

08/11/2018 Reference H1955

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9332 6808. Contact Craig Hall craig.hall@syngenta.com or  
accounts Michelle Hickman

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Tullamarine Vic 3043, Australia +61 3 9089  
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Global Proficiency Ltd for AsureQuality Ltd,  
Ruakura Research Centre, 10 Bisley Road,  
Enderley, Hamilton 3241, P O Box 20474  
Hamilton

To whom it may concern,

**Advion Cockroach Gel**

- Product description: pesticide, insecticide,
- Product use: for cockroach crack & crevice application in situations in directions for use (domestic, commercial, farms, food factories, hospitals, homes, kitchens, offices, restaurants, retail stores etc)

**"Passed AsureQuality assessment for food/beverage/dairy farm & factory type B no food contact - for food area crack & crevice application or outside the area H1955" 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:**

- Used per instructions, legislation, & GMP, type B with no food contact - food area crack & crevice application or outside the area.
- Use per a control programme where applicable & use does not create a nuisance.
- The assessment is subject to notification of change and expires on 08/11/2023.
- The full report is attached for supplier review and verification. The assessment is activated by countersigning & inclusion of assessment precautions / assessment statement / MPI dairy statement

Prepared by Global Proficiency for AsureQuality Ltd by  
Bob Hutchinson PhD SENIOR DEVELOPMENT SCIENTIST.



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 (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

**Summary of assessment with any risks highlighted:**

- Prior registrations (Regulatory (NZFSA non-dairy and "Passed Agriquality farm & factory food areas non-contact. Approved pursuant to HSNO HSR001752. HSNO 6.9B, 9.1C & 9.4 C).
- Food safety (is by non-contact & lists for permitted pesticides actives etc. Purity & residue carryover are not necessarily required for non-contact).
- QA (ISO 9000 series certification etc n/a for non-contact).
- QC (Chemistry n/a for non-contact and and micro safety is by preservative / formulated chemicals).
- Instructions –
  - Label (Warning. Keep out of reach of children, Advion Cockroach gel bait active ingredient- 6g/kg Indoxacarb in the form of a gel. For control of cockroaches per Use Directions. Net contents 30 g. Approved pursuant to HSNO HSR001752. Company & emergency contacts. Read instructions, HSNO 6.9B, 9.1C & 9.4 B. Warning may cause organ damage haemopoietic system. from repeated high doses. Long-lasting harm to aquatics. Toxic to terrestrial invertebrates. Panels completed for precautions including against any food contact. Disposal, First Aid, Spills, & General information. Directions - not on situations regularly washed not to contact food, livestock, feed or their water, food & packaging removed from room before use, not to contact food contact surfaces, utensils, packaging contact surfaces. May be used in cracks & crevices as a cockroach pesticide in conjunction with an approved vermin control programme provided no nuisance. NZFSA non-dairy and "Passed Agriquality farm & factory food areas non-contact. Situation details (include farm buildings, food processing establishments, kitchens, restaurants etc.). Pest (German (Blatella germanica), American (Periplaneta Americana) and other common cockroaches). Rate (apply at least 2 spots/m2 & up to 5 spots for heavy/American infestation. Spot size 5mm, 0.1 g). Critical comments (Careful inspection... Several small applications... May be thin bead .. cracks and crevices.... Indoor applications can include cracks and crevices along walls or floors, behind or under equipment, under tables, within framing of tables or furniture, around sinks, within or near garbage collection areas, attics, crawl spaces, and cracks and crevices in cabinets...Bait inspected periodically... May require 1/2 tube etc.
  - SDS Warning keep out of reach of children HSNO, 6.9b damage target organ through prolonged or repeat exposure. 9.1C aquatic harm long lasting. 9.4b toxic to terrestrial invertebrates. Composition (Indoxacarb CAS 173584-44-6 0.6%). List for First Aid, Fire, Accident, Handling, Exposure control (no limit set), Properties, Stability, Toxicology (per hazards + not mutagenic carcinogenic or reproduction effect), Ecology, Transport & Regulatory ((HSR001752).
- Unwanted effects (Covered by label & SDS. Production side effects ok by non-contact & refer to residues vs MRLs in table etc).
- Efficacy (Is expected from the registrations of the active)

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

|  |  |
|--|--|
| 0 Information is to be evidential (standard 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             |

**Organics**

For organic production when food is absent during use and residues are rinsed etc. Reference NZS8410 Organic Production section 10 Storage, transport, preparation and handling. 10.1.2 Where the premises vehicles and equipment are used solely for organic products: (a) Only those substances used in table D1 shall be used for housekeeping purposes in the presence of the product (note that product absence is already a requirement of this assessment). If other materials are used for cleaning, surfaces that could come in contact with organic products shall be flushed with potable water prior to re-entry of organic products, and any airborne substance dispersed. (b) If there are products of more than one organic status (e. g. organic and in conversion to organic), the requirements of 10.1.3 shall be followed as if the higher status organic product were in the presence of products not complying with this standard. 10.1.3 (Note that If not dedicated to organics then the plan must state how there is no non-organics inclusion including “sealing, labelling, documentation”).

