



DEGESCH America, Inc. Newsletter

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Issue XXII



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Rodenticide Update
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Rodenticide Update

Final Risk Mitigation Measures

After fully assessing human health and ecological effects, as well as benefits, EPA is announcing measures to reduce risks associated with ten rodenticides; Brodifacoum, Bromadiolone, Bromethalin, Chlorophacinone, Cholecalciferol, Difenacoum, Difethialone, Diphacinone, Warfarin & Zinc phosphide

New safety measures announced by the U.S. Environmental Protection Agency will protect children from accidental exposure to rodent-control products. These measures will also reduce the risk of accidental poisonings of pets and wildlife. With the Agency's risk mitigation measures in place, rodenticide products will be safe, effective, and affordable for all consumers.

EPA's decision reduces rodenticide exposures to children and wildlife, while still allowing residential users, livestock producers, and professional applicators access to a variety of effective and affordable rodent control products.

Childrens' Risk Mitigation - To minimize children's exposure to rodenticide products used in homes, EPA is requiring that all rodenticide bait products available for sale to consumers be sold only with bait stations. Loose bait such as pellets will be prohibited as a bait form. A range of different types of bait stations will meet the new requirements, providing flexibility in cost.

Tiered Bait Station Requirements for Consumer-Use Products

Tier 1 – Tamper-resistant for children and dogs; weather resistant; tested according to EPA protocols; indoor and outdoor use;

Tier 2 – Tamper-resistant for children and dogs; tested according to EPA protocols; indoor use only;

Tier 3 – Tamper-resistant for children; tested according to EPA protocols; indoor use only; and,

Tier 4 – Self-certification; packaging not reasonably anticipated to release other than small quantities of bait; resistant to opening by a child less than six years old; indoor use only; non-refillable (one-time-use only).

Sale and Distribution Restrictions

The terms and conditions of registration for products containing brodifacoum, bromadiolone, difenacoum, 1

and difethialone must be amended to specify that the registrants will control distribution of the products so that they shall only be distributed to or sold in agricultural, farm and tractor stores or directly to PCOs and other professional applicators, and that registrants will not sell or distribute products containing brodifacoum, bromadiolone, difenacoum, and difethialone in channels of trade likely to result in retail sale in hardware and home improvement stores, grocery stores, convenience stores, drug stores, club stores, big box stores, and other general retailers.

Minimum Package Size Requirements

The Agency is requiring second-generation anticoagulant bait products to be sold in packages that contain ≥ 8 pounds of bait for products that are labeled for use only inside of and around agricultural buildings, and not for use in and around homes.

For second-generation anticoagulant bait products intended for use by professional applicators, the minimum permissible amount of bait per package is 16 pounds.

Use Site Restriction

For second-generation anticoagulant bait products in packages with at least 8 but not more than 16 pounds of bait, labels must state that products may only be used in and around agricultural buildings (e.g., barns, hen houses), and bear the statement “Do not use this product in homes or other human residences.”

Summary of New Restrictions

“Consumer Size” Products (Products containing ≤ 1 pound of bait)

- May not contain brodifacoum, difethialone, bromadiolone, or difenacoum (the second-generation anticoagulants).
- Loose bait forms such as pellets are prohibited.
- Each retail unit must include a bait station.
- Bait refills may be sold with bait stations in a single retail unit.
- All outdoor above ground use must be in a bait station and be applied within 50 feet of buildings.

First Generation Anticoagulant and Non-Anticoagulant Products for Professional Users (Agricultural and PCO)

- Products must contain at least four pounds of bait.
- Bait stations are required for all outdoor, above-ground placements of first-generation anticoagulant and non-anticoagulant products.
- Bait stations are required indoors if exposure to children, pets, or non-target animals is possible.
- Product labels must indicate that the product is for use only in and around agricultural buildings and that use in residential use sites is prohibited.
- Distribution to and sales in “consumer” stores including grocery stores, drug stores, hardware stores, club stores will be prohibited.
- All outdoor above ground use must be in a bait station and be applied within 50 feet of buildings.

