



U.S. DEPARTMENT OF AGRICULTURE
Agricultural Marketing Service
Dairy Programs
Dairy Grading Branch

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NUMBER
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INSTRUCTIONS FOR
DAIRY INSPECTION AND GRADING SERVICE

U.S. DEPARTMENT OF AGRICULTURE

DA INSTRUCTION NO. 918-I

Agricultural Marketing Service

Dairy Programs

Dairy Grading Branch

Room 2746-S

1400 Independence Avenue, South West

Washington, D.C. 20250-0230

**INSTRUCTIONS FOR
DAIRY INSPECTION AND GRADING SERVICE**

This document has been prepared using all available, pertinent information. It has been reviewed by appropriate Washington, D.C. and field employees for accuracy and usefulness. All persuasive review comments have been incorporated.

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1. PURPOSE	1-1
A. Mission Statement	1-1
2. POLICY	2-3
3. PREREQUISITES TO INSPECTION AND GRADING	3-5
A. Plant Approval	3-5
B. Quality Control and Sanitation Programs	3-5
C. Tempering and Grading Facilities	3-5
D. Scales.....	3-6
E. Keeping Quality Cabinet	3-6
F. Storage Capacity	3-6
G. Inspection Office Space	3-6
4. RESPONSIBILITIES	4-7
A. Applicant	4-7
1. Product Manifests and Documents.....	4-7
B. Grader	4-9
1. Duties	4-9
2. Program Integrity Controls	4-12
3. Employee Conduct	4-19
4. Duty Assignments	4-20
5. Leave	4-21
6. Safety	4-21
7. Dress Code.....	4-22
8. Uniform Allowance.....	4-23
5. DOCUMENTS AND FORMS	5-25
A. Documents	5-25
1. Code of Federal Regulations	5-25
2. United States Grade Standards	5-25
3. United States Product Specifications	5-25
4. FSA Documents	5-26
5. Condition of Container	5-26
6. Military Documents	5-26
B. Forms	5-26
1. Official Identification.....	5-26
2. Miscellaneous Product Grading	5-26
3. In Process Product Grading	5-27
4. Condition of Container Examination	5-27
5. Re-grading	5-27
6. Plant Inspection	5-27
7. Cursory Inspections.....	5-28
8. Administrative	5-28
6. MONITORING PRODUCTION AND PACKAGING OPERATIONS	6-29
A. General Monitoring Activities	6-29
1. Cursory Inspection	6-29
2. General Monitoring Activities.....	6-31
3. Documentation	6-31
B. Special Considerations	6-32

1. Original Grading	6-32
2. In-Process Inspections	6-33
3. Denaturing Inspections	6-33
C. Rework Policy	6-33
1. Products Contaminated By Extraneous Material	6-34
2. Damaged or Misshaped Product	6-34
3. Product Meeting the Requirements of any U.S. Grade.....	6-35
4. Products Below U.S. Grade Requirements or Purchase Specifications	6-36
5. Products contaminated by Pathogenic Organisms	6-36
6. Labeling of Reworked Products	6-36
7. Butter for Butteroil.....	6-37
8. Cheese Trim.....	6-37
D. Metal Fragment Contamination Policy	6-38
1. Sampling	6-38
E. Extended Production Runs	6-40
1. Dry Systems.....	6-40
2. Liquid Systems	6-40
F. Farm Service Agency Contract Reviews	6-40
1. Inspector Guidelines	6-41
7. CODING AND MARKING	7-45
A. General Requirements	7-45
1. Products Offered for Official Grading or Inspection	7-45
B. Designation by Vat, Churning, or Sub-lot	7-46
C. Designation as a GRAND LOT	7-47
D. Date of Production, Processing, or Packaging.....	7-47
E. Consecutive Numbering Of Each Container	7-48
1. Consecutive Numbering Within a Vat, Churn, or Sub-lot	7-48
2. Consecutive Numbering Within A GRAND LOT	7-49
F. Special Requirements for Grade Label	7-49
1. General Policy	7-49
2. Responsibilities	7-50
3. Display of Official Identification and Certificate Coding	7-52
4. Approval to Display Official USDA Label Identification.....	7-54
G. USDA Officially Inspected Stamp	7-55
H. Product Control Tag	7-55
8. SAMPLE SELECTION	8-57
A. Authority	8-57
B. Approved Sources.....	8-57
C. Age of Products.....	8-57
D. Product Availability	8-58
E. Cursory Inspection.....	8-58
F. Product Uniformity	8-58
G. Random Number Generators	8-58
1. Random Number Generator Formula	8-59
2. Dairy Grading Branch Issued Laptops.....	8-59
3. Programming Instructions for the Hewlett Packard 20S Calculator	8-59

4. Programming Instructions for the Hewlett Packard 33S Calculator	8-61
5. Programming Instructions for the TI-66 Calculator	8-64
6. Precautions.....	8-66
7. Calculator Care.....	8-66
8. Operating Instructions.....	8-67
H. Selection Procedures	8-72
1. General.....	8-72
2. Number of Samples.....	8-73
3. Selection Procedures	8-76
I. Reserve Samples	8-77
1. Original Grading	8-77
2. Reserve Laboratory Samples	8-77
J. Random Verification Samples	8-77
K. Laboratory Analysis Samples	8-79
L. Recording of Sample Selection Information	8-79
M. Plant Testing of Official Samples.....	8-79
N. Sample Integrity and Controls	8-79
O. Applicant Supplied Samples	8-80
1. Eligible Samples.....	8-80
2. Automatic Sampling Devices	8-80
3. Sampling Control Plan (SCP).....	8-81
4. SCP Implementation	8-81
5. Cursory Inspection	8-82
9. NET WEIGHT DETERMINATION	9-83
A. Verification of Scale Accuracy.....	9-83
B. Reading Scales	9-84
1. Tare Weight	9-84
2. Gross Weight	9-84
3. Dial Scales	9-84
4. Digital Scales.....	9-84
C. Tare Weight Determination.....	9-84
1. Shipping Containers.....	9-84
2. Primary Containers.....	9-85
D. Test Weighing.....	9-86
1. Procedures.....	9-86
2. Identified By Vat, Churn, or Sub-lot Number.....	9-86
3. Not Identified By Vat, Churn, or Sub-lot Number.....	9-86
4. Special Considerations for Grand Lots	9-86
E. Reporting Test Weight Results	9-86
1. Products Identified by Vat, Churn or Sub-lot.....	9-87
2. Products Not Identified by Vat, Churn or Sub-lot	9-87
3. Test Weight Shortages	9-88
F. Validation of Test Weights with the Random Verification Samples.....	9-89
G. Marking of Test Weight Samples.....	9-90
10. CONDITION OF CONTAINER OR PRODUCT	10-91
A. Condition of Container Examinations.....	10-91

1. Selection of Samples	10-91
2. Recording of Observations	10-91
3. Reconditioned or Reworked Car-lots.....	10-92
4. Special Considerations for Grand Lots	10-92
B. Condition of Product	10-93
C. Special Inspections	10-94
11. EVALUATION OF PRODUCT CHARACTERISTICS	11-95
A. Evaluation of Random Verification Samples	11-95
1. Significant Variation in Verification Samples	11-95
B. Butter	11-97
1. Prerequisites.....	11-97
2. Documents and Forms	11-97
3. Monitoring	11-97
4. Coding and Marking	11-97
5. Net Weight.....	11-98
6. Condition of Container	11-99
7. Sampling	11-100
8. Product Evaluation	11-106
9. Re-grading Of CCC Owned Butter Stocks (Bulk and Prints)	11-124
C. Cheese.....	11-129
1. Prerequisites.....	11-129
2. Documents and Forms	11-129
3. Monitoring	11-129
4. Coding and Marking	11-130
5. Net Weight.....	11-131
6. Condition of Container	11-132
7. Sampling	11-133
8. Product Evaluation	11-140
9. Re-grading of CCC-Owned Block or Bulk Cheese	11-154
D. Dry Milk.....	11-156
1. Prerequisites.....	11-156
2. Documents and Forms	11-156
3. Monitoring	11-156
4. Coding and Marking	11-156
5. Net Weight.....	11-157
6. Condition of Container	11-157
7. Sampling	11-158
8. Product Evaluation	11-159
9. Re-grading of CCC owned Nonfat Dry Milk	11-163
E. Evaporated and Sweetened Condensed Milk	11-167
1. Prerequisites.....	11-167
2. Documents and Forms	11-167
3. Monitoring	11-167
4. Coding and Marking	11-167
5. Sampling	11-167
6. Net Weight.....	11-167

7. Condition of Container	11-168
8. Product Evaluation	11-168
9. Re-grading of CCC owned Evaporated Milk	11-169
F. Special Considerations for Grand Lots	11-170
12. PREPARING SAMPLES FOR SHIPMENT TO A SCIENCE AND TECHNOLOGY PROGRAM OR RESIDENT PROGRAM LABORATORY	12-171
A. Resident Program Samples	12-171
B. Fee Inspection Samples and Other Samples Sent to Either the National Science Laboratory or a Resident Program Laboratory	12-171
13. APPEAL GRADING, APPEAL INSPECTION, AND RETESTING	13-175
A. General	13-175
B. Appeal Grading	13-175
C. Appeal Inspection	13-176
D. Retest	13-177
E. Certificate Preparation	13-177
14. CHECK-LOADING	14-179
A. Check-loading	14-179
1. Actual Count	14-180
2. Reliable Tally	14-180
15. DISPOSAL OF OFFICIAL SAMPLES	15-181
A. Policy	15-181
B. Methods of Disposition	15-181
1. Destruction	15-181
C. Samples Requiring Disposition	15-182
1. Resident Programs	15-182
2. Process Cheese Samples	15-182
3. Original Grading of Fresh Bulk Butter and Cheese	15-182
4. Regrading of Government-owned Cheese	15-183
5. Sampling of Government-owned NDM	15-183
6. Butteroil Plants Processing Government-owned Butter	15-183
7. Miscellaneous	15-183
8. National Field Office Samples	15-184
9. Washington Office Samples	15-184
10. Miscellaneous samples	15-184
16. SALMONELLA SURVEILLANCE PROGRAM	16-185
A. Salmonella Surveillance Program	16-185
B. Responsibilities	16-186
1. Grader Responsibilities	16-186
2. National Field Office Responsibilities	16-186
3. National Program Coordinator	16-186
C. Sample Selection	16-186
1. Sampling Procedures for Plants Requesting Approval for a D Code or an Asterisked W or S Code	16-187
2. Environmental Sample Procedures	16-189
3. Sampling Procedures for Plants Requesting Approval for a Packaging or Processing "P" Code	16-191

D. Product Salmonella Testing (Optional).....	16-191
E. Follow-up Action on Quarterly Sampling.....	16-191
1. Follow-up Action on aPositive Product Salmonella Result	16-192
F. Environmental Material Positive.....	16-193
1. Tailings or Filter Material for Air in Direct Contact with Product	16-193
2. Vacuum Cleaner Material	16-194
3. Other Environmental Samples.....	16-194
G. Follow-up Action on the Results P Code Operations	16-194
H. DMS Report and Laboratory Certificate.....	16-195
I. Sample preparation for shipment	16-195
17. DENATURING OF OFF CONDITION PRODUCTS	17-197
A. General	17-197
B. Facilities	17-197
C. Procedures	17-197
D. Obliteration of Markings.....	17-198
E. Certificate of Compliance.....	17-199
1. Government Owned Commodities.....	17-199
2. Commercial Commodities	17-199
18. CERTIFICATES AND RELATED REPORTS	18-201
A. General	18-201
B. Preparation of Inspection and Grading Documents.....	18-201
1. Fresh Grading	18-201
2. Regrading.....	18-201
3. In-Process Grading.....	18-202
4. Condition Inspections	18-202
5. Cursory Inspections.....	18-202
C. Product Identification	18-202
1. Abbreviations	18-202
D. Preparation, Distribution and Retention of DMS Reports	18-203
1. Distribution of the DMS	18-203
E. Certificate Preparation	18-203
1. Certificate Numbering Protocol	18-203
2. Preparation by the National Field Office	18-205
3. Preparation at Field Locations (Resident and Fee Sites)	18-206
4. Certificate Signing Authority	18-206
5. Take-Off Certificates	18-208
6. Retest Certificates	18-208
7. Appeal Inspection or Grading Certificates	18-209
8. Condition Inspections	18-209
9. Export Certifications	18-210
F. Disclaimer Statement for Unofficial Samples.....	18-219
G. Distribution of Grading Certificates and Reports.....	18-219
1. Grader’s Memoranda, Forms DA-201B and 201C.....	18-219
2. Form DA-137, Dairy Miscellaneous Inspection Report (DMS)	18-219
3. Grading Certificates	18-219
H. Form DA-128, Warehouse Condition Checklist	18-220

I. Form WA-667, Certification of Labor	18-220
J. Form WA-570, Inventory Adjustment Notice	18-221
19. PROGRAM REVIEWS	19-223
A. Reviews of Plants Exporting Products to the European Union	19-223
1. Purpose.....	19-223
2. Scheduling	19-223
3. Review Procedures.....	19-223
4. Calculation of Geometric Mean (GM).....	19-225
5. Reports and Billing	19-226
B. Reviews for Applicant Supplied Samples.....	19-226
1. Dairy Grading Branch Review of the Sampling Control Plan (SCP)	19-226
2. SCP Approval.....	19-227
3. SCP Up-dates and Changes	19-227
4. Verification Reviews.....	19-227
5. Verification Samples.....	19-230
6. Documenting Review Findings	19-231
7. Changes in Review Frequency	19-231
8. Charges for Verification Reviews	19-231
20. RESIDENT GRADING AND QUALITY CONTROL SERVICE PROGRAM.....	20-233
A. Prerequisites	20-233
B. Responsibilities of Plants Utilizing Resident Services.....	20-233
1. General Management	20-233
2. Laboratory Facilities	20-234
C. Resident Grader Responsibilities.....	20-234
1. Laboratory Supervision.....	20-235
2. Resident Grader Standard Operating Procedures.....	20-236
D. Dairy Grading Branch Responsibilities	20-236
E. Conducting Laboratory Tests for Other Plants	20-236
1. Responsibilities of Resident Plants	20-237
2. Responsibilities of National Field Office	20-237
3. Responsibilities of Resident Graders	20-238
F. Sampling, Testing and Reporting NDM and Instant NDM	20-238
1. Sampling	20-238
2. Testing.....	20-238
3. Laboratory Analysis Reporting Parameters for NDM and Instant NDM	20-239
G. Laboratory Verification Samples in Resident Plants	20-239
1. Interpretation of Verification Results	20-240
H. Monthly Laboratory Comparisons	20-240
1. Butter and Dry milk	20-240
2. Salmonella Comparison Samples.....	20-243
I. Standards Book and Recordkeeping	20-244
J. Laboratory Safety.....	20-245
1. Emergency Plan Evacuations	20-245
2. Chemical Hygiene Plans.....	20-245
3. Material Safety Data Sheets	20-245
4. Disposal of Chemicals	20-245

5. Disposal of Samples.....	20-245
6. Disposal of Bacteria Plates	20-245
7. Use of Safety Glasses or Face Shields	20-246
8. Use of Rubber Mats	20-246
9. Availability and Location of Fire Blankets and Extinguishers	20-246
10. Availability of Eye Wash Stations	20-246
K. Science and Technology Program (STP) Audits	20-246
1. Responsibilities	20-246
2. Activities of the Science Division Auditor	20-246
3. Follow-up Procedures after an Audit	20-247
21. REGRADING	21-249
A. Inspection Request.....	21-249
B. Grading Facilities.....	21-249
C. Cursory Inspection of Facilities and Product	21-249
D. Net Weight	21-250
E. Certification of Warehouse Labor	21-250
22. CERTIFICATE STATEMENTS	22-251
23. EXHIBITS	23-259
1. Cursory Inspection Report	23-260
2. Grade Label Listing.....	23-261
3. Grade Label Butter Certificate, Metal Contamination.....	23-262
4. DMS, Metal Fragments Inspection	23-263
5. FSA Contract Report.....	23-264
6. Certificate of Conformance for Packaging Materials	23-265
7. Request to Display Special Statement	23-266
8. Product Control Tag.....	23-267
9. Seed Number List.....	23-268
10. Cheese Graders Memorandum, Sample Selection, Page 1	23-269
11. Sample Number Worksheet.....	23-271
12. Application for Butter Grading Service.....	23-272
13. DMS, Nonfat Dry Milk Inspection	23-273
14. Grade Label Butter Certificate	23-274
15. Grade Label Butter Certificate, Low Butterfat.....	23-275
16. Cheese Grader's Memorandum, Sample Selection.....	23-276
17. Sample Selection and Check Weighing Record.....	23-277
18. Application for Butter Grading, Completed, Short Weight & Packaging Deficiencies 23-278	
19. DMS, Nonfat Dry Milk Inspection, Completed.....	23-279
20. Application For Butter Grading Service, Test Weight Shortage	23-280
21. Cheese Graders Memorandum, Random Verification Samples.....	23-281
22. Butter Grading Certificate, In Process	23-282
23. Condition of Container Worksheet, Flexible Containers	23-283
24. Condition of Container, Glass Container	23-284
25. Condition of Container, Metal Containers	23-285
26. Condition of Container, Rigid and Semi Rigid Containers	23-286
27. Cumulative Condition of Container Worksheet.....	23-287

28.	DMS Nonfat Dry Milk, Condition of Container	23-288
29.	DMS Cheddar Cheese, Lab Samples	23-289
30.	Application for Butter Grading Service, Verification Samples	23-290
31.	Application for Butter Grading, Finish Deficiency, Rancid & Rancid KQ	23-291
32.	Product Control Tag.....	23-292
33.	Evidence Tape Placement.....	23-293
34.	DMS Butter, Butterfat Samples	23-294
35.	Cheese Sample Labels	23-295
36.	Butter Grading Certificate, Grand Lot.....	23-296
37.	Butter Grading Certificate, Low Butterfat.....	23-297
38.	Butter Grading Certificate, Regrading.....	23-298
39.	Butter Grading Certificate, Regrading.....	23-299
40.	Special Examination	23-300
41.	Grade Label Butter Grading Certificate, Butter Not Meeting Grade Label	23-301
42.	Butter Grading Certificate, Unwrapping Below Grade Butter.....	23-302
43.	Product Control Tags	23-303
44.	Block Interface	23-304
45.	Cheese Grading Certificate.....	23-305
46.	Cheese Grading Certificate, Lab Results.....	23-306
47.	Cheese Grading Certificate, CCC Purchase Kick Outs	23-307
48.	Cheese Grading Certificate, Lab Results.....	23-308
49.	Process American Cheese Grading Certificate	23-309
50.	Cream Cheese Grade Label Certificate	23-310
51.	Cheese Grader's Memorandum.....	23-311
52.	DMS, Nonfat Dry Milk Inspection, Lumpy Powder	23-312
53.	Evaporated Milk Grading Certificate.....	23-313
54.	Evaporated Milk Certificate, Regrading.....	23-314
55.	Nonfat Dry Milk Certificate, Grand Lot.....	23-315
56.	DMS, Nonfat Dry Milk, Appeal Grading	23-316
57.	Butter Grading Certificate, Appeal Grade	23-317
58.	Cheese Grading Certificate, Appeal Grade	23-318
59.	Process American Cheese In-Process Inspection Certificate	23-319
60.	Process American Cheese In-Process Inspection Certificate, Check-Loading	23-320
61.	Salmonella Surveillance Report	23-321
62.	DMS, Salmonella Sampling	23-322
63.	Nonfat Dry Milk Certificate, Denaturing – Government Owned NDM	23-323
64.	Certificate, Denaturing - Commercial	23-324
65.	Nonfat Dry Certificate, Retest.....	23-325
66.	Certificate, Condition Inspection	23-326
67.	Plant Letter	23-327
68.	Instructions for Completion of Health Certificate Worksheet for Export Certificate .	23-328
69.	Instructions for European Health Certificate Worksheet.....	23-331
70.	European Health Certificate Example	23-335
71.	European Union Animal Health Certificate Example	23-337
72.	Example of Letter of Analysis	23-338

73.	Certificate, Laboratory Billing	23-339
74.	Warehouse Condition Checklist.....	23-340
75.	Inventory Adjustment Notice	23-341
76.	Record of Accountable and Non-Accountable Items	23-342
77.	Guidelines for Physical Control and Storage of Accountable Items	23-343
78.	Transmittal Record.....	23-344
79.	European Union Audit Report.....	23-345
80.	Audit Report	23-347
81.	Audit Report	23-348
82.	Resident Laboratory Request to Test Outside Samples.....	23-349
83.	Laboratory Comparison Report on Non-Fat Dry Milk	23-350
84.	Laboratory Comparison Report on Butter	23-351
85.	Z Score Graphs.....	23-352
86.	Plant Survey Report	23-355
87.	Response to Science Division Review.....	23-356
88.	NonFat Dry Milk Re-Grade Certificate	23-357
89.	Certification of Labor	23-358
90.	Evaporated Milk Regrade Certificate	23-359
91.	Butter DMS CCC Purchase	23-360
92.	Butter Certificate, Commodity Credit Corporation	23-361

1. PURPOSE

These instructions establish the responsibilities and procedures applicable when the Dairy Grading Branch provides official inspection and grading services for manufactured or processed dairy and related products.

A. Mission Statement

The mission of the Dairy Grading Branch is to provide timely, cost effective, and accurate inspection and grading services to our customers. We will accomplish this mission with a dedicated, courteous and professional staff.

2. POLICY

The Dairy Grading Branch provides official Department of Agriculture (USDA) inspection and grading services to a participating dairy plant, applicant, or other interested party on either an intermittent or continuous basis. This service is intended to provide a participating dairy plant, applicant, or other interested party with impartial, expert observations of product characteristics, product quality and processing operations in order to maintain uniform production of wholesome finished products having consistent and stable quality.

Services are provided to participating dairy plants, applicants, or other interested parties on an impartial basis without regard to race, color, religion, sex, national origin, age or disability.

Graders shall follow specified procedures and use good judgment when performing these services to ensure the consistency and accuracy of USDA certifications issued for dairy and related products.

Inspection and grading activities which are not specified in this instruction may be permissible at the discretion and approval of the National Field Director with concurrence of the Branch Chief.

These instructions specify the minimum levels of sampling and surveillance required. Sampling and inspection levels can be increased at the discretion of the National Field Director or the Grader (subject to review by the National Field Director) when conditions indicate unusual situations or lack of quality control by the participating dairy plant, applicant, or other interested party. The participating dairy plant, applicant, or other interested party may also request higher sampling or inspection levels.

Any reference to the singular form shall be assumed applicable to the plural form and visa versa, and any use of the masculine form shall be assumed applicable to the feminine form and visa versa as the case may demand.

Any reference to a responsible or supervisory position shall be assumed applicable to any other position to which authority has been duly delegated.

3. PREREQUISITES TO INSPECTION AND GRADING

A. Plant Approval

The plant shall be surveyed and shall comply with the conditions set forth in the 7 CFR 58 Subpart B, USDA General Specifications for Approved Dairy Plants Approved for USDA Inspection and Grading Service with reference to facilities and equipment, quality of raw materials, processing procedures, sanitation and testing of finished products.

All commodities, that are offered for official inspection and grading services, shall have been manufactured by a facility that is approved by the Dairy Grading Branch.

B. Quality Control and Sanitation Programs

The plant or inspection site shall maintain quality control and sanitation programs sufficient to protect the commodities from contamination and to maintain the wholesomeness and quality of the commodities offered for official inspection and grading service.

C. Tempering and Grading Facilities

When product grading is to be performed, the plant or inspection site shall furnish adequate facilities to temper (when appropriate), obtain laboratory samples and grade official samples.

The grading room shall be of sound construction, clean, free from noise, traffic or other disturbing elements that may interfere with the inspection and grading of the product. The atmosphere shall be clean and free from foreign odors. Use of tobacco in the room is prohibited.

If an area other than a specifically designated grading room is used as a tempering room for butter or cheese, the area shall be of sound construction, clean and free from foreign odors. The use of tobacco in these areas is prohibited.

The grading room shall be provided with temperature controls suitable to maintain the grading room temperature between 60°F and 75°F (15.5°C and 23.9°C).

There shall be sufficient lighting, at least 50 foot candles, where grading activities are performed to ensure accurate evaluation of the product for grade and condition. Portable lighting may be used to satisfy this requirement.

There shall be suitable facilities; counter top, table, or desk; for the inspector to complete official grading reports.

There shall be a wash sink, hot water, disposable towels, and a waste receptacle with a tight fitting lid in the grading room, except that alternative locations for these facilities may be approved by a supervisor.

The sampling and grading of nonfat dry milk, dry buttermilk, dry whole milk, dry whey and other dry products, drums of butteroil or bulk style cheeses (barrels or 640 pound blocks) may be conducted in a designated area of the warehouse.

D. Scales

When test weighing is required, the applicant shall provide scales which are accurate and in good operating condition.

Scale graduations shall be 1 ounce or less; however, if the decimal system is used, the scale graduations shall be .1 pound or less. Direct reading electronic, digital type scales with 01, .05, or .1 pound increments are acceptable. See General Specifications for Dairy Plants Approved for USDA Inspection and Grading Service, section 58.128(m) for additional guidance.

Scales of 250 pounds or greater capacity (for test weighing butteroil drums, bulk powder bins, barrel cheese or 640 pound block cheese) shall have graduations no larger than ½ pound and shall be capable of an accuracy of ½ pound.

Test weights shall be available for checking accuracy of the scale within the test weighing range.

Refer to [Section 9](#) for detailed test weighing instructions.

E. Keeping Quality Cabinet

When required by the inspection and grading guidelines specified in [Section 11.B.8.a.1.d.i](#), the plant, inspection site, or the applicant shall provide a properly functioning keeping quality cabinet that can be maintained at 72°F (22.2°C) in which official Keeping Quality samples shall be stored.

The keeping quality cabinet shall be provided with a permanently welded hasp for the attachment of a locking device to secure the door. In addition a battery or spring actuated, seven day recording thermometer and supply of recording charts should be provided. If the cabinet is used by the plant for keeping quality tests, the official samples must be secured by use of evidence tape or grip lock seals.

F. Storage Capacity

The plant or inspection site shall have cooler or freezer storage capacity sufficient to maintain incoming and finished products at required temperatures until such time as they are presented for official inspection or grading service and are shipped from the premises.

G. Inspection Office Space

The applicant shall provide satisfactory office space or facilities for graders to conduct official business. At a minimum, this shall consist of a desk with adequate light, and lockable file cabinet, and access to a telephone.

4. RESPONSIBILITIES

A. Applicant

USDA inspection, grading and certification services do not relieve applicants from their obligations and responsibilities to present a product that complies with all requirements and specifications. Furthermore, the responsibilities referenced in this instruction do not excuse applicants or plant management from additional responsibilities stated in applicable Farm Service Agency (FSA) Purchase Announcements, purchase specifications and other Federal, State and local regulations.

It is the applicant's responsibility to:

- Assure that products comply with all contract requirements, standards of identity or U.S. Grade Standards before the product is submitted for any examination.
- Inform the National Field Office of inspection services required at least one week before the requested date of inspection, except that:
 - If a direct purchase contract requiring continuous inspection or CCC-owned product conversion contract is involved, the request for inspection and grading services should be filed with the National Field Office at least two weeks before the start of the contract.

1. Product Manifests and Documents

Provide the grader with all pertinent documents and information concerning product identity, purchase specifications, or contract requirements that the grader may require to perform the inspection.

a) Inspection and Grading In Accordance With U.S. Grade Standards

Prepare a manifest describing the lot of product which is offered for inspection and grading. The manifest shall include the following information.

- 1) Name and address of the applicant
- 2) Name and address of the shipper or seller when available
- 3) Name and address of the receiver or buyer when available
- 4) Name and address of the manufacturing plant including the State assigned plant number
- 5) Size, style, type and color of the product, as appropriate
- 6) Churn, vat, or sub-lot numbers
- 7) Number of containers per churning, vat, or sub-lot
- 8) Marked weight per container and gross weight of the entire lot
- 9) Total number of containers in the lot
- 10) The month, day and year of manufacture
- 11) Identification of vats which contain barrels or 640-pound containers of mixed vats of cheese

- 12) An original signature, in ink, of an authorized agent of the applicant. A photocopied signature is not acceptable

(1) Lot Size

See [Section 7.B](#) for further guidance on the maximum sizes of vats, churnings or sub-lots.

Car-lots (Grading Certificates) shall not exceed the following maximum size:

- 150,000 pounds — NDM (165,345 in metric bags)
- 125,000 pounds — Bulk Butter
- 125,000 pounds or 1 day's production — Grade Label Butter and Cream Cheese (including cheese packaged with official identification)
- 150,000 pounds — Butteroil and Anhydrous Milk-fat
- 150,000 pounds — Cheese
- 43,000 pounds — Process Cheese

b) Inspection and Grading In Accordance with Purchase Specifications and Contracts

Applicants that are engaged in contracts with the Commodity Credit Corporation (CCC), Department of Defense (DOD or DPSC), Veterans Administration (VA), Food and Consumer Services Agency (FCS), or Foreign Agriculture Service (FAS), shall:

When product is presented for price support purchase, Dairy Export Incentive Program (DEIP), or for end product evaluation, provide a product identification manifest complying with the requirements of [Section 4.A.1.a](#) and the following additional information:

- 1) The butterfat for each churning (Butter only)
- 2) The moisture and pH value for each vat (American Cheese only)
- 3) The type and style of wrapper, liners, shipping boxes, and barrels used, as appropriate (American Cheese only)
- 4) The pounds of moisture for each vat and the weighted average moisture test for the lot (American Cheese only)
- 5) A statement declaring when the cheese is made from heat treated milk and the required curing times, as appropriate (American Cheese only)
- 6) A statement that the vitamins used meet FSA requirement (Fortified NDM only)
- 7) All missing sequential numbers and notations of packaging irregularities

See [Section 7.B](#) for further guidance on the maximum sizes of vats, churnings or sub-lots.

Car-lots shall not exceed the maximum allowed in the appropriate FSA purchase specifications or contract or those specified above.

The applicant shall:

- Provide the inspector or grader with copies of the Purchase Contract, Invitation, Solicitation for Bids, Product Specifications and other contract documents, as appropriate.
- Sequentially number and label the product presented for inspection and grading according to contract and USDA requirements.

- Inform the grader of all product coding irregularities or other product changes made during production.
- Provide access to all products for inspection and the selection of samples.
- Provide access to all areas of the facility for inspection and monitoring.
- Designate qualified plant personnel to assist the USDA inspector or grader with product handling during inspection, grading and weighing activities when requested.
- Furnish adequate office facilities to complete paperwork associated with inspection and grading services. The office furnishings shall include a lockable file cabinet or drawer wherever USDA accountable items need to be stored.
- Properly label, control, and dispose of rejected products. When products are marked with a USDA Product Control Tag, no actions may be taken on the product without prior USDA approval.
- Promptly remit all fees and expense charges related to the USDA services rendered upon receipt of billing documents.

B. Grader

U.S. Grade Standards and Inspection and Grading Services help define industry standards for product quality. They also play an essential role in the efficient and orderly marketing of dairy products. High quality performance by the USDA grader is essential. Graders are expected to be professionals in their work and to be capable of making quick, sound, impartial decisions.

1. Duties

To accurately assess product quality and to uniformly apply inspection criteria, the grader shall:

- Be familiar with all and adhere strictly to applicable instructions, guidelines, announcements, standards, specifications, and USDA policies. All appropriate documents shall be readily available at the inspection site.

