

The 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

Training Package: AMP Australian Meat Processing

How the case for change was developed

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. After discussions at Training and Meat Industry and Quality Assurance meetings held in 2016, and responses received to a discussion paper circulated in 2017, it became evident that there was a need for:

- a new pest monitoring skill set
- the identification or development of a unit of competency suitable for inclusion in the *Certificate II in Meat Processing (Abattoirs)* to provide pest control training for sites where pest control responsibilities are not outsourced
- the development of a new unit, *Develop and implement a pest control program in a meat processing establishment* for inclusion in the *Certificate IV in Meat Processing (Quality Assurance)*.

From July to December 2016 this matter was listed for discussion in the state-based Training and Meat Industry and Quality Assurance (MI&QA) Network meetings. These informal discussions indicated that there was a genuine interest in exploring this matter further. The primary focus was on the monitoring responsibilities. It was also clear that there were significant regulatory differences between states, and that these would need to be considered.

A Discussion Paper was developed and 17 written responses were received between January and 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 *Australian 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 the skill set and units of competency with other industry sectors and their potential use will be considered during development.

The case for change

Drivers for change and the evidence on which the IRC recommendation for change is based

Pest control programs in food processing operations should be food-safe, effective, fully documented and regularly reviewed. They must strictly follow the guidelines and regulations that apply in their 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.

The IRC's recommendation for change is based on considerable research undertaken by MINTRAC. A discussion paper, considered by industry during the first half of 2017, confirmed the need for a skill set focussed on pest control monitoring by quality assurance staff, with only one responder out of 17 stating that no training development was required.

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

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

Most saw the proposed skill set as being at an Australian Qualifications Framework (AQF) Certificate III level. They considered that the skill set should include core skills such as hygiene and sanitation, workplace health and safety, together with a general understanding of the meat industry. Other areas considered to be essential were:

- understanding the importance of pest control and the effects of poor pest control on product/premises
- understanding the basic biology and ecology of likely pests
- communicating within the site and with pest control companies
- chemical safety
- determining the roles of company personnel and pest control contractors
- recording and presenting data
- complying with Quality Assurance (QA) and Hazard Analysis and Critical Control Points (HACCP) requirements
- developing standard operating procedures for pest control
- understanding regulatory requirements.

There was also a suggestion that a new unit of competency, *Overview pest control in a meat processing premises*, should be developed.

A specific question asked whether the design of the pest control monitoring program and development of applicable procedures should be part of a Skill Set. Although some responses said that these tasks were carried out by a contractor, others warned against leaving these tasks up to the contractor and maintained that the company needed control, and that these skills should be part of the skill set. It was also suggested that this requirement could be addressed by creating a new unit, *Develop and implement a pest control program in a meat processing establishment*, at Certificate IV level.

A series of possible units which could be imported from other training packages were also provided in the discussion paper for consideration.

Changes recommended and how these alleviate the problem or capitalise on the opportunity

The following recommendations are 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 FBPTEC3002
- ensuring compliance with schedules FBPTEC3002
- initiating corrective actions FBPTEC3002
- checking the work of contractors
- undertaking trend analysis and developing reports FBPTEC3002
- establishing and implementing a monitoring schedule FBPTEC3002
- communicating 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)*.

Please refer to Appendix A for a list of new or changed components.

Industry support for change

Method and scale of stakeholder consultation undertaken in building the Case for Change

From July to December 2016 this matter was listed for discussion in the Meat Industry 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 to June 2017. In addition, the matter was listed for general discussion at the Training and MI&QA Network meetings during this period.

A final Discussion paper (Stage 3) outlining the recommendations, was tabled for discussion at the same Network meetings from July -December 2017. The recommendations were fully supported.

Please refer to Attachment B for details.

Overview of the issues identified by stakeholders and how they will be addressed

Issue	Proposed solution
1. Significant differences in regulatory requirements between states.	Make the choices elective and as flexible as possible.
2. Some processors used their own operators and wanted specific training available for them.	Add an operator unit to the Certificate II in Meat Processing (Abattoirs).
3. The only available unit covering the development of a pest management plan does not address either implementation or monitoring.	Develop a new unit to address identified meat industry requirements.