**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 registrations (Regulatory (NZFSA non-dairy and "Passed Agriquality farm & factory food areas non-contact. Approved pursuant to HSNO HSR001752. HSNO 6.9B, 9.1C & 9.4 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**

|  |  |   |
|--|--|---|
| (Syngenta Crop Protection Limited) Advion Cockroach Gel H1955 08-11-2018 | Registrations column. Scope: NZ checks (NICNAS AICS/EPA NZ, FSANZ, US FDA 40 /21 CFR/ NSF, Food Chemicals Codex, 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 vs instructions  | Label (Warning. Keep out of reach of children, Advion Cockroach gel bait active ingredient- 6g/kg Indoxacarb in the form of a gel. For control of cockroaches per Use Directions. Net contents 30 g. Approved pursuant to HSNO HSR001752. Company & emergency contacts. Read instructions, HSNO 6.9B, 9.1C & 9.4 B. Warning may cause organ damage haemopoietic system. from repeated high doses. Long-lasting harm to aquatics. Toxic to terrestrial invertebrates. Panels completed for precautions including against any food contact. Disposal, First Aid, Spills, & General information. Directions - not on situations regularly washed not to contact food, livestock, feed or their water, food & packaging removed from room before use, not to contact food contact surfaces, utensils, packaging contact surfaces. May be used in cracks & crevices as a cockroach pesticide in conjunction with an approved vermin control programme provided no nuisance. NZFSA non-dairy and "Passed Agriquality farm & factory food areas non-contact. Situation details (include farm buildings, food processing | Rate (apply at least 2 spots/m2 & up to 5 spots for heavy/American infestation. Spot size 5mm, 0.1 g). Critical comments (Careful inspection... Several small applications... May be thin bead .. cracks and crevices.... Indoor applications can include cracks and crevices along walls or floors, behind or under equipment, under tables, within framing of tables or furniture, around sinks, within or near garbage collection areas, attics, crawl spaces, and cracks and crevices in cabinets...Bait inspected periodically... May require 1/2 tube etc. SDS Warning keep out of reach of children HSNO, 6.9b damage target organ through prolonged or repeat exposure. 9.1C aquatic harm long lasting. 9.4b toxic to terrestrial invertebrates. Composition (Indoxacarb CAS 173584-44-6 0.6%). List for First Aid, Fire, Accident, Handling, Exposure control (no limit set), Properties, Stability, |

|   |   |  |
|---|---|--|
|   | establishments, kitchens, restaurants etc.). Pest (German (Blattella germanica), American (Periplaneta Americana) and other common cockroaches).  | Toxicology (per hazards + not mutagenic carcinogenic or reproduction effect), Ecology, Transport & Regulatory ((HSR001752).  |
| HACCP checklist vs other aspects        | Prior registrations (Regulatory (NZFSA non-dairy and "Passed Agriquality farm & factory food areas non-contact. Approved pursuant to HSNO HSR001752. HSNO 6.9B, 9.1C & 9.4 C). Food safety (is by non-contact & lists for permitted pesticides actives etc. Purity & residue carryover are not necessarily required for non-contact). QA (ISO 9000 series certification etc n/a for non-contact). QC (Chemistry n/a for non-contact and and micro safety is by preservative / formulated chemicals) | Unwanted effects (Covered by label & SDS. Production side effects ok by non-contact & refer to residues vs MRLs in table etc). Efficacy (Is expected from the registrations of the active) |
| Formulation 100%.                       |   |  |
| Raw 1 Active Ingredient                 | NZIoC search unreturned? AICS unreturned. ECHA Annex 6 report sighted. 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?  | Codex 0.1, & milk fats 1 mg/kg and long list. Purity wanted (per column header). Purity found (Sufficient to ensure active level & otherwise not found or required)                        |
| Raw 2 Preservative                      | NZIoC HSR002748. AICS human health tier 2 no 2nd notification. EFSA Journal (2006) 416 contact with food impurity in saccharin as food additive - lower than 800 mg/kg in saccharin with consumption of saccharin at ADI 0-5 mg/kg means it is 2000x below NOAEL. It follows this is below the transfer from textiles.  | Purity wanted (per column header). Purity found (not required for non-contact)   |
| Raw 3-21 approximate list.              | FDA21CFR & FSANZ Food Code1.3.1 foodstuff or food additives or preservative latter at low level 0.2% & has only some listings for very low contact.   | Purity n/a for non-contact   |
| pH & pathogen implications are n/a here | pH growth ranges: B cereus 4.4-9.3, Campylobacter jejuni 4.9-9.0, C botulinum A & B 4.8-8.5 type E 5-8.5, C perfringens 5-8.9, Listeria monocytogenes 4.5-8.0, Salmonella 3.8-9,  | Staph aureus 4.3-9.0, vibrio cholerae 6-11, vibrio parahaemolyticus 4.8-9, vibrio vulnificus 5-10, Yersinia enterocolitica 4.4-9.6   |