All new or revised instructions are to be implemented on the designated effective dates. They are also to be properly placed in the employee's instruction books and computers. Also, all superseded or discontinued instructions are to be removed from use and instruction books and computers on the designated date.
- Not initiate inspection and grading services if the applicant cannot provide all the necessary documents and contract information. Pay particular attention to FSA Purchase Invitations. Obtain a copy of the specific Purchase Invitation for the contract as it may contain requirements different from those in the FSA Purchase Announcement.
- Not initiate grading of grade label product if the product is packaged in a packaging material that has not been approved and listed on the monthly grade label list or approved for grading by the National Program Coordinator for the Grade Label Program. The grader shall assure that current monthly listings are available.

- Select or personally witness the selection and assembly of all official samples or random verification samples, and safeguard their integrity. For products which require tempering prior to grading, Dairy Grading Branch allows the plant to assemble samples for grading. The use of random verification samples is the Branch's program integrity control to assure that plant assembled samples have not been manipulated. Official samples and the random verification samples are the basis for all of our inspection and grading activities. Safeguarding the integrity of these samples is a critical Branch priority.
- Provide inspection and grading activities in an accurate, efficient and productive manner that is consistent with guidance provided by the Branch supervisory staff. Graders shall not sacrifice accuracy and thoroughness for speed or volume.
- Increase the level of inspection or grading activities necessary to assure that the integrity of the program is maintained. The sampling and inspection levels identified in these instructions are minimums and shall be increased when appropriate.
- Not alter the grade or inspection observations of another grader unless specifically assigned by a supervisory grader to conduct an appeal grading or inspection, re-grade, or re-inspection, to act in the capacity of a Designated Trainer, or to be an on-the-job trainer for a new employee(s).
- Monitor the production, handling, packaging, or storage of the product as appropriate for the inspection site. The grader shall report and provide an appropriate response to any irregularities or unsanitary conditions observed. When such conditions occur, the grader shall provide the following minimum response and all additional responses as the situation warrants. Refer to [Section 6](#) for more detailed guidance.
 - Notify plant management of the condition.
 - Inform plant management verbally and in writing that USDA certifications will not be issued for any product produced until the situation is corrected and that the grader has had an opportunity to review the situation with his/her supervisor. The decision to continue to produce product is a plant management responsibility. Written documentation may be in the form of a memorandum to the plant management or completion of a plant survey cover page as appropriate.
- Use good judgment and make timely decisions appropriate to the circumstances encountered during inspection and grading activities. The grader is expected to make routine decisions based on these instructions, and other appropriate USDA guidelines, announcements, standards, specifications, and policies.
- Contact his/her supervisor or the National Field Office for guidance when unusual situations arise which are not covered by this instruction.
- Shall be fair and impartial when assessing complaints. Graders shall distinguish personal preferences from USDA requirements and policies.

- Not exceed their authority. Graders only have the authority to point out deficiencies within the scope of the inspection service, to recommend corrective action, and to advise the applicant of the USDA response to failure to correct or discontinue the unsatisfactory condition or action.
- Accurately document and record all observations. Special care shall be exercised to document unsatisfactory and unusual situations; including the date, time, observations, lot numbers, cases involved, and what was told to whom. Provide copies of documentation to plant management as appropriate.
- Complete all the necessary inspection documents and distribute them according to the provisions of this instruction.
- Be responsible for proofreading all documents and reports prepared or signed to assure accuracy and adherence to Branch format and policies. Employees are to verify the accuracy of all data items such as, but not limited to, dates, poundage, math calculations, spelling, grammar, syntax, inclusion of all required information or statements, etc.
- Accurately calculate and charge the fees and expenses for services rendered on appropriate certificates, memoranda, or reports.
- Be responsible for accurately completing the Employee Time & Attendance/Work Report each pay period and submitting the report to the National Field Office within the time frame specified by the National Field Director.
- Comply with all plant sanitation and safety requirements.
- Obtain prior approval from your supervisor or the National Field Office for all overtime requested by the applicant.

a) Inspection Site Files

Each inspection site where inspection and grading activities are provided on a routine basis shall maintain the necessary file(s) to assure continuity of our inspection and grading services. The files shall be maintained in an orderly fashion in one or more folders in a desk file drawer, cabinet or file box.

Retain all files that are appropriate for the type of inspection and grading services provided. The files may include but are not limited to:

- Condition of container examination cumulative reports
- Approved grade label packaging materials (filed or posted)
- DMS reports of samples submitted for laboratory analysis
- Product Inspection and Grading Assignment (Cursory Inspection Report) Retain only until a plant survey is completed, then begin the file anew.

If accountable items are to be stored at the inspection site, a lockable cabinet or drawer shall be used.

2. Program Integrity Controls

a) General

Dairy Grading Branch employees shall conduct their activities in a manner that will protect the integrity of USDA programs. The Dairy Grading Branch is responsible for the impartial evaluation of plant facilities and equipment; product quality; and supervision of contract performance. We have an obligation to protect USDA, the users of our services, and the recipients of the products which we inspect or grade, from misrepresentation and fraud.

b) Inspector and Grader Actions

The two most effective program integrity methods available to an inspector or grader are visibility and vigilance. When you are readily visible to the applicant and the applicant's employees—watching and surveying the inspection site—the opportunities for abuse and misrepresentation are minimized. As inspectors and graders, you are expected to be out of the inspection office and “on the line”, in the warehouse, watching the operations, and observing employee practices as much as possible. Observe and ask questions of the actions of plant employees and management.

Refer to [Section 4](#) Responsibilities for additional guidance of your responsibilities.

(1) Conduct and Ethics

All Dairy Grading Branch employees shall follow the guidance and requirements of the USDA Office of Personnel publication, Standards of Ethical Conduct for Employees of the Executive Branch, Executive Order 12674 of April 12, 1989 as modified by Executive Order 12371.

While it is recognized that there are certain limitations specified for the acceptance of gifts and gratuities in the above publication, **it is Dairy Grading Branch policy, that employees restrict their acceptance of offered amenities to those of nominal cost; such as, a cup of coffee or tea, soft drink, inexpensive ball point pens, pads, etc.**

Acceptance of items of greater value will be considered as a potential conflict of interest or as an action which gives the appearance of a conflict of interest. Our effectiveness as inspectors and graders is firmly based in our ability to claim and support impartiality. Acceptance of amenities will erode this impartiality.

(2) Abuse of Authority

All Branch employees are representatives of not only the Dairy Grading Branch but also of the Federal government.

Dairy Grading Branch instructions are intended as minimum levels of inspection. When conditions warrant, inspection activities are to be increased to determine the degree to which defects or inappropriate actions have occurred. Inspectors and graders are cautioned that they are to exercise their authority within the framework of the regulations, instructions and guidelines. Graders only have the authority to point out deficiencies within the scope of the

inspection service, to recommend corrective action, and to advise the applicant of the USDA response to failure to correct or discontinue the unsatisfactory condition or action.

Inspectors and graders shall distinguish personal preferences from USDA requirements and policies and shall not allow personal likes or dislikes to effect the application of the regulations, instructions and guidelines in a fair and impartial manner.

c) Control of Accountable Items

(1) Definitions of Accountable Items

(a) Official Stamps

Official stamps are hand stamps used by Dairy Grading Branch graders, inspectors, and plant employees working under direct USDA supervision to mark containers of officially graded or inspected dairy products. Each official stamp bears a unique four digit serial number (e.g., 0071) that has been imprinted on the USDA shield by the manufacturer. The stamp also has numbers that can be changed to correspond with the certificate number.

(b) Evidence Tape

Evidence tape is used to identify and seal official samples. This tape is red and bears the words “USDA DAIRY OFFICIAL SAMPLES” in black letters. Because this tape is very fragile, any attempts to tamper with official samples will be readily apparent.

(c) Keys

Accountable keys are those keys supplied by USDA over which the Dairy Grading Branch has total control. Accountable keys are used to unlock briefcases and padlocks and hasp locks that secure compartments in which other accountable items are stored.

A grader or inspector is not required to account for keys supplied by a plant or contractor.

(d) Lock Boxes

Lock boxes with combination locks are used to store the keys to any compartments or rooms containing accountable items.

(e) Certificates

All official certificates and certificate paper are considered as accountable items.

(f) Seed Numbers

Seed numbers are numbers used to generate random sample numbers. Seed numbers that a grader or inspector obtains from the National Field Office are accountable items. However, seed numbers that are produced by the random number generator itself are not considered to be accountable items because they are generated at the time of grading, thereby reducing the possibility that they could be misused.

(g) Product Control Tags

Product Control Tags are reddish/orange tags used to identify product which is placed on hold by the Dairy Grading Branch and is not to be moved or released by the applicant. The Product Control Tags are two part tags which are completed by the grader or inspector.

(2) Non-accountable Items that Require Control

(a) Grip Lock Seals

Grip lock seals are serially numbered metal seals used to close and safeguard the integrity of containers of official samples that are sent to the laboratory. Although grip lock seals are not accountable items, graders and inspectors shall retain physical control of them. When not in use, grip lock seals shall be stored in a manner which ensures reasonable safety. In addition, graders and inspectors shall promptly report the loss of these items to the National Field Office.

(3) Procurement of Accountable Items

Graders and inspectors shall receive official stamps, evidence tape, keys, lock boxes, certificates, product control tags, and accountable seed numbers from the National Field Office. Graders and inspectors are responsible for the proper use, control, and care of all assigned grading and certification equipment at all times. They also bear the responsibility for evaluating the condition of their equipment and requesting any necessary replacements or repairs.

Stamps, evidence tape, keys, lock boxes, certificates, product control tags, and seed numbers shall be requested by telephoning, e-mailing or writing to the National Field Office.

See [Section 4.B.2.c.10](#) Stamp Maintenance for further guidance.

(a) Delivery of Accountable Items

Official stamps, evidence tape, keys, lock boxes, certificates, product control tags, and accountable seed numbers may be hand delivered to graders and inspectors by supervisors, or mailed to their homes by the National Field Office. These items will NOT be mailed directly to a plant.

Each year during the Performance Evaluation conference each grader or inspector shall review and confirm his or her record of accountable and Non-accountable items maintained by the supervisor, which lists the serial number of the official stamp and all other items assigned to that grader or inspector. See [Exhibit 76](#).

All graders and inspectors shall review verbal and written instructions from their supervisors on the proper physical control and storage of accountable items.

See [Exhibit 77](#), which provides general guidance on the nature of these instructions.

(4) Official Stamp Identification

As stated in [Section 4.B.2.c.1.a](#), the manufacturer shall imprint a unique four digit serial number on the USDA shield of each official stamp.

(5) Documentation

Upon receiving the accountable equipment, the grader or inspector shall fill out and sign a Form AD-690. This form shall be kept in the National Field Office files and shall serve as the equipment receipt. See [Exhibit 78](#)

The National Field Office shall maintain an official stamp control record to keep track of the official stamps.

The National Field Office shall also maintain a record of accountable and Non-accountable items for each grader or inspector. This record shall list the unique serial number of the official stamp and all other items assigned to that employee. See [Exhibit 76](#).

(6) Inventory

Upon receiving the equipment, the grader or inspector shall check to see that he or she has all of the equipment listed on the copy of the record of accountable and Non-accountable items provided by the National Field Office. The grader or inspector shall then sign and date the record, and return it to the National Field Office. The National Field Office shall indicate any replacements or changes involving that grader's or inspector's equipment on the record of accountable and Non-accountable items. See [Exhibit 76](#)

(7) Physical Control

Once an official stamp or any other accountable item has been assigned to a grader or inspector, he or she is responsible for retaining complete physical control of them at all times. In order to maintain the integrity of official inspection markings, strict accountability controls shall be exercised not only by the grader or inspector, but by all persons involved.

The grader or inspector bears the responsibility for maintaining physical control of the official stamp or other accountable item even when not actually using them during working hours. For example, the grader or inspector shall not leave the stamp unsecured during lunch or restroom breaks, or while performing some other task at the plant.

When not in use during working hours, it is recommended that grading equipment and items be stored in a lockable carrying case. Only the responsible grader or inspector may remove equipment from or return it to the case.

Alternatively, the grader or inspector may store equipment he or she is not using in an approved locked cabinet, file, drawer, locker, or in another secure location.

The grader or inspector is cautioned to maintain surveillance over accountable equipment. Although the grader or inspector may receive assistance in stamping cases, he or she shall always closely supervise the use of official stamps by others. In addition, the grader or inspector shall never leave a stamp in the possession of plant or warehouse personnel.

(8) Use of Accountable Items

(a) Official Stamps

Official stamps are used to mark containers of officially graded or inspected products. Graders and inspectors shall use only stamp pad ink to ink official stamps. Using stencil ink can clog the stamp and destroy the rubber.

Contracts may require or companies may request that every box or bag containing graded product be stamped. In such a case, plant employees may help the grader or inspector stamp the containers. However, the grader or inspector shall supervise all use of the official stamp and shall remain in the immediate area where the stamp is being used.

(b) Evidence Tape

When graders or inspectors select official samples that will be out of their physical control, they shall secure them by placing evidence tape across the container openings. If necessary, graders and inspectors may then secure evidence tape with a clear tape, such as Scotch tape, to prevent it from being damaged during handling or in transit.

(c) Keys

Accountable keys are used to unlock briefcases and padlocks and hasp locks that secure compartments in which accountable items are stored.

(d) Lock Boxes

Lock boxes are used to secure the keys to compartments and rooms containing accountable items. The grader or inspector shall safeguard the combination from plant employees. The lock box shall be fully secured each time it is left unattended. It is unacceptable to partially enter the combination and then leave the lock box unattended. The lock box combination shall be changed immediately upon receipt of a new combination from the National field Office.

(e) Certificates

Grading and inspection certificates are used to describe products graded or inspected in accordance with Dairy Grading Branch instructions.

(f) Seed Numbers

Seed numbers are used in conjunction with the random number program stored in the random number generator to produce random sample numbers. If a grader or inspector uses a random number generator that cannot produce its own seed numbers, the National Field Office shall supply that employee with a printout list of approximately 50 seed numbers. The grader or inspector shall safeguard the confidentiality of the listed seed numbers in order to preserve sample integrity.

The grader or inspector should record the location and date each seed number was used on the printout list. The grader or inspector shall keep lists of used seed numbers for one year in case questions arise regarding seed number usage.

(g) Product Control Tags

The product to be placed on hold is to be clearly identified on both sections of the two part tag. The lower portion of the completed tag is to be removed and sent to the National Field Office with a copy of the graders memorandum or sampling report covering the product. The upper portion of the tag is then to be secured to the product under hold with evidence tape.

(9) Equipment Storage

Official stamps, evidence tape, unused certificates, product control tags, and seed number lists shall be stored in a manner which ensures reasonable protection and safety. Accountable items which are not currently being used by a grader or inspector shall be:

1. Placed in a locked carrying case, briefcase, cabinet, file, locker, drawer, or room;
2. Safely stored in the employee's home; or
3. Stored in a carrying case that has been placed inside the employee's locked car.

In a resident program, the resident grader shall store accountable items in a padlocked cabinet or drawer to which only he or she has the key. The key to the storage compartment shall be locked in a combination lock box.

Cabinets or lockers should be large enough to accommodate storage of accountable items. They shall be made of heavy gauge metal with sides, backs, tops, and bottoms securely fastened by rivets, pan-head bolts, or spot welds (or a combination of these devices) which shall prevent entry and plainly disclose attempts to gain entry. Also, door hinges shall be recessed or welded to prevent hinge post removal. Cabinets or lockers shall be equipped with a hasp that can be used in conjunction with a lock having at least a ¼ in. shackle diameter and a 1 in. shackle clearance.

(10) Official Stamp Maintenance

The official stamp should be cleaned whenever its marks are not clearly legible. The stamp may be cleaned by rubbing its rubber shield with a dull object (such as a straightened paper clip), or by briefly immersing it in a solution of warm water and mild soap. The turn wheels on a thumb dial stamp should occasionally be lubricated with oil.

(11) Official Stamp Replacement

The grader or inspector should check his or her official stamp periodically to ensure that it is in proper working condition. When a stamp appears to be wearing out, or if it breaks, the grader or inspector should immediately inform the National Field Office so that a replacement stamp may be delivered as soon as possible.

Replacements for official stamps shall be obtained by the same procedure used to acquire original stamps. (See [Section 4.B.2.c.3](#))

Old stamps that are beyond repair shall be destroyed in accordance with [Section 4.B.2.c.15](#).

(12) Surrendering Official Stamps or Other Accountable Items

When a grader or inspector leaves the grading service, all of that employee's accountable items and equipment shall be collected or destroyed. The National Field Office shall then compare the actual items and equipment with that employee's record of accountable and Non-accountable items maintained in the National Field Office files. If a special article (e.g., an official stamp or lock box) is missing, the National Field Office shall convey the information to the Washington Office. The Washington Office shall turn all information concerning unreturned accountable items over to the AMS Compliance Staff.

When replacement or repair of an accountable item is necessary, the grader, inspector, or supervisor shall prepare a memo describing the unserviceable, lost, or damaged property. The memo should clearly describe the defect, its cause, and request replacement or repair.

(13) Loss of Physical Control of Official Stamps or Other Accountable Items

Loss of physical control refers to instances when the stamp or other accountable item is being used by a plant employee who is not being supervised by a grader or inspector. It does not refer to disappearance of the official stamp.

The grader or inspector shall submit a written statement about the incident. If it is determined that the grader or inspector is at fault, the Washington Office and National Field Director shall determine the appropriate disciplinary action. The AMS Compliance Staff shall also receive a full report of the incident. This report shall be placed in the employee's performance file.

(14) Theft or Loss of Official Stamps or Other Accountable Items

If a grader or inspector cannot account for a stamp or other accountable items, he or she shall notify his or her supervisor or the National Field Office immediately. If the item is missing in a plant, the plant manager shall be informed, official grading service shall be discontinued immediately, and a thorough search of the plant shall be made by the grader or inspector and plant management. Official grading service shall be suspended until: (1) the item is found; or (2) in the case of a stamp, the serial number for that stamp is declared invalid and the employee receives a new stamp.

The grader or inspector shall send a written report of the missing stamp or other accountable item to the National Field Office, which in turn shall inform the Washington Office. If theft or improper use of the missing item is suspected, the Washington Office shall inform the AMS Compliance Staff.

If it is determined that the loss or theft was not due to the grader's or inspector's negligence or failure to follow instructions, this shall be noted on the report. No disciplinary action shall be taken against the employee.

If the loss or theft was due to the grader's or inspector's negligence or failure to follow instructions, this shall be noted on the report. The Washington and National Field Offices shall determine appropriate disciplinary action. This action shall be noted on the report of the incident.

(15) Official Stamp Disposal

Any official stamp which is beyond repair shall be returned to the National Field Office for disposal. An official stamp shall be destroyed in the presence of at least one witness by removing the rubber part, cutting it up, and throwing the pieces into the trash.

(16) Fraud and Misrepresentation of Accountable Items

According to 7 CFR Part 58.58, the use of an official stamp, label, or identification in the labeling or advertising of any product that has not been inspected or graded constitutes fraud and misrepresentation. Such acts may be deemed sufficient cause for debarment from any or all benefits of the Agricultural Marketing Act of 1946.

3. Employee Conduct

The validity of the Branch's services also comes from the proper and ethical conduct of its employees, particularly when dealing with applicants and the general public. When performing official duties, graders shall conduct themselves in a professional manner, paying particular attention to the following policies:

- The grader shall avoid any activity which may be construed as a conflict of interest, have the appearance of a conflict of interest, or cause him/her to be obligated to the plant officials or plant employees. (Guidelines on "conflicts of interest and outside employment" are outlined in AMS Directives. Additional guidance is provided in the *Standards Of Ethical Conduct For Employees Of The Executive Branch*, prepared by the United States Office of Government Ethics). If there are any concerns or questions about conflict of interest, contact your supervisor or the National Field Director.
- Graders shall not use applicant supplied services for personal use, except for such facilities as lunch rooms, rest room, locker rooms, etc. which are for general use.
- Graders shall not use applicant telephones for personal calls, except that an applicants telephone may be used for collect or credit card calls as provided for in AMS Directive 3300.1.
- Telephone calls relating to the inspection and grading activities requested by the plant may be made on the applicant's telephones.
- Graders, except resident graders, shall not accept uniforms or uniform laundering services from an applicant. Resident graders who are supplied uniform services under a plant wide contract shall not be eligible for the Dairy Grading Branch uniform allowance, except that; resident inspectors may use the uniform allowance for items not provided by the uniform service. See [Section 4.B.7](#).
- Graders (including members of a grader's immediate family) shall not accept meals, lodging, gifts, gratuities, or other amenities supplied by an applicant or interested party.

- Graders have access to privileged information and it is their responsibility to protect such information. Sensitive proprietary information concerning plant business, processes, techniques, equipment, and survey and grading results shall be kept confidential.
- Graders **shall not** sign confidentiality agreements presented by applicants. Graders should also check plant sign in sheets to make sure they do not include confidentiality statements.
- Graders shall acknowledge the department's established organizational structure and follow instructions given by the Branch's supervisory staff. The AMS Employee Handbook provides information as to the circumstances under which an employee can forego the chain of authority and the appropriate procedures to follow when filing a complaint or grievance.
- Graders shall conduct all of their activities in accordance with the principles of Equal Employment Opportunity (EEO). All services and contacts will be provided without regard to race, color, sex, marital status, religion, national origin, handicap, or age.
- Graders shall conduct interpersonal relationships with plant management, plant employees and coworkers in a professional and cordial manner. As part of the Agricultural Marketing Service, the Dairy Grading Branch's mission is to assist with the marketing of dairy products. Our relationships with applicants should not be adversarial in nature. Our interactions should be to assure that Dairy Grading Branch policies and instructions are being properly conducted; not, to "catch" applicants doing wrong.
- Graders shall maintain a professional attitude when representing the agency with plant personnel. When complaints are raised, graders shall promptly deal with them and shall address plant management in a direct and firm but polite manner. Offensive language, physical abuse and threats shall not be used by USDA employees nor tolerated when directed at them by other parties. If a grader encounters a situation where there is abuse of threats they should remove themselves from the situation as quickly as possible. Graders shall immediately notify the National Field Office of any abuse or threats directed at them from an applicant or their employees and representatives.

4. Duty Assignments

Graders can expect to receive duty assignment schedules by the close of business on the second to last scheduled work day of each week. If a duty assignment is not received by that time, it is the grader's responsibility to contact the National Field Office for their schedule.

Duty assignment schedules may be altered upon short notice by the National Field Office or scheduling supervisor in order to respond to changes in inspection and grading requests which were unknown at the time the duty assignment schedules were established.

Graders shall report promptly for scheduled duty assignments.

Graders can expect to be assigned to a variety of duty assignment tours which may include day or night shifts, overtime and holiday duty and travel.

Graders are required to work overtime authorized and assigned by the supervisor or National Field Director either prior to or ending an assigned tour of duty, or for unusual or emergency situations.

Graders may accept or decline weekend or Federal holiday overtime assignments resulting from industry requests approved by the National Field Director and which are not covered by the provisions of the above paragraph.

Graders can expect to be assigned duty schedules which require substantial overnight travel. Travel duty assignments may also require extension of travel status over weekend(s).

While on travel status, the Departmental regulations governing travel shall apply. Graders are responsible for maintaining all necessary travel records to substantiate claims for reimbursement of official travel expenses.

Graders shall notify the supervisor or the National Field Office when a duty assignment has been canceled by the applicant or if the assignment is of shorter duration than scheduled.

5. Leave

Annual leave and sick leave for such situations as scheduled appointments shall be requested by the grader, documented on a OPM Form-71, Application for Leave, and be approved by the National Field Office in a timely manner and as far in advance as possible.

The grader shall notify the supervisor or the National Field Office of emergency annual or sick leave as soon as possible after the emergency occurs.

Medical certifications shall be provided by the employee upon request by the National Field Director within the scope of AMS Directives.

6. Safety

Graders are to conduct themselves in a safe manner at all times and exercise extreme care when working around moving machinery. They are to wear the safety items, such as bump caps and ear plugs, provided by USDA or required by the plant. Additionally, the purchase of safety toe shoes is authorized for reimbursement as part of the Branch's Uniform Allowance policy. Loose fitting clothing shall not be worn around moving machinery.

The Dairy Grading Branch offers many types of inspection and grading services at a wide variety of applicant locations. Since all of these activities are not conducted by every employee, there may be items of safety equipment that will enhance safety for individual employees. Examples of specialized safety equipment include non-slip gloves, ear muff type hearing protection, or back support belts and braces. If there are items of safety equipment which you feel are necessary for you to conduct your job responsibilities in a safe manner or protect you from injury, contact the National Field Office.

Graders shall obtain a copy of the plant's Emergency Evacuation Plan and post it in the grading office and/or grading area. In the absence of a plant plan, the grader shall determine the fastest evacuation route from the grading office and area.

Dairy Grading Branch employees are not trained and do not have the expertise to interpret or enforce OSHA regulations. Dairy Grading Branch policy is to notify plant management of any obvious unsafe condition observed during our official duties.

If the conditions endanger the safety of Dairy Grading Branch employees and plant management fails to take action, grading services shall be discontinued with the concurrence of the National Field Director.

When traveling to official duty assignments in cars, either government supplied or personally owned, employees shall wear safety belts.

7. Dress Code

a) Hygiene

Graders shall be well groomed, clean, and maintain a high level of personal hygiene.

b) Clothing

Graders shall wear light colored or white slacks and shirts or blouses, white coveralls, or a white laboratory coat (knee length or short) over “street clothes”.

Resident inspectors that are covered by a plant uniform service and a plant policy to wear light colored uniforms other than white are exempt from the white clothing dress code requirements.

Special duty assignments may be scheduled which do not require white clothing. In such instances, graders will be advised of the exemption by the supervisor.

c) Hair Coverings and Headgear

Graders shall wear hair nets which completely envelop the hair while working in areas where product is being processed, sampled, graded, inspected or stored. Additionally, graders may wear disposable white paper hats, white cloth caps, or white plastic “bump” caps.

Beards, mustaches, and long sideburns are discouraged. Beards may be exempted because of religious reasons or when daily shaving is not advisable for a documented medical reason. When such exemptions are granted, beard nets shall be worn. The employee shall demonstrate that they are capable of performing all of the required grading duties while properly wearing the beard net.

The National Field Office shall supply the hair nets, beard nets, and bump caps.

d) Footwear

Graders shall wear clean, good condition, slip resistant footwear constructed of leather, rubber, or similar material. Footwear with safety toes is recommended.

Sandals shall not be worn while on duty.

e) USDA Insignia

Graders shall attach a cloth “USDA” patch, supplied by the National Field Office, to shirts or blouses, white coveralls, white knee length laboratory coats, or short style white laboratory coats worn while on duty. Except that resident graders utilizing a plant uniform service are not required to affix patches to the uniforms. Display of the plastic pocket protector with the USDA logo is encouraged.

All graders are encouraged to use and resident graders shall use the following forms of insignia while on duty.

- A “USDA” decal, supplied by the National Field Office, shall be applied on plastic bump caps.
- Disposable paper hats shall be printed with the “USDA” logo or shall be plain white paper. Cloth hats may display a cloth “USDA” patch or be stenciled with the “USDA” logo.

8. Uniform Allowance

Reimbursement for the cost of special clothing required in the performance of official duties is authorized pursuant to the Federal Employees Uniform Allowance Act (5 USC 5901). The following provisions shall apply:

Reimbursement for the cost of required white clothing and footwear shall not exceed \$400.00 per full time employee per fiscal year.

Intermittent employees may be reimbursed on a pro rata share proportional to the hours worked per fiscal year. The National Field Director shall calculate, document, and authorize the reimbursement.

Items eligible for reimbursement:

- White or light colored trousers or slacks
- White shirt or blouse
- White coveralls
- White jumpsuit
- White laboratory or doctors coat (long or short styles)
- White cloth caps
- White belt
- Shoes, safety toes
- Shoes, rubber
- Rubber footwear, slip on style
- Tailoring to attach “USDA” patches to clothing
- Tailoring to attach employees name to clothing

a) Claim for Reimbursement

The Grader shall provide proof of purchase in the form of an itemized receipt. The Grader shall sign the itemized receipt. The receipt shall be attached to a short memorandum which states that the items were purchased exclusively for use while performing official duties, and which is signed and dated by the grader.

Claims for reimbursements shall be sent to the National field Office for reimbursement.

The following are ineligible for reimbursement.

- White clothing purchased for non job use or which is not readily identifiable as for official use.
- Laundry services.
- White clothing purchased by resident inspectors covered by a plant uniform service.
- White clothing purchased by nonfederal employees such as cooperating State graders.
- Hair nets, beard nets, or other items which are supplied by the National Field Office.

5. DOCUMENTS AND FORMS

A. Documents

In addition to this instruction, applicable issues of the following documents, in effect on the date of the request for inspection or grading, shall apply as applicable to the specific grading or inspection request.

1. Code of Federal Regulations

- 7 CFR Part 58 Subpart A—Regulations Governing the Inspection and Grading Services of Manufactured or Processed Dairy Products
- 7CFR Part 58 Subpart B—General Specification for Dairy Plants Approved for USDA Inspection and Grading Service, and Amendments

2. United States Grade Standards

- U.S. Standards for Butter
- U.S. Standards for Grades of Whipped Butter
- U.S. Standards for Grades of Cheddar Cheese
- U.S. Standards for Grades of Bulk American Cheese
- U.S. Standards for Grades of Colby Cheese
- U.S. Standards for Grades of Monterey (Monterey Jack) Cheese
- U.S. Standards for Grades of Swiss Cheese, Emmentaler Cheese
- U.S. Standards for Grades of Dry Buttermilk and Dry Buttermilk Product
- U.S. Standards for Grades of Dry Whole Milk
- U.S. Standards for Dry Whey
- U.S. Standards for Grades of Edible Dry Casein (Acid)
- U.S. Standards for Instant Nonfat Dry Milk
- U.S. Standards for Grades of Nonfat Dry Milk (Spray Process)
- U.S. Standards for Grades of Nonfat Dry Milk (Roller Process)
- U.S. Department of Agriculture Standard for Ice Cream

3. United States Product Specifications

- USDA Specifications for Cream Cheese, Cream Cheese with Other Foods and Related Products
- USDA Specifications for Ghee
- USDA Specifications for Instant Dry Whole Milk
- USDA Specifications for Loaf and Shredded Lite Mozzarella
- USDA Specification for Light Butter
- USDA Specifications for Margarine/Butter Blend
- USDA Specification for Mozzarella Cheeses
- USDA Specifications for Reduced Fat Cheddar Cheese

- USDA Specifications for Ricotta Cheese
- USDA Specification for Loaf, Sliced, Shredded and Diced Muenster Cheese
- USDA Specification for Sour Cream and Acidified Sour Cream
- USDA Specification for Yogurt and Lowfat Yogurt
- USDA Specifications for Shredded Cheddar Cheese
- USDA Specifications for Vegetable Oil Margarine
- U.S. Sediment Standards for Milk and Milk Products
- U.S. Scorched Particle Standards for Dry Milk

4. FSA Documents

- FSA Purchase Invitation, as appropriate
- FSA Purchase Announcement for Bulk Dairy Products
- General Terms and Conditions for the Procurement of Agricultural Commodities or Services

5. Condition of Container

- U.S. Standards for Condition of Food Containers
- Handbook for Inspection of the Condition of Food Containers
- Visual Aids for Inspection of Flexible, Metal, Rigid and Semi-rigid Containers

6. Military Documents

- DOD Purchase Solicitation, as appropriate
- Invitation for Bid, as appropriate
- MIL-STD-105D, Sampling Procedures and Tables for Inspection by Attributes

B. Forms

The following forms shall be used by the grader to document the findings made during the inspection and grading process.

