’*.

A specific question addressed the design of the pest control monitoring program and development of applicable procedures, asking whether these should be part of a Skill Set. Some said that these tasks were carried out by their contractor. However, others warned against leaving these tasks up to the contractor, were adamant that the Company needed control, and that these skills should be part of a Skill Set. It was also suggested that this could be addressed by the creation of a new unit at Certificate IV level: *Develop & implement a pest control program in a meat processing establishment.*

A series of possible Units from other Training Packages were also provided in the discussion paper for consideration.

### Recommendations based on discussion paper responses

#### Recommendation 1 – level II training

It is recommended that a specific unit be identified or developed to provide for operator training at those sites where pest control responsibilities are not outsourced.

#### Recommendation 2 – level III training

It is recommended that a *Pest Control Monitoring Skill Set* be developed, addressing the following skills:

* assessing program effectiveness
* ensuring compliance with schedules
* initiating corrective actions
* checking the work of contractors
* undertaking trend analysis and developing reports
* establishing and implementing a monitoring schedule
* communication within the site and with the pest control company.

The following knowledge requirements should be addressed:

* hygiene and sanitation
* work health and safety
* the connection between why pest control is important and what the effects to product/premises are if poor pest control
* understanding the basic biology and ecology of pests likely to be encountered
* chemical safety
* recording and presenting data
* complying with QA and HACCP requirements
* understanding and interpreting regulatory requirements.

#### Recommendation 3: level IV training

It is recommended that a new unit *Develop & implement a pest control program in a meat processing establishment* be developed for inclusion in the Certificate IV in Meat Processing (Quality Assurance) qualification.

#### Estimated impacts of proposed change

Consultations with stakeholders indicate the following benefits resulting from the proposed changes:

* better control of pest control monitoring within a food processing environment
* improved management of subcontractors
* greater capacity to meet regulatory requirements.

Potential impacts on training providers include the following.

* RTOs will need to up-skill trainers in these areas. Opportunity for this is usually offered by the industry as the units are implemented.
* training providers may incur extra costs to put new units on scope.

Risks of not proceeding with the project:

* risk of not providing the industry with appropriate training for pest control
* risk of adverse audit findings at some processing plants
* failure to address a skills gap may undermine customer confidence
* risk of poor pest control management leading to increased regulation
* WHS – safety risk to staff of not having pests effectively managed – disease, illness
* food safety – contamination of product due to inadequate pest management.

No risks in proceeding with the project have been identified.

#### Outstanding issues

There are no outstanding issues.

#### Proposed methodology

Training package development and review work will follow the standard stages of project scoping, technical development, validation, final draft, quality check, validation and endorsement.

The recommended time to complete work is 6 months to the time of submission for endorsement. If this Case for Change is approved, the next phase will be to evaluate the options for implementation of the recommendations.

The work will be informed by a Technical Advisory Committee consisting of:

* the Australian Environmental Pest Managers Association (AEPMA)
* One State Food Authority
* one RTO
* four processor representatives, including a non-meat food processor
* one IRC representative.

This group will provide the subject matter expertise and appropriate coverage of how the Skill Set and proposed units can address the key issues.

A general invitation to all processors inviting them to become part of the consultative process will be issued, and electronic consultation will occur with all those who accept. In addition, the progress and process will be discussed at all industry Network meetings (which include HR Managers, Trainers, QA mangers, Meat Inspectors and regulatory representatives) which fall within the development period.

#### Training product review status

NA

#### IRC Signoff

This Case for Change was agreed to by the Meat Industry IRC on XXXXX.

Cameron Dart

(Name of Chair) Signature of Chair