



United States
Department of
Agriculture

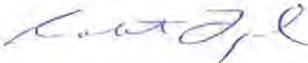
Grain Inspection,
Packers and Stockyards
Administration

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

March 7, 2012

Reference # 248

TO: FGIS POLICY BULLETIN BOARD

FROM: Robert Lijewski, Director 
Field Management Division

SUBJECT: Inspection of Insect Damage Kernels in Wheat

ORIGINATING OFFICE: Policies, Procedures, and Market Analysis Branch

1. PURPOSE

This memorandum establishes the policy for determining the inspection method and sample portion size when inspecting Insect Damaged Kernels (IDK) in wheat and supersedes FGIS Policy Bulletin Board #237 dated May 5, 2011.

2. BACKGROUND

Federal Grain Inspection Service (FGIS) and Food and Drug Administration (FDA) have certain mutual objectives in carrying out their respective service and regulatory functions. In accordance with the FGIS-FDA Memorandum of Understanding (MOU), FGIS reports to FDA lots of grain, rice, pulses, or food products which are considered actionable under the Federal Food, Drug, and Cosmetic Act. FGIS has developed procedures to analyze wheat samples for IDK on the basis of 100 grams to align with FDA's defect action level of 32 or more kernels per 100 grams.

In an effort to reduce the IDK analysis time per individual sample, FGIS developed a statistically sound three-stage inspection process to eliminate the need to always determine IDK on the entire 100 gram portion. This process involves examining smaller portions and applying tolerances calculated to duplicate the 32 insect-damaged kernels per 100 grams limit (Grain Inspection Handbook, Book II, Ch 13, Section 13.22).

A survey was presented to field offices and official agencies to determine how IDK is being analyzed. The results indicated inconsistencies on how the portion size was being determined. Therefore, to establish consistency in IDK analysis, the following policy is implemented.

3. POLICY

The following scenarios will indicate the inspection method and sample size when determining IDK in wheat.

- a. The default is to pick 100 grams, **using the three-stage procedure**, when:
 - 1) There is no specific request for IDK analysis.
 - 2) There is no request for IDK certification.
 - 3) IDK analysis is requested but no limit is specified on the load order or contract.
 - 4) Performing single lot inspections (whether or not IDK certification is requested).

Note 1: The applicant has the right to forego the three-stage analysis at any time and request the analysis be based on the full 100 gram portion.

- b. Analyze a 100 gram portion (**do not use the three-stage procedure**) and report the number of insect damaged kernels using the Agricultural Product Standards (APS) abbreviated factor IDK when:
 - 1) IDK certification is requested without specifying any limits.
 - 2) A load order or contract specifies a maximum IDK not equal to 31 (e.g., maximum 10 IDK per subplot).
 - 3) A load order or contract specifies an entire 100 gram portion be examined for IDK.

Note 2: IDK is a sample grade factor therefore not applicable for average quality.

Note 3: Enter a statement in the remarks section of the work record indicating IDK based on 100 grams when applicable

4. FILING INSTRUCTIONS

File a copy of this memo with the Grain Inspection Handbook, Book II, Chapter 13, Wheat, until the handbook is revised to include this change. Field office managers must ensure that a copy of this memorandum is provided to official agencies operating within their circuit.

5. QUESTIONS

Direct any questions regarding this policy to Patrick McCluskey
Patrick.J.McCluskey@usda.gov at (816) 659-8403, or Robert Dorman
Robert.J.Dorman@usda.gov at (816)659-8411, Policies, Procedures, and Market
Analysis Branch.