1. Official Identification

- DA-155 Application to Use Official Identification or Grade Labels
- DA-156 Request to Display Official Identification or Grade Labels

2. Miscellaneous Product Grading

- DA-201 Universal Grading Certificate
- DA-201B Application for Butter Grading service
- DA-201C Cheese Graders Memorandum
- DA-147 Product Control Tag

3. In Process Product Grading

- DA-153 Sample Selection and Test Weighing Record
- DA-201 Universal Grading Certificate
- Identification for Process American Cheese
- Natural Cheese Trim Tag

4. Condition of Container Examination

- AD-748 Container Examination Worksheet (Rigid and Semi-rigid containers, corrugated or solid fiberboard, chipboard, wood, etc.)
- AD-748 Container Examination Worksheet (Metal Containers)
- AD-741 Container Examination Worksheet (Flexible Containers)
- AD-741 Container Examination Worksheet (Glass Containers)
- AD-749 Cumulative Original Inspections of Conditions of Container

5. Re-grading

Use the appropriate grading certificates and worksheet listed previously.

- DA-128 Warehouse Condition Checklist
- WA-667 Certification of Warehouse Labor
- KC-426 Request for Commodity Inspection
- WA-570 Inventory Adjustment Notice

6. Plant Inspection

The following forms are used to document observations and unsatisfactory plant conditions that warrant the reduction in plant status assignment which are encountered during a grading or inspection assignment.

- DA -151 Plant Survey Report, Cover Page
- DA-151-1 Plant Survey Report, Page A
- DA-151-2 Plant Survey Report, Page B - Butter
- DA-151-3 Plant Survey Report, Page C - Cheese
- DA-151-4 Plant Survey Report, Page D - Dry Products
- DA-151-5 Plant Survey Report, Page E - Evaporated & Sweetened Condensed Milk
- DA-151-6 Plant Survey Report, Page G - Dry Products Blending and Packaging
- DA-151-7 Plant Survey Report, Page H - Instant Products
- DA-151-8 Plant Survey Report, Page K - Process Cheese
- DA-151-9 Plant Survey Report, Page L - Miscellaneous
- DA-151-10 Plant Survey Report, Page M - Membrane Processing
- DA-151-11 Plant Survey Report, Page N - Natural Cheese Cutting & Shredding
- DA-151-12 Plant Survey Report, Page W - Whey
- DA-151-13 Plant Survey Report, Page Z - Status

- DA-151-14 Nonconforming Equipment Report

7. Cursory Inspections

- DA-28 Product Inspection and Grading Assignment (Cursory Inspection Report)
- DA-28A Plant Inspection Follow-up (Cursory Inspection Report)

8. Administrative

- Employee Time and Attendance/Work Report
- OPM-71 Application for Leave

6. MONITORING PRODUCTION AND PACKAGING OPERATIONS

When conditions are observed which can substantially and adversely effect product quality, are a public health hazard, or will compromise program integrity:

- Contact the National Field Office for further instructions,
- Do not conduct grading or inspection activities,
- Document the observations, and
- Assign an Ineligible plant status.

A. General Monitoring Activities

The following monitoring activities are applicable to all inspection and grading assignments. It is the responsibility of each grader to conduct these activities, as well as the appropriate activities identified in [Section 6.B](#), in a manner and at a frequency which will assure the integrity of Dairy Grading Branch programs. As appropriate, question plant management or employees for clarification of observations.

1. Cursory Inspection

Conduct a brief, visual run-time inspection of production, processing, packaging and warehousing at the inspection or grading site. Also conduct a visual evaluation of the specific lots to be graded or inspected and the grading room or area. These activities are to assure compliance with Dairy Grading Branch requirements prior to commencing official inspection or grading activities.

A cursory inspection is not intended as a complete plant inspection or as an extension of a previously conducted plant inspection. The cursory inspection shall be sufficiently detailed to assure that serious conditions (Plant Survey Defect Categories A and B) have not developed that will adversely effect the condition, quality, or safety of the product to be graded or inspected. When deficiencies have been previously noted, the inspector shall refer to the cursory inspection file and monitor that improvements have been accomplished.

The cursory inspection shall include but shall not be limited to the following:

- Evaluate facilities for deficiencies which potentially can contaminate exposed product such as peeling paint, leaking ceilings or service piping, mold, openings to the exterior, overflowing sewers, etc.
- Observe product handling and processing procedures. When pasteurization is required, check that the regulatory seals are intact.
- Evaluate equipment sanitation and maintenance when appropriate (as it pertains to product quality and wholesomeness.)
- When production of product is occurring at the plant, observe employee actions and practices. Place particular emphasis on employee sanitary handling of exposed product.
- Inspect for the evidence of rodent, bird, other animal, or insect pest infestation.

- Confirm that adequate grading facilities are available. Check for adequate lighting, ventilation, temperature, and freedom of extraneous traffic, odors, or noise.
- Products requiring either refrigerated or freezer storage shall be stored in appropriate facilities.
- If there are obviously damaged containers or improperly sealed containers, arrangements shall be made for immediate repackaging under supervision (if appropriate) or for deletion from the manifest.
- When faulty packaging (i.e. loose flaps, missing tape, dry products sifting from bags, etc.) is noted on the cursory inspection, determine if the defects are isolated or throughout the production.
 - Isolated packages are to be separated from the lot or repaired.
 - If the defects comprise 20 percent or more of the inspection lot, the inspection lot as presented shall not be inspected or graded for sale to Commodity Credit Corporation (CCC).
 - For commercial grading, Sub-lots, vats or churnings that have been identified as having 20 percent or more defective packaging shall be rejected from all grading. Vats, or churnings from the inspection lot which do not exhibit damaged containers may be re-offered, alone or combined with other product, for official grading as a new inspection lot which is subject to all routine sampling and inspection procedures. Sub-lots of nonfat dry milk can not be reoffered unless the product is re-bagged.

See [Section 6.C.2](#) for guidance on acceptable reworking of damaged product.

- Document the cursory inspection on a Form DA-28, Product Inspection and Grading Assignment (Cursory Inspection Report). Complete the heading and the portion pertaining to assignments on the left side of the report. See [Exhibit 1](#).

If no serious deficiencies (Category A or B) complete only the heading information of the report and check the “No serious deficiencies noted” box.

- If a Category A deficiency is noted, discontinue grading, inform the applicant that you are recommending that the Ineligible plant status be assigned, and contact the National Field Office for further guidance. Complete a plant survey cover page and page Z, as appropriate, to document the conditions observed and the recommendations made to the responsible official at the grading site. Provide a copy of the plant survey pages to the responsible official.
- If a Category B deficiency is noted, continue grading, notify the applicant of the seriousness of the deficiency, recommend immediate correction, and contact the National Field Office to advise them of the deficiency.
- File a copy of all completed cursory inspection forms in the inspection file in the grading room or area that is provided under the requirements of [Section 3.G](#). The cursory inspection report can be deleted from the file following a complete plant survey of the facility.

- Telephone the National Field Office for guidance when unusual conditions or conditions that could affect public health are encountered.

2. General Monitoring Activities

Monitor storage temperatures of raw or processed products used to produce products presented for official inspection or grading services.

Monitor that all dairy ingredients or raw dairy products received and used for products offered for official inspection or grading service are produced in USDA approved facilities.

Products which have been produced or packaged in an Approved Plant bearing a “P” code and listed in *Dairy Plants Surveyed and Approved for USDA Grading Service*, Section II, are not acceptable for official inspection services unless they are accompanied by a Dairy Grading Branch Grading Certificate.

Dairy products which emanate from a Grade A source plant are considered acceptable for use under the following conditions:

1. The plant is listed on the National Conference on Interstate Milk Shipments compliance listing, or the plant is inspected under a State regulatory agency inspection program utilizing the criteria of the FDA Pasteurized Milk Ordinance; and
2. The product is in a container (such as 25kg bags of nonfat dry milk, buttermilk, dry whey protein concentrate, etc.) that is labeled as Grade A, or, as in the case of bulk liquid products (such as cream, condensed whey, condensed whey protein concentrate, etc.) the shipment must be accompanied by a manifest which clearly states that the products are Grade A.

Monitor that the required container and sample markings are accurate and are properly applied in accordance with [Section 7.A.1](#).

Monitor that adequate storage facilities are available and, when applicable, adequate cooling capacity is available to properly cool processed products.

Monitor and be alert for any conditions or situations that could potentially result in fraud or misrepresentation, or compromise the integrity of the program.

Monitor that the scales and test weights used for official test weighing have been validated by an authorized scale maintenance company or State Agency.

Monitor that the tare weight materials are representative of the materials being used.

Monitor that tare weight materials are properly dated and have not exceeded the acceptable time for use. See [Section 11.B.5.2](#)

3. Documentation

Document your monitoring observations which require action or correction by plant management. Provide a copy to plant management and retain a copy for the inspection files.

If the conditions observed warrant the assignment of an Ineligible status, written notification shall be left with plant management. The documentation shall include the following information:

- The date of the occurrence
- The name and number of the plant
- A description of the deficiencies which resulted in the Ineligible status
- Who in plant management was notified
- The signature of the grader issuing the notification

It is preferred that the notification be on Plant Survey Report cover page (DA-151) and page Z (DA 151-13). However, if these pages are not available at the inspection site, a memorandum style notification is acceptable.

B. Special Considerations

In addition to the monitoring activities specified in [Section 6.A](#), the following special considerations shall also be performed.

1. Original Grading

These monitoring functions apply to original grading activities for CCC purchases, commercial gradings, Department of Defense (DOD or DPSC) purchases, or Veterans Administration contracts.

When products offered for official inspection and grading services require tempering and sample selection numbers have been provided to the processing plant; the grader shall validate that the sample numbers selected correspond to the appropriate seed number sequence for each lot of product offered; the grader shall identify and be present to observe the gathering of the verification samples.

Confirm that the samples have been tempered to the proper grading temperature range (45° to 55° F.).

When products offered for official inspection and grading services do not require tempering, the grader shall identify and observe the gathering of all official samples.

Confirm the age of the product offered is eligible for grading. See [Sections 11.B.7.a](#) and [11.C.7.a](#), Age Determination.

Check the accuracy of grading manifests and worksheets presented.

a) Grade Labeled Products

Monitor that the grade labels offered for grading are listed on the monthly update listings provided by the Washington Office. When unlisted labels are offered for grading, do not grade until approval (written or verbal) has been granted by the National Coordinator for Grading Activities (which includes the Grade Label Program). See [Exhibit 2](#). Also see [Sections 7.F](#) and [7.H](#).

Periodically, when possible, check that the number of cases offered for grading on the manifest(s) are the same shown as produced on plant production records. Lots showing a discrepancy shall not be graded without concurrence of the National Field Office.

2. In-Process Inspections

These monitoring functions apply whenever inspection activities are applied on a continuous basis during processing or packaging:

Monitor the quality of the dairy products being processed to assure it is consistent with the contract or purchase specification.

Observe the sanitation of the processing machinery prior to the start of processing.

Verify that all stripping and cleaning operations conducted by the plant are done in a sanitary manner and that waste products are properly controlled. See [Section 6.C](#).

Maintain continual monitoring of processing operation to assure that good manufacturing practices are being used.

Monitor that adequate housekeeping is maintained.

Makeup lots prepared in advance for replacement of official samples removed for laboratory analysis shall have been fully inspected and accepted for all contact requirements (laboratory analysis, test weight, condition of container) and be covered by an accompanying certificate.

Replacement with un-inspected product shall not be permitted.

3. Denaturing Inspections

These monitoring functions apply whenever off condition products that have been sold by CCC are denatured under continuous inspection. For additional inspection guidance, see [Section 17](#).

Monitor all covering certificates (identification numbers and quantity of product) to assure that all product covered by the denaturing contract is denatured. This shall include accurate inventory counts of all product denatured.

Test all denaturing equipment periodically throughout the denaturing process to assure that it is functioning properly.

Provide continuous observation of the denaturing process.

Confirm that all USDA markings are obliterated from the packaging materials and containers are clearly marked "Not for use as Human Food."

C. Rework Policy

Reclaim operations, by their very nature, are high risk enterprises which can put the entire production operation in jeopardy if not carried out in a sanitary manner.

Dairy Grading Branch recognizes that some products which fail to comply with U.S. Grade requirements or specifications because of occasional, temporary deficiencies may be reworked and not materially affect the final quality or suitability for use of the finished product.

Store returns are not acceptable for reclaiming operations in USDA approved plants. These products have been subjected to a variety of storage and handling conditions that are unknown to USDA. Therefore, they are considered as unapproved source products.

The following guidelines are for the reclaiming of occasional or temporary production of off-condition products. They are not intended to sanction poor management policies, unwholesome or careless production practices, or the wholesale reclamation of rejected products regardless of the reason for the off condition.

Reclaim products are to be reprocessed at the plant of manufacture and shall not be accumulated and shipped to off site plants for reclaiming except as allowed for the processing of butter for butteroil and cheese trim. See [Sections 6.C.7](#) and [6.C.8](#).

1. Products Contaminated By Extraneous Material

Products which contain extraneous material, such as grease intermixed with product due to a bearing failure, embedded shipping carton material resulting from a forklift tine puncture, filth, insects or rodent contamination, lumpy powder, foreign flavors, or other foreign materials or unapproved ingredients are not considered as suitable for blending with satisfactory product. See [Section 6.D](#) for inspection guidance for products contaminated with metal fragments.

Scrap or waste product shall be placed in containers labeled “FISH BAIT”, “WASTE”, “INEDIBLE SCRAP” or similar wording and “NOT FOR HUMAN CONSUMPTION.”

Product containing foreign materials which do not pose a threat to health or product safety and which can be effectively removed from the product by reprocessing techniques such as filtering, screening, etc.; may be acceptable for reprocessing.

The containers for temporary storage of such products shall be clearly labeled “(PRODUCT) FOR REPROCESSING FOR HUMAN CONSUMPTION.”

The routine reclaiming of butter from sanitarily handled damaged or mislabeled packages of butter; or, the reworking of process cheese loaves because of damaged wrappers or incidental cardboard box lint (provided the process cheese system is equipped with suitable filters) is permitted.

Other proposals to reclaim products in this category shall be evaluated on a case by case basis and approved with the concurrence of the National Field Director and the Branch Chief. Examples of such situations would be the filtering of lumpy emulsifiers/stabilizers from process cheese, removal of excessive cardboard box lint, etc.

2. Damaged or Misshaped Product

Products from current production which are damaged or misshapen during manufacturing, but which have not been rendered unacceptable as identified in [Section 6.C.1](#), may be reworked immediately.

The product shall be collected and stored in good condition stainless steel containers, in lined boxes or barrels, or other suitable containers.

Containers shall be marked with “(PRODUCT) FOR REPROCESSING FOR HUMAN CONSUMPTION.”

It is often impractical to reprocess all of the product in this category promptly. When such products are accumulated throughout a production shift or are of such quantity as to prevent prompt reworking they shall be properly labeled and stored or refrigerated in covered containers until fully reprocessed. When these products are eventually reprocessed they are to be labeled and lotted according to the provisions in [Section 6.C.6](#).

Sub-lots, vats, or churnings that have been identified as having damaged containers in excess of 20 percent of the inspection lot or identified on official samples selected, shall not be eligible to be reworked and offered for official grading. Sub-lots, vats, or churnings from the inspection lot which do not exhibit damaged containers may be re-offered, alone or combined with other product, for official grading as a new inspection lot which is subject to all routine sampling and inspection procedures.

Examples:

- Occasional butter prints damaged during printing but not contaminated with extraneous material may be unwrapped and reintroduced to the print machine hopper when handled in a sanitary manner.
- Damaged or improperly sealed bags of NDM may be re-bagged and renumbered when product has not been exposed to contamination.
- Occasional misshapen blocks of cheese ejected from block-former towers may be reintroduced to the draining conveyors or draining tables in such a manner to assure uniform distribution and not adversely affect the uniformity of the vat.
- Occasional misshapen loaves of Mozzarella cheese may be reintroduced back into the cooker stretcher. Care should be taken that the cheese is cut into sufficiently small pieces so as to fully meld and mix with the fresh curd.

3. Product Meeting the Requirements of any U.S. Grade

Product meeting the requirements of any U.S. Grade may be reconstituted, re-blended, and reprocessed.

a) Examples

- Nonfat dry milk which is standard grade for any quality factor may be reconstituted, re-pasteurized and re-dried, or,
 - dry blended with extra grade NDM, or,
 - dry blended with un-graded NDM.
 - The reprocessed or blended product may then be presented for official grading.
- Grade AA, A or B butter (including misshapen and short weight packages) may be melted and reprocessed with fresh cream. The resulting butter may be presented for official grading.
- When suitable equipment is utilized, wrapped butter or process cheese may be separated by means of pressure from the packaging material and the reclaimed butter or cheese may be reprocessed.

4. Products Below U.S. Grade Requirements or Purchase Specifications

Products below U.S. Grade requirements or purchase specifications for characteristics which materially affect quality are not eligible to be reconstituted or re-blended, and reprocessed.

When the following characteristics are below specifications, the products are **not** eligible for blending, reworking or reconstitution: off flavors, Direct Microscopic Count (DMC), Standard Plate Count (SPC), coliform count, yeast and mold counts, titratable acidity, unnatural color, or scorched particles.

This provision should not be interpreted to prohibit or impede the normal usage of lower quality natural cheese in the preparation of blends for the manufacture of process cheese. Such disposition has been traditional in the process cheese industry and this industry practice should not be criticized.

Products below U.S. Grade requirements or purchase specification for characteristics of a compositional nature may be reconstituted, re-blended, or reprocessed and offered for grading. Reworking of these products by segregation and offering for retesting is **not** an acceptable alternative to reconstitution, re-blending or reprocessing.

When the following characteristics are below specifications, the products are acceptable for blending, reworking or reconstitution: moisture, butterfat, solubility index, body and texture, density, high or low salt, wavy, mottled or high intensity color, high or low vitamins (if used in other fortified products), meltability, and color specks.

Instant NDM which is below grade because of dispersability may not be dry blended with fresh instant NDM. This product may be reclaimed by reconstitution, reprocessing and re-drying as base NDM or be used as an ingredient in other dairy products where nonfat dry milk is permitted as an optional ingredient.

5. Products contaminated by Pathogenic Organisms

Products which have been contaminated by pathogenic organisms are **not** suitable for reworking or reconstitution; except that nonfat dry milk or other dry products with salmonella contamination may be reconstituted, re-pasteurized and re-dried under Dairy Grading Branch supervision and then officially inspected and graded provided all follow up tests for Salmonella are negative. For additional inspection guidance see [Section 16](#).

Reclaim operations shall be conducted under sanitary conditions. Equipment shall be properly designed and fabricated to meet appropriate 3A Sanitary Standards or USDA Guidelines for Dairy Equipment Design and Fabrication. The equipment shall be located in an area meeting the Dairy Grading Branch Specifications criteria for a processing area. Reclaim operations shall be conducted according to good manufacturing practices for the processing of dairy products for human consumption.

6. Labeling of Reworked Products

Such reclaimed product shall be properly labeled so as not to misrepresent the age of the product or plant of origin.

Products which are reconstituted or reworked, such as, reconstituted NDM, melted butter, diced and reworked mozzarella cheese can be lotted and dated as of the date of processing. Products which are merely blended, such as, dry blending of NDM shall be lotted and dated to reflect the oldest date of production of the products blended.

7. Butter for Butteroil

Butter printing operations which do not also have cream processing and butter churning operations routinely assemble excess damaged product for reprocessing. This product is commonly shipped to plants specializing in butteroil processing. This practice should not be criticized. All damaged butter is to be handled as provided for in [Section 6.C](#).

Butter which has been labeled as “FISH BAIT”, “WASTE”, or “INEDIBLE SCRAP” and “NOT FOR HUMAN CONSUMPTION.” shall not be reprocessed in a USDA approved plant (includes both Section I and Section II listed plants).

8. Cheese Trim

These guidelines apply to cheese trim which is intended for use in the production of pasteurized process American cheese, cold pack cheese, dry pasteurized process American cheese, or other cheese products made by USDA approved operations that have appropriate product codes or which manufacture product for government purchase or conversion.

In addition all other [Section 6.C](#) requirements apply. Also see DA Instruction 918-PS, Page N, Items N28-Handling of Trim, N29-Disposition of Trim, and N30-Trim Press Room for requirements for handling trim.

Cheese trim shall have been produced by USDA approved cheese cutting or processing operations and be listed in Section I, *Dairy Plants Surveyed and Approved for USDA Grading Service* for product code C47 “Natural Cheese Trim” or have been produced under continuous USDA inspection.

Check that cheese trim is properly classified, handled and stored. The term “cheese trim” shall apply only to good condition, clean cheese that is collected, packaged and stored in a sanitary manner. It is to be free of defects such as dirt, mold, and soft spots, and be suitable for human consumption. The most common sources of cheese trim are from natural cheese cutting and packaging operations and from operations which cut 640 pound blocks.

Cheese trim produced and utilized at the same facility within seven calendar days need not be pressed, provided mold development does not occur. Cheese trim which will not be utilized within seven days or will be shipped from the plant regardless of age shall be pressed into the container, and the liner folded to completely cover the surface to minimize the amount of air in the container and reduce the opportunity for mold to develop.

Containers which are partially filled at the end of the day’s operation may be finished the following day. This product shall be adequately protected during overnight storage.

Check trim container labels for production dates. If any production dates are older than 20 days, make a recommendation for prompt handling and processing of cheese trim.

The cheese trim containers shall display a securely attached tag which contains the following information:

- “Natural Cheese Trim from Cheese Manufactured in USDA Approved Dairy Plants”
- Plant Number of Cheese Trim Operation
- Production Date (s) of Cheese Trim
- Color of Trim (“White, Colored or Mixed”)
- Signature and Date by a Responsible Plant Official.
- Plant number of Cheese Manufacturing Operation(s)—Date of Cheese Manufacture—and types of Natural Cheese in Container
- Examples:
 - 55-1950 06/01/86, 07/05/86 Cheddar
 - 55-0108 12/12/86 Colby
 - 27-156 01/10/87, 01/11/87 Edam.

D. Metal Fragment Contamination Policy

The following policy will apply whenever the Dairy Grading Branch observes or suspects that product offered for inspection or grading is contaminated with metal fragments.

Whenever metal fragments are observed or suspected to be in a product, discontinue grading immediately and contact the National Field Office to alert them of the problem. The National Field Office will arrange for an inspection of the processing and packaging equipment to be conducted at the manufacturing facility as soon as possible to determine the possible sources of the metal fragments.

The car-lot in which the metal fragment was observed shall be rejected. Additionally, no certificates shall be issued on any product inspected or graded during that day’s grading assignment. All affected car-lots shall be held pending further intensified examination for metal fragments.

1. Sampling

Beginning with the current car-lots available (including the car-lots for which certificates were not issued), using the random number generator, select 32 sample cases from each car-lot. Sampling and testing shall continue until 10 consecutive car-lots are determined to be free of metal fragments. Less than 10 car-lots may be tested when the manufacturing plant has been inspected and the National Field Office or Washington Office has determined that the source of the metal contamination has been corrected. In such instance, all car-lots produced up to the survey shall be examined.

Normal product acceptance inspection and grading activities for the car-lots may be conducted concurrently with the additional evaluations for metal fragment contamination.

a) Visual examination

From each sample case, select one container (loaf, print, cup, etc) of product regardless of the size or number of containers in the case. If, during your handling of the product or selection of the sample you observe any metal fragments, even if not on the sample intended for selection, discontinue the examination and reject the car-lot. If there are additional car-lots to be examined, proceed to the examination of the samples from the next car-lot.

Visually examine the surfaces of the product from the selected container. This will require the unwrapping or opening of the packaging materials. Record any observations of metal particles on the surfaces. Reject the car-lot when 1 metal fragment is observed and discontinue the examination. See [Exhibit 3](#). Continue with the examination if no metal fragments are observed on the surfaces of the product. If foreign materials, other than metal, are observed, contact the National Field Office for guidance.

For loaves of process or mozzarella cheese or prints of butter (either 1 pound or ¼ pound) slice the sample lengthwise along the longest dimension. Visually examine these cut surfaces of the product. Record any observations of metal particles on the surfaces. Reject the car-lot when one metal fragment is observed and discontinue the examination. See [Exhibit 3](#). Continue with the examination if no metal fragments are observed on these surfaces of the product. If foreign materials, other than metal, are observed, contact the National Field Office for guidance.

For product in cups, pats, continentals, chips, or if granular in nature, examine only the available surfaces for metal fragments.

b) Laboratory Samples

If no metal fragments are observed in the procedures followed in [Section 6.D.1.a](#), make a composite sample by placing a portion of each container examined in a sample container for laboratory analysis. However, if metal fragments are observed during the compositing process, reject the car-lot and discontinue the examination. Select enough from each container to result in a total of approximately 1 pound of sample for each car-lot examined. Car-lots of small containers may require the use of additional containers from the sample cases to obtain the required 1 pound of sample for the laboratory. Send the samples to the National Science Laboratory, in Gastonia, NC. Include a DMS which clearly identifies the samples are to be tested for metal fragments. See [Exhibit 4](#).

The laboratory shall thoroughly mix the sample and microscopically examine a 225 gram portion for metal fragments.

The car-lot shall be rejected when the number of metal fragments in a 225 gram sample exceeds 100 or any one fragment is equal to or exceeds 0.5mm in its longest dimension.

c) Product Control

Identify all rejected product with Dairy Grading Branch Product Control Tags. Rejected car-lots shall be evaluated on an individual basis to determine the disposition of the product. This may include destruction, reworking or reprocessing under USDA supervision.

The applicant may choose to turn the investigation over to the Food and Drug Administration (FDA) for evaluation and release of product. In such case, all product produced during the time period from the first observation of metal fragments to when the plant has had a USDA plant inspection which determines that the potential source of metal fragments has been corrected shall be rejected by USDA pending the results of the FDA evaluation. Written documentation from FDA of the acceptability of the suspect car-lots of the product for release for human consumption shall be required for USDA inspection and grading services to be provided for the rejected product.

E. Extended Production Runs

Production runs of longer than one day are common occurrences in the dairy industry. However, extended runs can have an adverse impact on both product safety and product quality unless handled properly with good manufacturing practices. When evaluating extended runs, it is important to treat each occurrence on a case by case basis because the conditions at one facility may be significantly different from another facility. As necessary, contact your supervisor or the National Field Office for guidance.

Following are some general guidance principles for extended runs.

1. Dry Systems

Dry systems such as dry products filling machines, powder conveying lines, drier systems, etc., may be run continuously or allowed to sit idle for extended periods provided the systems are essentially closed and no water or moisture is allowed to enter the system or attached components. When extended idle periods are anticipated the plant should dry clean the equipment to remove the bulk of any product left in the system.

2. Liquid Systems

In liquid, high moisture or high fat systems, extended runs are acceptable provided the equipment is run continuously and is properly designed so that there is a continuous flushing of the product from all parts of the equipment. Examples of this type of equipment would be evaporator systems, continuous butter churns, butter print machines, continuous process cheese blenders, process cheese fillers, etc. Evaluate the systems carefully to assure that the products are not subject to mishandling and that pockets of product are adequately flushed from the machine during operation.

Generally, when a liquid, high moisture or high fat system is idle for a period of 2 hours or more the equipment shall be cleaned prior to reuse. Any products within the machine at this time should be directed to either rework or animal feed as appropriate.

F. Farm Service Agency Contract Reviews

The Farm Service Agency (FSA) may request that we provide reviews of purchasing contracts for dairy products which are not required to have either end product or on-line inspection.

Product and processing activities will be evaluated during the review but products will NOT be certified. All observations of the process and product analysis (when performed) will be reported to FSA in a narrative style report.

1. Inspector Guidelines

FSA will generally specify the day on which they want the review to be conducted. The Dairy Grading Branch will perform the review during at least one full shift of production at the contractor's facilities.

During the review, the inspector shall conduct cursory surveys of the processing facilities and record all observations. The raw and finished product coolers need only be reviewed once during the shift. Raw ingredient handling, processing and packaging shall be evaluated on the same basis as if the Branch were conducting an on-line inspection of the processing contract. Record all observations. Be sure to record both adequate processing and product controls and deficiencies as appropriate. Record your observations under the following general categories for the final report. As necessary these general categories can be modified to accommodate the type of processing or packaging contract under review. See the report preparation section for further guidance.

A. Raw product storage

- Cooler conditions
- Coding
- Source of ingredients

B. Raw product handling

- Unwrapping
- Identity control of staged product
- Cleaning
- Sanitation of the cleaning operation
- Employee practices
- Housekeeping

C. Processing

- Control of ingredients for source and handling (such as, added fat, vitamins)
- Sanitation and housekeeping
- Proper processing temperatures
- Protection from contamination or adulteration
- Employee practices

D. Packaging

- Control of packaging materials
- Sanitation and housekeeping

- Weight control
- Condition of containers
- Coding

E. Finished product storage

- Temperature control of cooler
- Cooling of product
- Sanitation and housekeeping
- Condition of stored product

F. General

- Pest control
- Equipment repair and maintenance
- Plant facilities and grounds
- General employee attitudes and practices

a) On Line Review

Perform all inspection and grading activities which would normally be done for an on-line inspection of the commodity being produced. These activities are to be conducted during the evaluation in the same fashion as during an on-line inspection assignment. These activities are to include but are not limited to observing the ingredient cleaning and preparation, the processing line, and the packaging operations; and the conducting of test weighing, condition of container examinations, and pre-grading as appropriate. Record the observations of your various activities on the worksheets normally used. Maintain these worksheets as part of the supporting documentation of the review.

b) Laboratory Samples

Select laboratory analysis samples in the same fashion as you would for an on-line inspection of the commodity being produced. Send the samples to the National Science Laboratory, Gastonia, NC. Note on the sample DMS that each sample is to be tested individually for all factors appropriate to the commodity. The laboratory results will be included in the final review report submitted to FSA.

Unless an observation reveals product contamination or is of public health significance, do not take action, such as rejecting product, with the processing plant. If unsafe or unwholesome products are observed recommend to the plant that they stop production and correct the deficiencies; and contact the National Field Office immediately so that FSA can be informed of the situation.

If any plant condition that would result in the assignment of an Ineligible status during a normal on-line inspection or during a plant survey is observed during the review, complete plant survey cover page and a page Z, assign the Ineligible status and notify the National Field Office immediately so FSA can be informed of the situation.

c) Reports

Final review reports shall be completed by the inspector within seven days of the evaluation of the review of the processing facility. The final review report shall be a narrative report. The report will be typed on USDA Letterhead paper. Do not include the worksheets for test weights or condition of container with the report. These observations are to be summarized in the narrative. Follow the format shown on [Exhibit 5](#) for the report.

All fees and expenses shall be billed to FSA on a DA-201, which will be attached to the final report. The DA-201 shall identify the review with the following statement:

“Fees and expenses incurred for the evaluation of (Product) for (Contract No.) conducted at (Plant name, address, and plant number) on (Date) .”

Supporting documentation shall include but is not limited to the following:

- Cursory inspection notes and reports
- Test weight records
- Condition of container worksheets
- Pre-grading memorandums
- Laboratory analysis reports
- Other notes and worksheets

7. CODING AND MARKING

Product coding and marking requirements are to facilitate the accurate identification of all units of production. Coding and marking of product containers shall comply with the following criteria.

A. General Requirements

Containers shall comply with all labeling requirements for food containers as specified by the Food and Drug Administration, 21 CFR Part 101.

1. Products Offered for Official Grading or Inspection

Shipping containers shall display the following information.

