



United States
Department of
Agriculture

June 13, 2001

EOD-83

Farm and Foreign
Agricultural
Services

Farm Service
Agency

Kansas City
Commodity Office
P.O. Box 419205
Kansas City,
Missouri
64141-6205

NOTICE TO THE TRADE

This Notice advises all interested parties of the change in procedures currently used for fumigation of flour procured for use under foreign food assistance programs. Currently required port fumigation five days prior to vessel loading is canceled. The following procedures are effective immediately and are referred to as "Commodity Operations Fumigation Protocol."

A. Manufacture

All flour must be entoleted prior to bagging. Boxcars must be inspected for cleanliness and transport worthiness prior to loading. These requirements must be part of every flour suppliers' quality control system, which will be reviewed under the Total Quality System Audit documentation process.

B. Time Period Requirements

During the period March 1 - October 31 all bagged flour in transit to, or resting at, U.S. port shall receive at least one fumigation prior to export according to the standards listed below.

C. Minimum Fumigation Standard

All fumigation shall be performed by a licensed or certified fumigation applicator. Applicators shall apply a phosphine gas product and document the attainment of the minimum fumigation level within 24 hours of application.

<u>Temperature</u>	<u>Parts Per Million</u>	<u>Exposure Time</u>
Less than 61° F	300 +	*See Note Below
61° F to 68° F	300	144 Hours
Greater than 68° F	300	96 Hours

Minimum time parameters refer to total hours of product exposure at the recommended concentration level and shall begin when the concentration is



documented to have reached the 300 PPM level. Any failure to maintain the 300 PPM level during the instructed time period will require the addition of fumigant, additional sealing, or other accepted measures to meet the 300 PPM requirement. The number of hours elapsed since the last recording of a 300 PPM concentration level will be deducted. The elapsed time under fumigation shall be those hours that have met the required concentration level. These hours, temperatures, and concentration levels shall be verified by the Federal Grain Inspection Service (FGIS) at least once every 24 hours.

* NOTE: Fumigation with flour under storage temperatures between 40°- 60°F with phosphine is known to be less effective. Consequently, higher concentrations than 300 PPM should be maintained as long as possible beyond the minimum 144 hours, with results reported to the Kansas City Commodity Office (KCCO). Phosphine fumigations below 40°F are not legal under current labeling requirements. Any shipment within the U.S. not fumigated because of a temperature below 40°F is to receive fumigation at a later in-transit or at-port point if temperatures reach 40°F or higher.

D. Kansas City Commodity Office (KCCO) Contact

Tim Reaman
Export Operations Division
Phone: (816) 926-6045
E-mail: treaman@kcc.fsa.usda.gov.

E. FGIS Certificate Requirements and Distribution

1. The FGIS shall witness and certify on Form FGIS-993, fumigation levels, temperatures and exposure time periods by lot of product.
2. The Form FGIS-993 shall note the date, quantity, and Notice to Deliver (ND) number of the products under fumigation. It will also record the temperature, date, and time the fumigation standard was met.
3. If the fumigation standard is not met, the Form FGIS-993 must also be issued stating the applicable items contained in 1 and 2 above, as well as the reason for the failure.
4. Vendors, ports, and ocean carriers at different times will be responsible for fumigating the cargo. Notwithstanding, carriers shall provide a copy of the Form FGIS-993 as part of the payment package for ocean freight to show that fumigation has been performed meeting the standards. Cargo shall not be exported without the Form FGIS-993 confirming that the fumigation has been performed meeting the standards.

5. Copies of each Form FGIS-933 shall be provided by FGIS to the applicant for service for subsequent distribution to the designated interested parties.

F. Pre-positioned Cargo

1. The requirements set forth in paragraphs B, C, D, and E above shall apply to all pre-positioned cargo.
2. Flour shall be segregated at arrival and fumigated under-tarp, with monitoring devices attached, as soon as practical.
3. Tarps shall not be removed from any cargo until vessel assignment and inspections. Cargo stored for more than 30 days shall be re-inspected by FGIS to determine if the recommended minimum fumigant level is still present. Cargo will be re-fumigated and documented every 30 days if the fumigant level falls below the minimum standard.
4. Product must not be released for loading until the recommended minimum standards are met or a waiver of fumigation is granted by KCCO. KCCO may waive port fumigation to meet vessel shipping needs, however, fumigation during shipment is then required to assure that no flour is delivered without a minimum of one certified fumigation.
5. If a lot under fumigation does not meet the required standard, a FGIS certificate shall be issued. Notification of this failure shall be provided to the KCCO as soon as possible.

G. Ocean Carrier Responsibilities

1. Fumigation during shipment, as stipulated in the applicable booking note or charter party agreement, will be the responsibility of the ocean carrier in accordance with the standards identified below.
2. Carriers shall have some flexibility in meeting the fumigation standards according to the method of ocean conveyance.

(a) Containers

- Only inspected and approved containers with metal floors shall be used for flour.
- Carrier must certify that each container is:
 - no more than 10 years of age,
 - wind and water tight,

- capable of maintaining fumigant concentrations at the required level,
 - not a salvage or mustered-out-of-service container, and
 - transit worthy under all applicable law.
- Loaded containers shall be fumigated under the requirements set out in Paragraph B, C, D and E above and must have monitoring devices attached.
 - FGIS personnel shall witness and document temperature, concentration level, and exposure time by container.
 - Carrier may fumigate container at the container-stuffing facility or at a container yard prior to loading onboard the mother vessel. If vessel loading takes place more than 20 days after the initial fumigation, additional fumigation shall be performed at no less than 20 day intervals until vessel loading.
 - Carrier may fumigate the cargo under-tarp prior to stuffing the container.

(b) LASH Barges

- Loaded barges shall be fumigated under the requirements set out in Paragraph B, C, D and E above and must have monitoring devices installed after loading.
- FGIS personnel shall witness and document temperature, concentration level, and exposure time for each barge prior to loading onboard the mother vessel.
- Barges under tow shall be assumed to meet the minimum fumigant concentrations 24 hours after fumigation.
- Carrier may fumigate barges at the initial load port or final ocean load port prior to loading onboard the mother vessel. In any case, fumigation shall be performed at no less than 20 day intervals until vessel loading.

Note: Notwithstanding the above flexibility for containers and LASH barges, all cargoes shall require FGIS verification of the 300 PPM concentration level measured 24 hours after application and once every 24 hours until the required fumigation standard is achieved.

(c) Breakbulk Vessels

- Phosphine gas fumigant shall be applied and hatches sealed at the final ocean load port. Application shall be made with a minimum dosage of 33g/1000 cubic feet of hold area using pre-packaged dust retention containers and with monitoring devices attached.
- Observation and certification of the application shall be made by FGIS personnel in accordance with FGIS procedures for in-transit fumigation and documentation for bulk grain published in the FGIS Fumigation Handbook. Documentation of fumigant concentration and days of exposure are waived on such fumigations.

George Aldaya
Director