PEST PREVENTION PROGRAM
SERVICE PROTOCOLS

Organic Processing Pest Prevention Program

Responsible Pest Management sometimes known as "Organic" or "Green" Pest Management has almost as many definitions as there are shades of green. While the intent is good, the efforts to eliminate chemicals from pest management programs often do not take into account geographic, seasonal, and macro/micro environmental issues that impact performance resulting in increased presence, exposure and contamination from insect and rodent pests. Rather than working for no pest activity these programs include thresholds of pest activity that must be attained before corrective actions, that include use of traditional materials, can be taken. With these expectations acceptable results can be attained for some customers through a service offering that does not include use of traditional materials. Green programs meet these expectations by replacing many of our traditional service materials with choices deemed "low hazard". With the exception of insect and rodent baits, low hazard materials often are effective only when contacting the target pest at the time of application. The vast majority of these materials do not have residual mitigation effects once they have dried. For this reason green/organic programs in our service areas are offered on a monthly, or more frequent, service cycle.

Many aspects of the Massey Services Pest Prevention Program are consistent with the expectations of organic and green programs. The emphasis these programs put on inspection, trapping, removal, and exclusion have long been major points of focus in all of our Pest Prevention service programs. The most significant differences between our traditional Pest Prevention and our Green/Organic programs appear in the selection and application of materials used to impact existing populations and/or prevent future activity. As a general rule synthetic materials are not acceptable a Integrated Pest Management tools in any organic or green program. In cases where pest activity thresholds have been exceeded and NOP (USDA National Organic Program) approved methods have failed to protect the occupants and building from pest activity it is important the program scope of service allow limited conventional synthetic materials to be used. The documentation of these exceptions must include the level of pest thresholds exceeded, limitations of approved materials/methods to prevent/correct the pest issue and

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justification for the use of synthetic materials. The documentation must be reviewed and treatment strategy approved by the customer or their representative in advance of the application. The service goal for the technician is to use the least amount of the least toxic material necessary to provide the desired result.

The National Organic Program (NOP) Final Rule section 205.271 outlines three progressive levels of pest management measures; 1)Preventive Practices, 2) Non-Synthetic/Synthetic materials per the National List, 3) Synthetic Materials/Materials not on the National List.

Preventive Pest Management Practices include considerations of environmental, structural and operational elements that are less conducive to pest activity. Perimeter and exterior landscaping and lighting are examples of environmental considerations. Structural considerations include building type/construction, exterior lighting, doors and seals, windows, roof materials/construction, screening/filtering of exterior air introduced into HVAC systems. Operational elements include receiving procedures, inspection practices, product storage and rotation. During the course of service the Pest Management Technician will inspect these areas/points and provide reports to the customer identifying exceptions, maintenance, and repairs that need to be made. Minor exclusionary services (caulking & sealing) are included in all Massey Services Pest Prevention Programs. Our inspections will also include inspection of traps and monitors placed in the facility to measure pest activity. The results of these inspections are included in Service Reports completed at the end of each service.

To address pest activity that has exceeded acceptable thresholds the Technician may provide exclusionary services (caulking & sealing) to eliminate avenues of entry or pest harborage sites. Pests may be removed via placement of additional traps or physically with a vacuum or damp paper towel. NOP approved non-synthetics may be applied to eliminate/repel accessible pests with the goal of bringing the pest activity below the acceptable threshold. All techniques and materials used will be documented in the Service Report.

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In some instances level 1 and 2 efforts are ineffective in preventing or providing the return of pest populations to below threshold levels. In these cases Level 3 methods and materials are used. Prior to utilizing these tools and techniques the Service Reports documenting the Level 1 & 2 actions and techniques utilized along with a description of the facility's efforts (sanitation/structural/environmental) to correct the pest issues will be forwarded to the NOP certifying agency along with a detailed description of the materials and techniques to be used to correct the pest issue. The information forwarded will include the name(s) of the materials to be used, application rates, location(s) where the materials will be used and measures taken to prevent contamination of organic ingredients or materials. Each request to use level 3 methods/materials is an independent event requiring notification and approval of the certifying agency prior to implementation.

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Technicians providing organic or green services are to be equipped as follows:

Inspection

a) Flash Light

b) Inspection Tools

   a. small spatula

   b. mirror

   c. screwdrivers

   d. pliers

Removal – Population Reduction

a) Vacuum with Hepa Filter

b) Massey Commercial Insect Detection Traps – IDT

c) Insect and mouse adhesive traps

d) Food scent & pheromone attractants

Exclusion

a) Caulk and caulk gun

b) ¼ inch hardware cloth

c) screen material

d) staple gun & adhesive

Material Application Tools & Equipment

a) Bait gun or syringe plunger, bait tube extension

b) White Crusader Hand duster or Centro Bulb.

c) Compressed air sprayer

d) Protecta bait stations

e) Back Pack compressed air sprayer

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Approved Pest Prevention Materials

a) Essentria IC Pro

b) Essentria G

c) Sterifab (alcohol)

d) Pyganic Specialty (pyrethrum w/o pbo)

e) Granular insecticide bait such as Niban or Intice(boric acid)

f) German Cockroach baits with boric acid active ingredient.(InTice)

g) Ant Baits with boric acid active ingredient.

