



News & Views

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

Fumigation Plans ■

We have recently received questions regarding the need for Fumigation Management Plans (FMP). This is a label requirement and impacts most products distributed in the last couple of years nationwide. They are required for use of all fumigants containing aluminum or magnesium phosphide. This includes products like Degesch Phostoxin Tablets or Pellets, Detia Phos Tablets or Pellets, Fumitoxin Tablets or Pellets, Gastoxin Fumigation Tablets or Pellets and others. *It is the responsibility of the applicator to have the FMP in place, whether that applicator is a hired outside professional or a member of your in-house staff.*

The FMP requirement is intended to ensure a safe and effective fumigation and is listed in the manual that accompanies the fumigant as part of its label. The manual provides guidance for developing a FMP. FMP templates are available through the product manufacturer and other sources. FMPs do not require prior approval, but are required prior to fumigation and are subject to inspection. FMPs must be maintained on file for a minimum of three years. A model FMP template is available from Degesch, (www.degeschamerica.com/download.html) or by contacting the WASA office. Please note: it is important that all applicators refer to the label and manual provided with the specific fumigant when developing a plan to ensure that all aspects of the label is covered.

In addition to having an FMP and posting the bins that have been fumigated, it is important to notify the local fire department of all areas that have been treated. Recently, 10 firefighters and four other individuals were hospitalized after being exposed to phosphine fumes during a grain bin fire. While fighting the blaze, crews discovered the placard showing the presence of the fumigant.

FDA's New Feed Rule ■

As you are probably aware, the U.S. Food and Drug Administration (FDA) has recently released its proposed rulemaking to tighten bovine spongiform encephalopathy regulations (BSE, also known as "mad cow disease") to help further protect consumers. All of the proposed prohibitions, except for those related to tallow, have already applied to cattle feed since 1997, assuming the rule is adopted as proposed.

As proposed, for feed manufacturers and distributors, current regulations (except for tallow) are not affected. Essentially, FDA is not proposing to change any of the currently prohibited items in the BSE feed rule. The proposed rule would allow plate waste, blood and blood products, gelatin, milk and milk products and poultry litter to continue to be legal to feed to cattle if this rule is adopted.

However, FDA is now proposing to prohibit brains and spinal cords from cattle 30 months of age or older in all feed, including for non-food animals. Similarly, dead and downer animals would not be allowed in any feed if the brains and spinal cords are not removed. For feed manufacturers, there would be no changes in the way business is done if this rule is final, as these changes (regarding brain and spinal cord removal) will have been made before the ingredients arrive in the feed mill with one exception. It would essentially impact renders that would somehow have to remove brains and spinal cords from their stock. This is a procedure which most renders are not set up to currently do.

Regarding tallow, FDA is proposing to change the beef fat/tallow ingredient definition. The current AAFCO Animal Fat definition allows a maximum of 1.0% insoluble impurities. The world standard is now 0.15%, and FDA is proposing this level. If this rule is finalized, no beef fat (tallow) could be sold for feed (this does not apply to industrial uses of tallow) with more than 0.15% insoluble impurities.

This would not apply to other fat forms, only beef. So, tallow that feed firms buy would need to meet this standard to be utilized in feed.

The proposed rule says that tallow produced from the prohibited materials in this rule must meet the 0.15% insoluble impurities threshold. This means that tallow made from either brains and spinal cords of animals over 30 months of age, or from dead or downers from which the brains and spinal cords have not been removed, must meet the 0.15% level. All other tallow from rendering operations and packing plants may exceed this level up to the 1.0% for the AAFCO Animal Fat definition. The majority of tallow traded in the US, we are told, meets the 0.15% level.

While public comment is invited on the rule and nothing is final just yet, these proposed regulations build on a series of firewalls that include FDA's 1997 feed regulation which prohibits the use of certain mammalian-origin proteins in ruminant feed (e.g. for cattle and sheep), but allows these materials to be used in feed for non-ruminant species. The removal of high-risk materials from all animal feed - including pet food -- will protect against the transmission of the agent of BSE that could occur either through cross-contamination of ruminant feed with non-ruminant feed or feed ingredients during feed manufacture and transport, or intentional or unintentional misfeeding of non-ruminant feed to ruminants on the farm.

Sources: AFIA & NGFA

Aflatoxin Rules

Although we are not aware of any problems with aflatoxin here in Wisconsin, the FDA has been petitioned by at least two states -- Missouri and Iowa -- to exercise enforcement discretion this year to permit the blending of corn containing aflatoxin exceeding 300 p.p.b. to reduce the aflatoxin content of the resulting mixture so it can be used as feed for appropriate species authorized under FDA's action level guidelines. (See nearby table.) Although FDA has enforcement discretion, blending of aflatoxin-tainted lots in order to reduce the content of aflatoxin is not currently allowed. For example, blending a load with 600 p.p.b. with an equal

amount of non-aflatoxin corn to achieve an overall presence of 300 p.p.b. is not allowed. The resulting lot, under FDA rules, would be considered adulterated and not be able to be fed. This is the rule the states of Iowa and Missouri are requesting the FDA temporarily use discretion not to enforce.