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- Food safety (is by non-contact & lists for permitted pesticides actives etc. Purity & residue carryover are not necessarily required for non-contact).

**12 The formulation in confidence follows & is not for public circulation n/a in this case**

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| HACCP checklist vs other aspects   | Prior registrations (Regulatory (NZFSA non-dairy and "Passed Agriquality farm & factory food areas non-contact. Approved pursuant to HSNO HSR001752. HSNO 6.9B, 9.1C & 9.4 C). Food safety (is by non-contact & lists for permitted pesticides actives etc. Purity & residue carryover are not necessarily required for non-contact). QA (ISO 9000 series certification etc n/a for non-contact). QC (Chemistry n/a for non-contact and and micro safety is by preservative / formulated chemicals)   | Unwanted effects (Covered by label & SDS. Production side effects ok by non-contact & refer to residues vs MRLs in table etc). Efficacy (Is expected from the registrations of the active)  |
| Formulation 100%.  |   |   |
| Indoxacarb Technical Grade CAS 173584-44-6 Active Ingredient (sufficient to provide 6 +/- 1.5 g/kg from - Raw 1 Active Ingredient  | NZIoC search unreturned? AICS unreturned. ECHA Annex 6 report sighted. 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?  | Codex 0.1, & milk fats 1 mg/kg and long list. Purity wanted (per column header). Purity found (Sufficient to ensure active level & otherwise not found or required)   |
| Proxel GXL 20% Acticide B 20 / Preventol BIT 20N 1,2-benzothiazol-3(2H)-one previously CAS 2634-33-5 from - 2 g/kg Raw 2 Preservative  | NZIoC HSR002748. AICS human health tier 2 no 2nd notification. EFSA Journal (2006) 416 contact with food impurity in saccharin as food additive - lower than 800 mg/kg in saccharin with consumption of saccharin at ADI 0-5 mg/kg means it is 2000x below NOAEL. It follows this is below the transfer from textiles.  | Purity wanted (per column header). Purity found (not required for non-contact)  |
| Raw 3-21 approximate PEG 400, fruit juice, sorbitol, EDTA, corn syrup, whole milk powder, chicken liver, soybean oil hydrogenated, yeast, sucrose, honey powder, poultry powder, corn-starch, polyacrylic acid, carrageentan, sodium hydroxide, acetic acid, benzisothiazolin-3-one Proxel GXL, sorbic acid, potassium sorbate, & water. | FDA21CFR & FSANZ Food Code1.3.1 foodstuff or food additives or preservative latter at low level 0.2% & has only some listings for very low contact.   | Purity n/a for non-contact  |
| pH & pathogen implications are n/a here  | pH growth ranges: B cereus 4.4-9.3, Campylobacter jejuni 4.9-9.0, C botulinum A & B 4.8-8.5 type E 5-8.5, C perfringens 5-8.9, Listeria monocytogenes 4.5-8.0, Salmonella 3.8-9,  | Staph aureus 4.3-9.0, vibrio cholerae 6-11, vibrio parahaemolyticus 4.8-9, vibrio vulnificus 5-10, Yersinia enterocolitica 4.4-9.6  |

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Ruakura Research Centre, 10 Bisley Road,  
Enderley, Hamilton 3241, P O Box 20474  
Hamilton

Dear Craig Hall,

Please find attached your assessment report for any questions or suggestions and the invoice and later the web listing should follow. Thank you for the data supplied.

#### Advion Cockroach Gel

- Product description: pesticide, insecticide,
- Product use: for cockroach crack & crevice application in situations in directions for use (domestic, commercial, farms, food factories, hospitals, homes, kitchens, offices, restaurants, retail stores etc)
- Status: passed renewed AsureQuality assessment for farm & factory use renewed \$280 for 1:45 hours O/N -

**"Passed AsureQuality assessment for food/beverage/dairy farm & factory type B no food contact - for food area crack & crevice application or outside the area H1955" 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).

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