

19/08/2015 ref H2584

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 or Karen Thode karen@keyindustries.co.nz

To whom it may concern,

#### Vendetta

- Product description: pesticide insecticide (cockroach gel bait)
- Product use: for control of insect pests listed in instructions


**"Passed AsureQuality assessment for food/beverage/dairy factory to outside of food/storage areas or with no potential contact H2548" 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: use per manufacturer instructions type B/C - outside food / storage areas except where conditions such as spot/ crack-crevice application prevents food risk from pests & pesticide.**

#### Conditions generally:

- There is to be no potential contact - with food, food contact surfaces, vents or packaging.
- The product is to be used according to Manufacturer's Instructions, Good Manufacturing Practice (GMP), and applicable legislation.
- The assessment is subject to notification of change (e.g. in formulation, raw materials or instructions) and expires on 19/08/2020).
- The full report is attached for supplier review and verification. The assessment is activated by countersigning. .

Prepared by Global Proficiency for AsureQuality Ltd...



Supplier:.....*Karen Thode*.....

Date:.....19/08/2015.....

#### 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:

- Prior information/ registrations (MPI non-dairy approved type B. Renewed AsureQuality type B/C).
- Food safety/toxicity (by non-contact with fair safety factors calculated vs residue toxicity/ MRLs).
- QA (unfound unrequired for low contact).
- QC specs (Unfound. Unrequired for non-contact. Micro safety by anhydrous formula, non-contact & regular inspection and replacement)
- Instructions:
  - Label (Vendetta Cockroach Gel Bait. Active is Abamectin 0.5 g/kg, HSNO approval code HSR100408. For control of cockroaches per directions for use. Read directions. Hazards to humans & domestic animals. Caution causes moderate eye irritation. Avoid contact with eyes & clothes. Wash after handling and before eating.. Eco-toxic hazards for fish & fish & wildlife & do not contaminate water.. Avoid electrical equipment v s electric shock. Directions. Do not apply to humans, animals, clothing or bedding. Do not contaminate feed or food or food preparation surfaces, dishes, kitchen utensils or food containers. Do not use residual insecticide sprays near Vendetta gel bait placements. NZFSA non-dairy animal products type D. AsureQuality type B & C food areas only with no possible contact. Use as a spot or crack & crevice treatment for indoor control of cockroaches in residential areas including food/feed areas for institutional, warehousing, restaurants, food processing plants, supermarkets, hospitals, nursing homes, motels, hotels, schools, laboratories, computer facilities, buses, boats/ships, aircraft, trains, pet shops and zoos. Includes non-food/feed areas list and food/feed areas list. Food/feed areas list (avoids while food is exposed/ being served). . Details for injection device and crack crevice etc application. Do not apply where it may be washed away including to food feed contact surfaces. Avoid exposed surfaces, inspect and re-apply as necessary. Notes on aircraft cockpit.

- Notes on application rate per area. Notes on application of gel. Manufacturer and distributor details).
- MSDS (is similar & adds hazard classes 6.5b, 9.1a, 9.4b. Low oral toxicity if swallowed. May cause moderate eye irritation. May cause mild skin irritation. Eco-toxic very toxic to fish & freshwater invertebrates. Composition data. Physical and chemical detail. Toxicological detail LD50 oral rat >5000 mg/kg, dermal rabbit >5000 mg/kg, inhalation n/a, eye effects clearing in 72 hours, & sensitisation negative).
- Unwanted effects (HSNO: refer EPA NZ system scope & label & MSDS. Production side effects ok by non-contact).
- Hygiene efficacy (by reviews and prior registrations of main active/s)

#### Contents (This is a simplified report with sections 2-11 replaced by a summary on p1 and the table in section 1)

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-moderate (post-heat step)
Severity	Low	Low-high
Total	Low	Low-moderate (post-heat step)

**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).**

- Prior information/ registrations (MPI non-dairy approved type B. Renewed AsureQuality type B/C).