Aflatoxin Commodities and Species Level

(in parts per billion)

- 20 p.p.b.: For corn, cottonseed meal and other animal feeds and feed ingredients intended for dairy animals; for animal species or uses not specified below, or when the intended use is not known.
- 20 p.p.b.: For corn and other animal feeds and feed ingredients, but excluding cottonseed meal, intended for immature animals.
- 100 p.p.b.: For corn and peanut products intended for breeding beef cattle, breeding swine or mature poultry (e.g., laying hens).
- 200 p.p.b.: For corn intended for finishing swine (100 pounds or more).
- 300 p.p.b.: For cottonseed meal intended for beef cattle, swine or poultry (regardless of age or breeding status).
- 300 p.p.b.: For corn intended for finishing beef cattle (e.g., feedlot cattle).

Among the factors FDA will consider in deciding whether and how to exercise its enforcement discretion for aflatoxin are: 1) whether the incidence of aflatoxin is localized within specific parts of a state, or whether it is more state-wide, regional or national in scope; and 2) whether there are sufficient available feed markets for livestock and poultry within a state or region to accommodate the levels of aflatoxin being found.

It is important to note that while current FDA rules do not allow blending "down" of a lot containing aflatoxin, it is permissible to blend or combine a lot with other lots provided the action level of the resulting lot is the highest of the beginning lots. For example, combining a 200 p.p.b. lot with a 50 p.p.b. lot would mean the end lot could only be fed to species allowed to have 200 p.p.b. fed. swine, etc.).

Source: NGFA & WASA

Updated Super Poster

We have a new edition of the all-in-one WASA Super Poster available. It fulfills all current posting requirements, including the new USERRA poster, in one very convenient poster. Put it up and you're done with the requirement to have all 13 of the posters displayed. Members of the WASA Loss Control Program have already received their copy as a benefit of the program.

At a cost of \$5.28 postpaid (compared to others offering the same thing at over \$100), you can't afford not to get a Super Poster and be done with it.

A Friendly Reminder

We were reminded of this item the other day, when we saw a used truck being operated while we were visiting a facility. The name on the truck cab didn't match the name of the company using it. We learned the operation which we were visiting had recently purchased the used truck from the other operation whose name and USDOT number was still on the truck.

We would suggest it would be a good practice to simply spray paint over any references to your business, and especially the USDOT number, on vehicles that you sell. Should the vehicle be stopped by law enforcement regarding violations, the potential time and energy that will be expended in straightening up the resulting mess by you, could have and would have been simply addressed by a can of spray paint and a couple minutes at the truck.

Email Address Request

Several members have stated they prefer to receive communications (including this newsletter) from WASA in email form and have asked why WASA does not send out more information in that format. These members have also stated that for them email: 1) provides a format in which it can easily be decided if the content is relevant to their operation, 2) can be read quickly, and 3) generally bubbles to the top of their reading faster than hard print material.

The answer is simply that we don't have a substantial number of member's emails. And if you're receiving this issue in hard copy, that means

we don't have yours.

First, let me say that we have no intention whatsoever of discontinuing the printed materials that we distribute for those that wish to receive them in that format. However, delivery by email of the newsletter and various mailings would save your association substantial costs if the majority were delivered via email. Secondly, if we were able to deliver via email to a substantial majority of the members we would be able to address much more information to the membership than we are currently able to do given the cost constraints of ever increasing postage. And lastly, if we have your email it will never be distributed to anyone outside our office and, in addition, your email address will be hidden from all other email recipients.

To these ends, if you have an email address to which you would like WASA communications directed, please email us at info@wasa.org with "WASA email" in the subject line. In the message body, just write the name of the business with which the email is affiliated. It can be a personal, home email or a work email, it doesn't matter. That's all you have to do. We'll do the rest.

Looking Down The Road■

- Nov. 2 & 3 4-State Dairy Beef Conference
Kahler Grand Hotel, Rochester MN
- Dec. 4 – 6 National Grain & Feed Association's
Country Elevator/Feed Industry
Conference and Trade Show
St. Louis, MO
- Jan 26 & 27 WASA Convention & Trade Show
in conjunction with Corn/Soy Expo
and the *Pork Taste of Elegance*
Kalahari Resort, Wisconsin Dells