

30/09/2013 reference H3183

Global Proficiency Ltd for AsureQuality Ltd,
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P O Box 20474 Hamilton.

Key Industries Limited, P O Box 65070 Mairangi Bay, Auckland,
NZ Phone 09 917 1790, fax 09 917 1793. Contact Frank
Visser. email frank@keyindustries.co.nz

To whom it may concern,

Enforce

Product description: pesticide insecticide, cockroach paste (Indoxacarb)

Product use: outside food areas or no possible contact

"Passed AsureQuality assessment for food/beverage/dairy factory type B/C outside food areas or spot/ crack & crevice use with no possible contact with food, contact surfaces, vents or packaging" H3183 with conditions. This assessment was prepared by Global Proficiency Ltd using HACCP principles to determine equivalence with food standards listed below. See <http://assessedproducts.asurequality.com/>. This supports food Risk Management Programmes & other endorsements that may apply to this product include MPI regulated farm dairy approval, MPI dairy factory endorsement, MPI regulated non-dairy animal product approvals, EPA HSNO-OSH-environment approval (& previously AQIS).

Conditions: outside food areas or spot application with no possible contact with food, food contact surfaces, vents or packaging.

General conditions:

1. The product is to be used according to Manufacturer's Instructions, Good Manufacturing Practice (GMP), and applicable legislation.
2. The assessment is subject to notification of change (e.g. in formulation, raw materials or instructions) and expires on 01/10/2018).
3. The full report is attached for supplier review and verification. The assessment is activated by countersigning.

Prepared by Global Proficiency for AsureQuality Ltd...



Supplier:..... Date:.....

Scope and purpose of the assessment:

- Asurequality assessment is a non-regulated, voluntary, and evidential certification by the supplier demonstrating equivalence with food safety standards, and also that product instructions address hazards for staff & equipment. The assessment is independently confirmed, without prejudice or guarantee, using information submitted by the supplier or from other sources. Confidentiality of the product formulation is maintained using coded material identifiers in the report, and appendices containing confidential information are provided only to the supplier.
- Scope: NZ checks (FSANZ, US FDA 21 CFR/ NSF, Food Chemicals Codex, EPA NZ, EU, French culinary listings or related data for equivalent safety). NZ background (Animal Products Act, Risk Management Programmes. Detergent & Sanitiser Manufacturer's Code of Practice) Detergent & Sanitiser Standards and Analytical Methods. Quality Manual - Assessment Procedures.

Summary of assessment with risks highlighted:

- **Food safety** is according to food listing of components in the table.
- **QA & QC** (not required for non-contact).
- **Instructions.** Label (Key Industries. Enforce cockroach paste for situations specified in use directions. Contains 6g/kg Indoxacarb as paste. Warning read safety directions first. Company contacts. Hazard classifications 6.9B, 9.1C, 9.4B. Toxicity warning may cause organ damage from repeat oral high dose. Eco-toxicity harmful to aquatics etc. Toxic to terrestrial invertebrates do not apply where bees or beneficial predators may forage. Panels completed for handling precautions, personal protection, disposal, spills, first aid, notice & warnings. HSNO status. MPI nondairy animal products type D, AsureQuality type BC food areas only with no potential contact. . . Do not place paste in locations that are routinely washed or where routine cleansing operations may transfer diluted paste to food/preparation surfaces. Not on food preparation surfaces. Avoid fabrics/carpets vs. staining. Directions: For cockroaches paste points 3-5 mm. Use 2-3 paste points up to 5 paste points/m2).MSDS (Similar with added data on hazards 6.9B, 9.1C, 9.4B. May cause damage to organs with prolonged/ repeat exposure. Harmful to aquatics with long lasting effects, toxic to terrestrial invertebrates. Added information on toxicity& HSNO controls & trigger levels & approved handler not required).
- **Side effects** (Sighted EPA NZ clearance and instructions have warnings. Production side effects are not expected for non-contact).
- **Efficacy** (per prior registrations & MRLs in the table).

Contents

0 Information is to be evidential (std 0).	1 Materials safety and residues etc
2 Material (other – function)	3 Quality assurance certificate
4 Purity (or Design, formulation, fabrication and finish).	5 Instructions
6 Freedom from apparent side effects	7 Efficacy or hygiene to meet food safety margins
8 Packaging safety.	9 Summary of submitted information etc
10 Standards/References - front page/may be attached	11 Contacts.
12 Confidential information re design, formulation etc.	13 Covering letter & then 14 Raw material confidential information

Risk Rating (failure/accident)

	Chemical	Microbiological
Incidence	Low	Low
Susceptibility	Low	Low
Severity	Low	Low
Total	Low	Low

Evaluation: Note that Standards vs. submission-responses yield compliance status in each of the sections below.

Nature of information

0 Standard: Assurance information is to be evidential/cross-registered/or ex accredited bodies (and approvals may need levels of independence for toxicity and efficacy).

- Response/status: information is fair.