(Terro Ant Bait)

h) Boractin Dust (may not contact food or food crops)

i) Diatomaceous Earth(may not contact food or food crops)

j) Non-synergized Pyrethrum

Illuminated Light Traps

a) Exterior Entry Points

b) Interior critical control points

c) Fly Magnet Fly Traps (Exterior)

Rodent Prevention Materials

a) T-Rex & Snap Traps

b) Repeating Mouse Traps

c) Rodent Glue Trap

d) Protecta Rodent Bait Stations

e) Vitamin D_3 rodenticide – Selontra

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Service Protocols

The service procedures are intended to first impact the pest population present at the time of service and then influence the environment through trapping, exclusion and/or baiting to impact pest populations. A thorough inspection followed by a detailed service will establish a level of influence that will ensure performance of our pest prevention program and customer satisfaction.

Service Procedures:

1) Service Overview

a. Interior - establish service time and frequency of inspections and service. Inspection to focus on conditions favorable to pest activity, avenues of entry and sources of pests that have entered the facility. Frequency of services should be at least twice per month and will be impacted by the level of pest activity. Crawling insect populations will be addressed through monitoring trapping, exclusion and the application of NOP approved contact insecticides, granular baits or gel baits as appropriate.

b. Perimeter – establish service time and frequency of inspections and service. Inspection to focus on conditions favorable to pest activity and sources of pests that may attempt to enter the facility. Frequency of rodent services should be at least monthly and will be impacted by the level of rodent activity. Crawling insect populations discovered during inspections will be addressed through structural exclusionary services, the application of contact insecticides and granular baits.

c. Boundary – establish service time and frequency of inspections and service. Inspection to focus on conditions favorable to pest activity and sources of pests that may approach the facility. Frequency of rodent services should be at least monthly and will be impacted by the level of rodent activity and proximity to the structure. Crawling insect populations discovered during

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scheduled inspections will be addressed through application of granular baits

2) Interior inspection & applications.

a. Kitchen, Food Production, Food Service Areas

i. Dust wall voids, seal cracks & crevices with caulk including where plumbing lines exit walls at drink machines and restrooms.

ii. Dust void spaces of counters and equipment, seal cracks & crevices with caulk.

iii. Place dated IDT's where they can be concealed under and behind equipment, cabinets and storage counters. Use food or pheromone attractants as appropriate.

iv. Apply German cockroach baits into, under and behind equipment, cabinets and storage counters.

v. Install illuminated light traps for fly control near the entry doors.

b. Mechanical Areas

i. Dust wall voids, seal cracks & crevices with caulk.

ii. Dust void spaces of counters and equipment, seal cracks & crevices with caulk.

iii. Apply liquid knock down material as crack & crevice and/or spot applications as appropriate as a contact application to areas there is potential for insect pest activity.

iv. Place IDT's where they can be concealed inside voids of equipment, conveyors, and storage counters. Use food or pheromone attractants as appropriate.

v. When insect pests are present apply liquid knock down materials to the wheels, legs and bases of machinery, equipment and the

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baseboard cracks located at the wall floor junction.

c. Storerooms

i. Dust wall voids, seal cracks & crevices with caulk.

ii. Dust void spaces of shelving, counters and equipment, seal cracks & crevices with caulk.

iii. Place IDT's where they can be concealed at the front and back of the shelving units,

equipment and storage counters. Use food or pheromone attractants as appropriate.

iv. Apply German cockroach baits into cracks & crevices where they can be concealed at the front and back (3 dimensionally) of the shelving units, other equipment and storage counters.

v. Apply liquid contact control materials to the wheels, legs and bases of storage and other equipment, as well as baseboard cracks located at the wall floor junction.

vi. As required install illuminated light traps for fly control on opposite walls as close to the entry and receiving doors as possible.

3) Building Perimeter (foundation to 10 from structure)

i. Inspect area seeking sites where pest activity is likely to be found or originate from.

ii. Seek out cracks & crevices in structure to be dusted and sealed. Note large openings on the service report for the customer to close.

iii. Apply granular baits according to label directions to the perimeter of the structure and up to 10 feet away from the foundation.

4) Building Boundary (more than 10 from structure)

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i. Inspect area seeking sites where pest activity is likely to be found or originate from.

ii. Apply granular bait products as spot applications away from the structure into plant bed areas and around trash cans, light posts, and signage.

iii. Apply liquid knock down materials to the dumpster and dumpster pad. Install fly traps stations.

iv. Place secure rodent bait stations inside the dumpster corral area and to perimeter of the building. Place EVO Tunnels on each side of pedestrian and delivery doors. Add rodent equipment around the structure as required by rodent activity.

Complete the Customer Service Report detailing observations made during inspections, actions taken, materials used and sanitation, structural or landscape issues that will contribute to insect or rodent pest activity. Meet with the location management or contact to review service results and required customer actions. When required provide detailed information explaining service escalation needs as detailed above.

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