#### 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**

#### Response

(Key) Vendetta H2584 19-08-2015	Registrations column. Scope: NZ checks (NICNAS AICS, 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.
HACCP analysis instructions summary. & attached table has concentrations & carryover. Note FDA relegates residuals & attractants outside food areas - so as to avoid insect fall. Exception crack & crevice control.	Label (Vendetta Cockroach Gel Bait. Active is Abamectin 0.5 g/kg, HSNO approval code HSR100408. For control of cockroaches per directions for use. Read directions. Hazards to humans & domestic animals. Caution causes moderate eye irritation. Avoid contact with eyes & clothes. Wash after handling and before eating.. Eco-toxic hazards fo fish & fish & wildlife & do not contaminate water.. Avoid electrical equipment v s electric shock. Directions. Do not apply to humans, animals, clothing or bedding. Do not contaminate feed or food or food preparation surfaces, dishes, kitchen utensils or food containers. Do not use residual insecticide sprays near Vendetta gel bait placements. NZFSA non-dairy animal products type D. AsureQuality type B & C food areas only with no possible contact. Use as a spot or crack & crevice treatment for indoor control of cockroaches in residential areas including food/feed areas for institutional, warehousing, restaurants, food processing plants, supermarkets, hospitals, nuring homes, motels, hotels, schools, laboratories, computer facilities, buses, boats/ships, aircraft, trains, pet shops and zoos. Includes non-food/feed areas list and food/feed areas list. Food/feed	MSDS (is similar & adds hazard classes 6.5b, 9.1a, 9.4b. Low oral toxicity if swallowed. May cause moderate eye irritation. May cause mild skin irritation. Eco-toxic very toxic to fish & freshwater invertebrates. Composition data. Physical and chemical detail. Toxicological detail LD50 oral rat >5000 mg/kg, dermal rabbit >5000 mg/kg, inhalation n/a, eye effects clearing in 72 hours, & sensitisation negative).

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HACCP analysis for aspects other than instructions	Prior information/ registrations (MPI non-dairy approved type B. Renewed AsureQuality type B/C). Food safety/toxicity (by non-contact with fair safety factors calculated vs residue toxicity/ MRLs). QA (unfound unrequired for low contact) QC specs (Unfound. Unrequired for non-contact. Micro safety by anhydrous formula, non-contact & regular inspection and replacement)	Unwanted effects (HSNO: refer EPA NZ system scope & label & MSDS. Production side effects ok by non-contact). . Hygiene efficacy (by reviews and prior registrations of main active/s)
HACCP analysis for aspects other than instructions	Prior information/ registrations (MPI non-dairy approved type B). Food safety/toxicity (by non-contact with fair safety factors calculated vs residue toxicity/ MRLs). QA (unfound unrequired for low contact) QC specs (Unfound. Unrequired for non-contact. Micro safety by anhydrous formula & dilution immediately before use)	Unwanted effects (HSNO: refer EPA NZ system scope & label. Production side effects ok by non-contact). . Hygiene efficacy (by reviews and registrations of main active/s)
Raw 1 pesticide	NZ MRL of Ag compounds Liver MRL 0.01 5 mg/kg, mammalian fats 0.02 mg/kg, meat 0.01 mg/kg and no other listings. Australian MRLs not applicable for NZ apple 0.01, cattle edible offal 0.1, cattle fat 0.1, cattle meat 0.005, cattle milk 0.005, citrus fruits 0.01, cotton seed 0.01, eggplant 0.02, hops dry 0.1, pear 0.01, peppers 0.02, sheep edible offal 0.05, sheep meat in fat 0.05, tomato 0.01, strawberry 0.02.	FAO WHO An ADI of 0-0.002 mg/kg bw was established for the sum of abamectin and its 8,9-Z-isomer. In order to harmonize the MRLs with those proposed by JECFA, the Meeting suggested that the MRLs be modified as follows: cattle edible offal to be removed; cattle liver and cattle fat, 0.1 mg/kg; and cattle kidney, 0.05 mg/kg. The value for milk remained 0.005
Raw 2 Other ingredients edible gel matrix	Other ingredients edible gel matrix apparently safe	

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- Food safety/toxicity (by non-contact with fair safety factors calculated vs residue toxicity/ MRLs).