- Name of the product
- Plant name, State assigned plant number, or name of distributor (grade label packages only). Also see additional guidance for grade labeled containers in [Section 7.F](#).
- Consecutive number in order of manufacture or packaging when products are offered for purchase by the Federal government. Consecutive numbering should be encouraged for all other packaging to aid in product segregation or recall, but, it is not required. See [Section 7.E](#) for additional guidance when numbering is required
- Date of manufacture or packaging
- Lot number (if appropriate)
- Vat, churn, or sub-lot number

Each state is identified by a number assigned to it in accordance with the national uniform coding system known as FIPS (Federal Information Processing Standards). A plant receives its identifying number from the state in which it is located. Therefore, when a State number and plant number are used on packaging material, the correct use of the identifying number does not include the term “USDA”. For example, the statement “Packed by USDA Plant Number XX-YY” is incorrect.

The phrase, “Packed by Plant number XX-YY,” is correct and may be used on the packaging material when the product is packed at that plant. The phrase, “Distributed by Plant number XX-YY,” may be used when appropriate, provided that the plant number identifies a plant that is eligible for grading service.

All markings shall be with indelible, waterproof ink. The color of the ink markings may be specified by a purchase announcement or specification. Stamping, printing, or stenciling are generally acceptable. Permanent ink felt pen markers may be used to record the weights on bulk cheese and dry products in packages of more than 100 pounds. Pencil or crayon markings are not acceptable.

When coding malfunctions and errors occur, plants may obliterate the erroneous markings and apply the corrected markings. This practice should not be criticized provided the erroneous markings can not be read and the correct information is readily legible.

These occurrences should be occasional in nature. The grader shall question management as to the nature of the malfunction. If there is any reason to suspect that the samples are not representative of the product presented, discontinue grading.

All markings shall be legible and of sufficient size to be clearly recognizable under the conditions of normal viewing. For example, consumer size containers viewed at normal reading distance (approximately 18 inches) may have markings in relatively small type sizes. Shipping containers which are normally viewed in warehouse settings with subdued lighting will require markings large enough to be legible when read from warehouse, cooler, or freezer aisles.

The grader shall notify management in writing of markings that are not easily legible. If corrective actions are not taken the grader, with concurrence of the National Field Office, shall refuse to grade future containers.

If the markings on nonfat dry milk bags are located on the closure tape or flap, the applicant shall provide means for transferring the markings of the sample bags for positive identification after sampling.

Sample bag markings only may be transferred using an indelible ink marker under the supervision of the grader to verify the accuracy of the markings.

All products sold to CCC, Department of Defense, or Veterans Administration, reprocessed under FSA contract, or other specification shall comply with all container markings as specified in the applicable announcement, specification, or solicitation for bids.

The packaging material supplier shall provide a Certificate of Conformance (C.O.C.) to the applicant for all materials used, such as, wrappers, liners, cartons, shipping cases, etc. The C.O.C. may be printed directly on the container or may be provided in writing for presentation and review by the grader. If proper C.O.C.'s cannot be provided by the applicant, contact the National Field Office for guidance prior to grading or inspecting the product. See [Exhibit 6](#).

C.O.C.'s are to be provided for each shipment of supplies received by the applicant. Copies of the C.O.C.'s are to be included in the contract files. If packaging supplies are carried over from one contract to another, a new copy of the C.O.C. is to be included with the new contract files.

B. Designation by Vat, Churning, or Sub-lot

A vat, churning, or sub-lot shall represent a unit of production which can be clearly identified and is declared to be of homogeneous quality and condition by the applicant. A randomly selected sample from this unit will represent the entire unit of production. Arbitrary designations which cannot be demonstrated to be homogeneous are not acceptable.

Unless more specific guidance is provided in [Sections 11.B.4](#), [11.C.4](#), or [11.D.4](#), churnings and sub-lot designations for continuously produced butter, butteroil, anhydrous milk-fat, and nonfat dry milk shall not exceed 20,000 pounds, except that larger quantities may be allowed for metric weight packages. For example, 25kg bags of nonfat dry milk may contain 22,046 pounds per sub-lot.

C. Designation as a GRAND LOT

When units of production can not be documented to be of homogeneous quality or condition, or units of production have lost their vat, churn, or sub-lot identity (as during repackaging), the lot shall be designated as a GRAND LOT from which a statistically representative percentage of available containers will be selected as samples. All subsequent grading or inspection results will apply to all containers in the GRAND LOT.

For In-Process grading, the lot number shall be the covering certificate number.

When a lot has been designated as a GRAND LOT by USDA for inspection and grading purposes, the applicant may assign vat, churn, or sub-lot designations for internal product identification or inventory control. These markings shall be recorded on manifests when the product is offered for grading but shall be disregarded as a means of sample selection. Make a notation on the sampling report to indicate that the vat, churn, or sub-lot designations were arbitrarily assigned by the applicant for inventory control only and that the sampling was performed as a GRAND LOT.

The applicant shall provide the inspector with a signed manifest identifying the product to be included in the sample. Bear in mind that these Grand Lot procedures are often used when specific lot numbers or number of containers per code are unknown. Do not criticize a lack of specific details. The manifest shall provide as much information available and shall, at least, include the following information:

- Applicant name and address
- Product to be sampled
- Type and size of containers
- Total number of containers to be sampled
- Total gross weight
- Manufacturer of the product (plant number or name and address)

D. Date of Production, Processing, or Packaging

Accurate documentation of the date of production, processing, or packaging is important to:

- Determine the age of the product. See [Sections 11.B.7.a.3](#) and [11.C.7.a.1](#) for guidance on when product is eligible for grading,
- Determine that the product meets the purchase announcement age requirement,
- Determine the FDA required 60 day hold time for cheese made from raw or heat treated milk, and
- Determine applicable prices when products are sold to CCC at the time of a price change.

The date of production, processing, or packaging shall be designated as midnight to midnight for each calendar day unless the applicant can document other reasonable production schedules.

The date of production, processing, or packaging shall be clearly identifiable as a Julian date or commonly recognized date abbreviation. Acceptable examples of date markings are as follows:

Jan 24 06, Jan 24 2006
01 24 06, 01/24/060
024, 234, 365 (Julian dates are often used in conjunction with a vat, churn, or sub-lot number, i.e., 024 1, 234 A, 365 ZA)

Products which are manufactured and packaged into the container in which they are offered for grading shall be dated as of the date of manufacture.

For example:

- 25 kg or 68 pound boxes of butter.
- 36 pound boxes of soft printed butter.
- 25 kg or 50 pound bags of NDM.
- Bulk bins of NDM.
- 40 pound blocks of cheese.
- Barrel or 640 pound containers of cheese.

The date of manufacture for cheese shall be the day on which the majority of the cheese making operations are performed. These operations include the ripening, renneting, cutting, cooking, draining, salting and hooping. Final draining and hooping may not be accomplished on the same day due to plant operations. After the curd is salted and hooped and the pressing and draining has started it may be correctly termed “cheese.”

Products which are reprocessed or repackaged from bulk products shall be dated as of the date of reprocessing or repackaging.

For example:

- Process cheese shall be dated as of the date of processing.
- Butter printed from bulk containers shall be dated as of the date of printing. (Hard butter and micro-fixed butter printing)
- Butter printed directly from the churn, butter boat, or butter silo shall be dated as of the date of printing. (Soft butter printing)
- Nonfat dry milk shall be dated as of the date of manufacture.
- Consumer size containers of instant nonfat dry milk filled from bulk bins shall be dated as of the date of packaging.

E. Consecutive Numbering Of Each Container

1. Consecutive Numbering Within a Vat, Churn, or Sub-lot

When required by [Section 7.A.1](#), each container in the vat, churn, or sub-lot offered for grading shall be consecutively numbered in the order of production. The first container in the vat, churn, or sub-lot shall be marked number 1 with each successive container marked consecutively through the last container.

The consecutive numbering sequence shall be repeated on each new vat, churn, or sub-lot.

Product made at the start of an operating day that does not meet specifications, may be excluded from the product graded, and need not be included in the consecutive numbering sequence.

At the applicant's discretion, individual containers or portions of a vat, churn, or sub-lot may be excluded due to damage, failure to meet specifications, or other disposition. It is not necessary for the applicant to renumber the remaining containers offered. The container numbers of the withdrawn product shall be recorded on the manifest covering products offered for grading.

The container consecutive number shall be located so that it can not be confused with the vat, churn, or sub-lot number. The number can be placed on a separate line or be preceded by an appropriate identifier such as "#", "box", "bag", or "barrel".

For example: 121 A or 121 A Box 37
37

2. Consecutive Numbering Within A GRAND LOT

When a product is produced specifically with the intent of offering as a GRAND LOT all containers within the lot shall be numbered consecutively from the first container to the last. However, there are instances when a lot is consecutively numbered according to the vat, churn or sub-lot but has been determined to be unsuitable for grading on that basis. In such instances, contact the National Field Office for guidance for determining an appropriate sampling scheme.

F. Special Requirements for Grade Label

1. General Policy

The regulatory authority and general requirements for the Dairy Grading Branch's Official Identification (Grade Label) program are stated in 7 CFR, Part 58 Subpart A.

Each distributor identified on packaging material, and each packaging plant, is required to submit an "Application to Use Official Identification and Grade Labels," Form DA-155. The contact information is printed at the end of these guidelines.

Three samples of each piece of packaging material, shipping box or pressure sensitive label that reflects official identification are to be submitted to, and approved by, USDA for use at each packaging plant where the material is to be used. However, USDA may provide temporary approval of these materials prior to their actual submission when requested to do so by a plant to facilitate marketing needs. Temporary approval not to exceed 45 days may be granted by USDA after receipt of a faxed copy of the proposed material.

Finished, labeled product is to be offered to USDA for grading in the final package prior to leaving control of the packaging plant.

The official shield used with the grade identification shall be prominently displayed on the package and shall be not less than $\frac{3}{4}$ inch by $\frac{3}{4}$ inch in size (and preferably 1 inch by 1 inch) on 1-pound and larger packages and wrappers. Smaller size shields will be approved on smaller size packages provided the shield is prominently displayed in relation to the package size and other printing provided on the packaging material.

A six-digit code that identifies the corresponding USDA grading certificate number is to be imprinted on packaging materials (or shipping boxes) as required in these guidelines under the heading Display of Official Identification and Certificate Coding.

Shipping boxes that exhibit a U.S. Official Identification are to have the official identification preprinted on the box. Alternatively, pressure sensitive stickers or labels may be used to apply U.S. official identification on shipping boxes, provided that the sticker or label also shows the following information: the name of the product, weight, and the name, city and state of the distributor or the packaging plant. Hand stamps shall not be used to apply U.S. official identification on shipping boxes containing product packaged in officially identified (grade labeled) materials.

See [Section 7.F.3.h](#) under the heading Display of Official Identification and Certificate Coding of these guidelines for guidance on the proper use of pressure sensitive stickers or labels.

Previously approved packaging materials must be submitted to USDA for follow-up approval whenever the following changes are made:

- Basic color change
- Ingredient change
- Name change of distributor or packer
- Basic format or design change

Previously approved packaging materials do not have to be submitted to USDA for follow-up approval whenever the following changes are made:

- Intensity of color
- Recipe change
- Advertising
- Preprinted coupons
- UPC or product code numbers

2. Responsibilities

a) Distributor

Complete an “Application To Use Official Identification and Grade Labels,” Form DA-155, or have a current application on file, prior to the anticipated approval of grade label packaging materials, shipping boxes, and pressure sensitive labels submitted to USDA.

Coordinate with the packaging plant to make certain that all new or revised grade label packaging materials, shipping boxes, and pressure sensitive labels used at the packaging plant are submitted to USDA for approval.

b) Packaging Plant

Complete an “Application to Use Official Identification and Grade Labels,” Form DA-155, or have a current application on file, prior to the anticipated approval of grade label packaging materials, shipping boxes, and pressure sensitive labels submitted to USDA.

Coordinate with the distributor to make certain that all new or revised grade label packaging materials, shipping boxes and pressure sensitive labels used at the packaging plant are submitted to USDA for approval.

Ensure that three samples of each piece of officially identified packaging material, shipping box and pressure sensitive label are submitted to USDA for approval, and that approval is received from USDA prior to requesting grading and inspection services for the product.

Utilize form DA-156 available from the Washington Office when faxing or mailing a request for approval or temporary approval of packaging materials and shipping boxes.

Place the USDA certificate number coding on packaging materials (or shipping boxes) as required in these guidelines under [Section 7.F.3](#), Display of Official Identification and Certificate Coding.

Review the list of approved labels sent to the plant monthly by USDA and notify USDA promptly of any additions, deletions, or other modifications to the list.

Maintain a file of the examples of packaging materials submitted to USDA and subsequently returned to the plant stamped with the approval of a USDA official.

c) USDA, AMS, Dairy Programs

Provide accurate grading and inspection services in a timely, cost effective manner using dedicated, courteous, and professional staff.

Notify a plant or distributor when a review of officially identified materials cannot be completed pending submission of Form DA-155.

Provide temporary approval, when appropriate, to a requesting plant to utilize officially identified packaging materials, shipping boxes, and pressure sensitive labels prior to the plant submitting three samples of the material to USDA for approval. Temporary approval not to exceed 45 days may be granted after receipt of a faxed copy of the proposed material.

Review the (three) samples of each piece of officially identified packaging material, shipping box, or pressure sensitive label submitted by a plant or distributor for correct identification of the distributor and packaging plant, as applicable, the proper size of the official shield, and the accuracy of other information relevant to the USDA Official Identification Program.

Notify the appropriate person as quickly as possible as to the approval or other status of the submitted materials. Enclose a stamped, approved example of the submitted material with the approval letter, when appropriate.

Grant approval, when appropriate, to a plant to use packaging materials with official identification that deviates slightly from the size or other requirements. The USDA approval will be made in writing and will apply conditionally only to the existing supply of packaging materials.

Send monthly to each packaging plant for its files a copy of the list of labels approved for use at the plant, and another copy of the list addressed to the USDA grader to be posted in the grading room.

3. Display of Official Identification and Certificate Coding

a) Wrappers or Pouches with Over-cartons

Examples of this category are: cream cheese cartons with an inner pouch, processed cheese in a pouch packed in a carton, and individual serving envelopes of NDM inside a carton.

Products in this category must have:

- The U.S. Official Identification shield placed on each of the inner wrappers or pouches and on the over-carton, and
- The USDA certificate coding placed on each of the inner wrappers or pouches and on the over-carton.

Special Considerations for butter cartons containing 1/4-pound prints: The U.S. Official Identification shield is not required on the parchment wrapper of the 1/4 prints when present on the carton. The USDA certificate coding on butter cartons containing 1/4-pound prints is required either on the carton or on (a minimum of) one of the 1/4-pound prints.

b) Wrappers or Pouches with No Cartons

Examples of this category are wrapped one-pound solids of butter, and natural cheese packages.

Products in this category must have:

- The U.S. Official Identification shield placed on the wrapper or pouch, and
- The USDA certificate coding placed on the wrapper or pouch.

c) Cups or Tubs or Cans (Lithographed), and Lids

Examples of this category are cottage cheese containers, cream cheese tubs, ice cream cups and cartons, and cans of whipped cream.

Products in this category are considered as a primary container (one unit) and must have:

- The U.S. Official Identification shield placed on either the cup/tub/can, or its lid, and
- The USDA certificate coding placed on either the cup/tub/can, or its lid.

d) Single Service Containers

Examples of this category are single service cups of butter or whipped butter, and continental chips and reddie pats of butter.

Products in this category must have:

- The U.S. Official Identification shield on the cover or covering, and
- The USDA certificate coding placed on the carton, or alternatively on the sealing tape used to close the shipping boxes containing the cartons. (U. S. Grade identification on cartons is at the option of the distributor or the packaging plant).

e) Institutional or Food Service Packages

This category includes only those dairy products that have their packaging material removed prior to presentation to the end-user of the product. Examples of this category are institutional packs of butter chips.

Products in this category must have:

- The U.S. Official Identification placed on the carton, and
- The USDA certificate coding placed on the carton, or alternatively on the sealing tape used to close the shipping boxes containing the cartons.

f) Cartons with Adhering Over-wrap

Examples of this category are cartons of instant dry milk.

Products in this category must have:

- The U.S. Official Identification shield on the outer wrapper (adhering outer-wrap), and
- The USDA certificate coding on the outer wrapper (adhering outer-wrap).

g) Shipping Boxes or Bags

The use of U.S. Official Identification on shipping boxes is optional at the discretion of the distributor or the packaging plant. The alternative placement of USDA certificate coding on sealing tape used to close shipping boxes is described in the applicable paragraphs in this section.

Hand stamps may not be used to apply U.S. official identification on shipping boxes containing product packaged in officially identified (grade labeled) materials

h) Pressure Sensitive Stickers or Labels

Pressure sensitive stickers or labels are considered as packaging materials and are to be submitted to USDA for approval in the same manner as described in this handout for other packaging materials.

Pressure sensitive stickers or labels that reflect U.S. Official Identification may be applied on any product packaging surface, or on shipping boxes as an alternative to pre-printing the official identification shield on the boxes, provided that the sticker or label also shows the following information:

- The name of the product
- Weight
- Name, city and state of the distributor or the packaging plant.

4. Approval to Display Official USDA Label Identification

a) Approval of Distributors or Firms Packaging Grade Labeled Product

All distributors and plants wishing to participate in the grade label program must first make application to the Dairy Grading Branch, Washington Office.

When a plant inquires about entering the program or wishes to add a new distributor to their list of clients, advise plant management to contact the Washington Office. Also, advise plant management that product in the new labels will not be graded until the distributor and the labels have been approved.

b) Approval of Packaging Material Printed With Grade Label Identification

All labels shall be approved for use at individual packaging plants before grading of the product is permitted. Approved labels are printed on the monthly listing distributed by the Washington Office for each plant approved for grade label packaging.

The following actions are required of the applicant in order to obtain approval of new or revised materials printed with a grade label or approved materials transferred from another packaging facility.

Prior to printing of the supply of labels, the packaging plant or distributor is encouraged to submit a sketch, proof, or scanned copy of the proposed carton or wrapper, including the label information and official identification to the Washington Office for approval.

The official identification shall comply with the requirements in 7 CFR 58, Subpart A—Regulations Governing the Inspection and Grading Services of Manufactured or Processed Dairy Products.

After approval and printing the packaging plant or distributor shall submit to the Washington Office three copies of the printed packaging material as soon as it is available. The Washington Office will confirm that the materials comply with the previously submitted example and the regulations.

In the event that prior submission of the label was not made, the entire review process will be conducted on the printed labels submitted. The plant or distributor assumes all risk for labels that are printed prior to submission and approval. If only minor discrepancies are noted, a temporary approval may be granted for the use of the existing supplies.

Packaging plants may request approval of an official grade label “stock wrapper” to be used with grade label cartons or over-wraps. The stock wrapper shall bear a grade shield and the statement “Packed by plant No. _____” instead of the name and address of the packaging plant or distributor. The plant number shall be the State assigned plant number under the FIPS, National Uniform Coding System.

Upon approval of the packaging material, the material will be entered into the USDA Grade Label Data Base for inclusion on the monthly listing of approved labels. In addition, an approved copy of the packaging material will be distributed to the following:

- The USDA grader’s file at the packaging plant

- The packaging plant manager's approved label file
- The Washington Grade Label file

c) Application to use Special Statement on Packaging Materials

Approved plants may package products in materials which bear a statement that the manufacturing plant is USDA approved.

The only approved wording is as follows:

MANUFACTURED IN A PLANT PARTICIPATING IN THE USDA DAIRY PLANT INSPECTION PROGRAM

If you observe packaging material displaying these or similar markings while conducting plant surveys or cursory plant inspections, ask plant management to show you the authorized application. See [Exhibit 7](#).

G. USDA Officially Inspected Stamp

Official samples selected for grading shall be stamped with the "USDA Officially Inspected" shield stamp, which includes the core lot identifier number of the covering certificate number (if applicable), and a "Sample" stamp, except that, shipping cases from which grade label samples are selected do not need to be stamped.

Reserve samples shall be marked with a "USDA Officially Inspected" shield stamp, "reserve sample" stamp, and a large "R" in crayon or magic marker.

Official test weight samples shall be marked with a "USDA Officially Inspected" shield stamp, "sample" stamp, and a large "S" in crayon or magic marker.

Samples used solely for condition of container examination shall not be marked.

When samples selected for official inspection or grading cannot be inspected or graded immediately or are to be held until the completion of a car-lot subjected to on line inspection, the sample shall be secured in a locked cabinet or with evidence tape in such a manner as to preclude tampering by unauthorized individuals. The evidence tape is to be placed over any container flaps which could be opened to get at the samples (when multiple samples are placed in a single container) or sample contents.

H. Product Control Tag

Occasionally during the course of inspection and grading activities, products are observed which the inspector wishes to control to prevent its use or shipment. This may be due to defects, contamination, or the need to verify some information concerning the products. Product Control Tags are provided for use by the inspector to identify the products and notify the applicant or his agents that the product is to be held. See [Exhibit 8](#).

The inspector shall complete the upper and lower portions, front and back, of the Product Control Tag. On the front of the tag include the number and size of the containers and vat, churn or sub-lot numbers as appropriate. On the back of the tag enter the date the product was inspected or graded, sign and date the tag. Include all of the information from the top portion of the tag on the lower portion. Attach the upper portion to the product to be held with USDA evidence tape. If more than one pallet is to be held, a tag shall be attached to each pallet. In such case to minimize the preparation of tags, record the above information on the first tag. Subsequent tags can reference X of Y, See tag xxxxx (For example, 3 of 4, See tag 12345).

The lower half of the Product Control Tag shall be sent to the National Field Office. Staple the tag portion to a copy of any associated worksheets such as a DMS, Graders memorandum or memo explaining the actions taken by the inspector.

Advise plant management that release of the product may only be made by an authorized USDA inspector or grader or the National Field Office.

Upon release, the inspector or grader shall send the upper portions of the Product Control Tag to the National Field Office. As with the lower portion, the upper portions are to be stapled to a covering worksheet.

If the product is to be released for regular program distribution no further observation of the product is necessary.

If the product is to be destroyed, denatured, reprocessed, reworked, or to be shipped to another location for such actions, the inspector or grader shall either:

- Witness the actual destruction, denaturing, reprocessing, or reworking of the product, or;
- Witness that the product has been sufficiently altered to prevent it from entering into normal commercial distribution.

When the inspector or grader witnesses either of the options above, they are to collect the upper portion of the tags and send them to the National Field Office with any associated paperwork.

8. SAMPLE SELECTION

A. Authority

Only a USDA licensed grader or designated National Field Office employee shall be authorized to furnish seed numbers for the selection of official samples.

When samples require tempering prior to grading or inspection, applicants may assemble samples utilizing either a seed number or specific sample numbers which have been designated by a USDA grader or authorized National Field Office employee. Additional random verification samples shall be required at the time of grading or inspection as per inspection guidance in [Section 8.J](#).

When samples do not require tempering prior to grading, the grader shall select the individual sample container numbers after arriving at the inspection site, except as provided for in [Sections 8.J](#) or [8.O](#).

When the provisions in [Sections 8.J](#) or [8.O](#) are not used, the inspector or grader shall provide sufficient observation and supervision to witness the selection and assembly of all the selected sample containers to assure integrity of the samples. It is not acceptable to provide plant personnel with the sample numbers and allow selection without direct USDA observation as samples are selected.

Applicant presented samples without the benefit of USDA sample integrity controls are eligible for official grading only when the covering documentation bears the Disclaimer Statement for unofficial samples. See preparation guidance in [Section 18.F](#)

B. Approved Sources

Prior to the selection of any samples, the grader shall determine that the product or all dairy ingredients if a processed product, were produced in a USDA approved facility during such time as the approval was in effect.

Dairy ingredients manufactured or packaged by “P” code plants listed in Section II of *Dairy Plants Surveyed and Approved for USDA Grading Service* are NOT eligible for the assignment of official grade or inspection services except as provided for in the Preface to Section II of that publication.

C. Age of Products

Products offered for inspection or grading may be inspected or graded as soon as the inspection or grading can be scheduled, except for butter and cheese which must be aged prior to grading. See [Section 11.B.7.a.3](#) for butter and [Section 11.C.7.a.1](#) for cheese age requirements.

D. Product Availability

For end lot inspections, the entire lot of product offered for inspection or grading shall be available for sampling. Access shall be provided so each individual unit shall have the same probability of selection as an official sample. For on-line sampling refer to [Section 8.H.1.a.](#)

The entire lot shall be stored at the same location under essentially identical conditions.

E. Cursory Inspection

As part of the inspection or grading process, a cursory inspection shall be made of the processing areas, storage conditions, the stored lot presented for grading, the inspection and grading areas, and the surrounding areas at the inspection site. If the inspection or grading assignment is at an outside warehouse the processing areas will not be evaluated. See [Section 6.A.1](#) for inspection guidance for the cursory inspection.

For extended on-line inspection and grading assignments, a full cursory inspection need be done only at the beginning of each week of a continuous assignment. However, the inspector shall conduct spot checks of the various cursory inspection items throughout the assignment and be alert to changing plant conditions.

F. Product Uniformity

The sample selection procedures outlined in this instruction will provide impartially selected samples to accurately assess product characteristics and condition in order to assign a U.S. Grade or accept the product according to a purchase specification.

The applicant bears sole responsibility to present products of uniform quality and characteristics. If it becomes evident that product quality within manufacturers sub-lots, vats, or churnings is not reasonably uniform, the sampling level may be altered to assure meaningful grading or inspection. Information about unreasonable quality variations may come from plant or product observations or from histories of previous gradings. Such information shall be telephoned to the National Field Director for appropriate decision making.

G. Random Number Generators

These instructions provide programming and operating guidelines for the laptops and PC's issued by the Dairy Grading Branch and the Hewlett-Packard 20S, Casio FX 3800 P and Texas Instruments TI 66 calculators used to generate reproducible random number sequences for official sample selection.

If you encounter programming problems, contact your immediate supervisor or the National Field Office.

1. Random Number Generator Formula

A mathematical function is used to generate random numbers. The function is given by:

$$U_{n+1} = \text{frac}(U_n * C + K)$$

where:

U_{n+1} = New value for random number (the “seed”)

U_n = Old value for random number (the “seed”)

C = Constant multiplier (we use 6247)

K = Constant addend (we use .211327)

To generate a number within a specified range, from N_{low} to N_{high} , we use the equation:

$$N = \text{int}(U_{n+1} * (N_{high} - N_{low}) + N_{low})$$

where U_{n+1} is calculated new each time as shown above.

2. Dairy Grading Branch Issued Laptops

a) Program loading procedures

The program for generating random numbers is programmed into each laptop or PC prior to it being issued to the grader. Turn on the computer. On the desktop locate and click on the icon for “Random Numbers”. If the icon is not visible on your desk top, click on the icon for “Unused Desktop Shortcuts”. In the list of icons that appear click on the “Random Numbers” file. If you have trouble finding this program contact the National Field Office for further assistance.

b) Program Testing Procedure

Note: The “Random Numbers” program is a DOS based program and the mouse does not work in this program. You must use the keyboard on your laptop.

At the end of the question “Do you have a specific seed? type [y] [Enter]

At the end of the question “What is the seed number?” type [0] [Enter]

At the end of the question “How many samples?” type [5] [Enter].

At the end of the question “What is the lower limit?” type [1] [Enter]

At the end of the question “What is the upper limit? Type [1] [0] [0] [Enter]

The screen should display the following numbers:

71 38 95 12 88

3. Programming Instructions for the Hewlett Packard 20S Calculator

a) Program Entry

Turn the calculator on. Enter [\leftarrow] [R/S].

This will place the calculator into programming mode, and the display will show [00- PRGM].

Enter the key sequences shown below:

Keystrokes	Displayed	Keystrokes	Displayed
[\rightarrow] [INPUT]	00-	X	31-55
[\rightarrow] [XEQ] [\sqrt{x}]	01-61 41 A	6	32-6
[STO] 7	02-21 7	2	33-2
[C]	03-71	4	34-4
[\rightarrow] [R/S]	04-61 26	7	35-7
[\rightarrow] [XEQ] [e^x]	05-61 41 b	+	36-75
[STO] 8	06-21 8	[.]	37-73
[C]	07-71	2	38-2
[\rightarrow] [R/S]	08-61 26	1	39-1
[\rightarrow] [XEQ] [LN]	09-61 41 C	1	40-1
[STO] 9	10-21 9	3	41-3
[C]	11-71	2	42-2
[\rightarrow] [R/S]	12-61 26	7	43-7
[\rightarrow] [XEQ] [y^x]	13-61 41 d	=	44-74
[XEQ] [$\Sigma+$]	14-41 F	[STO] 7	45-21 7
[RCL] 9	15-22 9	[\leftarrow] [() 0	46-51 33 0
-	16-65	[\rightarrow] 9	47-61 44
[RCL] 8	17-22 8	[\rightarrow] [()]	48-61 34
=	18-74	-	49-65
X	19-55	[.]	50-73
[RCL] 7	20-22 7	5	51-5
+	21-75	=	52-74
[RCL] 8	22-22 8	[+/-]	53-32
+	23-75	[STO] [+] 7	54-21 75 7
[.]	24-73	[RCL] 7	55-22 7
5	25-5	[\rightarrow] [R/S]	56-61 26
=	26-74	[\rightarrow] [XEQ] [1/x]	57-61 41 E
[\leftarrow] [\div]	27-51 45	[STO] 9	58-21 9
[\rightarrow] [R/S]	28-61 26	1	59-1
[\rightarrow] [XEQ] [$\Sigma+$]	29-61 41 F	[STO] 8	60-21 8
[RCL] 7	30-22 7	[\leftarrow] [XEQ] [y^x]	61-51 41 d

Enter [\leftarrow] [R/S].

This places the calculator back in normal operating mode.

Note: Data memories 7 through 9 are used by the random generation program. Do not use these for any other purpose without reinitializing them as described in [Section 8.G.3.a](#). Note that memory locations 4 through 9 are used by the calculator's built-in statistical functions. If you do use these memory locations, you must reinitialize the seed value, lower, and upper ranges.

b) Program Testing Procedures

Initialize the seed value by pressing 0 [XEQ] [\sqrt{x}]

Initialize the range by pressing 1 [XEQ] [e^x] 100 [XEQ] [LN].

Press [XEQ][y^x] five times. You should receive the following numbers:

71 38 95 12 88

4. Programming Instructions for the Hewlett Packard 33S Calculator

a) Program Entry

Turn the calculator on. Enter [\leftarrow] [\leftarrow] [3]. Press the left side of the central silver direction button to select Y. Press the [ENTER] key.

Press [\leftarrow] [R/S]. This will place the calculator into programming mode, and the display will show PRGM TOP.