Second-Generation Anticoagulant Products for Use Around Agricultural Buildings

Products must contain at least eight pounds of bait.

- Bait stations are required for all outdoor, above-ground placements of second-generation anticoagulant products.
- Bait stations are required indoors if exposure to children, pets, or non-target animals is possible.
- Product labels must indicate that the product is for use only in and around agricultural buildings and that use in residential use sites is prohibited.
- Distribution to and sales in “consumer” stores including grocery stores, drug stores, hardware stores, club stores will be prohibited.
- All outdoor above ground use must be in a bait station and be applied within 50 feet of buildings.

Second-Generation Anticoagulant Products for Professional Applicators

- Products must contain at least 16 pounds of bait.
- Bait stations are required for all outdoor, above-ground placements of second-generation anticoagulants.
- Bait stations are required indoors if exposure to children, pets, or non-target animals is possible.
- Distribution to and sales in “consumer” stores including grocery stores, drug stores, hardware stores, club stores will be prohibited.
- All outdoor above ground use must be in a bait station and be applied within 50 feet of buildings.

Source: EPA website

Insects Infesting Bagged Foods A Primer by Mike Holcomb

With respect to insects infesting processed food, a commonly asked question is: *Did the insect bore into the package after leaving the plant or did the insect find its way into the product during manufacture?* Questions like this have extreme liability implications. As an entomologist working with food processors, retailers and warehousemen, I get involved in this type of finger-pointing situation all the time. I must admit that solving these mysteries really keeps my intuitive skills sharpened!



Unfortunately, many of the talents needed to perform CSI-like feats are not generally taught in school. Investigators must have an understanding of :

1. Insect identification (adult and immature), as well as their feeding habits and developmental biology;
2. How the food product was manufactured, packaged, handled, shipped and stored;
3. Time and temperature variables during manufacture and distribution;
4. The level of sanitation and pest control at every step from receiving raw ingredients, through production, delivery and consumption.

When the kids open their breakfast cereal and find little wiggly or flying things, who gets the blame? Most often it is the deep-pocketed manufacturer if he prints a 1-800 number on the package, or the local grocer who in turn passes the buck (or in this case, the bug) back to the distributor, who then lays the blame onto the manufacturer.

Now, before I go any further, let me qualify all this by stating that most often there are very customer-concerned, professional people at every step along this chain of events who are more than willing to accept responsibility for their customer complaints. However, in liability cases, finger pointing can happen, and at the point a consulting entomologist is brought in to objectively review the facts and describe a probable cause so that similar incidents can be prevented. Let's look at a simple example of how such a case unfolds:

“Bugs” in a package of cookies – The consumer purchases a box of cookies at the local grocery store. The box is opened on Tuesday and three cookies are eaten; the box was then sealed and placed in a pantry. On Saturday afternoon, the consumer finds live insects in the box of cookies. The consumer dials the 1-800 number on the cookie box and registers a formal consumer complaint, threatening to bring suit against the manufacturer (baker).

The manufacturer recovers the damaged goods and contacts a consulting entomologist (our hero). Our hero makes a positive identification of the insect specimen. He looks at the code date on the package and finds it to be more than 90 days old. Other pieces of the puzzle fall into place.