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

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HACCP analysis instructions summary. & attached table has concentrations & carryover. Note FDA relegates residuals & attractants outside food areas - so as to avoid insect fall. Exception crack & crevice control.	Label (Vendetta Cockroach Gel Bait. Active is Abamectin 0.5 g/kg, HSNO approval code HSR100408. For control of cockroaches per directions for use. Read directions. Hazards to humans & domestic animals. Caution causes moderate eye irritation. Avoid contact with eyes & clothes. Wash after handling and before eating.. Eco-toxic hazards to fish & fish & wildlife & do not contaminate water.. Avoid electrical equipment v s electric shock. Directions. Do not apply to humans, animals, clothing or bedding. Do not contaminate feed or food or food preparation surfaces, dishes, kitchen utensils or food containers. Do not use residual insecticide sprays near Vendetta gel bait placements. NZFSA non-dairy animal products type D. AsureQuality type B & C food areas only with no possible contact. Use as a spot or crack & crevice treatment for indoor control of cockroaches in residential areas including food/feed areas for institutional, warehousing, restaurants, food processing plants, supermarkets, hospitals, nursing homes, motels, hotels, schools, laboratories, computer facilities, buses, boats/ships, aircraft, trains, pet shops and zoos. Includes non-food/feed areas list and food/feed areas list. Food/feed areas list (avoids while food is exposed/ being served). . Details for injection device and crack crevice etc application. Do not apply where it may be washed away including to food feed contact surfaces. Avoid exposed surfaces, inspect and re-apply as necessary. Notes on aircraft cockpit. Notes on application rate per area. Notes on application of gel. Manufacturer and distributor details).	MSDS (is similar & adds hazard classes 6.5b, 9.1a, 9.4b. Low oral toxicity if swallowed. May cause moderate eye irritation. May cause mild skin irritation. Eco-toxic very toxic to fish & freshwater invertebrates. Composition data. Physical and chemical detail. Toxicological detail LD50 oral rat >5000 mg/kg, dermal rabbit >5000 mg/kg, inhalation n/a, eye effects clearing in 72 hours, & sensitisation negative).
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Abamectin B1 CAS071751-42-2 sum of avermectin B1a, B1b, (Z)-8,9-B1a&b from MGK 0.05% Raw 1 pesticide	NZ MRL of Ag compounds Liver MRL 0.01 5 mg/kg, mammalian fats 0.02 mg/kg, meat 0.01 mg/kg and no other listings. Australian MRLs not applicable for NZ apple 0.01, cattle edible offal 0.1, cattle fat 0.1, cattle meat 0.005, cattle milk 0.005, citrus fruits 0.01, cotton seed 0.01, eggplant 0.02, hops dry 0.1, pear 0.01, peppers 0.02, sheep edible offal 0.05, sheep meat in fat 0.05, tomato 0.01, strawberry 0.02.	FAO WHO An ADI of 0-0.002 mg/kg bw was established for the sum of abamectin and its 8,9-Z-isomer. In order to harmonize the MRLs with those proposed by JECFA, the Meeting suggested that the MRLs be modified as follows: cattle edible offal to be removed; cattle liver and cattle fat, 0.1 mg/kg; and cattle kidney, 0.05 mg/kg. The value for milk remained 0.005
Other ingredients edible gel matrix from MGK 99.95% Raw 2 Other ingredients edible gel matrix	Other ingredients edible gel matrix apparently safe	

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Dear Frank Visser and Karen Thode,

Please find attached your assessment (and this covering letter is not part of it). Please let us know added questions or suggestions. The invoice and web listing should follow later. The formula IDs section is included. Thanks and let us know if we can help in any way.

#### Vendetta

- Product description: pesticide insecticide (cockroach gel bait)
- Product use: for control of insect pests listed in instructions
- Status: passed AsureQuality assessment factory new \$270, against O/N -

**"Passed AsureQuality assessment for food/beverage/dairy factory to outside of food/storage areas or with no potential contact H2548" 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: use per manufacturer instructions type B/C - outside food / storage areas except where conditions such as spot/ crack-crevice application prevents food risk from pests & pesticide.**

#### Conditions generally:

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