Enter the key sequences shown on next page:

KEYPRESS	DISPLAYS	KEYPRESS	DISPLAYS
[<←][+][ex]	A0001 LBL A	[<←][+][x2]	F0001 LBL F
[STO][7]	A0002 STO Q	[<←][x√y]	F0002 RPN
[↵][+]	A0003 RTN	[.][2][1][1][3][2][7]	F0003 0.211327
[<←][+][LN]	B0001 LBL B	[ENTER]	F0004 ENTER
[STO][8]	B0002 STO R	[6][2][4][7]	F0005 6,247
[↵][+]	B0003 RTN	[RCL][7]	F0006 RCL Q
[<←][+][yx]	C0001 LBL C	[X]	F0007 X
[STO][9]	C0002 STO S	[+]	F0008 +
[↵][+]	C0003 RTN	[STO][7]	F0009 STO Q
[<←][+][1/x]	D0001 LBL D	[DISPLAY][1][0]	F0010 FIX 0
[<←][x√y]	D0002 RPN	[<←][RCL]	F0011 RND
[XEQ][x2]	D0003 XEQ F	[DISPLAY][4]	F0012 ALL
[RCL][9]	D0004 RCL S	[.][5]	F0013 0.5
[RCL][8]	D0005 RCL R	[-]	F0014 -
[-]	D0006 -	[STO][-][7]	F0016 STO- Q
[X]	D0007 ×	[RCL][7]	F0017 RCL Q
[RCL][8]	D0008 RCL R	[↵][+]	F0018 RTN
[+]	D0009 +	[<←][+][%]	I0001 LBL I
[.][5]	D0010 0.5	[<←][x√y]	I0002 RPN
[+]	D0011 +	[↵][8]	I0003 RANDOM
[↵][x2]	D0012 IP	[1][0][0][0][0][0][0]	I0004 1,000,000
[↵][x√y]	D0013 ALG	[X]	I0005 ×
[↵][+]	D0014 RTN	[↵][x2]	I0006 IP
[<←][+][Σ+]	E0001 LBL E	[1][0][0][0][0][0][0]	I0007 1,000,000
[STO][9]	E0002 STO S	[÷]	I0008 ÷
[1]	E0003 1	[STO][7]	I0009 STO Q
[STO][8]	E0004 STO R	[↵][x√y]	I0010 ALG
[<←][XEQ][1/x]	E0005 GTO D	[↵][+]	I0011 RTN

Press [\leftarrow] [$x \leftrightarrow y$], [2], then press and hold [\rightarrow] [ENTER]. You should see:

CK=A42F

LN=9

Press the bottom of the large silver button, then press and hold [\rightarrow] [ENTER]. You should see:

CK=E771

LN=9

Press the bottom of the large silver button, then press and hold [\rightarrow] [ENTER]. You should see:

CK=29A4

LN=9

Press the bottom of the large silver button, then press and hold [\rightarrow] [ENTER]. You should see:

CK=0176

LN=54

Press the bottom of the large silver button, then press and hold [\rightarrow] [ENTER]. You should see:

CK=8B77

LN=27

Press the bottom of the large silver button, then press and hold [\rightarrow] [ENTER]. You should see:

CK=C97E

LN=87

Press the bottom of the large silver button, then press and hold [\rightarrow] [ENTER]. You should see:

CK=AF8C

LN=57

Press [C] [C] to exit programming mode.

Note: Data memories [7] through [9] (Q thru S) are used by the random generation program. Do not use these for any other purpose without reinitializing them as described in Section [8.G.4.a](#)

b) Program testing procedure

Initialize the seed value by pressing 0 [XEQ] [ex].

Initialize the range by pressing 1 [XEQ] [LN] 100 [XEQ] [yx].

Press [XEQ] [1/x] five times. You should receive the following numbers:

71 38 95 12 88

5. Programming Instructions for the TI-66 Calculator

a) Program Loading Procedures

Turn the calculator on. Enter [2nd] [1] [2nd] [)]

Enter [2nd] [LRN] [2] [0].

This step partitions the total memory storage area into 20 user data memories available for data storage and 352 program steps allocated for program storage. The random number generator will take up 87 steps.

Enter [LRN].

This step brings you into the learning mode. The calculator will “learn” everything you put in after this step.

Enter the key sequences shown on the next page.

Step	Key Sequence	Step	Key Sequence
000	[LBL]	045	[(]
001	[A]	046	[RCL]
002	[STO]	047	[1][7]
003	[1][5]	048	[-]
004	[R/S]	049	[RCL]
005	[LBL]	050	[1][6]
006	[B]	051	[)]
007	[STO]	052	[+]
008	[1][6]	053	[RCL]
009	[R/S]	054	[1][6]
010	[LBL]	055	[=]
011	[C]	056	[2 nd][2]
012	[STO]	057	[0]
013	[1][7]	058	[R/S]
014	[R/S]	059	[LBL]
015	[LBL]	060	[E]
016	[D]	061	[6]
017	[RCL]	062	[2]
018	[1][5]	063	[4]
019	[X]	064	[7]
020	[RCL]	065	[STO]
021	[1][8]	066	[1][8]
022	[+]	067	[.]
023	[RCL]	068	[2]
024	[1][9]	069	[1]
025	[=]	070	[1]
026	[STO]	071	[3]
027	[0][0]	072	[2]
028	[+]	073	[7]
029	[.]	074	[STO]
030	[5]	075	[1][9]
031	[=]	076	[CLR]
032	[2 nd][1/x]	077	[R/S]
033	[-]	078	[LBL]
034	[.]	079	[2 nd][A]
035	[5]	080	[RCL]
036	[=]	081	[1][6]
037	[+/-]	082	[R/S]
038	[+]	083	[LBL]
039	[RCL]	084	[2 nd][B]
040	[0][0]	085	[RCL]
041	[=]	086	[1][7]
042	[STO]	087	[R/S]
043	[1][5]	Enter	[LRN]
044	[X]		

After you have entered the entire program, entering [LRN] again will take you out of the learning mode. The calculator is now ready for test running.

Note: Data memories 15 through 19 are used by the random generation program. Do not use these for any other purpose without reinitializing them as described in [Section 8.G.5.a](#).

b) Program Testing Procedure

Initialize the multiplier and addend by pressing [E].

Initialize the seed value by pressing [0] [A].

Initialize the range by pressing [1] [B] [1] [0] [0] [C].

Press [D] five times. You should receive the following numbers:

71 38 95 12 88

6. Precautions

The program may be lost in three different ways. If any one of these three conditions occur, the calculator must be reprogrammed.

For all calculators:

- (1) If the batteries have to be replaced, the program is erased.

For the TI-66 calculator:

- (2) If the [2nd] and number [1] keys are pressed, the program is erased.
- (3) If the [LRN] and any other key are pressed, the program is changed and can no longer be used.

7. Calculator Care

Approximately 1 year of battery life is expected. See the Users Manual for information about battery life, and types of replacement batteries.

Care should be taken that information is not inserted into the calculator faster than the information can be handled. Wait for the display readout.

Reentering the seed number after beginning the sample selection sequence will render the results non-reproducible.

Extreme heat or cold can affect the operation of the calculator. Operate it as close to room temperature as possible.

8. Operating Instructions

The “Random Numbers” software program, installed on the Dairy Grading Branch issued computers and the programmable calculators, requires a seed number to initiate the random number generation process. Seed numbers are a four to six digit, decimal number. For example: .1234.

Those using the laptops or the Casio or Hewlett-Packard calculators can generate their own seed numbers. See the appropriate sections of [Sections 8.G.8.a.1](#); [8.G.8.b.1](#) and [8.G.8.c.1](#).

Those using the TI-66 calculator shall be issued a series of seed numbers by the National Field Office. Seed numbers shall be used only once. When the list has been fully used, the grader shall contact the National Field Office for a replacement list.

The grader shall be responsible for safeguarding the confidentiality of these numbers. The grader shall also maintain a record of when and where each seed number is used. See [Exhibit 9](#).

The grader shall maintain the records of the seed numbers used for at least one year from the date of use.

a) Laptop and PC's

(1) Generating Seed Numbers

Access the “Random Numbers” program. On the initial screen after the question; “Do you have a specific seed?” enter [N] [Enter]. Under the program heading “This program duplicates random numbers calculated using the Universal routines” the seed number will appear.

Record the seed number.

(2) Generating Sample Numbers

Access the “Random Numbers” program.

If you have a specific seed number to enter, on the initial screen after the question: “Do you have a specific Seed?” enter [Y] [Enter]. On the next screen after the question: “What is the seed number?” enter the seed number, then [Enter]. If you do not have a specific seed number to enter, after the question “Do you have a specific Seed?” enter [N] [Enter] Under the program heading “This program duplicates random numbers calculated using the Universal routines” the seed number will appear.

Record the seed number.

Determine the number of sample numbers you will need. Enter that number at the end of the question “How many samples?”. Press [Enter].

Enter the lower limit of the number of containers in the vat, churn, or sub-lot at the end of the question “What is the lower limit?”. Press [Enter]. For example, assuming a churn has from 1 to 72 containers, enter a [1] and press [Enter].

Enter the upper limit of the number of containers in the vat, churn, or sub-lot at the end of the question “What is the upper limit?”. Using the same example as above, enter a [7] [2] and press [Enter]. This assures the selection of a sample in the range from 1 to 72.

Sample number determinations shall be made for one manufacturer’s lot at a time and in the exact order as the listing on the manifest. This is necessary so that the same sequence of sample numbers can be reproduced as a check on plant and/or grader sample selection.

When the calculator selects a container that is missing from a manufacturer’s lot, simply drop down to the next number in the list. (To be prepared for this possibility, it is a good idea to ask for additional sample numbers when selecting “how many samples?”.) Then proceed to the next vat, churn, or sub-lot.

(3) Alternative Procedure

This alternate procedure will work well if each vat, churn or lot in the car-lot has about the same number of containers. For example, a barrel cheese car-lot may have 30 vats, each containing 7, 8, or 9 barrels. For such a car-lot, set the number of samples at 50. This will give you some additional sample numbers to use on this car-lot. Set the low limit on [1] and the high limit on [9]. A list of 50 random sample numbers will appear on the screen. The first random number on the screen is for the first vat listed on the manifest. If it is not a satisfactory number go to the next number on the list. If the next number is not satisfactory, go on to the next number in the list until a satisfactory number is obtained. Repeat the process for subsequent vats. CAUTION: DO NOT DEVIATE FROM THE ORDER AS LISTED ON THE MANIFEST.

When this alternate procedure is used, make the notation “Alt.” above the seed number on the manifest section of the sampling report or grader’s memorandum. This information, the seed number and “Alt.”, shall also be typed on the covering certificate(s). See [Exhibit 10](#).

b) Hewlett Packard 20S Calculator

(1) Generating Seed Numbers

Press [XEQ][Σ]. The seed number, a value between 0 and 1, will appear on the display.

Record the seed number.

(2) Generating Sample Numbers

Turn the calculator on by pressing [C].

If the seed number needs changing, type in the desired seed value and press [XEQ][\sqrt{x}].

If the lower range needs changing, type the lower value and press [XEQ][e^x]

If the upper range needs changing, type the upper value and press [XEQ][LN].

Press [XEQ][y^x] once for each ranged random value needed. Each seed number will select a completely new and different series of random numbers.

Press [RCL][8] to see the current low value and [RCL][9] to see the current high value.

(3) Alternative Procedures

This alternative procedure will work well if each vat, churn or lot in the car-lot has about the same number of containers. For example, a barrel cheese car-lot may have 30 vats, each containing 7, 8 or 9 barrels. For such a car-lot set the low limit on [1] and the high limit on [9]. Press the [XEQ] [y^x] to obtain the first random number for the first vat listed on the manifest. If a satisfactory number is obtained, repeat the process for subsequent vats. CAUTION; DO NOT DEVIATE FROM THE ORDER AS LISTED ON THE MANIFEST.

When the calculator generates a number that is too large for the vat size, press the [XEQ] [y^x] keys again for a new number. Repeat if necessary. With this procedure the upper and lower limit in the calculator are not changed throughout the sample selection process.

When this alternate procedure is used, make the notation “alt” above the seed number on the manifest section of the sampling report or grader’s memorandum. This information, the seed number and “alt” shall also be typed on the covering certificate(s). See [Exhibit 10](#)

c) Casio FX 3800 P Calculator

(1) Generating Seed Numbers

Press [SHIFT][.]. The seed number, a value between 0 and 1, will appear on the display.

Record the seed number.

(2) Generating Sample Numbers

Turn the calculator on. Press [II] to insure the multiplier and the addend are initialized.

If the seed number needs to be changed, enter the desired seed number, including the decimal point, and press the [Kin] [2] keys.

If the lower limit needs changing, enter the lower limit of the number of containers in the vat, churn, or sub-lot into the calculator. For example, assuming a churn has from 1 to 72 containers, enter a [1] and press the [Kin] [3] keys.

Enter the upper limit of the number of containers in the vat, churn, or sub-lot into the calculator. Using the same example as above, enter a [7] [2] and press the [Kin] [4] keys. This assures the selection of a sample in the range from 1 to 72.

Sample number determinations shall be made for one manufacturer’s lot at a time and in the exact order as the listing on the manifest. This is necessary so that the same sequence of sample numbers can be reproduced as a check on plant and/or grader sample selection.

To produce the random number, press the [I] key. The number will appear in the display window. For example, the first random number will be 39 when using the seed number .2665. Each seed number will select a completely new and different series of random numbers.

Continue to press the [I] key for as many numbers as needed for the number of vats, churns, or sub-lots with number of containers defined by the upper and lower limits entered. CAUTION: DO NOT DEVIATE FROM THE ORDER AS LISTED ON THE MANIFEST.

To change the upper limit number of containers using the same seed number, enter a new upper limit number and press the [Kin] [3] keys, then press the [I] key for the next sample number.

When only part of a vat, churn, or sub-lot (split lot) is shown on the car-lot manifest, for instance, boxes numbered 41 through 80, reset the calculator to select a number in the range 41 through 80. Enter [4] [1] and press the [Kin] [3] keys to set the lower limit and enter [8] [0] and press the [Kin] [4] keys to set the upper limit. Then press the [I] key for the random sample number. If the calculator is already set with the correct high limit, it is necessary only to reset the lower limit and vice versa.

When the calculator selects a container which is missing from a manufacturer's lot, simply press [I] and obtain a new random number. If necessary, repeat the process until a satisfactory number is obtained. Then proceed to the next vat, churn, or sub-lot.

The calculator will shut itself off if no entry is made for about 8 minutes. However, preceding entries are NOT lost. Continue the selection process where it was discontinued and the numbers will be the same as if there were no interruption.

(3) Alternative Procedure

This alternate procedure will work well if each vat, churn or lot in the car-lot has about the same number of containers. For example, a barrel cheese car-lot may have 30 vats, each containing 7, 8, or 9 barrels. For such a car-lot, set the low limit on [1] and the high limit on [9]. Press the [I] key to obtain the first random number for the first vat listed on the manifest. If a satisfactory number is obtained, repeat the process for subsequent vats. **CAUTION: DO NOT DEVIATE FROM THE ORDER AS LISTED ON THE MANIFEST.**

When the calculator generates a number which is too large for the vat size, press the [I] key again for a new number. Repeat if necessary. With this procedure, the upper and lower limits in the calculator are not changed throughout the sample selection process.

When this alternate procedure is used, make the notation "Alt." above the seed number on the manifest section of the sampling report or grader's memorandum. This information, the seed number and "Alt.", shall also be typed on the covering certificate(s). See [Exhibit 10](#)

If you forget what your seed number or limit numbers are you may retrieve this information as follows:

Press [Kout] [3] to see the current lower limit.

Press [Kout] [4] to see the current high limit.

d) TI-66 Calculator

Turn the calculator on. Press [E] to insure the multiplier and the addend are initialized.

(1) Generating Sample Numbers

If the seed number needs changing, enter the desired seed number, including the decimal point, and press the [A] key.

If the lower limit needs changing, enter the lower limit of the number of containers in the vat, churn, or sub-lot into the calculator. For example, assuming a churn has from 1 to 72 containers, enter a [1] and press the [B] key.

Enter the upper limit of the number of containers in the vat, churn, or sub-lot into the calculator. Using the same example as above, enter a [7] [2] and press the [C] key. This assures the selection of a sample in the range from 1 to 72.

Sample number determinations shall be made for one manufacturer's lot at a time and in the exact order as the listing on the manifest. This is necessary so that the same sequence of sample numbers can be reproduced as a check on plant and/or grader sample selection.

To produce the random number, press the [D] key. The number will appear in the display window. For example, the first random number will be 39 when using the seed number .2665. Each seed number will select a completely new and different series of random numbers.

Continue to press the [D] key for as many numbers as needed for the number of vats, churns, or sub-lots with number of containers defined by the upper and lower limits entered. CAUTION: DO NOT DEVIATE FROM THE ORDER AS LISTED ON THE MANIFEST.

To change the upper limit number of containers using the same seed number, enter a new upper limit number and press the [C] key, then press the [D] key for the next sample number.

When only part of a vat, churn, or sub-lot (split lot) is shown on the car-lot manifest, for instance, boxes numbered 41 through 80, reset the calculator to select a number in the range 41 through 80. Enter [4] [1] and press the [B] key to set the lower limit and enter [8] [0] and press the [C] key to set the upper limit. Then press the [D] key for the random sample number. If the calculator is already set with the correct high limit, it is necessary only to reset the lower limit and vice versa.

When the calculator selects a container which is missing from a manufacturer's lot, simply press [D] and obtain a new random number. If necessary, repeat the process until a satisfactory number is obtained. Then proceed to the next vat, churn, or sub-lot.

The calculator will shut itself off if no entry is made for about 8 minutes. However, preceding entries are NOT lost. Continue the selection process where it was discontinued and the numbers will be the same as if there were no interruption.

(2) Alternative Procedure

This alternate procedure will work well if each vat, churn or lot in the car-lot has about the same number of containers. For example, a barrel cheese car-lot may have 30 vats, each containing 7, 8, or 9 barrels. For such a car-lot, set the low limit on [1] and the high limit on [9]. Press the [D] key to obtain the first random number for the first vat listed on the manifest. If a satisfactory number is obtained, repeat the process for subsequent vats. CAUTION: DO NOT DEVIATE FROM THE ORDER AS LISTED ON THE MANIFEST.

When the calculator generates a number which is too large for the vat size, press the [D] key again for a new number. Repeat if necessary. With this procedure, the upper and lower limits in the calculator are not changed throughout the sample selection process.

When this alternate procedure is used, make the notation “Alt.” above the seed number on the manifest section of the sampling report or grader’s memorandum. This information, the seed number and “Alt.”, shall also be typed on the covering certificate(s). See [Exhibit 10](#)

If you forget what your limit numbers are you may retrieve this information as follows:

Press [2nd] [A] to see the current lower limit.

Press [2nd] [B] to see the current high limit.

The seed number cannot be retrieved as the program changes the seed number with each number generated.

H. Selection Procedures

1. General

a) Completion of Lots Prior to Selection of Samples

No sample or seed numbers shall be provided until the entire lot has been produced. Products must be completely packaged, sealed for shipment, and marked with the manufacturer’s lot numbers and serial numbers as appropriate. For barrel cheese, the covers and cover straps shall be in place before the sample numbers are issued. Except that:

Samples may be selected during production when on-line, continuous inspection is conducted, except when the cooling process has a significant effect on product characteristics; such as with process cheese. Inspection of the samples (for weight determination, condition of container examination, etc.) shall not be conducted until production of the entire inspection lot has been completed.

A sample may be selected from a completed vat, churn, or sub-lot during production of a car-lot when continuous resident inspection service is provided. Inspection of the samples (for weight determination, condition of container examination, etc.) shall not be conducted until production of the entire inspection lot has been completed.

When samples are selected as provided for above, the sample shall be protected by the use of evidence tape applied to all openings of the container. This shall be accomplished before the samples are left unattended or outside of your direct observation. Alternatively, the samples may be secured in a locked facility (cabinet or office) provided all keys to the facility are controlled by Dairy Grading Branch inspectors or graders.

In both cases, the storage facilities are to be of sufficient size and, when cooling is required, have sufficient cooling capacity so that the assembled samples are subjected to essentially the same storage and cooling conditions as the remainder of the lot.

b) Storage of Car-lot in Multiple Rows

The manufacturer may store a car-lot of product in the warehouse, cooler, or freezer with one pallet from each vat, churn or sub-lot in one row and the other pallet from that vat, churn or sub-lot in another row. With this method of storage, the inspector may select samples from either half of the car-lot.

For instance, if a manufacturer's lot contains 20 sub-lots of 100 bags of NDM each, it will be required that the bags in each sub-lot which are numbered 1 through 50 be in one row, and all containers numbered 51 through 100 be in the other row.

If the car-lot has a "part lot" at the end of the day's run, half of the bags in this "part lot" may be stored in each row. For instance, lot 124F contains 24 bags numbered 1 through 24. Bags #1 through 12 shall be in row one and 13 through 24 in row two.

Alternatively, if all the bags are on one pallet in one row, then the upper limit can be changed on the random number generator and a sample selected from the entire "part lot"

If the part lot contains an odd number of bags, the "extra" bag shall always be stored in row one.

For instance, if lot 125F contains 37 bags numbered 1 through 37, bags 1 through 19 shall be in row one and bags 20 through 37 should be in row 2.

Number the rows 1 and 2, set the lower limit on 1 and the higher limit on 2 for row selection. All samples will then be chosen from the selected row.

In the case of rows with 1 through 50 in one row and 51 through 100 in another and the selected row is number 2, then the lower limit for samples would be set at 51, and the higher limit would be set at 100.

There may be instances in which the applicant may wish to store car-lots of product in more than two rows. This practice is to be severely discouraged. In no case shall product be sampled by rows if it is stored in more than three rows.

Follow the sampling procedure objectives as outlined above allowing for each row to have 1/3 of the car-lot.

2. Number of Samples

Prior to the selection of samples the inspector or grader shall determine the maximum number of official samples necessary to conduct the inspection and grading. As appropriate, samples for grading, condition of container, test weighing, and laboratory samples are to be considered.

Refer to [Sections 8.I](#) Reserve Samples, [8.J](#) Random Verification Samples, or [8.O](#) Audited Applicant Supplied Samples for additional sample selection guidance.

a) Original Grading

(1) Identified by Vat, Churn, or Sub-lot Number

Using the random number generator the grader shall select one consecutively numbered sample from each vat, churn or sub-lot presented on the manifest after arriving at the plant for grading (See [Section 8.K](#) for guidance for laboratory analysis samples), except that:

(a) When Tempering Is Required

When tempering of the samples is necessary in order to complete the grading assignment, sample numbers may be provided to the applicant for selection and tempering prior to the arrival of the grader. Verification of the sample validity shall be required. Refer to [Section 8.J](#) for the selection of the random verification samples.

Alternatively, resident graders may witness the selection of samples and then secure them from tampering with evidence tape or by placing the samples in a USDA locked tempering area at the manufacturer's facilities.

(2) Grand Lot (Not Identified By Vat, Churn, or Sub-lot Number)

The Dairy Grading Branch is occasionally requested to inspect, sample or grade products whose package coding or storage does not allow normal sample selection procedures outlined in other dairy grading instructions. This may be due to insufficient package coding that does not provide sub-lot or order of production information; or, storage conditions that do not allow sub-lot segregation. When such conditions exist, the only option available is to have the product sampled and inspected or graded according to the following Grand Lot procedures.

This Grand Lot inspection shall only be conducted as a last resort and the applicant shall be made aware that the cost of this type of inspection will be substantially more than if the lot was properly coded or stored in a manner that would permit normal sample selection procedures.

The statistical basis for the sampling plan, sample sizes, acceptance and rejection levels used in these Grand Lot inspection, sampling or grading procedures is MIL-STD-105D, *Sampling Procedures and Tables for Inspection by Attributes*.

(a) Sample Size

Refer to the Sample Size section below to determine the number of samples required. Mentally establish some order or pattern to the lot. For example, number each pallet and decide that you will start with the upper right hand container and number each container on the pallet. Use the random number generator to produce a list of random numbers. Select the samples using the random numbers and your sampling pattern.

When a lot of product is offered for inspection, sampling or grading, the number of samples shall be established from the information presented in the following table. The number of containers in the lot will be established based on the intent of inspection to be performed. For example, if the inspection is to determine the condition of shipping cases for 6/5 pound loaves of process cheese, the number of containers would be the number of cases in the lot. However, if the inspection is to determine if the cheese had "oiled off", the number of containers would be determined by the number of 5 pound loaves in the lot.

TABLE 1

Lot Size (Number of containers)	Number of Samples
2 to 8	2
9 to 15	3
16 to 25	5
26 to 50	8
51 to 90	13
91 to 150	20
151 to 280	32
281 to 500	50
501 to 1200	80
1201 to 3200	125
3201 to 10000	200
10001 and above	315

b) In Process Grading and Inspection

(1) Identified By Vat, Churn, or Sub-lot Number

Select one shipping case or unit as a sample from each vat, churn, or sub-lot number. If additional samples are necessary to obtain the necessary number of samples for condition of containers, select the additional samples from the next consecutively numbered shipping cases or units using the randomly generated samples as the starting point. If the randomly generated sample is the last container in the vat, churn, or sub-lot, the next previous container shall be selected. These additional samples are to be evenly spaced among the vats, churnings, or sub-lots offered.

For example, assume a car-lot of print butter with 9 churnings is offered and a total of 29 samples are required to accomplish all the inspection and grading activities. Select the randomly designated container plus the next 2 consecutively numbered containers for churnings 1 through 7, and select the randomly designated container plus the next 3 consecutively numbered containers from churnings 8 and 9, for a total of 29 samples.

$$\begin{array}{rcl}
 9 \text{ random churn samples} & = & 9 \\
 7 \text{ churns with the next 2 consecutive containers} & = & 14 \\
 2 \text{ churns with the next 3 consecutive containers} & = & \underline{6} \\
 & & 29
 \end{array}$$

(2) Not Identified By Vat, Churn, or Sub-lot Number

Select 30 shipping cases or units as samples for test weighing of all commodities, except select 15 samples for butteroil packaged in 50 gallon drums. If additional samples are necessary to obtain the necessary number of samples for condition of containers, select the additional samples following the guidance in [Section 8.H.2.b.1](#).

c) Special Considerations for CCC Owned Product Intended for Reprocessing

When pre-grading is required, select one sample per churning of butter or vat of cheese intended for reprocessing. The churnings or vats intended for pre-grading shall be listed on a manifest prepared by the applicant. Since this product is owned by USDA, use of the random number generator and the selection of random verification samples are not required.

d) Miscellaneous or Special Inspections

Contact the National Field Office or the Washington Office for specific inspection guidance.

3. Selection Procedures

a) Consecutively Numbered Units

All samples shall be selected using the random number generator.

Follow the operating instructions provided under [Section 8.G](#)

The generator will provide a series of random numbers between the lower and upper limits. These numbers shall correspond to the serial number which the manufacturer has already assigned to each shipping unit in the lot.

If applicable, also make note of the unit numbers from which lab samples were selected for further testing and analyses. These units shall also be selected at random. See [Section 8.K](#) for inspection guidance for the selection of laboratory analysis samples.

If the generator produces duplicate numbers, continue listing numbers until the required number of different numbers is reached. Should the generator provide the number of a removed or missing unit, follow inspection guidance provided in [Section 8.G.8.a.2](#). See [Exhibit 11](#).

When generating sample numbers for In-Process inspections, list on the worksheet the numbers generated by the calculator from the lowest to highest to facilitate the pulling of sample units from the lot.

Any coding irregularities shall be documented on the sampling report. See [Exhibits 12](#) and [13](#).

When samples are presented by the applicant, use the same seed number supplied to the applicant by the National Field Office to verify that the correct sample numbers were provided. If the samples provided do not match the sequence of numbers generated during your verification, DO NOT continue the inspection or grading. Contact your supervisor for guidance before proceeding.

b) Special Considerations for Grade Label

Car-lots of products bearing grade label identification shall comply with all requirements for availability as other products offered for grading. Grade label products shall not be shipped from the plant prior to sample selection and grading.

Products bearing grade label identification that are not listed on the Monthly USDA Grade Label Listing by Plants issued by the Washington Office shall not be sampled or accepted for grading unless the Grade Label Coordinator verifies the label has been approved. See [Exhibit 2](#).

All products bearing grade label identification shall be graded in the final package. Applicants may request pre-grading of bulk products if they so desire. Any such pre-grading shall NOT be construed as an alternative to final product grading.

I. Reserve Samples

1. Original Grading

Reserve samples are required for car-lots of bulk butter, rindless block cheese, and regular nonfat dry milk, but not for print butter, fortified NDM or barrel cheese offered for sale to CCC (optional for commercial sales). No grading or sampling of the reserve samples is necessary at this time. The purpose of the reserve samples is to replace the original samples when repeated tempering or re-grading may affect their quality and they no longer represent the quality and condition of the storage lot.

Following the procedures outlined in [Section 8.H](#) for the “Original” sample selection, either the preceding or the next consecutive number (whichever is easiest to locate) in the lot, vat, or churn shall be taken as the “Reserve” sample.

2. Reserve Laboratory Samples

Reserve samples selected for laboratory samples shall be used only when the original laboratory samples are lost or damaged during shipment to the laboratory for analysis.

These reserve samples shall not be used for retesting when the original sample analysis is questioned by the applicant. See [Sections 13.B](#) and [13.C](#) for Appeal Inspections and [Section 13.D](#) for Retest Inspection guidance.

J. Random Verification Samples

Whenever plant assembled samples are presented for grading, additional samples shall be selected to verify that they are representative of the car-lot. The use of random verification samples is the Dairy Grading Branch’s program integrity control to assure that the plant assembled samples have not been manipulated.

Inspectors and graders are to personally witness the selection and assembly of all random verification samples. It is not acceptable to provide plant personnel with the random verification numbers and allow selection without direct USDA observation of each sample selected

Additional samples equivalent to 20 percent of the original samples but not less than 1 per car-lot of cheese or butter shall be selected for comparison grading, test weighing, and selection of lab analysis samples, as applicable.

The grader shall select these additional samples using the random number generator and a different seed number than the number used to select the original sample numbers. Follow the operating instructions as presented in [Section 8.G](#).

After designating the vats or churnings, the method of selection shall follow the procedure outlined in [Section 8.H](#). If the car-lot is stored in special rows, the calculator may be used to select the row and all of the 20 percent samples may be selected from that row. See [Section 8.H](#).

For example, for those using the TI calculator (Note: the process is the same for the Casio and Hewlett-Packard calculators but the actual key strokes will be different. This process can be followed using the computers). Assume a car-lot of butter is stored in two rows and the original and reserve samples were taken from only one of the rows as outlined in [Section 8.H](#). First choose a seed number from the list supplied by the National Field Office and insert it in the calculator (this step is not required for the Casio or Hewlett-Packard calculators as they generate their own seed numbers.) Then insert a low level of 1 and a high level of 2 to determine which row to sample. Assume that row 1 is selected.

The car-lot has 14 churnings. $14 \times .20 = 2.8$, therefore 3 additional samples are needed. (Round up to the next higher whole number).

Next, insert low level [1] [B] and high level [1] [4] [C] and press [D] three times to obtain 3 random numbers. (If any of the random numbers are duplicated, press [D] to obtain another.) If for instance, the numbers are 13, 2, and 6, you will select the 20 percent additional samples from the 2nd, 6th, and 13th churnings listed on the manifest or sampling report.

Next, insert the appropriate high and low limits representing the highest and lowest serial number of boxes in the first row of the 2nd listed churning and press [D] to obtain the box serial number. Repeat for the 6th and 13th churning.

The 20 percent additional samples are not required under the following circumstances:

When dry product sample selection is witnessed by the USDA inspector or grader (see [Section 8.A](#)) at the time of inspection or the procedures in [Section 8.O](#) have been followed.

When samples are selected by warehouse personnel at a commercial warehouse that has been authorized by the National Field Director or Branch Chief as a disinterested third party, the sampling procedures will be based on instructions given directly by the National Field Office or Field Supervisor.

Record the seed number used for generating the random sample numbers in a location at the upper left hand corner of the column identifying the churn, vat, or sub-lot number.

The seed number used and the additional verification samples chosen shall be recorded on the manifest in the "Remarks" area.

List these samples as follows:

“20 % sample numbers, seed .8140”

128D Box 20

131A Box 39

133B Box 11

When tempering is not required or when the samples have been selected by a disinterested party and no additional verification samples are selected and examined, show the following statement on cheese and butter grading worksheets:

“No 20% additional samples selected or examined.”

K. Laboratory Analysis Samples

The majority of inspection and grading activities require some level of laboratory analysis in order to complete the inspection procedures. Follow the specific guidance in [Section 11](#) for the selection of these samples.

See [Section 12](#), Preparing Samples for Shipment to a Science and Technology Program or Resident Program Laboratory, for guidance on proper preparation of the laboratory samples.

Laboratory charges for each sample submitted for analysis shall be reflected on the certificate. See [Exhibits 14](#) and [15](#).