Dissenting views from stakeholders on the recommended approach

There was only one dissenting view from a processing company who felt they had their pest control arrangements under control and did not see the need for accredited training.

Impact of change

Impacts of recommended changes on stakeholders

Consultation 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 need for RTOs 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 add new units of competency to their delivery programs.

Risks of not implementing the changes

The risks of not implementing the changes include:

- industry will not receive appropriate training to manage pest control
- adverse audit findings at some processing plants
- failure to address a skills gap may undermine customer confidence
- poor pest control management leading to increased regulation
- workplace health and safety – increased risk of disease or illness to staff by ineffective pest management
- food safety – increased risk of contamination of product due to inadequate pest management.

No risks in proceeding with the project have been identified.

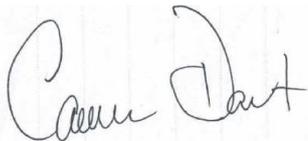
Timeframes to implement the proposed changes to training package

There is now some urgency to complete this development, and auditors are placing pressure on processors to provide evidence of training in monitoring of compliance. This development will be given high priority as soon as it is approved and it is estimated that it will take a maximum of two months to complete.

How the recommended work will implement the reforms for Training Packages agreed by COAG Industry and Skills Council (CISC) in November 2015. ¹

Reform	Response
Remove obsolete qualifications from the system	Not applicable. No obsolete qualifications were identified
Provide more information about industry's expectations of training delivery	The industry will expect this training to be delivered on the job using standard, customised industry resources. Three specified forms of assessment will be required. Unduly short training is not an issue in this industry.
Better support individuals to move more easily between related occupations	Skills gained in pest control monitoring for the meat processing sector could be utilised in other areas of food processing.
Create more units that can be owned and used by multiple industry sectors	The new level II and III units will be developed specifically to meet the requirements of the meat processing industry. However, the level IV unit could be adopted by other sectors requiring Quality Assurance training. The Skills Set will be comprised predominantly of imported units and could be readily adapted to other sectors.
Foster greater recognition of skill sets	One Skill Set will be created.

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

Name of Chair	Cameron Dart
Signature of Chair	
Date	20 February 2018

¹ More information about the CISC reforms is available at [Outcomes of the review of training packages and accredited courses](#). Reforms were to: remove obsolete qualifications from the system; provide more information about industry's expectations of training delivery; better support individuals to move more easily between related occupations; create more units that can be owned and used by multiple industry sectors; and foster greater recognition of skill sets.

Attachment A: Training Package components to change

Skills Impact

Contact details: MINTRAC

Date submitted: February 2018

Training Package Code and Name	Qualification Code and Name	IRC Name	Review status	Change Required
AMP Australian Meat Industry Training Package	AMP20316 Certificate II in Meat Processing (Abattoirs)	Meat IRC		Add one new elective Unit
AMP Australian Meat Industry Training Package	Not applicable	Meat IRC		Develop a <i>Pest Control Monitoring Skill Set</i> This will include one new Unit.
AMP Australian Meat Industry Training Package	AMP40415 Certificate IV in Meat processing (Quality Assurance)	Meat IRC		Add one new elective Unit.

Attachment B: Stakeholder Consultation Method and Scale

Stakeholder Consultation

Name of Stakeholder	Detail method(s) and Scale of Consultation
129 attendees	July – December 2016 – Meat Industry Training Network meetings
174 attendees	July – December 2016 – Meat Inspection and Quality Assurance Network meetings

75 attendees	January -June 2017 – Meat Industry Training Network meetings
136 attendees	January -June 2017 – Meat Inspection and Quality Assurance Network meetings
17 responses	Written responses to discussion paper
128 attendees	July – December 2017 – Meat Industry Training Network meetings
156 attendees	July – December 2017 – Meat Inspection and Quality Assurance Network meetings