Raw materials:

1 Standard:

Raw materials are to be identified safe: traceably identified, non-toxic, and pure - depending on the level of contact. Raw materials are to be safe at residue levels with safety factors (simplified here eg per cross-registration of USFDA 21 CFR/ ANZF/ EU etc registrations factored for likely equivalence and recognising high 1.5 L milk consumption would have been required by FDA etc – refers to supplier confidential appendix but with identifiers excluded

(Key) Enforce H3183 30-09-13. Large safety factor for non-contact here vs calculations for accidental spraying on food. Calculation not required for paste but done elsewhere for similar solution.	Registrations column. Scope: NZ checks (FSANZ, US FDA 21 CFR/ NSF, Food Chemicals Codex, EPA NZ, EU, French culinary listings or related data for equivalent safety). NZ background (Animal Products Act, Risk Management Programmes. Detergent & Sanitiser Manufacturer's Code of Practice) Detergent & Sanitiser Standards and Analytical Methods. Quality Manual - Assessment Procedures	Purity column Scope: Purity column raw purities to be per FSANZ purity wanted (as ingredient etc) FCC7 2010-2011 with GMP indicators & FSANZ also (require Pb<2, As<1, Heavy metals <40 mg/kg). Purity column.
Formulation 100%(There is to be no potential for any contact - concentrations shown are for accidental overspray - unpermitted).	Instructions. Label (Key Industries. Enforce cockroach paste for situations specified in use directions. Contains 6g/kg Indoxacarb as paste. Warning read safety directions first. Company contacts. Hazard classifications 6.9B, 9.1C, 9.4B. Toxicity warning may cause organ damage from repeat oral high dose. Eco-toxicity harmful to aquatics etc. Toxic to terrestrial invertebrates do not apply where bees or beneficial predators may forage. Panels completed for handling precautions, personal protection, disposal, spills, first aid, notice & warnings. HSNO status. MPI nondairy animal products type D,ASUREQuality type BC food areas only with no potential contact. . . Do not place paste in locations that are routinely washed or where routine cleansing operations may transfer diluted paste to food/preparation surfaces. Not on food preparation surfaces. Avoid fabrics/carpets vs. staining. Directions: For cockroaches paste points 3-5 mm. Use 2-3 paste points up to 5 paste points/m2)	MSDS (Similar with added data on hazards 6.9B, 9.1C, 9.4B. May cause damage to organs with prolonged/ repeat exposure. Harmful to aquatics with long lasting effects, toxic to terrestrial invertebrates. Added information on toxicity& HSNO controls & trigger levels & approved handler not required). QA & QC (not required for non-contact). Unwanted' Side effects (Sighted EPA NZ clearance and instructions have warnings. Production side effects are not expected for non-contact). Efficacy (per prior registrations & MRLs in the table).
Indoxacarb, indeno oxadiazine, technical grade active ingredient 71.25+% Indoxacarb 2-isomer - 0.84% for 0.6% w/w of active Raw 1 active ingredient	EPA designation "reduced risk" USMRLs 40CFR180.565 indoxacarb cattle fat 1.5 ppm , milk 0.15ppm, milk fat 4 ppm. NZFSA brassicas 0.5ppm, head lettuce 1ppm, pome fruits 0.5 ppm, ACVM Steward approval is for vegetables, .for apples, pears and grapes. Brassicas to 0.5 ppm, lettuce 1ppm, pome fruits 0.5 ppm, and no entry for animals/milk. USAFDA Toxicity summary w/o concern 18/07/02, 40CFR part 185 food not found?	NZ MRLs for agricultural compounds. Brassicas 0.5, grapes 0.6, lettuces 1, pome fruits 0.5 ppm . Codex 0.1, & milk fats 1 mg/kg and long list. Purity n/a for non-contact
Raw 2 ID sighted surfactant dispersant minor	40CFR 180.. Exempted from requirement from tolerance when used with certain other pesticides	Purity is not applicable for low concentration/ low contact
Raw 3 antifoam trace	21CFR & FSANZ Food Standards Code ingredient	Purity is not applicable for low concentration/ low contact
Raw 4 & 5 food ingredient trace	FSANZ & 21CFR processed food ingredient listing	Purity is not applicable for low concentration/ low contact
Raw 6 preservative trace	FSANZ unfound, 21CFR found as slimicide for paper/board at low level	Purity is not applicable for low concentration/ low contact
Raw 7 preservative trace	Food listing unfound - trace	Purity is not applicable for low concentration/ low

0.001%		contact
Raw 8 & 9 thickener minor	21CFR & FSANZ Food Standards Code ingredient	Purity is not applicable for low concentration/ low contact
Raw 10 preservative minor/trace	21CFR & FSANZ Food Standards Code ingredient (maybe unwanted by Japan?)	Purity is not applicable for low concentration/ low contact
Raw 11 Food ingredients major	"Food ingredients" safe	Purity is not applicable for low concentration/ low contact
Raw 12 Ubiquitous major carrier	Ubiquitous and safe	Purity is not applicable for low concentration/ low contact

- Food safety is according to food listing of components in the table.