L. Recording of Sample Selection Information

Graders shall document sample selection information on the graders manifest or worksheet. Proper documentation allows for supervisory monitoring of the sample selection process. See [Section 18.C.1](#) for guidance on the proper use of abbreviations.

For this section refer to Exhibits [10](#), [12](#), [13](#), and [16](#).

All special sampling and testing requests shall be coordinated by the National Field Office with concurrence and guidance by the National Program Coordinator or Branch Chief as appropriate. Specific guidance for the markings and required statements to be included on the graders worksheet will be provided on a case by case basis.

M. Plant Testing of Official Samples

Following the selection, sampling, or grading of official samples by the grader, the manufacturer may remove samples for their purposes. At no time shall the manufacturer remove samples from officially selected samples prior to grading or inspection.

N. Sample Integrity and Controls

All appropriate monitoring requirements in [Section 6](#), Monitoring Production and Packaging Operations, shall apply to sample selection procedures.

The grader shall safeguard the list of sample numbers. No one else, most especially the plant personnel, shall have access to this list of official samples.

Sometimes the grader may be called away by other pressing matters and some samples may not be taken directly from the conveyor. In such instances, samples shall be taken from the pallets where the cases of the lot are stacked. Take only the cases which were selected earlier by the random number generator. Do not pick cases at random just to complete the required number of samples or initiate a new sampling process.

Once the official samples have been selected, apply evidence tape on the samples as soon as practical so that any unauthorized movement or tampering of the samples can be detected.

If the samples are not inspected or tested immediately, make sure they are kept in optimum storage conditions.

O. Applicant Supplied Samples

The procedures and inspection guidance in this Section will establish the necessary integrity controls to be included in a Sampling Control Plan (SCP) which an applicant may voluntarily present to the Branch. Upon acceptance of the SCP by the Branch, the applicant will be permitted to present samples for official inspection and grading purposes which were assembled without a Dairy Grading Branch inspector witnessing the selection and without the selection of random verification samples required in [Section 8.J](#) at the time of grading.

Applicants that want to participate in this service must be approved and eligible for listing in Section I of *Dairy Plants Surveyed and Approved for USDA Grading Service*.

Eligible applicants are to be advised that participants in this service will be responsible for the cost and additional time necessary to perform the reviews of the SCP. These reviews will be performed during routine grading and inspection duty assignments.

1. Eligible Samples

The SCP can include procedures and controls for the selection and safeguarding of samples to be used for any of the following: official grading; laboratory analysis; test weighing; or condition of container examinations.

2. Automatic Sampling Devices

The SCP may include the use of automatic sampling devices to obtain samples for grading and laboratory analysis of dry products; automatic scales for test weighing samples; and segregation (kick-out) conveyors for condition of container, test weighing, or grading samples. Automatic scales for test weighing shall be certified by a regulatory agency for weights and measures and validated by certified test weights.

3. Sampling Control Plan (SCP)

a) Required Elements

The SCP is to be prepared by responsible individuals familiar with the manufacturing plant operations and procedures designated by the applicant. The plan shall clearly present all of the procedures, controls, documentation, and records to be implemented by the applicant in order to assure the accuracy, representativeness, and integrity of the official samples (see [Section 8.N](#)).

The applicant shall designate an individual to be responsible for the management, implementation and integrity of the SCP and for liaison with the Branch on inspection and grading issues.

The SCP shall include documentation of the container and lot marking code protocols that are used to identify the product and assure traceability.

All containers shall be consecutively coded in the order of production. This may be accomplished by consecutively numbering or time stamping of the containers.

Samples shall be selected by procedures that guarantee the randomness of the sample selection.

Samples shall be subjected to equivalent storage and handling conditions as the lot from which they are selected, except when tempering is required. When tempering is required, the samples shall remain with the vat, sub-lot, or churning until they are removed for tempering for grading (See [Section 11.B.7.a.3](#) for butter and [Section 11.C.7.a.1](#) for cheese age requirements.)

The SCP shall include sufficient integrity controls to assure that the samples are representative of the lot from which they are selected and are protected from tampering or manipulation before and after selection.

The production lots shall be under the control of the applicant until completion of official inspection or grading. Control may be at the applicant's production facility or at some other location, such as a distribution warehouse, where the entire lot remains under the control of the applicant. Shipments to final consumers or users prior to completion of the inspection or grading shall not be permitted.

4. SCP Implementation

The applicant shall present a completed SCP to the Dairy Grading Branch National Field Director for review and approval. See guidance in [Section 19.B.2](#) for SCP review and approval procedures.

Following successful completion of the desk ([Section 19.B.1.a](#)) and validation ([Section 19.B.1.b](#)) reviews, and notification of the plan approval ([Section 19.B.2](#)), the applicant may select and offer samples for official inspection and grading services.

(See [Section 19.B](#) for the inspection guidance to conduct the periodic reviews of the SCP.)

5. Cursory Inspection

Follow the inspection guidance of [Section 8.E](#) for conducting a cursory inspection associated with every inspection and grading assignment.

9. NET WEIGHT DETERMINATION

Refer to [Section 8](#), Sample Selection, for guidance on obtaining samples.

No net weight determinations shall be conducted prior to the completion of the car-lot offered for inspection or grading even though samples may be selected from a processing line during production.

A. Verification of Scale Accuracy

All scales used for official test weighing shall have been validated by a State regulatory authority or a scale servicing company that has been certified by the State regulatory authority. The validation shall be evidenced by a signed and dated report or seal identifying the scale and test weights attached to the scale.

If the scale validation report or seal is more than one year old and the scale accuracy is satisfactory according to the guidance in this section, the scale may be used. The grader shall contact the National Field Office to report the out of date validation report or seal and notify plant management to have the scales validated as soon as possible.

If the scale documentation or checking of the test weights indicates the scale or test weights are unsatisfactory, do not use the unsatisfactory item.

If the plant cannot supply accurate test weighing equipment, discontinue test weighing activities.

If the plant can replace or repair the unsatisfactory test weighing items, grading and inspection activities can be conducted provided the repaired or replaced items are covered by a signed and dated certificate from a State regulatory authority or a scale servicing company that has been certified by the State regulatory authority attesting to the accuracy of the repaired or replaced item.

Prior to performing the net weight examination on each car-lot, check the accuracy of the scale at zero and, with the use of test weights, at the range of weighing. If the scale does not register an accurate weight, do not attempt to use it. Request the applicant to supply an accurate scale. If an accurate scale cannot be supplied, contact the National Field Office for guidance. The plant may continue to package product. However, net weight determination shall be delayed until an accurate scale is supplied.

The scale shall weigh accurately regardless of where the test weight is placed on the scale platform. There shall be no deviation in the displayed weight when the test weight is placed on the four corners or the center of the scale platform.

Sufficient test weights shall be used to test the scale in the expected range of weighing. For example, use 35 pounds of test weights (a 25 pound weight and a 10 pound weight) to test the scale for test weighing a 36 pound box of print butter, or use 500 pounds of test weight to test a scale for test weighing bulk cheese in barrels. As an alternative for barrel or 640 pound bulk cheese containers, place a filled container on the scale and then add a 50 pound test weight. The scale shall accurately register the addition of the test weight.

B. Reading Scales

1. Tare Weight

When determining a tare weight, if the scale needle falls between any two numbers or divisions of the scale, the weight shall be as indicated by the heavier of the two.

2. Gross Weight

When determining gross weight, if the scale needle falls between any two numbers or divisions on the scale, the weight shall be indicated as the lighter of the two.

3. Dial Scales

Read the weight after the dial pointer has come to rest after the initial swing of the pointer.

DO NOT press on the product container to change the dial pointer resting point.

4. Digital Scales

Read the weight as displayed. However, when “bouncing” between two numbers is observed, record the heavier weight for tare and the lighter weight for gross weight.

C. Tare Weight Determination

Tare weight determinations generally shall be made independently for each car-lot of product offered for inspection and grading. During end product grading assignments when several car-lots are offered, a single tare weight determination may be used for all product inspected or graded during one day. A new tare weight shall be determined each day of a multiple day assignment.

Tare weight determinations shall be made by averaging the weights of all packaging components (wrappers, chip boards, pouches, cups, lids, etc.) excluding any shipping container removed during the test weighing procedures (see [Section 9.C.1](#)), equivalent to 10 containers. See additional guidance in [Section 11.B.5.a.2](#) for packaged print butter and [Section 11.C.5.a.2.b](#) for miscellaneous consumer size cheeses (including process cheeses). The tare weight calculations shall be shown on Form DA 153, Sample Selection and Test Weight Record. See [Exhibit 17](#).

Unless other methods are permitted below, all new tare weight materials shall be selected from the materials currently in use for packaging the products.

1. Shipping Containers

In view of the potential for variations of weight in cardboard materials, tare weights shall not be determined for cardboard shipping containers that can be removed during the test weighing procedures, except that,

The average tare weight of bags for nonfat dry milk shall be determined by the weighing of 10 empty bags, liners, string used to tie the liner, and tape and stitching thread (if used to seal the bags). The total weight of the empty containers shall be divided by 10 for the average tare weight.

The average tare weight of butteroil or anhydrous milkfat drums shall be determined by averaging the tare weights of ten drums scheduled to be filled selected at random.

The average tare weight for 5 gallon or number 10 cans shall be determined by averaging 10 cans and all component parts (lids, bottoms, spouts, caps, bungs, etc. as appropriate) selected at random from the supplies to be used for packaging the car-lot.

The tare weight of dry products packaged in portable bulk bins (excluding over the road tankers) shall be determined by the established tare weight stamped into the metal of the bulk bin.

If a tare weight is preprinted on the container and the average tare weight of 10 containers is less than the preprinted figure, use the preprinted tare weight for all net weight determinations. For example, the preprinted tare weight is 0.10 pounds and the average of 10 containers is 0.08 pounds. Use the 0.10 pounds as the tare weight.

If the average tare weight of 10 containers is greater than the preprinted tare weight use the average tare for net weight determinations.

2. Primary Containers

Unless otherwise specified, all primary container tare weights shall be determined on the basis of weighing all of the primary container materials included in the equivalent of 10 shipping containers of product. The total weight of the empty containers and associated components shall be divided by 10 for the average tare weight.

a) Grand Lot Tare Weights

When inspecting a Grand Lot of finished product, tare weights are set at the following levels:

Fiberboard or corrugated barrels with lids	20 lbs.
40 pound block cheese liners	.31 lbs.
Bulk butter liners	.13 lb.
One pound print butter (no carton)	.02 lb. *
¼ pound print butter in cartons	.06 lb. *
25 kg Cap-Sac or Aire-Tite bags on dry milks	.75 lb.
25 kg goose-neck tied bags	.86 lb.

* Multiply this figure by the number of pounds in the case

If a tare weight value is not listed, test weighing of finished packages can not be performed.

D. Test Weighing

1. Procedures

All test weight determinations except for barrel cheese, 640 pound containers of cheese, and bulk dry products (nonfat dry milk, instant nonfat dry milk, dry buttermilk, dry whole milk, etc.) shall be conducted by removing the product from its shipping container prior to weighing.

In order to eliminate variations of weight caused by the potential change in weight of shipping containers and chip boards, remove the packaged product (except for evaporated milk) from each shipping container, remove all chip boards and only weigh the primary containers of product. See [Section 9.E](#) for guidance on recording test weight information.

An impervious metal or plastic plate may be used to facilitate the removal of the product from the shipping box provided its weight has been included in the tare weight determination and it is maintained in a clean condition.

If at any time the grader suspects that product weights are being manipulated by the applicant to influence the test weight record, the grader shall contact the National Field Office for guidance and take as many additional weight samples as necessary to assure test weight accuracy.

2. Identified By Vat, Churn, or Sub-lot Number

One sample of each churn, vat, or sub-lot in the car-lot shall be weighed.

3. Not Identified By Vat, Churn, or Sub-lot Number

30 shipping containers per car-lot shall be weighed.

4. Special Considerations for Grand Lots

If any test weight(s) is observed to be below the weight indicated on the package, the net weight of the entire lot shall be based on the lowest test weight. Other samples that were randomly selected and found satisfactory in weight shall not be included in the lot weight shortage. Use the following calculation to determine lot weight shortage.

Test wt. shortage = (total number of containers less samples containers of acceptable weight) times largest test weight shortage observed. At the applicant's request, all containers in the lot can be test weighed.

E. Reporting Test Weight Results

All test weight and tare weight results are to be recorded on either;

Form DA 153, Sample Selection and Test Weighing Record when not identified by churn, vat or sub-lot,

or,

Form DA-201B, Application for Butter Grading Service; DA-201C, Cheese Graders Memorandum; or DA-137, Dairy Miscellaneous Sampling Report (DMS) as appropriate.

See [Section 9.F](#) for special instructions for when the random verification samples do not agree with the official samples.

Record all test weight shortages to 2 decimal places as appropriate, except that, bulk containers of 500 pounds or more may be weighed on a scale which is accurate to ½-pound and may be recorded to 1 decimal place. See [Section 9.B](#) and [Exhibits 17, 18 19, 20](#) and [21](#).

When the scale is a direct readout digital scale, record the weights exactly as shown on the readout screen, except as directed under [Section 9.E.3](#). See [Section 9.B.4](#) for additional guidance for when the scale “bounces”.

When the scale is graduated in ounces, the weights, except as directed under [Section 9.E.3](#), shall be recorded in the decimal system using the following conversion chart:

1 oz. = .06 lb.	9 oz. = .56 lb.
2 oz. = .13 lb.	10 oz. = .63 lb.
3 oz. = .19 lb.	11 oz. = .69 lb.
4 oz. = .25 lb.	12 oz. = .75 lb.
5 oz. = .31 lb.	13 oz. = .81 lb.
6 oz. = .38 lb.	14 oz. = .88 lb.
7 oz. = .44 lb.	15 oz. = .94 lb.
8 oz. = .50 lb.	16 oz. = 1.00 lb.

1. Products Identified by Vat, Churn or Sub-lot

When the test weight is equal to or greater than the declared net weight, mark the test weight as “OK” on the graders memoranda. See [Exhibits 18, 19, and 20](#). On the certificate show only the shortages. Do not put OK in the test weight column. See [Exhibits 37 and 45](#).

2. Products Not Identified by Vat, Churn or Sub-lot

Record all gross and net weights exactly as shown by the scale. See [Section 9.E](#). See [Exhibit 17](#).

The contractor does not get credit for weights in excess of the marked weight on the container. Calculate the average gross weight of the samples by adding all the gross weights and dividing by the number of samples weighed. See [Exhibit 17](#).

To determine the average net weight of the cases in the car-lot, subtract the computed average tare weight of the packaging material from the average gross weight. See [Exhibit 17](#).

Record the Gross, Tare, and Net weights in the appropriate columns of the In-Process Grading Certificate worksheet. See [Exhibit 22](#).

When individual container net weights are below minimums set forth in the applicable FSA Announcement show the following statements on the Inspection Certificate:

“_____ sample cases weighed _____, _____ pounds net weight. This is below the required minimum individual case weight of _____ pounds”.

See [Exhibit 20](#).

When the total car-lot test weight shortage exceeds the limits set forth in the applicable FSA Announcement show the following information and statement on the In Process Certificate:

“Marked Wt xx,xxx.xx Shortage xx.xx* Net Weight xx,xxx.xx

Test weight shortage of car-lot exceeds _____ percent.”

See [Exhibit 22](#).

3. Test Weight Shortages

a) Bulk Sized Packaged Products

When the test weight is less than the declared net weight, record only the shortage as shown by the scale, except as provided for in [9.E.3.b](#). See [Section 9.E](#). Do not record the accumulated shortage for the entire sub-lot, vat or churn; or, the full net weight of the container. See [Exhibits 18](#) and [19](#).

Calculate the test weight shortage for each churn, vat, or sub-lot based on the amount of shortage multiplied by the number of containers in each vat, churn, or sub-lot. Calculate the total test weight shortage for the car-lot by adding together all of the individual shortages calculated for the individual churns, vats, or sub-lots. Show the test weight shortage information on the graders worksheet using the format below or in the worksheet columns provided.

Marked Wt.	xx,xxx.xx
Test Shortage	xx.xx
Net Weight	xx,xxx.xx

See [Exhibits 18](#) and [19](#).

b) Consumer Sized Packaged Products

(1) Identified by Churn, Vat or Sub-Lot

When the test weight is less than the declared net weight, record only the shortage as shown by the scale See [Section 9.E](#). See [Exhibit 20](#).

(2) Not identified by Churn, Vat or Sub-Lot

Record all gross and net weights exactly as shown by the scale. See [Section 9.E](#). See [Exhibit 17](#).

When individual container net weights are below minimums set forth in the applicable FSA Announcement show the following statements on the Inspection Certificate:

“_____ sample cases weighed _____, _____ pounds net weight. This is below the required minimum individual case weight of _____ pounds”.

See [Exhibit 20](#).

When the total car-lot test weight shortage exceeds the limits set forth in the applicable FSA Announcement show the following information and statement on the In Process Certificate:

“Marked Wt xx,xxx.xx Shortage xx.xx* Net Weight xx,xxx.xx

*Test weight shortage of car-lot exceeds _____ percent.”

See [Exhibit 22](#).

F. Validation of Test Weights with the Random Verification Samples

Weigh all of the random verification samples for each car-lot using the same procedures as for the official samples and record the verification test weight results on the graders worksheets.

For the purposes of this instruction, A significant variation of a test weight shall be any verification test weight which is:

- .25 pounds below the marked weight of the container or the recorded test weight of the original sample, whichever is lower.
- .5 pounds below the marked weight of containers of bulk cheese (barrels or 640-pound containers).

Weights greater than the marked weight are not to be criticized.

When the random verification sample test weight is equal to or greater than the official samples, retain and use the test weight results for the official samples.

When the random verification sample test weight is less than the official sample but not significantly less (see above), use the random verification sample test weight to replace the official sample weight.

When the random verification samples reveal a significant variation in test weight below the test weight of the official samples, discontinue grading of the car-lot and inform the National Field Office of the variation in test weights. Plant management may select one of the following options in order to proceed with the inspection.

Option 1

Withdraw the car-lot from grading. The car-lot is not eligible for reoffering or appeal grading.

Option 2

Accept the lowest test weight of any sample or random verification sample for all the churnings, vats, or sub-lots in the car-lot. For example on a car-lot of butter:

<u>Original</u>	<u>Verification</u>
ok	
ok	
ok	67.65*
ok	
67.9	
ok	
ok	
67.9	ok

*Assuming 72 boxes per churning and the lowest test weight of 67.65 pounds, the car-lot will be assigned a 201.6 pound test weight shortage (72 boxes x 8 churnings x .35 pounds shortage = 201.6 pounds).

Document on the graders worksheet the test weight shortage to be applied to the car-lot. Add one of the following comments to the “Remarks” section of the worksheet:

”Car-lot withdrawn from grading at the request of plant management”

“Due to a significant variation in test weights of (number) Random Verification Samples, plant management accepts the lowest test weight for all samples weighed.”

Contact the National Field Office to inform them of the situation.

Beginning immediately, select at least 40 percent random verification samples but in no case less than 2 per car-lot for all car-lots offered for grading. Continue this level until 10 consecutive car-lots demonstrate satisfactory verification of the plant assembled samples.

G. Marking of Test Weight Samples

See [Section 7.G](#) for coding and marking guidance.

10. CONDITION OF CONTAINER OR PRODUCT

A. Condition of Container Examinations

Condition of Container examinations shall only be performed when they are required by the purchase announcement or specification, or upon the request of an interested party.

No condition of container examinations shall be conducted prior to the completion of the car-lot offered for inspection and grading even though samples may be selected on line.

The provisions of the United States Standards for Condition of Food Containers shall be used whenever condition of container examinations are conducted. Additional procedures and guidance are provided in *The Handbook for Inspection of the Condition of Food Containers* (AMS Handbook).

1. Selection of Samples

Unless instructed differently by the National Field Office, the **single** sampling plans shall be used, except that the **double** sampling plan will be used for 25 kg bags of dry milk products. The number of samples required for the condition of container examination shall be determined by reference to the applicable tables for reduced, normal, or tightened inspections listed in the Standards.

It is not necessary to switch to tightened inspection (as called for in the container standards) when performing condition of container examinations on product intended for delivery to FSA unless specifically requested to do so by an interested party. The rules for switching to normal from reduced inspection and back to normal inspection will apply. The only exception is for re-inspection of a reconditioned or reworked lot that was previously rejected. The **tightened level** of sampling shall be used for re-inspection of these lots.

2. Recording of Observations

Examination results shall be recorded on the appropriate Condition of Container Examination worksheets and shall be filled out in accordance with guidance provided in the AMS Handbook. See [Exhibits 23](#), [24](#), [25](#) and [26](#).

A cumulative record of all condition of container examinations shall be maintained for each applicant presenting products for condition of container examinations. These cumulative records shall be maintained at the inspection site and shall be used to document when sampling plans are switched between reduced, normal, or tightened. When a car-lot is rejected on any of the sampling plans, all figures on the cumulative record are to be reset to zero. See Table III-B in the United States Standards for Condition of Food Containers and [Exhibit 27](#).

When a lot meets the United States Standards for Condition of Food Containers for all containers, check the “Meets” box located in the condition of container section on the grader’s worksheet and type “MEETS” in the condition of container section of the Inspection Certificate. See [Exhibits 19](#) and [22](#).

When a lot fails the United States Standards for Condition of Food Containers for any containers, check the “Fails” box located in the condition of container section on the grader’s worksheet and type “FAILS” in the condition of container section of the Inspection Certificate. Also, show the following statement on the certificate, substituting the applicable defect, number of samples examined, number of defects and a description of the defects noted in the inspection.

For example:

“Condition of Containers failed because 17 of 168 one pound print wrappers examined were dirty and smeared (Minor defect). Only 16 defects permitted”.

See [Exhibit 28](#).

The grader shall immediately supply a copy of the Condition of Container report to plant management to inform them of the reason for failure.

3. Reconditioned or Reworked Car-lots

Lots that fail to comply with U.S. Standards for Condition of Food Containers may be reoffered for inspection only when the entire lot has been reworked by the applicant. For reworked lots, use the sampling plan for tightened inspections to determine the correct number of containers to select. The sampling procedures and the examination for defects shall be the same as for the original inspection. See [Section 6.C](#) Rework Policy for guidance for the proper handling of rejected containers.

4. Special Considerations for Grand Lots

A condition examination may be requested to evaluate the extent of a variety of potential defects such as, mold, water damage, rodent or insect infestation, fire damage, heat stress, etc. Defects shall be classified according to the following definitions.

a) Defect Classification

Critical defect: A defect that is likely to result in unsafe or unwholesome product, or a defect which will prevent the normal performance of the product. (Examples: mold, rodent damage, insect infestation, exposed product, etc)

Major defect: A defect that will materially reduce the usability of the product for its intended use. (Examples: water damage to outer container only, heat stress such as oiling-off, product sifting from containers, etc.)

Minor defect: A defect which while present is not likely to materially reduce the usability of the product for its intended use. (Examples: stained containers, misaligned closures, etc.)

b) Acceptance and Rejection Levels

ACCEPTANCE AND REJECTION LEVELS FOR CONDITION INSPECTIONS

Sample size	Critical		Major		Total	
	Ac	Re	Ac	Re	Ac	Re
0 - 5	0	1	0	1	0	1
8	0	1	0	1	1	2
13	0	1	0	1	2	3
20	0	1	0	1	3	4
32	0	1	1	2	5	6
50	0	1	2	3	7	8
80	0	1	3	4	10	11
125	0	1	5	6	14	15
200	1	2	7	8	21	22
315	2	3	10	11	21	22

B. Condition of Product

There are various examinations required by purchase announcements or specifications and which are required to determine product acceptability. These examinations are not considered as part of the Condition of Container examinations as referenced in [Section 10.A](#).

However, in many cases the Condition of Container samples selected may be used to conduct these examinations.

Examples of these examinations are:

Bulk Cheese

Free whey	Loose flaps (blocks)
Loose wrappers (blocks)	Container fill
Torn barrel liners	Wet barrels

Process Cheese

Cardboard box lint

Butter

Voids in corners
Hand prints or other workmanship defects on surfaces
Exposed product

Inspection guidance for these condition examinations will be provided in appropriate subsections of [Section 11](#).

Dairy Grading Branch is frequently called upon to evaluate the condition of products which have been damaged or distressed while in storage or transit. Unless otherwise directed by the National Field Office or the Washington staff, such inspections will be conducted following the sample selection and inspection guidance provided in the United States Standards for Sampling Plans for Inspection by Attributes and Mil Standard 105d.

Condition examinations will generally be documented on a DX certificate. Complete all of the appropriate information in the heading section of the certificate. In the body section, clearly document the conditions observed. When appropriate a recommendation for disposition shall be included. See [Exhibit 66](#).

C. Special Inspections

Special inspections for which there is no specific guidance provided in this instruction shall be coordinated by the National Field Office and the Washington staff.

11. EVALUATION OF PRODUCT CHARACTERISTICS

Refer to [Section 3](#), Prerequisites to Inspection and Grading, for guidance on eligibility for inspection and grading services.

Refer to [Section 5](#), Documents and Forms, for guidance on the appropriate standards, specifications, announcements, and documents to use during product evaluations.

Refer to [Section 6](#), Monitoring Production and Packaging Operations, for additional inspection guidance.

If there is evidence that the products offered for inspection or grading have been subjected to abnormal conditions or mishandling, are not representative of the car-lot offered, or have been subjected to conditions which potentially could result in contamination of the product, DO NOT inspect or grade the product.

Refer to [Section 8](#), Sample Selection, for guidance on obtaining samples.

No official grading or product evaluation shall be conducted prior to completion of the car-lot offered for inspection or grading and satisfaction of any age requirements prior to grading of the product (see [Sections 11.B.7.a.3](#) and [11.C.7.a.1](#)). These conditions apply even though samples may be selected from the processing line during production.

A. Evaluation of Random Verification Samples

If samples are assembled by a disinterested party, such as an outside warehouse, or assembled and controlled by a USDA grader, random verification samples are not required.

When products require tempering prior to grading or inspection and the applicant is permitted to assemble the USDA identified sample containers (see [Section 8.H.2.a.1.a](#)), random verification samples shall be selected by the grader at the time of grading (see [Section 8.J](#)).

All random verification samples selected for each car-lot are to be test weighed (when test weighing is conducted on the original samples), and evaluated for product characteristics. All results of the test weighing and grading of the random verification samples are to be recorded on graders memorandum in the same format as the original samples. Do not record this information on the certificate. See [Exhibit 30](#).

When the random verification samples are satisfactory, make the following statement on the grader's memorandum:

“(Number) random verification samples satisfactory.”

1. Significant Variation in Verification Samples

When any of the random verification samples reveals a significant variation from the test weight or product characteristics of the corresponding plant assembled sample(s), the grader shall immediately take the actions presented in this Section.

A significant variation of a product characteristic shall be any characteristic or intensity of a characteristic which would lower the level of the grade assignment.

Examples:

- Lowering an AA grade to an A grade.
- Definite leaky present when leaky is not identified on the original sample.

When a significant variation is found in the verification samples, discontinue all grading and inspection activities on the car-lot.

If the significant variation pertains to a product grade characteristic, the entire car-lot shall be rejected.

Document on the graders memorandum the discrepancies observed with the random verification samples. No vat or churning in the car-lot shall receive a final grade. Mark the final grade column with asterisks as appropriate with other comments on the memorandum. In the remarks section of the memorandum add the following statement:

“_____ of _____ random verification samples inspected failed to confirm the condition or quality of the applicant assembled samples. No final US grade assigned.”

See [Exhibit 21](#).

None of the vats, churnings, or sub-lots in the rejected car-lot are eligible for reoffering or appeal grading.

a) Variation in Test Weight

See [Section 9.F](#) and [Exhibit 30](#).

Contact the National Field Office to inform them of the situation.

Beginning immediately, select at least 40 percent random verification samples but in no case less than 2 samples per car-lot for all car-lots offered for grading. Continue this level of random verification sampling until such time as 10 consecutive car-lots demonstrate satisfactory verification of plant assembled samples.

B. Butter

1. Prerequisites

Refer to [Section 3](#), Prerequisites to Inspection and Grading, for guidance on eligibility for inspection and grading services.

2. Documents and Forms

- ▶ DA-201B Application for Butter Grading Service
- ▶ DA-201 Universal Grading Certificate

Refer to [Section 5](#), Documents and Forms, for guidance on appropriate standards, specifications, announcements and documents to use during product evaluations.

3. Monitoring

Refer to [Section 6](#), Monitoring, for additional instructions for monitoring the production of all products.

a) In-Process Inspection

One sample from each churning of bulk butter to be reprocessed into one pound prints shall be tempered and pre-graded prior to printing

4. Coding and Marking

a) Churn Designation

Churn designations are used for the identification of butter.

When barrel style batch churns are employed, the production of butter from each separate churning shall be identified as a churning. Multiple churnings shall not be combined into one churn designation.

When continuous style churns are employed, the churning designation shall be changed when cream supply tanks to the churn are changed.

When continuous style churns are supplying a common butter boat or butter silo which, in turn, is supplying one or more packaging machines, the churning designation shall not exceed maximum established (See [Section 7.B](#)) for each style of package produced. This may result in several different style packages bearing the same churn number. However, the products can be easily segregated and graded according to their different styles. Each of these “churnings” will be graded independently.

Fresh butter produced from a continuous churn shall not be intermixed with butter softened by a micro-fix or similar equipment. Butter from these two processes shall be kept separate and different churn designations assigned.

Refer to [Section 7](#), Coding and Marking, for general coding and marking requirements.

b) USDA Officially Inspected Stamp

Officially graded bulk butter shall be stamped on the side panel displaying the manufacturers name in the following pattern with double shield stamps.

Grade AA	—	Upper left corner
Grade A	—	Upper right corner
Grade B	—	Lower left corner
Below Grade	—	Lower right corner

5. Net Weight

Refer to [Section 9](#), Net Weight Determination, for inspection procedures used in determining net weight of all products.

a) Tare Weight Determination

Tare weights are to be established using the guidance found in [Section 9.C](#). If materials are not available to establish tare weights use the following guidance.

(1) Bulk Butter Liners

The following tare weights shall be used for 25 kg and 68 pound bulk butter liners unless the plant management or the grader feels these weights are not representative of the liners used. In such a case, follow the guidance in this section.

Smallest Scale Graduation	Parchment		Polyethylene Bag	Wrapper	
	Damp	Wet		25KG	68 Lb
One ounce (31gm)	3 oz. (93gm)	4 oz. (124gm)	2oz. (62gm)	3oz (93gm)	4oz (124gm)
.1 lb. (46gm)	.2 lb. (91gm)	.3 lb. (136gm)	.1 lb. (46gm)	.2lb (91gm)	.2 (91gm)
.05 lb. (22.7gm)	.20 lb. (90.8gm)	.25 lb. (113.4gm)	.10 lb. (45.4gm)	.15	.20 (90.8gm)
.01 lb. (4.5gm)	.19 lb. (86.2 gm)	.25 lb. (113.4gm)	.10 lb. (45.4gm)	.15	.20 (90.8gm)

A 1 ounce tare may be used for polyethylene liners when test weighing of 10 or more liners shows an average of 1 ounce (31gm) or less. When using a tare weight which is less than specified in Table above, show the tare weight calculation information on the worksheet.

(2) Print Butter

Determine the tare weight of primary container packaging materials e.g., wrappers, cartons etc., by weighing the equivalent contents of ten (10) shipping containers.

The same set of wrappers for the ten cases may be reused when establishing the tare weight for subsequent car-lots. These wrappers shall be signed and dated by the grader and its use as tare material shall not exceed one month. However, if the grader has reason to believe that the weight of the wrappers has changed or is not representative of the tare material being used due to a new shipment or change of supplier, a new set of wrappers shall be selected and used.

