



United States  
Department of  
Agriculture

Grain Inspection,  
Packers and Stockyards  
Administration

Stop 3630  
1400 Independence Ave., SW  
Washington, DC 20250-3630

Reference # 199

November 25, 2002

TO: FGIS POLICY BULLETIN BOARD

FROM: David Orr, Director /s/  
Field Management Division

SUBJECT: Blacklight Inspection Service

ORIGINATING OFFICE: Policies and Procedures Branch

This memorandum transmits our policy of using a longwave ultraviolet light (blacklight) in performing an inspection of packaged commodities contaminated by rodents.

A blacklight inspection is a special service that we provide using an inspection method employed by the Food and Drug Administration (FDA). In performing this service, we use a blacklight to identify and segregate packages that we suspect are stained with rodent urine. Under the blacklight, fresh dry urine stains fluoresce blue-white, while older stains may be more yellowish-white. Rodent hairs also fluoresce, appearing as blue-white streaks.

#### POLICY

We will only perform a blacklight inspection after first performing a condition inspection. However, FDA must approve the blacklight inspection as part of a reconditioning plan proposed by the applicant requesting the blacklight inspection service.

#### BACKGROUND

FGIS and FDA have certain mutual objectives in carrying out our respective service and regulatory functions. On request, we perform condition inspections to assess the physical condition of a commodity by determining if it is damaged, infested, contaminated, or has any other deteriorating condition. The FDA enforces the Federal Food, Drug, and Cosmetic Act (the Act), which deals with unsanitary conditions where food is manufactured, packaged, or held. Under the Act are Defect Action Levels for food defects (e.g. insects, rodent droppings, rodent hairs, etc.). The action levels are guidelines on which FDA may take action when a commodity has a food defect that meets the action level.

When we perform a condition inspection and find a condition that FDA may consider actionable, we must report our findings to FDA according to the FGIS-FDA Memorandum of Understanding (Directive 9060.2). FDA will then decide whether to get involved by performing another inspection to determine if they should consider the commodity actionable, or whether they will accept our findings. Sometimes, FDA may not view our findings as actionable after reviewing the facts of our inspection.

When FDA declares a commodity actionable, it then falls under their jurisdiction and we must discontinue any involvement with the commodity, unless they approve otherwise. Also, the owner of the commodity is faced with having to destroy, donate for animal feed, or recondition the commodity, depending on the severity of its condition. FDA may accept a reconditioning proposal submitted by the owner of the commodity if the proposal contains certain provisions including procedures to eliminate the actionable condition. Usually, the owner of the commodity will include our involvement as part of their reconditioning plan.

When we perform an initial condition inspection and find evidence of rodents, the applicant may try to salvage some of the commodity by having us perform another inspection using a blacklight to segregate stained packages from packages in sound condition. Before we can perform this second inspection, FDA must approve the inspection process and our involvement.

Sometimes, an applicant may suspect that rodents have contaminated a commodity and will request that we perform a blacklight inspection without first having us perform the standard condition inspection. When this occurs, inform the applicant that we must first perform a condition inspection to determine if the commodity lot has any other deteriorating conditions. Also, if we should find any conditions that might be actionable under FDA guidelines, we are required to report those findings to FDA.

Contact the Policies and Procedures Branch if you have any questions and for guidance on situations different from those addressed in this memorandum.