2 Standard:

Raw materials should be suitable- e.g. sanitisers for sanitising etc

- Raw materials comply per food safety listings/data for similar use in section 1 & refer to side effects in section 6.

3 Standard:

Additives are to be manufactured consistently safe - per quality assurance to ISO 9002 (& labs should be certified to ISO Guide 25). Detergent and Sanitisers should be listed with the Code of Practice Group (see manufacturers parent code).

- QA & QC (not required for non-contact).

4 Standard:

Formulation quality control - continues 3 above.

Raw materials should be controlled at manufacturers stated levels (+/- 5% x level and this can be covered by quality assurance but the manufacturer will have make/QC sheets..). Purity: The target should be taken from the raw materials standards in Food Chemicals Codex (Arsenic, Heavy metals and Foreign Matter).

- QA & QC (not required for non-contact).

Quality assurance of use

5 Label: to provide for quality assurance of use; trace-ability and description including mode of use (per ref 6 method 3.5 a) to be complete and clear (c.f. farms check list below).

- **Label instructions are to provide quality assurance of the method of use for efficacy, safety and side effects by addressing key points:**
- **Product name •, batch •, expiry • etc**
- **Distributors/Manufacturers name and address •**
- **The description of the substance e.g. detergent/ sanitizer/ detergent-sanitiser, general purpose/ heavy duty detergent, nature of sanitizer active, level of foaming (low, medium and high), routine or periodic treatment, and compatibility to levels of hardness. (These can be similar to Australian Standards & AQIS). •**
- **The description of the type of equipment to be treated •**
- **The use instructions concentration, temperature in and out, time/and typical volumes. All the steps in the cleaning routine, the hot temperatures at incoming and dump, permitted cold steps, the acid and alkali routine, and reference to periodic cleaning. They include safe residue minimisation (drainage, & rinse before next milking or air purge etc).**
- **Warnings about possible harmful effects and the other regulatory etc requirements should be met but may be outside the food safety scope.**
- **Note NZ may use e.g. 10L/cluster, enough solution for re-circulation, 75C initial solutions (or to not damage & dump the pipeline machine at 65C and BMT at >55C).**
- **Instructions.** Label (Key Industries. Enforce cockroach paste for situations specified in use directions. Contains 6g/kg Indoxacarb as paste. Warning read safety directions first. Company contacts. Hazard classifications 6.9B, 9.1C, 9.4B. Toxicity warning may cause organ damage from repeat oral high dose. Eco-toxicity harmful to aquatics etc. Toxic to terrestrial invertebrates do not apply where bees or beneficial predators may forage. Panels completed for handling precautions, personal protection, disposal, spills, first aid, notice & warnings. HSNO status. MPI nondairy animal products type D, AsureQuality type BC food areas only with no potential contact. . . Do not place paste in locations that are routinely washed or where routine cleansing operations may transfer diluted paste to food/preparation surfaces. Not on food preparation surfaces. Avoid fabrics/carpets vs. staining. Directions: For cockroaches paste points 3-5 mm. Use 2-3 paste points up to 5 paste points/m²).MSDS (Similar with added data on hazards 6.9B, 9.1C, 9.4B. May cause damage to organs with prolonged/ repeat exposure. Harmful to aquatics with long lasting effects, toxic to terrestrial invertebrates. Added information on toxicity& HSNO controls & trigger levels & approved handler not required).

Performance

6 Standard:

To be free from apparent side effects: inc taint, corrosion, inhibition, insolubility, market, or other effects.

- Side effects (Sighted EPA NZ clearance and instructions have warnings. Production side effects are not expected for non-contact).

7 Standard: Efficacy:

Efficacy: for detergents to clean and sanitisers to sanitise - to complete their part in sanitation systems to minimum food safety standards - and to industry established safety margins according to the particular product/process. This uses laboratory methods. Or it uses product outturn microbiological performance, as well as plant visual or microbiological status.

- Efficacy (per prior registrations & MRLs in the table).

8 Standard: containers/transport to be safe

- Response/status: is accepted according to the history of care.

9 Attachments:

- NZ Application form, instructions & formulation in confidence.

10 Standards are listed in the introduction and concentration table and references may be attached to the assessment file.

11 Contacts

- Bob E J Hutchinson PhD, Marion Buckley-Smith PhD for chemicals & otherwise n/a for Australia.

12 The formulation in confidence follows & is not for public circulation

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Visser. email frank@keyindustries.co.nz

Dear Frank Visser,

Please find attached your assessment report for any questions or suggestions and the invoice and web listing will follow after

Enforce

Product description: pesticide insecticide, cockroach paste (Indoxacarb)

Product use: outside food areas or no possible contact

Status: passed AsureQuality assessment factory reviewed, \$230 against O/N -

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