Calculate the total tare weight of the samples and divide by ten (10) to determine the average tare weight.

(3) Miscellaneous Butter Containers

Determine the tare weight of primary container packaging materials e.g., reddie cards, reddie caps, reddie trays, continental wrappers, chip divider sheets and cartons, thermoformed cups and cover sheets, etc. equivalent to the contents of one case.

b) Special Consideration for Butteroil in Bulk Drums

10 drums (with bungs) of butteroil per car-lot shall be weighed.

6. Condition of Container

Refer to [Section 10](#), Condition of Container, for general instructions for performing Condition of Container examinations.

a) Special Considerations for Print Butter

Parchment wrappers smeared with butter or stained with grease stains shall be considered as part of the evaluation of the condition of the container of the case. When this defect is noted classify it as a minor defect and note it on the condition of container form. If the number of defects exceeds those permitted, fail the car-lot for condition of container.

b) Special Considerations for Butteroil

FSA has requested Dairy grading Branch to examine the integrity of drum seals. Inspectors are to remove the aluminum dust covers from the fill and vent bungs on drums and observe for proper sealing. Bungs are to be tight with gaskets properly seated. Bungs are not to be removed during the examination. The following are to be considered major defects.

- Loose bungs.
- Cross threaded bungs.
- Missing, torn, or extruded gaskets.

7. Sampling

Refer to [Section 8](#), Sampling; for sampling procedures applying to all products.

a) Age of Products

(1) Bulk Butter

No official grade shall be assigned to bulk butter less than 48 hours after manufacture.

(2) Print Butter

Print butter may be assigned an official grade as soon after manufacture as the samples can be thoroughly cooled to 40° F or below and then tempered to the required 45° to 55° F grading temperature range.

(3) Age Determination

The date of manufacture shall not be included in the calculation to determine the date a product is eligible for grading or inspection unless the plant can produce accurate documentation to establish the actual time of manufacture. For example:

January		1	2	3	4	5	6	7	8	9	10	11	12	13	14	15
Date of manufacture	-----															
Date bulk butter eligible for grading	-----															

b) Samples for Product being offered to CCC

(1) Bulk Butter offered to CCC

All bulk butter presented for grading for sale to CCC under the price support program shall be presented from a financially disinterested, outside warehouse storage facility. Bulk butter presented for grading for sale to CCC from the manufacturer's facilities shall be declined until such time as it is relocated. The purpose of this requirement is to strengthen program integrity through the control of the selection and tempering of official grading samples by financially disinterested warehouse employees rather than the manufacturer.

(2) Print Butter offered to CCC

Official samples of print butter for sale to CCC under the price support program shall be selected, tempered and graded under the control of the USDA grader during a single duty assignment

c) Special Considerations for Grade Labeled Butter

The following additional requirements apply:

- Select one sample of each label and style offered from each churning. Each sample will be evaluated independently. For example, if the “ABC” label is offered in both ¼ pound prints and continentals bearing the same churn designation, select a sample of both styles. Grade each sample independently and record the grades as appropriate.
- The grading samples should be spread out as soon as possible after selection of all the samples to facilitate tempering. The grader shall maintain control of the integrity of the samples throughout tempering.

Inspection lots are to be completed prior to the selection of samples, except that:

- At a resident program the grader may select churnings for grading after the churning is completed but before the entire car-lot is completed. When such churnings are graded and released for distribution prior to completion of the car-lot, the car-lot is **NOT** eligible for appeal grading.

(1) Instructions for Emergency Shipments of Grade Label Product

Under special circumstances emergency shipment of butter prior to grading may be authorized provided all of the following criteria are satisfied. Alternatively, the applicant can request approval under the Industry Supplied Samples procedures covered by [Section 8.Q](#).

1. These procedures are for emergency shipments only. (Butter packers are to adjust production and shipping schedules to allow for the butter to be normally graded in the final package.)
2. All such shipments shall have the prior approval of the National Field Office. The packaging plant shall telephone their request for shipment to the National Field Office and follow-up the request with a written confirmation signed by plant management. The follow-up request may be faxed to the National Field Office at the option of the packaging plant.

The request shall include:

- The date of the shipment.
- The label(s) being shipped (brand name and code number from the monthly listing).
- The number of cases for each label being shipped.
- The destination of the shipment.
- Nature of the emergency requiring shipment.
- Acknowledgment that the plant will assume all additional charges for the check grading of samples at the destination if conducted by USDA.

3. There is a USDA sampler or grader available to draw samples. If no grader or sampler is available the product MAY NOT be shipped prior to grading, except as authorized by the National Field Director such as in the case of inspector unavailability during grading clinics and Branch All Employee Conferences. During such exceptions granted by the National Field Director, the requirements to use Product Control Tags in item 4 below are waived.
4. The samples shall be drawn from the completed lots prior to shipment.
A Product Control Tag shall be completed as shown in [Exhibit 32](#) for each box of official samples. The tag shall be signed by the sampler. The signed stub ends of all the tags used for the sample containers shall be assembled and placed in an envelope. The envelope shall be sealed and stamped with the sampler's official stamp across the seal. The sealed envelope shall be placed inside one of the sample containers prior to sealing the container so the grader can retrieve the stub ends to verify the sample box Product Control Tag numbers.
Each container of official samples shall be secured with the top portion of a Product Control Tag and evidence tape, stamped with the sampler's official stamp, and held at the plant for official grading. See [Exhibit 33](#). The sample boxes shall be stored in the cooler until grading is conducted. The applicant or warehouse shall be informed that the samples are not to be moved or disturbed.
5. A grader shall be scheduled for the first regular workday following the shipment to grade the USDA selected samples.
6. In the event that a portion of a manifest offered for grading has been shipped without prior authorization, discontinue all grading and contact the National Field Office immediately. Do not issue certificates for any butter which was graded during the grading assignment prior to detection of the shipment.

d) Laboratory Samples

(1) Butter

As appropriate, these instructions apply to the selection of laboratory samples for plastic cream, concentrated milk-fat, or other high fat products which are packaged in standard bulk butter style boxes.

When applicable, the laboratory samples shall be selected only from the 20 percent random verification samples selected under observation by the grader. It is the graders responsibility to assure that sufficient random samples are available to meet the laboratory sample requirements. In circumstances where random verification samples are not required, see [Section 8.J](#), laboratory samples shall be selected using the random number generator.

For those using the TI calculator, enter 1 as the low limit and the number of churnings in the car-lot as the high limit. Press the [D] key to select the required number of samples. The random numbers generated indicate the churn numbers in the car-lot from which the samples are to be selected. For example, for a car-lot of nine churnings and the random numbers generated are 3 and 7, select the laboratory samples from the 3rd and 7th churnings on the manifest.

Note: The procedures are similar for the laptops and for the Casio and Hewlett-Packard calculators but the key strokes will be different.

(2) Butterfat Testing for Butter (Bulk and Grade Label)

These sampling and follow-up procedures are minimum requirements. Sampling and testing by USDA over and above these minimum requirements, when requested by the applicant, are encouraged. In addition, an internal butterfat testing program conducted by the applicant is advised.

Each certificate for butter shall not represent more than 125,000 pounds of product, except in those instances when one day's production of grade labeled butter exceeds 125,000 pounds.

At a USDA resident grading program, all official fat results less than 80.0% shall be reported immediately to the resident grader who shall initiate the tightened level of sampling and testing according to this instruction.

The applicant may request the resident grader to officially sample and test or supervise the testing of all churnings for butterfat analysis or pH to satisfy the requirement of [Section 11.B.8.a.2.a.](#)

If this alternative is used, it is not necessary to type all of the butterfat results on the covering certificate. Instead, show the following statement in the "Remarks" section:

"Official USDA tests on each churning, as recorded on the manifest, indicate butterfat content 80.0% or higher."

In all other cases, follow the guidance for [Section 11.B.7.d.](#)

At a nonresident (fee) grading plant program, all official fat results less than 80.0% shall be reported immediately by the National Science Laboratory to the National Field Office (NFO). The NFO shall contact the grader who is scheduled to do the next grading to initiate the tightened level of sampling according to this instruction. The DMS on file in the grading room shall provide the documentation of sampling activity. Test results faxed by the Science Division laboratory are to be used as the basis for moving from the regular level of sampling to the tightened level of sampling, and back to the regular level.

(a) Sampling Level

There are 2 levels of sampling available:

Regular — 1 chance in 5 for 1 fat analysis per certificate offered for grading

Tightened— 4 fat analyses per certificate offered for grading

The level of sampling to initiate this program shall be at the regular rate.

It shall be the graders responsibility to assure the correct level of sampling is done at an individual plant when grading is performed. When in doubt, the grader is to contact the National Field Office.

(i) Selection of Certificates to Be Sampled When Under the Regular Level

Use the random number generator for this selection. Enter a seed number, a low of 1, and a high of 5. Generate a new number for each certificate offered. Whenever a 3 is displayed for a

certificate, sample that certificate for fat. See the inspection guidance in the next paragraph. Whenever a 1-2 or 4-5 is displayed, don't sample for fat. Remember that this procedure provides a 1 chance in 5 for a certificate to be selected, not a sampling frequency of 1 per 5 certificates offered. Record the seed number on the graders memorandum.

(a) Selection of Churnings in the Certificate to Be Sampled for Fat

The Dairy Grading Branch shall select all samples for fat testing except as provided for in [Section 11.B.7.c.1](#). Use the random number generator and the same seed number as referenced above to select the churning(s) to be sampled for fat. Mentally assign consecutive numbers to each churning listed on the application for grading, i.e., 1, 2, 3, 4, 5, etc. Enter a low of 1, and a high which corresponds to the number of churnings listed on the application for grading. The random number selected by the generator shall be sampled for fat.

The following alternative procedure may be used at resident grading plants when the resident selects samples on-line from production:

1. The grader will select one sample from each churning produced and hold the sample under seal or evidence tape until the car-lot is completed.
2. A 1 in 5 determination will be made for the car-lot. If a 3 is designated, proceed to step 3. If a 1, 2, 4, or 5 is designated, only grade the samples.
3. Select one of the churnings (when production does not exceed 25 churnings) as the official fat sample. The other samples are to be returned to the plant after grading.
4. The plant has the option of testing all of the samples selected.
5. If a tightened follow-up regimen is required, the same steps are to be followed, except, 4 samples are selected for butterfat testing. If there is only 1 churning on a certificate, that churning will be sampled 4 times.

(ii) Collection and Preparation of the Sample Submitted for Fat Analysis

Mark butter churnings selected for analysis with an asterisk (*) in the remarks column. Complete the DMS on the laptop under the certificate number that the product will be graded under. On the DMS accompanying the samples to the laboratory clearly indicate for the laboratory the type of analysis that is to be performed, i.e., "Test for butterfat and moisture", "Test for butterfat, moisture, and salt", or "Test for butterfat, moisture, salt, and pH". See [Exhibit 34](#).

Select one, ¼ pound stick when available. Place the stick in a plastic sample bag for mailing to the National Science Laboratory.

When 1 pound solids are selected for sampling, place approximately 100 grams in a cup which can be properly sealed for shipment (1 pound equals 454 grams).

Individual portions, continental chips and butter cups, shall be placed in a cup or container with the wrapper intact. The laboratory is better equipped to un-wrap these types of packaging materials in order to protect the integrity of the sample. The number of butter cups will be dependent upon the individual cup size. Send approximately 100 grams.

All fat results shall be entered on the covering certificate by the National Field Office or resident plant. For churnings with low fat results in the space for Flavor and U.S. Grade insert two

asterisks (**). Show the following statement in the remarks section of the graders memorandum and on the certificate:

“**No flavor rating or U.S. Grade assigned because butterfat content is below the 80 percent requirement”

(iii) Follow-up Actions When Low-fats are Reported

The following actions are required by the grader when a low fat is reported on a sample taken at the regular level.

- Sample 4 churnings (tightened level) from every car-lot offered from the date you are notified until such time that test results show all tests from 5 consecutively offered car-lots are satisfactory.

The following actions are required by the grader when a low fat is reported on a sample taken at the tightened level.

- Continue sampling at the tightened level. Alternatively, a tighter level than 4 fat analyses per certificate can be initiated, if requested by the applicant. Sampling at the tightened level will continue until such time that ALL results, representing 5 consecutively offered car-lots, are satisfactory.

A low fat result on a sample taken during the regular or tightened level of sampling will not require the packaging plant to hold or to withdraw any product from distribution.

See [Section 18.D](#) for guidance on reporting fat results. Fat results are to be maintained and filed in the office where the covering certificate is typed.

The Branch Chief may request a written report of all official fat results for a specific applicant for the most recent 6 month period. If more than 5 percent of the official samples tested during that period show less than 80% fat, all churnings offered for grading will be sampled and tested for fat. Testing will continue until all churnings for 5 consecutive car-lots demonstrate adequate control.

Continued and repetitive low-fat results may warrant withdrawal of the grade label program from the applicant.

(3) Butteroil/Anhydrous Milk-fat

As appropriate, these instructions apply to the selection of laboratory samples for anhydrous milk-fat, ghee, or similar products packaged in drums, pails or cans. Following the same sampling levels as for bulk cheese as referenced in Sections [11.B.8.a.2.b.i](#) and [11.B.8.a.2.b.ii](#).

Obtain triplicate samples in clean, dry, six ounce jars or other appropriate containers. One sample is to be sent to the National Science Laboratory, one sample provided to the applicant, and the remaining sample held as a reserve sample. See [Section 8.I.2](#).

Complete the sample identification label and attach to each sample portion. See [Exhibit 35](#).

8. Product Evaluation

a) Butter

(1) Bulk Containers

Check that the butter samples have been fully cooled to 40° F or below before tempering to between 45° F and 55° F for grading. See [Section 11.B.8.a.3](#) for guidance on consumer size packages. If the butter is not properly tempered to within this specified temperature range, DO NOT begin grading.

The grading temperature shall be recorded on the Application for Grading Service.

Check the markings on the containers to assure the churning designations, plant numbers, etc. match the coding as recorded on the grading manifest.

Also, use your random number generator to validate that the samples presented by the applicant are the correct box numbers. If the numbers are not correct for every box offered, contact the National Field Office for guidance.

(a) Grading Procedures

Completely open the container so the entire top surface of the butter can be examined for surface defects, such as poor finish, mottled color, color specks, free moisture, voids, or foreign material. See [Sections 11.B.8.a.1.b](#) and [11.B.8.a.1.c](#) for further guidance if defects or mold are observed.

Prior to beginning grading, make sure that your hands and the trier are clean. The trier should be at approximately room temperature. A cold trier will make the butter appear to be ragged boring, while a warm trier will produce a greasy surface on the plug.

Use a bulk butter trier and insert the trier into the butter at a slight angle, open side down, to a depth sufficient to withdraw a 9 to 10 inch plug. Give the trier a one half turn. Carefully withdraw the plug. DO NOT twist the trier repeatedly.

Immediately smell the entire length of the plug by passing the trier under the nose. It is important to inhale evenly and moderately in order to properly evaluate the aroma of the butter. Concentrate on discerning the aromas and their intensity.

If the accurate determination of the aroma intensity is difficult to make, the trier may be warmed to enhance the volatilization of the aromatic components. This is often useful to identify borderline rancid aromas. This technique shall not be used constantly as a grading procedure.

Remove ½ to 1 inch from the bottom of the plug and quickly melt the sample in your mouth. Concentrate on discerning the flavor characteristic(s) and flavor intensities. To facilitate the flavor evaluation, the melted butter should be evenly distributed over your tongue and mouth surfaces. Move the melted butter to the back roof of the mouth to utilize the palate to detect flavor components. Normal breathing should be continued throughout the process to help identify volatile components. As the butter melts in your mouth note if there are indications of gummy, mealy, or grainy body defects. Also, feel for the presence of “grit” between the teeth and the surface of the tongue indicating un-dissolved salt which would be classified as a gritty

salt defect. When you have completed the flavor examination, spit the sample out and note if there is any aftertaste and whether or not the flavors endure.

If in doubt about the flavor identification or its intensity, evaluate another sample plug or container to refresh your taste buds. Be sure to return to the sample in question before completing the car-lot.

Record all of your flavor determinations regardless of the final grade of the butter.

When the butter exhibits more than one flavor defect, the flavor which carries the lowest classification in the U. S. Standards for Grades of Butter shall determine the flavor classification for the churning.

Simultaneously with the flavor determinations, check for sharp or gritty salt defects and their intensity. Also determine the intensity of the salt flavor as:

L — Light
M — Medium
MH — Medium High
H — High

Carefully evaluate the body and texture of the butter. A firm, waxy textured body with well incorporated moisture is desirable and equates to good appearance and spreadability. Examine the plug for body defects listed in the U. S. Standards for Grades of Butter. See [Exhibit 18](#).

Crumbly, sticky, leaky, and ragged boring defects are usually evident by their characteristic conditions on the trier. Short or weak body defects are discerned by applying slight pressure to the plug with your spatula. The gummy and mealy or grainy defects are generally determined by mouth feel in connection with the flavor determination.

Observe the entire length of the front and backside of the trier for evidence of leakiness. Check for droplets or beads of moisture on the surface of the butter. As with the examination for shortness, apply slight pressure to the plug with your spatula.

Butter made by the cream-oil-butter process often has short or gummy body (conventional continuous churns may also produce butter with these defects). The condition is closely related to the butter temperature, thus reinforcing the importance of proper tempering of the butter prior to grading. There is no justification or allowance to be made to the grading temperatures or to the classification of the short or gummy defect intensity when grading this butter. DO NOT disregard the short defect as “normal” for this type of butter. All butter, regardless of the method of manufacture, shall to be graded according to the standards.

If cracks appear on the surface of the cube when the trier is inserted or if the plug exhibits cracks or splits, the body shall be classified as pronounced short. Definite short applies if the butter splits off into individual pieces or shows distinct breaks in the plug as pressure is applied with your spatula.

Observe the entire length of the plug for the intensity and uniformity of color. Use the USDA Butter Color Chips to evaluate the degree of color intensity. Classify the color intensity as:

VL	— Very Light
L	— Light
ML	— Medium Light
M	— Medium
MH	— Medium High
H	— High
VH	— Very High

See [Exhibit 18](#).

Butter with a VH color classification is not normally packaged for table use. It is usually made at the buyer's request for special cooking or baking purposes. In such instances, include the statement on the graders memorandum:

“Very high color at the buyer's request.”

Flavor comments and listings of defects in body, color, and salt shall be in accordance with the U. S. Standards for Grades of Butter and no other terms shall be used to assign an official grade. Other accurate descriptive terms may be used to characterize defects which are below U. S. Grade requirements.

Carefully replace the remainder of the plug into the cube, smooth out the surface, and fold the liners to completely cover the surfaces of the butter.

(b) Bulk Butter Finish and Packaging

The grader shall check the finish of the cubes when the butter is stripped for test weighing and checking for mold. Packaging deficiencies shall be reported under the “Remarks” section of the memorandum and the certificate.

(i) Finish

Examples of finish deficiencies are:

- Butter not solidly packed with voids in the corners. Any single void equal to or greater than the size of the cube of butter color chips shall be considered as a defect.
- Polyethylene liners or parchments not neatly folded resulting in butter trapped in the folds of the plastic and deep impressions of the wrinkled liner.
- Folds or pockets on the cubes surfaces (surface not smoothed prior to closing).
- Finger marks or palm prints on the cube surfaces.

A final U.S. grade may be assigned to butter exhibiting these deficiencies. However, it is not eligible for sale to CCC. See [Section 11.B.8.a.2](#) for further guidance. See [Exhibit 31](#).

(ii) Packaging

Example of packaging deficiencies are:

- Torn liner or pin holes in the liner. Checking the inside of the box for grease stains is a good method to determine if there are holes in the liner.
- Exposed butter from improperly positioned polyethylene or parchment liners.
- Greasy or smeared boxes.

No final U.S. grade can be assigned to butter exhibiting faulty packaging. See [Exhibit 18](#).

(c) Evidence of Mold

Examine each sample, including the random verification samples, for any evidence of mold development on the butter, liners or shipping containers. The examination may be conducted as the butter is removed from the shipping container for test weighing. If the manufacturer has used a colored liner which is sufficiently dark to obscure the surface of the butter, the applicant shall remove the liner completely so all surfaces of the butter can be observed.

If the liners are parchment, check for proper salt treatment by sight, feel, and taste. Liners shall have a pronounced salty taste. Note: Proper treatment of parchment liners consists of complete immersion in a 15 percent minimum salt solution at the boiling point for 30 minutes.

When mold is found on the surface of the butter, on the liners or the shipping container of any churning in a lot of either fresh or storage butter, each churning in the lot shall be given a flavor rating only, and shall not be assigned a final U. S. Grade.

Show the flavor rating in the proper column of the graders memorandum and the certificate. In the space for U. S. Grade insert two asterisks (**). Include any flavor comments as appropriate.

Show the following statement in the remarks section of the graders memorandum and the certificate:

“** No U. S. Grade assigned to any churning in this car-lot because of (slight, definite, or pronounced as appropriate) mold on surface of the butter, liners, or shipping container of churnings (list churning numbers).”

Classify the degree of mold using the following guidelines:

- | | |
|-----------------|--|
| Very Sight (VS) | - The total moldy area(s) on the sample cube are not greater than the area of a single dime. |
| Slight (S) | - The total moldy area(s) is greater than the area of one dime but less than the area of 10 dimes. |
| Definite (D) | - The total moldy area(s) is greater than the area covered by 10 dimes but is less than one-fourth of the surface of the cube. |
| Pronounced (P) | - The area covered by the mold is greater than one-fourth of the total surface of the total surface of the sample. |

(i) Mold on Fresh Butter

When mold is found on the surface, liners, or the shipping case of fresh bulk butter contact the National Field Office immediately to inform them of the conditions observed. The National Field Office will contact the plant management or, if the grading is being conducted at the manufacturing plant, the National Field Office may instruct the grader to notify the plant management that a plant survey is required.

If the plant management makes arrangements for a plant survey, butter from the plant may be graded during the interim period until the plant survey is completed.

If the plant management declines the plant survey, the plant shall be rated as Ineligible and all grading activities are to be discontinued. When rated as Ineligible, no product on-site is eligible for grading.

Complete a plant survey cover page and a page Z to document the Ineligible status assignment. If you don't have plant survey pages with you during the grading assignment, document your observations and the plant status assignment in a memorandum to plant management. Sign and date the documentation and provide a copy to plant management.

(ii) Mold on Storage Butter

When mold is found on the surface, liners, or shipping containers of storage butter (i.e., stored for one month or more) contact the National Field Office immediately to inform them of the conditions observed. The National Field office will advise if a plant survey is required. The survey may be waived if:

- A routine survey has already been performed after the butter was made, or
- It is determined that the condition causing the mold has already been corrected.

If a plant survey is required by the National Field Office, follow the guidance in [Section 11.B.8.a.1.c.i.](#)

(d) Butter with Rancid Flavor or of Deteriorating Quality

Rancid flavor butter is defined as butter in which the lipase enzyme has reacted with the fat to produce a distinctive rancid flavor and aroma.

Butter of deteriorating quality is defined as butter exhibiting defects such as surface taint, Limburger, cheesy, putrid, or other progressive types of quality deterioration on the surface or within the interior of the butter.

When any degree of rancidity or quality deterioration is observed during official grading of butter, take the following action:

Place two asterisks (**) in the U. S. Grade column for the churning(s) which exhibited the defect.

Describe the degree of rancid flavor or distinctive quality deterioration flavor in the comments column, using the terms slight, definite, and pronounced as defined in the U.S. Standards for Grades of Butter.

Add the following statement in the remarks section of the certificate:

“** Below U. S. Grade requirements”

See [Exhibit 31](#)

The remaining churnings in the car-lot may not be assigned a U. S. Grade unless a Keeping Quality (KQ) test is performed and those churnings are found to be satisfactory.

If the applicant does not wish to have the KQ test performed, the graders memorandum and certificate may be issued immediately showing no final grade with a flavor rating only for the churnings exhibiting no rancidity at the time of grading.

Show asterisks as appropriate in the U. S. Grade column for these churnings.

Add the statement:

“(Asterisks as appropriate) No U. S. Grade assigned because of rancid or quality deterioration condition of churning_____. Keeping Quality tests are required for official grading.”

(i) Keeping Quality Test and Incubator Cabinet

If the applicant requests the KQ tests to be performed, issuance of the grading certificate shall be delayed pending the results of the tests, except as provided for below. See [Section 3.E](#) for Keeping Quality cabinet requirements

Test procedures other than those described below shall not be considered as official tests.

Keeping Quality tests are required under the following situations:

- When grading unsalted butter.
- When required by an export specification or applicable buyers specification.
- When requested by the applicant.
- When grading reveals the rancid flavor defect.
- When required at the discretion of the National Field Director in connection with continuing quality problems from a manufacturing plant.
- When required by DA Instructions.
- When butter is sold to the Commodity Credit Corporation.
- When butter is packaged with official grade identification.
- During the interim period after butter of deteriorating quality is observed and the performance of a plant survey.

Place a sample of at least ½ of a trier plug into a sealed plastic cup or sample container (plastic twirl bag). The clean, single service cup or container shall be supplied by the applicant or the National Field Office. The trier and spatula are to be wiped clean between each sample. As an alternative, an unwrapped ¼ pound print may be used as a sample.

Incubate the cup or print at 72° F for seven days.

The incubator shall be provided with the means to be locked under the control of USDA, or the samples must be secured by evidence tape or grip lock seals. It is also recommended that a battery or spring actuated, seven day recording thermometer and supply of recording charts be provided.

If it is not feasible for the grader to return to the warehouse or grading location at the end of the incubation period, or there are inadequate facilities for conducting the KQ test, the samples shall be sent to the National Field Office or taken to another properly equipped facility where the test may be performed and checked after the required 7 days of incubation.

The 7 days shall not start until the samples are placed in the incubator. At the end of the seven day incubation period, the incubated samples shall be examined for off odors (samples may also be flavored, if necessary) and the grader's memorandum and certificate prepared as follows:

Churnings showing no evidence of rancidity shall be assigned a U. S. Grade.

Show the following statement in the remarks section of the certificate:

“Keeping Quality Tests on a sample from each churning were satisfactory”

When a plant has demonstrated a history of satisfactory KQ test results, the certificate may be issued before the completion of the test. In such cases, show the following statement in the remarks section of the certificate.

“Keeping Quality tests to be completed on (Date).”

Churnings showing rancidity on the KQ test, although none was evident at the time of grading, shall be designated by asterisks as appropriate in the flavor rating and U. S. Grade columns.

Add the statement:

“(Asterisks as appropriate) No flavor rating or U. S. Grade assigned because of rancid quality deterioration on Keeping Quality tests.”

See [Exhibit 31](#).

When unsalted butter originates from a plant determined by the National Field Director to have a satisfactory Keeping Quality history, the covering certificate may be issued and dated immediately after grading. The KQ test information will be for monitoring purposes.

Show the following statement on the certificate when butter is shipped prior to the completion of the Keeping Quality test:

“Keeping Quality tests to be completed (Date).”

When grading reveals rancidity or when the KQ tests indicates progressive deterioration follow the inspection guidance as described in [Section 11.B.8.a.1.c.i](#) through [11.B.8.a.1.c.ii](#). The National Field Office will pursue the necessity for a follow-up plant survey based on the conditions which influence the development of the rancid defect development.

The requirement for KQ tests prior to issuing certificates may be continued after the completion of the plant survey at the discretion of the National Field Director until a history of satisfactory results is established.

(e) Butter Not Meeting U. S. Grade Requirements

Butter which does not meet the requirements for U. S. Grade B as outlined in the U.S. Standards for Grades of Butter shall be designated in the U. S. Grade column with two asterisks (**). Show appropriate description of the flavor, body, salt, or color defects in the comments column of the memorandum and certificate.

Add the following statement to the remarks section of the memorandum and the certificate:

“** Below U. S. Grade requirements.”

See [Exhibit 31](#)

When the butter is determined to be unwholesome, in an abnormal condition due to mishandling, or has been subjected to conditions resulting in possible contamination, no flavor rating or U. S. Grade shall be assigned.

For such car-lots, show two asterisks (**) in the flavor rating and U. S. Grade columns. In the “Remarks” section of the memorandum and certificate show the two asterisks and a description of the condition of the butter, circumstances causing the contamination, etc.

(i) Notice of Unsatisfactory Conditions by the Food and Drug Administration

The Branch will provide the following actions when butter from plants identified in a Food and Drug Administration (FDA) Notice is offered for grading services.

If the FDA notice indicates findings of butter to be below 80% butterfat, the next car-lots presented for grading shall be subjected to USDA butterfat analysis of each churning prior to issuing the certificate. All laboratory test charges are the responsibility of the applicant. Butterfat testing shall continue until 5 consecutive satisfactory car-lots have been offered.

If the FDA notice indicates findings of butter containing extraneous matter or made from decomposed or unsanitary cream, all churnings in the next car-lots offered for grading shall be tested for extraneous matter or WIA (water insoluble acids) as appropriate. All laboratory test charges are the responsibility of the applicant. Any unsatisfactory churnings shall be classified following above instruction. Testing shall be continued until 5 consecutive satisfactory car-lots are offered.

If the FDA notice is for unsanitary conditions, no flavor rating or U. S. Grade may be assigned until the plant has had a satisfactory USDA survey made after the date of the FDA observed condition(s).

(f) Establishing the U. S. Grade

Establish the flavor classification in accordance with the U.S. Standards for Grades of Butter. If there are no defects in body, color, or salt, the U. S. Grade will be identical to the flavor classification.

If defects in body, color, or salt are present, the U. S. Grade will be determined in accordance with the maximum amount of disratings permitted for each U. S. Grade classification.

In cases where the packages are not properly identified with the original churn number and there is a variation in the quality of the samples graded, treat the lot as a Grand Lot. The entire lot shall be classified as the lowest U. S. Grade assigned to any of the samples in the car-lot.

Show the lowest grade in the U. S. Grade column for all samples.

Add the following statement on the memorandum and on the certificate:

“
Grand Lot
This lot of butter is classified as U. S. Grade (), which is the lowest U. S. Grade assigned to any sample because the packages are not identified with churn numbers.”

See [Exhibit 36](#).

(g) Special Considerations for Unsalted Butter (Including Grade Label)

KQ tests as described in [Section 11.B.8.a.1.d.i](#) shall be performed on each churning in a lot of unsalted butter.

In the event that a KQ test is found to be unsatisfactory or the butter originates from a plant that has an unsatisfactory history of Keeping Quality, issuance of grading certificates shall be held pending the completion of the KQ tests. This shall continue until the National Field Director determines that the plant has re-established a satisfactory history of KQ tests or the conditions responsible for the unsatisfactory churnings have been corrected.

The issuance date of the certificate shall be the date the KQ test results are available.

See [Section 11.B.8.a.1.d.i](#) for appropriate certificate statement.

It is not necessary that the plant return butter from distribution. The Keeping Quality test is an accelerated test and the butter in distribution may not yet be of deteriorating quality.

Any churning of butter in the lot showing off-condition at the end of the Keeping Quality test incubation period shall be either:

- Excluded from the certificate covering the satisfactory churnings and listed on a separate certificate showing no U. S. Grade, or
- Shown on the certificate covering the satisfactory churnings and designated with a double asterisk in the flavor and U. S. Grade columns. The certificate shall bear the statement:
“No U. S. Grade assigned to churning(s) _____ because (Type of Deterioration) quality deterioration noted in the sample as the result of Keeping Quality tests.”

For unsalted churnings, insert a dash (-) in the salt classification column. Below the listing of churnings, in the body of the certificate, show the statement:

“- Unsalted Butter”,

or

“- Unsalted Butter with added culture” (or starter distillate, as appropriate).