The package is an unlined cardboard box with loose glue flaps and lots of bore holes leading into and out of the box. The cookies are baked at 300 degrees F. (a temperature lethal to all insect life stages) and immediately shipped to a distribution center. The bakery has no record of cigarette beetle activity (according to pheromone trap data and inspection records), and ships the product to a distribution center in their own trucks (well-managed and clean). The distribution center warehouses the cookies for up to 60 days before moving them to retail. Further investigation shows the warehouse to have a very poor insect monitoring program. It was also learned that the warehouse frequently co-mingles products (i.e., dry pet food, bagged rice and other high-risk products next to packaged snack foods), and doors are routinely left open for ventilation during warm parts of year. While the retail store shows evidence of stored product insects around some shelves, product is held here for less than a week. Based on this information, our hero concludes that the infestation **probably occurred at the distribution center.**

The conclusion in this hypothetical (and sketchy) example is based on:

1. Insect-lethal baking temperatures, just-in-time shipping practices, the detailed pest control documentation showing , and the sanitation condition of the bakery;
2. The poor sanitation , lack of pest activity monitoring, and poor storage practices at the distribution center; and
3. The rapid product turnover at the retail level which is well ahead of the life cycle of the cigarette beetle.

The manufacturer should seek a distribution facility with an understanding of Good Warehousing Practices and a viable Integrated Pest Management (IPM) program. Next case!

In reality, pest infestations are seldom this simple. However, regardless of how complex the problem is, the basic steps outlined in this example must be considered. Insects are persistent and sooner or later everyone involved with commercial food will have a consumer complaint involving insects. If you manufacture a cereal-based product, that insect is likely to be the Indian meal moth, flour beetle, cigarette beetle or other stored product insect.

Look at the various methods by which the product is manufactured and handled, make a proper species identification, compare the known biology of the identified insect to the other pieces of the puzzle, then make the call and outline a program that prevents the situation from happening again. Afterall, except in rare situation, the manufacturer is probably going to accept the blame and make restitution just to put the problem behind them. A close relationship with your business (marketing) partners, positive diagnosis, and an effective corrective action will minimize reoccurrence of the problem.



Insect Contamination Evaluation

With over 25 years of hands-on pest control experience in mills, bakeries, Pet food, and snack food plants, an MSc. degree in Entomology, as well as a former Associate Entomologist with the Okumura Biological Institute, Mike Holcomb is an IPM expert and stored products entomologist with a lifetime of international food plant experience!

Technical Directions, Inc.

Contact us for an introductory brochure or for more information about our professional services which include

- Expert witness
- Consumer complaint analysis
- Insect package penetration investigations
- Evaluation of IPM as a HACCP or GFSI prerequisite
- Insect pheromone monitoring technology
- Industrial IPM training for in-house operators

256-355-8104

e-mail HMikeL@msn.com

-- or see our web page --
www.foodipm.com

Conferences & Conventions

2012 Degesch America, Inc. Recertification School

Degesch America, Inc. Recertification School

Thursday, April 26, 2012

Stonewall Jackson Hotel

Staunton, VA

The agenda for the 2012 Degesch America, Inc. Recertification School has been finalized. The seminar is scheduled for Thursday, April 26, 2012 and will be held at the Stonewall Jackson Hotel in Staunton, VA.

Visit www.degeschamerica.com for Registration Information

Grain Elevator and Processing Society (GEAPS)



GEAPS Exchange 2012

March 3-6, 2012

Minneapolis Convention Center
Minneapolis, Minnesota

International Association of Operative Millers (IAOM)



116th Annual Conference & Expo

May 7-11, 2012

Join hundreds of milling professionals from across North America and around the world when they convene in Spokane, Washington, in 2012 for IAOM's Annual Conference & Expo to be held at the The Davenport Hotel and Tower and the Spokane Convention Center from May 7-11.

Milestones

Acquisitions

It is our pleasure to announce that effective Friday, September 16, 2011, the Columbia River Division of Degesch America, Inc. and DICO Pacific Fumigation, Inc. have merged operations. DICO founder, John Alfieri will join the current Degesch America team, bringing his 30+ years of experience in the fumigation industry. The business will operate under the Degesch America, Inc. banner from our location in Portland, Oregon.

Emergency Contact Numbers

For Chemical Spills or Emergencies: Chemtrec - (800) 242-9300
For Human or Animal Medical Emergencies: Prozar - (800) 308-4856