



News & Views

A Monthly Publication Dedicated to the Feed, Seed, Grain and Farm Supply Industries of Wisconsin

Somebody Asked ■

Q.: With the concern regarding mold and mycotoxins in this year's corn harvest, what assurance do I have regarding the quality of the DDGs that I'm getting from the state's ethanol plants? Are they testing their inbound corn loads?

A.: Short answer: yes, they are. The longer answer is yes, but in a variety of ways and manners.

A quick survey of Wisconsin ethanol plants has revealed plants which are utilizing everything from professional testing services on both inbound and outbound loads to random "black light" testing of inbound corn loads. Since the mycotoxin will concentrate in the DDGs, ethanol plants have been very wary of this year's crop and the potential for feeding issues. Testing has ensued as a result.

What assurance you might receive from ethanol plants to reassure both yourself and your livestock customers as to the quality of product will probably vary by plant. We would suggest however that it would not be out of line to request and receive written confirmation that ongoing testing is occurring. But, even with this, just be aware that testing of any product is only as good as the sampling of the product that is done.

In a related note, the toxin most associated with corn is aflatoxin. However we have heard reports of vomitoxin, which has been normally associated with wheat, showing up in corn samples. And yes, we have heard reports of "vomo" getting to swine diets in other states with nasty results.

Just so you are aware, the following are FDA advisory guidelines for allowable limits of vomitoxin in various livestock species. ("Vomo" is measured in parts per million (ppm). The limits are listed first for those in grains & grain by-products

and then in parentheses for the allowable level in finished feed.)

- 10 ppm (five ppm) for ruminating beef and feedlot cattle older than 4 months with grain and grain by-products not to exceed 50% of the diet,
- 10 ppm (five ppm) for chickens with grain and grain by-products not to exceed 50% of the diet,
- five ppm (one ppm) for swine with grain and grain by-products not to exceed 20% of the diet, and
- five ppm (two ppm) for all other animals with grain and grain by-products not to exceed 40% of the diet.

As an additional reminder we are also including a listing of FDA allowable limits for aflatoxin. (The following are FDA action levels for aflatoxin in livestock feed. The level, it should be noted, is more stringent than for vomitoxin. That is, for aflatoxin the levels are parts per *billion* (ppb) rather than parts per million, as is the case for "vomo.")

- five parts per billion (ppb) for horses and rabbits;
- 20 ppb for swine and catfish;
- 30 ppb for lactating dairy cattle, laying hens and breeding ruminants, poultry and mink;
- 60 ppb for ruminants older than three months being raised for slaughter;
- 100 ppb for poultry being raised for slaughter; and
- 10 ppb for all other animals including pet animals

We also wish to point out a couple other points of which you should be aware regarding this issue. The FDA levels for vomitoxin are "advisory" and the levels for aflatoxin are described as "action." The difference is subtle but important. "Advisory" levels are just that; the FDA issues them to advise industry as to what safe levels of a contaminant are allowable assuming a margin of safety. However, there is not a

“hard line” at which you can not feed. It’s basically advice not to feed greater than those levels. But is it forbidden? No.

Action levels, as those for aflatoxin, are a completely different story. These are defined levels above which the FDA is permitted to begin regulatory action. That said, you should be aware grains with mycotoxin(s) exceeding the appropriate action, advisory or guidance levels **may be** considered by CVM as adulterated, and in some cases deemed unfit for use in animal feed.

So can I blend one load of corn with a high level of mycotoxin with other grain to get a resulting lower level of a mycotoxin? The FDA also has a policy, with one exception, that blending of “clean” grain with adulterated grain is **generally not permitted** and the final product resulting from blending is unlawful, regardless of the level of the contaminant. That one exception is allowed under very specific special provisions and it is *not* something you can do on your own. Those special provisions are:

- States may make a written request to CVM for permission to blend corn for up to a year to meet the FDA aflatoxin action levels for certain animals (feedlot cattle, mature poultry, finishing swine, etc.),
- states must demonstrate that an extraordinary situation exists (e.g., unusual drought conditions),
- permission is granted to the State and the State is responsible for ensuring the activity is conducted safely,
- to date, CVM has not permitted blending of corn with > 500 ppb total aflatoxins, and
- FDA aflatoxin action levels are still applicable.

Handling Wet Corn■

As a follow-up to the article above, earlier this month the folks at Kansas State University did an hour-long webinar on grain drying and handling a wet harvest. The program covers the following topics and more:

- Harvest practices that can minimize damage and subsequent quality management problems.

- How to dry high-moisture grain to prevent further damage, maintain quality in subsequent storage, and maximize safety by preventing dryer fires.
- How best to manage grain once it emerges from the dryer.
- General practical tips and suggestions, as well as questions that were submitted after the formal program concluded.

If you haven’t seen it, it’s worth an hour of your time. The link is as follows:

<https://www1.gotomeeting.com/register/817203536>

Propane Hours of Service■

Given the mess this harvest season is across the whole upper Midwest, a direct result has been skyrocketing demand for propane gas to fuel grain dryers. This has meant longer lines at terminals for supply. Feeder tanks at terminals, which normally are used to load trucks, have been emptied with trucks then having to be filled more slowly directly from the pipeline. The result is longer and longer waits to load. And then the drivers run up against the hours of service rules.

Currently federal regulations allow propane delivery operations for crop dryers to be exempt from the hours of service limits for the extent of the planting and harvest seasons in each state respectively. For Wisconsin, that is March 15 to Dec 15th.

Outside of this date range, Wisconsin employers can self-declare an “emergency” that would exempt INTRASTATE propane delivery drivers from the hours of service limits for the length of the declared period. When INTERSTATE operations are conducted, the Wisconsin self-declared exemption stops at the state-line and the driver is limited to the dates specified by the state being entered. Please follow this link for a listing of state specific exemptions, along with downloadable copies of each state’s declaration:

<http://www.npga.org/i4a/pages/index.cfm?pageid=832>

If you are planning to self-declare a propane emergency, but are concerned with the requirement

that at the end of the "emergency period" your drivers must have 24 consecutive hours off-duty hours, please consider the following:

- Establish another emergency period from Nov 27th thru Dec 24th, with the drivers off-duty on Christmas Day.

You must also notify the Wisconsin Department of Transportation, Division of State Patrol of such declarations by fax or first class mail within 30 days or by the end of the calendar year, whichever is greater. Each employer must also maintain the documentation for one year and make it available upon request of a traffic officer or state patrol inspector.

In addition, WASA, along with the Cooperative Network and the Wisconsin Propane Gas Association, have successfully requested the Wisconsin governor declare a statewide emergency which would eliminate both the necessity that an individual propane hauler individually declare an emergency and observe the "24-hour off" rule described above. The governor's emergency declaration is in effect right now until December 1, 2009. A copy of that declaration has been included with this newsletter for your use.

In either a self-declared or state-wide emergency declaration, there are a few items regarding any hours of service exemption of which you and your drivers should be aware:

- It is limited to an area within a 100 air-mile radius from the source of the commodities or the distribution point for the farm supplies
- Make sure each of your propane drivers is aware they are exempt from hours of service and have each of your affected driver carry a physical copy of the emergency declaration with them for each and every state in which you wish to have the exemption. Just like your drivers, not all law enforcement may have received the message, it's better to be safe than sorry.

WASA Superposter■

This month, the Genetic Information Non-discrimination Act goes into effect. A provision of that law is a new labor law poster requirement which replaces the current Equal Employment Opportunity Commission Poster. There are companies which are advertising compliance kits for just this one poster which top over \$100. Save yourself some money and get the WASA Superposter covering all Wisconsin and federal posting requirements for only \$15.

If you have purchased copies of the Superposter to comply with both state and federal labor law posting requirements, and have *not* yet received this specific new self-adhesive poster insert, please contact the WASA office.

In order to determine if you need the update, simply look at the poster and find the bottom row, second from the right poster. If it has a header that states "Equal Employment Opportunity is THE LAW," please contact us to get a new insert. Once you receive it, remove the backing of the enclosed new poster and apply it over the older version on your poster.

If your version of the Superposter doesn't have "THE LAW" poster in this location, please contact the WASA office as you have an out-of-date Superposter which needs to be replaced in whole.

WASA Directory Update■

The following updates should be made to your WASA Directory.

New:

**Walinga USA Inc.
1190 Electric Ave.
Wayland, MI 49348
Phone: (800) 466-1197
Fax: (616) 877-3474**

Looking Down the Road■

**Jan. 28-29 WASA Convention and Trade Show, held in conjunction with the Corn/Soy Expo
Kalahari Resort, Wisconsin Dells**