(2) Special Considerations for Butter Offered to CCC

FSA purchase announcements require bulk butter offered to CCC to be accompanied by a certificate covering only one grade of butter; i.e. either AA or A grade.

The applicant is responsible for all decisions concerning the assembly of car-lots of butter to be offered for grading and to CCC. Dairy Grading personnel are to be prepared to cooperate to the fullest extent possible to minimize the paperwork and time necessary to accomplish offers of butter to CCC.

During the course of grading, the applicant may add or subtract churnings from the DA-201B in order to create car-lots suitable for offering provided that all other prerequisites for grading are met.

Stamping of sample boxes with the USDA certificate numbers should be at a point after which the applicant has made all decisions and adjustments to the car-lot.

Take-off certificates may be used to establish car-lots of uniform grade. The issuance of Take-off certificates should be used as a last resort. An adjustment to the car-lot size at the time of original grading is more efficient. If the applicant, however, chooses to utilize Take-off certificates, the regular hourly rate shall be charged for the time necessary to prepare the certificates with a minimum of ½ hour charge.

If the applicant or a representative is not present at the time of grading and is unable to be contacted to make adjustments to the car-lots offered, certificates are to be prepared as presented. The applicant may request that they be contacted before stamping of the containers with the USDA identification so that they can make adjustments to the car-lots.

A car-lot which does not contain sufficient weight for offering to CCC may be held until the next scheduled grading without re-grading so additional churnings may be added, provided:

- The next grading is within 10 days of the first grading,
- The butter is held for only one additional grading session
- There is no evidence of alteration of the number of packages or condition of the original butter graded and
- Keeping Quality samples are not taken until all the butter to be graded is presented.

Car-lots of butter withdrawn from offering to CCC by the applicant may be identified on a certificate reflecting mixed grades.

Bulk butter offered for sale to CCC shall not be more than 60 days old on the date it is offered. The minimum car-lot size is 38,500 pounds (17,464 kg) and the maximum is 123,000 pounds (55,792 kg).

Show on the grader's memorandum the storage lot number (if assigned), and whether the car-lot is stored in cooler or freezer space. Verify that the butter is actually stored in the type of storage space specified.

If the butter is moved from the place where originally graded and is offered to CCC at the new location, FSA requires the butter to be graded again. When the original grading was within three weeks prior to the second request for grading, the test weight, KQ tests, and butterfat tests do not need to be repeated. These original results (except flavor) may be brought forward to the new certificate with appropriate cross-reference to the previous certificate.

If the original grading was more than three weeks prior to the second request, a complete grading from new samples shall be conducted.

When butter is offered in parchment liners verify that they have been properly treated. See [Section 11.B.8.a.1.c](#) for inspection guidance. When it is determined that the liners have not been treated to comply with the above procedure, notify the applicant that the butter is NOT eligible for sale to CCC due to improperly treated parchment liners. Grading may be continued in order to establish a final grade if the applicant wishes.

All car-lots of butter offered for sale to CCC shall have KQ tests performed. Follow the inspection guidance of [Section 11.B.8.a.1.d.i](#).

All containers which are removed from the cartons for test weighing shall be examined for the condition of the inner liner and the butter. Check for all of the items listed under [Section 11.B.8.a.1.b](#) Bulk Butter Finish and Packaging.

When any finish or packaging defects are noted, the churning shall be rejected as ineligible for sale to CCC. See [Sections 11.B.8.a.1.b.i](#) and [11.B.8.a.1.b.ii](#) for guidance on the proper assignment of the final grade. If 20 percent of the churnings within the car-lot are rejected for finish or packaging deficiencies, the entire car-lot shall be rejected as ineligible for sale to CCC.

Show the appropriate following comment in the remarks section of the memorandum and certificate:

“Churning ____ not eligible for sale to CCC because of (state reason for rejection).”

or

“Car-lot is not eligible for sale to CCC because of (state reason for rejection).”

(a) Coliform, Salt, Yeast and Mold Testing

All car-lots of butter offered for sale to CCC shall meet specifications for coliform, salt and yeast and mold. Spot checks for these criteria, at the rate of one per certificate, will be conducted on all butter offered for sale to CCC.

Before pulling samples for flavor or butterfat, select one of the samples selected for butter fat samples for this spot check. Using aseptic techniques pull a plug from the cube of butter for laboratory analysis for coliform and yeast and mold. Designate one of the butterfat samples selected for the certificate to be tested for salt. (The salt test can be run as part of the Kohman analysis for butter fat.) See Exhibit 91

On the certificate show the results in the remarks. Show the appropriate statement:

“Lab Results: Churning XXX Coli XX Yeast & Mold X”

When a test result does not meet the requirements of the announcement for salt, coliform or yeast and mold, the car-lot shall be rejected for not meeting contract requirements. Record the information on the certificate by the appropriate churning. Show the following statement under “Remarks”:

“Car-lot not eligible for sale to CCC because of (state reason).”

See Exhibit 92

(i) Re-offering Failed Car-lots or Churnings

Failed car-lots or churnings from failed car-lots may not be offered for sale to CCC unless each churning on the manifest is officially test for the factor (salt, coliform, yeast and mold) for which the car-lot was rejected.

Churnings that are officially tested and meet the requirements of the announcement may be transferred to new car-lots and offered for sale to CCC.

(b) Butterfat Testing

Verify that the grading manifest presented by the applicant contains a butterfat analysis for each churning.

If the applicant lists any churnings with butterfat content below 80.0%, draw a line through the churning to delete it from the car-lot.

For inspection guidance for grade labeled butter see [Section 11.B.7.c](#).

All butter offered for sale to CCC shall be subjected to spot checks of butterfat content. CCC requires at least one official USDA butterfat analysis on each certificate. Issuance of certificates shall be withheld pending the results of the testing.

(i) Initial or Normal Sampling and Testing

The normal level shall be used whenever a plant has not offered butter for grading on a routine basis or has not offered butter for a period of six months. Select samples according to the following table:

<u>Weight of Car-lot</u>	<u>Number of Samples</u>
50,000 lbs or less	2 (If one churn presented, sample that churning twice)
50,001 to 100,000 lbs	3
100,001 to 150,000 lbs	4

If 20 percent random verification samples are required by [Section 8.J](#), butterfat spot check samples shall be taken from these containers. If the 20 percent random verification samples are not required, take the samples from the individual churn samples selected for grading.

(ii) Reduced Sampling and Testing

When 10 consecutively tested samples (not 10 car-lots) are satisfactory for fat, the number of randomly selected samples from each car-lot may be reduced. The number of randomly selected samples will be dependent on the marked net weight of the car-lot offered as follows:

<u>Weight of Car-lot</u>	<u>Number of Samples</u>
50,000 lbs or less	1 (If one churn presented, select as the sample)
50,001 to 100,000 lbs	2
100,001 to 150,000 lbs	3

Refer to [Section 8.J](#) concerning the selection of samples from the 20 percent random verification samples.

When all the test results are satisfactory (80.0% butterfat or higher) no further action is required. Show the results and applicable laboratory charges on the certificate.

When a test result is less than 80.0% butterfat, take the appropriate following actions.

The car-lot shall be rejected for butterfat composition. Show all test results on the certificate.

If the low butterfat result was detected while on normal testing, revert to the tightened sampling procedure for future car-lots offered.

For the low butterfat churnings, DO NOT assign a flavor rating or U. S. Grade. Instead place asterisks as appropriate in these columns and show the following statement under “Remarks”:

“No flavor rating or U. S. Grade assigned because butterfat content is below the 80 percent requirement.”

See [Exhibit 37](#).

For untested churnings in the car-lot, show the applicable flavor classification and any body, texture, or color comments, but DO NOT assign a U. S. Grade. Insert asterisks as appropriate in the U. S. Grade column and show the following statement under “Remarks”:

“No U. S. Grade assigned because the car-lot failed tests for butterfat content.”

See [Exhibit 37](#).

Churnings which were officially tested and found to contain at least 80.0% butterfat shall be assigned a U. S. Grade.

Applicants who are dissatisfied with the butterfat test results may request a retest or appeal in accordance with the guidelines set forth in [Section 13](#).

(iii) Multiple Plants on a Single Manifest

When multiple plants are offered on a single manifest, the following procedures will apply for butterfat spot check sampling.

If all plants listed on the manifest are on the normal testing level, select one sample from the entire car-lot using the random number generator.

If one or more of the plants listed are on the tightened testing level, select samples from the portions of the butter represented by the plants on the tightened testing level in accordance with the guidance in [Section 11.B.7.d.2](#). Also select one sample at random from the remaining butter from the plants which are on the normal testing level.

For example:

Three plants offered on the same manifest:

Plant XYZ, 5 churnings, 22,000 pounds

Plant ABC, 6 churnings, 45,000 pounds

Plant PQR, 6 churnings, 30,000 pounds

Plant ABC has been placed on tightened testing. Select 4 samples from the 6 churnings offered. Also select 1 sample from the remaining 11 churnings offered by plants XYZ and PQR. A total of five samples are to be submitted to the laboratory for testing.

(iv) Re-offering Failed Car-lots or Churnings

Failed car-lots or churnings from failed car-lots may not be re-offered for grading unless the churnings are officially tested. The applicant, or the manufacturer, or an agent for either party must remove any churnings which do not contain at least 80.0% butterfat.

Churnings from failed car-lots which were tested originally and were shown to contain at least 80.0% butterfat may be transferred to new car-lots.

(3) Consumer Size Packages

Consumer size packages include all packaging styles not considered as bulk containers (5 pounds or larger). These styles may include but are not limited to prints, chips, pats, Reddies, continentals, cups, tubs, and chubs.

Refer to [Section 11.B.8.a.1.a](#) for inspection and grading guidance, except that the following guidance shall also apply.

(a) Special Considerations for Butter Packaged With Grade Labels

See [Section 7.F](#) for inspection guidance for the approval of grade label materials and [Section 6.B.1.a](#) for inspector monitoring requirements of approved label listings.

(i) Preparation for Grading

(a) Grading in the Finished Package

All grade labeled butter shall be graded in the final package prior to shipment from the packaging plant except that butter may be shipped prior to grading when all of the following criteria have been met:

All such shipments shall have the prior approval of the National Field Office. The packaging plant shall telephone their request for shipment to the National Field Office and follow-up the request with a written confirmation signed by plant management. The follow-up request may be faxed to the National Field Office at the option of the packaging plant.

See [Section 11.B.7.c.1](#) for further guidance for information to be supplied by the applicant.

When there is a USDA licensed sampler available to draw samples, the samples shall be drawn from the completed lots prior to shipment. The samples will be secured with evidence tape and a Product Control Tag and held at the plant for official grading. See [Exhibit 32](#).

A grader shall be scheduled to grade the USDA selected samples on the first regular workday following the shipment.

(i) Butter Not Meeting Official U.S. Grade Printed on Packaging Material

All packaged butter shall be withheld from distribution, identified with a USDA Product Control Tag, unwrapped or reprocessed under USDA supervision. Do not assign a grade to the butter which does not meet the U.S. grade declared on the label. Place an asterisk in the U.S. Grade column and add the following statement to the Certificate:

“**No grade assigned due to butter not meeting the U.S. Grade declared on the label.”

See [Exhibit 41](#).

If the butter has been shipped under the emergency circumstances allowed for in [Section 11.B.7.c.1](#), all butter shipped shall be returned to the packaging plant for unwrapping or reprocessing under USDA supervision. At the option of the packaging plant, packaged butter that does not meet the label declaration may be sent to another facility for unwrapping or reprocessing. See below.

The packaging plant shall be responsible for coordinating the unwrapping or reprocessing of packaged butter and for all associated charges.

The following criteria shall apply for USDA supervision of the unwrapping or reprocessing.

The packaging plant shall provide a Graders Memorandum showing all unacceptable churnings which includes the number of cases per churning and the total cases for the lot. The original Graders memorandum may be used for this purpose.

If the unacceptable butter is to be sent to another facility for unwrapping or reprocessing, the unwrapping or reprocessing shall not begin until a USDA inspector is on site and verifies that ALL of the unacceptable butter is present.

The unwrapping or reprocessing of the unacceptable butter shall be done under continuous USDA inspection. The inspector shall document the unwrapping or reprocessing of the unacceptable butter on the certificate. A certificate shall be issued for the unwrapped or reprocessed butter. See [Exhibit 42](#)

Depending on the circumstances of the shipment, the unwrapping or the reprocessing of improperly labeled butter, additional penalties may be imposed on the packaging plant. Contact the National Field Office for guidance.

(ii) Pre-grading Bulk Butter

The grade for all print butter shall be determined in the final package. The applicant may request that the bulk butter be pre-graded prior to packaging for added assurance. Pre-grading shall not be used in lieu of finished product grading and the finished package grading shall supersede any and all pre-grading results.

(iii) Grade Label Listing

Graders are required to check the monthly grade label list prior to grading to validate that the label is approved for packaging at the specific plant requesting service. If a label presented for grading is not listed DO NOT grade the product until you verify with the National Field Office or Washington Office that the label has been approved.

(ii) Grading Procedures

(a) Examination for Mold

Special checking for mold is not necessary when grading freshly packed butter in consumer size packages. However, if the butter has been in storage for 30 days or more unwrap or open and examine one container from each sample box.

(b) Non-whipped Products

When the consumer size portion is of sufficient size that a number 6 or number 8 trier can draw a plug follow the grading procedures as described in [Section 11.B.8.a.1.a.](#)

When the consumer size package is too small for a trier (such as patties, chips, Reddies, continentals, or plastic cups) select a sample package from the sample case. Keep the containers closed during tempering so that the surface of the butter will not dry out or change color. Open the package to examine the surfaces of the butter for defects in color and for leakiness. Use a spatula to remove the butter from the package and examine for flavor and other quality factors.

(c) Whipped Butter

Keep the containers closed during tempering so the surface of the butter will not dry out or change color. Whipped butter shall be graded in the final package utilizing the appropriate sections of the United States Standards for Grades of Whipped Butter.

Flavor evaluations shall conform to the criteria of the standards.

Free moisture shall be identified as slight when beads of moisture are visible on the surface of the butter or in the crease formed where the butter meets the side of the container. Free moisture shall be identified as definite when the beads of moisture flow together or form pools. Free moisture shall be identified as pronounced when moisture can be poured from the container.

Color and salt evaluations shall conform to the criteria of the standards.

(iii) Keeping Quality Tests

Keeping Quality samples from the finished packages of butter are required for all churnings of grade label butter. Follow the inspection guidance of [Section 11.B.8.a.1.d.i.](#)

(iv) Wrapper Codes

Individual plant wrappers or cartons shall be identified as specified in [Section 7. F.](#)

(4) Special Consideration for the Purchase of Print Butter by CCC

(a) Direct Purchase of Fresh Prints

(i) End Product Inspection

End product inspection is permitted only when the butter is manufactured and printed in the same facility and the plant is approved for the B2 code.

Butter which does not meet the grade requirements as specified in the purchase announcement and is wrapped in a special USDA label shall be unwrapped under USDA supervision. See [Section 11.B.8.a.3.a.i.a.i](#) for inspection guidance.

Refer to [Section 10](#), Condition of Containers or Products, for additional inspection guidance and [Section 11.B.8.a.2.a](#), for the selection and testing for butterfat.

Keeping Quality samples from the finished packages of butter are required for all churnings. Follow the inspection guidance of [Section 11.B.8.a.1.d.i](#).

(ii) On-Line Inspection

On-line inspection is required whenever butter is offered from a plant which is approved for a P1 code. The inspector shall be present at the plant continuously during the hours of operation to inspect handling and packaging of the butter, to check sanitation of the plant and equipment, to keep accurate inventory of packaged product, and to further assure the seller's compliance with the terms and conditions of the FSA Announcement and Invitation.

See [Section 11.B.8.a.3.a.i.ii](#) for inspection guidance for pre-grading of bulk butter and [Section 11.B.8.a.2.a](#), for the selection and testing for butterfat.

(b) Special Considerations for Repackaging Of CCC-Owned Butter

All butter shall be pre-graded prior to packaging. Follow the inspection guidance in [Section 11.B](#) as appropriate to pre-grading for repackaging when grading the bulk packages.

If the original samples are missing or appear not to be representative of the churnings, select new samples from each churning listed on the original bulk butter certificate.

(i) Rejected Butter

Churnings of bulk butter shall be rejected when grading reveals the butter is U.S. Grade B or below, or when any butter exhibits poor condition or contamination. It shall be handled as reject commodity, except that butter showing mold development which can be easily scraped from the surface prior to packaging may be utilized provided its flavor grade is U.S. Grade A or better.

When butter is rejected, record the following information on the Rejected Commodity Summary Certificate. Show the following information:

- Bulk certificate number and date
- Notice to Deliver number
- Date rejected
- Number of containers rejected
- Net weight of rejected product
- Reason for rejection
- U.S. Grade

(a) Rework Butter

Rework butter may be used if it is properly classified, handled, and stored. The term “rework butter” shall apply only to good condition, clean butter which is suitable for human consumption. The most common source is malformed prints caused by a malfunction of the printing machine. It may also be butter which is removed from the augers and heads of the printing machines at the end of the run. This butter shall be properly stored in good condition stainless steel or tinned containers, in good condition, lined butter boxes, or other suitable approved container.

All rework butter is to be graded and inspected for debris before reuse. Any butter contaminated with grease or other foreign materials shall be considered as waste butter and not be used.

(b) Waste Butter

Butter shall be considered “waste butter” when it is rendered as unfit for human consumption. This will occur whenever the butter becomes contaminated with dirt, filth, grease or foreign materials. Butter shall be considered as contaminated when it comes in contact with the floor or non-product contact surfaces of the packaging or cutting equipment.

Waste butter shall be clearly marked as “Inedible” or “Waste Butter - Not for Human Consumption”. The containers of waste butter shall be kept strictly segregated in the plant cooler or freezer from butter intended for human consumption.

As appropriate mark the boxes of waste butter with evidence tape or Product Control Tags to assure that it is being properly disposed of and not offered for grading or use. See [Exhibit 43](#).

(c) Special Considerations for Department Of Defense, Veterans Administration, or Commercial Contracts

All contractors and subcontractors are identified in the contract. Therefore, copies of the necessary paperwork should be available. The applicant should be able to provide at a minimum:

- Technical Data Sheets for the products
- Contract (Section C is particularly important to the inspection)
- CID appropriate to the product

Inspection activities may proceed according to the applicant’s instructions while they assemble the required paperwork. However, DO NOT issue any product inspection or grading certificates unless the applicant can provide you with the above referenced paperwork.

When inspection services are approved, follow the appropriate inspection guidance for the activity as identified in [Section 11.B.8.a.1.a](#) and subsections.

DO NOT stamp cases. All shipments shall be covered by a Dairy Grading Branch certificate.

Contractor Certificates of Conformance DO NOT exempt normal inspection activities such as test weighing, condition of container examinations, and compositional analysis. Certificates of Conformance are to cover such items as ingredients and supplies for which we do not provide inspection services. Examples for which a Certificate of Conformance will be required are packaging materials, salt, stabilizers, emulsifiers, other minor ingredients, sealing tape, etc. Dairy ingredients covered by a USDA grading certificate do not require a Certificate of Conformance.

DPSC terminology for packaging material inspections (P, P&M) shall be considered the same as USDA Condition of Container examinations.

b) Butteroil and Anhydrous Milkfat

Evaluation of the finished product characteristics of butteroil and anhydrous milkfat is accomplished by laboratory analysis. The inspector's responsibility is limited to the drawing of accurate samples and the proper preparation of the samples for shipment to the laboratory for analysis. Refer to the sample selection procedures in [Section 11.B.7.d.3](#), and the procedures for preparation of samples for the laboratory in [Section 12](#).

c) Margarine

Check that the margarine has been fully cooled to 40° F or below before tempering to between 45° F and 55° F for evaluation. If the margarine is not within this specified temperature range, DO NOT begin product evaluation.

Check the identification of the margarine offered for evaluation to assure the "churn" designations match the coding as recorded on the manifest.

Follow the product evaluation procedures for consumer size packages of butter as presented in [Section 11.B.8.a.3](#) and all appropriate subsections.

Evaluate the product characteristics according to the criteria set forth in the appropriate purchase announcement or specification.

9. Re-grading Of CCC Owned Butter Stocks (Bulk and Prints)

The purpose of re-grading is to evaluate the condition of CCC owned stocks so FSA may make informed decisions as to the appropriate distribution of the product in storage. Special attention is to be placed on observed defects which will lower the grade to below U. S. Grade A. Minor variations from the original grade which do not alter the original grade are not to be considered as significant.

Butter that is made from a blend of cream and whey cream may exhibit an increase in the intensity of the characteristic whey flavor defect while in storage. This change in flavor development is not considered as a failure of the original grading. This flavor will naturally intensify as the original "bloom" and cooked flavors dissipate. Whey flavor intensification is of particular interest to FSA. Carefully evaluate the sample flavor characteristics and clearly document ALL determinations of slight or definite whey flavor.

The first grader to be assigned to an FSA Request for Commodity Inspection shall make a cursory inspection of all of the areas where the butter is stored. The cursory inspection shall be documented on a Form DA-128, Warehouse Condition Checklist. If unsatisfactory storage conditions are observed, contact the National Field Office for guidance on how to proceed with the inspection request.

Follow inspection guidance in [Section 11.B.8.a.1](#) through [11.B.8.a.1.b](#) when performing regrading. Use the original samples unless there is reason to believe they are no longer representative of the lot. Select samples representative of each 20,000 pounds in the car-lot but in no case less than three of the sample containers. If the car-lot has less than three original samples, select all the original samples for regrading (additional samples are not necessary). For example, if the car-lot is 48,000 pounds of butter, select three of the original sample containers for regrading.

Storage flavor development on the surface of the butter is to be specifically evaluated. When regrading, be sure to evaluate the flavor characteristics of the top surface of the butter by flavoring the top end of the trier plug or by scraping the surface of the sample.

The following procedures, [Sections 11.B.8.a.1.c](#); [11.B.8.a.1.d](#), will apply for evaluations of samples exhibiting mold, rancidity, or deteriorating quality.

If the samples selected for regrading are below U.S. Grade A when the product is evaluated, all the remaining samples in the car-lot are to be evaluated. See [Sections 11.B.8.a.1.d](#) and [11.B.8.a.1.e](#) for additional inspection guidance as appropriate for the conditions observed.

(a) Evaluation of Mold during Re-grading

Remove the corrugated boxes from at least two sample cubes or boxes of prints from each storage lot. If the storage lot contains butter from more than one plant, remove the corrugated boxes from at least two samples cubes from each plant represented. If any of the butter is packaged in colored liners, the liners shall be removed to allow for observation of all the surfaces of the butter.

Carefully examine all surfaces of these cubes or prints for evidence of mold.

Carefully examine the top surfaces of all other sample cubes or boxes of prints for mold as they are graded.

If these examinations reveal any mold on the surfaces of butter, remove all the samples from their cases and examine all surfaces. Document any mold observed using the following guidelines. Contact the National Field Office to advise them of the conditions observed.

See [Section 11.B.8.a.1.c](#) for guidance on classifying the degree of mold.

To determine if the mold is limited to the samples, strip the boxes from all of the reserve samples or additional boxes of prints and examine for mold development. Tempering of the reserve samples is not necessary prior to examination.

If the reserve samples or additional boxes of prints have no mold, show a descriptive statement such as the following in the remarks section of the certificate:

“Original samples of churnings_____ were (very slight, slight, definite) moldy. Examination of (number) reserve samples revealed no mold. Mold shall be scraped from the sample cubes under USDA supervision prior to repackaging or processing into butteroil.”

When the mold condition is limited to the original sample containers, assign a U. S. Grade to all churnings. See [Exhibit 38](#).

If mold is observed on the reserve samples as well as the original samples (not necessarily the same samples), show the following statement under the comments section:

“The U. S. Grade (A or AA) butter covered by original certificate DB _____ dated _____ was re-graded this date per Inspection Request _____. No U. S. Grade is assigned to churnings in this lot due to _____ mold on the original samples for churnings _____ and on reserve samples for churnings _____. Mold shall be scraped off under USDA inspection prior to repackaging.”

Or

“The U.S. Grade (A or AA) print butter covered by original certificate DB _____ dated _____ was re-graded this date per Inspection Request _____. No U. S. Grade is assigned to churnings in this lot due to _____ mold on the original samples for churnings _____ and on additional samples for churnings _____. Moldy churnings are not suitable for distribution for regular program use.”

As indicated in the statement, no U. S. Grade shall be assigned to any churning due to the mold development.

(b) Evaluation of Rancid Flavor and Butter with Deteriorating Quality during Re-grading

DO NOT assign a U. S. Grade when rancid flavor or quality deterioration such as surface taint, limburger, cheesy, putrid, or other types of progressive deterioration is observed on the surface or interior of a churning being re-graded. Show the defect and its intensity for the churning in the “comments” column. Enter two asterisks in the flavor and U. S. Grade columns to denote “**Below U. S. Grade requirements”. Other churnings in the car-lot which do not exhibit the defect may be assigned a U. S. Grade.

Also show the following statement on the certificate:

“We recommend churnings _____ be processed into butteroil or sold as off-condition product.”

See [Exhibit 39](#)

(c) Preparation of Graders Certificate

Use the proper certificate in the DBIGS Program to document your grading.

Complete the heading information as appropriate. Include the number of samples graded in the appropriate space and in the remarks sections use “Original samples” or “Reserve samples” to indicate which set of samples were used for the re-grading.

Select the proper manufacturing plant for “Manufactured by”.

Make the necessary changes to the original certificate to reflect the current grade of the butter. Make the necessary adjustment to the net weight and number of packages to correspond with the inspection request. If the weight is different than the original request, place the following statement in the remarks section:

“Weight as shown on inspection request.”

See [Exhibit 38](#).

Report the contract number stenciled on the sample boxes. If no number is shown, mark the statement “Not shown on sample boxes.”

When the butter has been previously re-graded, record the previous re-grading certificate and its date on the grading certificate.

Follow guidance in [Section 18](#) for the completion of:

- Form WA-570, for recording damaged product.
- Form WA-667, Certification of Warehouse Labor.

(d) Special Warehouse Examinations of CCC-Owned Butter

Car-lots of butter are not under the control or surveillance of USDA from the time of original grading to the time when received by CCC. Therefore, a random selection of car-lots delivered to CCC will be evaluated to determine if product tampering or substitution has taken place. These examinations will be undertaken with the first FSA request for re-grading.

(i) Number of Car-lots To Be Checked

Use the following table to select approximately 2% of the car-lots on the inspection request when there are 20 or more car-lots listed:

<u>No. of Car-lots on Request</u>	<u>No. of Car-lots to Examine</u>
1 – 19	0
20 – 50	1
51 – 100	2
101 – 150	3
151 – 200	4
201 – 250	5
251 – 300	6
301 – 350	7
351 – 400	8
401 – 450	9
451 – 500	10

Make the car-lot selection from as many different manufacturers as possible represented on the Inspection Request. Mark the selected car-lots on the Inspection Request Form so that all

graders working on the request know which car-lots have been selected for this special examination.

Request the warehouse to bring out and temper one full pallet of product in addition to the usual sample containers from each designated car-lot. This additional pallet shall not be the reserve samples. Use the checklist shown in [Exhibit 40](#).

In Response to question A1, grade two boxes from each churning represented on the pallet. If only one box is available from a churning, grade that box.

Open at least 6 boxes and examine to answer questions B2, B3, and B4. Re-tape the boxes when finished.

Next conduct the examinations necessary to answer questions C5 through C8. This is to be a box by box examination of all of the boxes on the pallet.

(e) Procedures to Follow If Discrepancies Are Noted

If the comparison of the additional boxes to the samples reveals any irregularities requiring a “No” answer to any of the items 1 through 8 on the Special Examination form (See [Exhibit 40](#)), contact the National Field Office immediately with your findings. Also, document your observations, according to the specific question number(s), in the “Remarks” section of the form. Send the completed forms to the attention of the National Field Director.

The National Field Director may require additional samples to be evaluated.

(i) Reporting results of the Special Examination

Follow the guidance in [Section 11.B.9.e](#) when discrepancies are found.

When no discrepancies or irregularities are found, complete the form in original and 1 copy. Staple both copies to the re-grading memorandum for the car-lot regraded and mail to the National Field Office with your routine paperwork.

Charges for the additional time required to make the examinations shall be included on the appropriate re-grading certificate or inspection request used to bill FSA.

The re-grading certificate shall bear the following statement in the remarks section in addition to the normal re-grading information:

“Special examination made of this warehouse lot by comparing _____ additional boxes with the _____ samples. No irregularities were observed.”

Or

“Special examination made of this warehouse lot by comparing _____ additional boxes with the _____ samples. _____ of the additional samples did not agree with the original samples because (state reason).”

See [Exhibit 38](#).

C. Cheese

1. Prerequisites

Refer to [Section 3](#), Prerequisites to Inspection and Grading, for guidance on eligibility for inspection and grading services.

2. Documents and Forms

- DA-201C Cheese Graders Memorandum
- DA-201 Universal Grading Certificate

Refer to [Section 5](#), Documents and Forms, for guidance on appropriate standards, specifications, announcements and documents to use during product evaluations.

3. Monitoring

Refer to [Section 6](#), Monitoring, for additional instructions for monitoring the production of all products.

a) In-Process Inspection

One 40 pound block, one barrel, or one 640-pound container per vat of cheese to be processed shall be tempered and pre-graded prior to processing. The applicant may optionally request each barrel or 640-pound container intended for processing be pre-graded.

Every barrel of properly identified cheese trim shall be examined after dumping and prior to processing to evaluate for freedom from mold development, soft spots, soiled cheese or other undesirable characteristics.

Fat sources for addition to process cheese shall comply with the optional ingredients permitted in the Standards of Identity and shall emanate from an USDA Dairy Grading Branch approved plant. FDA has accepted that concentrated milk-fat complies with the Standards of Identity.

Once during the production of each car-lot, check the process cheese cooker indicating thermometer against the recording chart. Record the two temperatures on your worksheets to document the readings.

If either of the thermometers is registering a temperature below the required pasteurization temperature of 158° F. for 30 seconds, alert plant management of the discrepancy. Following adjustment made by plant management, check the thermometers again.

Determine the amount of process cheese produced between the acceptable thermometer comparison readings (good to good). For each car-lot that may contain process cheese produced during this period, include the following statement on your worksheet and in-process certificate:

“Process cheese identified with (indicate lot or sub-lot number) does not meet contract requirements. Pasteurization temperature could not be validated.”

4. Coding and Marking

a) Vat Designations

Vat designations are used for the identification of cheeses.

(1) Conventional Cheese Vats

When conventional cheese vats and draining tables are employed, the production of cheese from each discrete vat shall be identified as a vat.

(2) Automated Cheese Making Systems

An automated cheese making system shall be defined as a continuous, automated system in which the components of the system preclude the ability to maintain discrete make vat identity throughout the cheese making process. These systems may include two or more of the following equipment components: conventional cheese vats, continuous draining conveyors, salting conveyors, block-forming or barrel-forming towers, and continuous Mozzarella cheese manufacturing lines incorporating cookers, stretchers, molders, cooling tunnels, and brining systems.

The maximum size of a designated vat shall not exceed 7,000 pounds of cheese except when the applicant can demonstrate valid technical reasons for the increased vat size, such as, larger vat capacity, pre-condensing to boost vat yield, etc. The applicant shall provide a Statement of Conformance with the manifest to state the reasons for the increased vat size.

(3) Mixed Curd Barrels or 640 Pound Block Containers

There shall be no more than one mixed barrel or 640-pound container per vat.

The mixed barrel or “640” container shall be designated as the first container of the vat and shall be so marked. This will assure the grader that the cheese in the top portion of the container represents the marked vat.

Each mixed container shall be clearly marked “Mixed” under the required vat markings on the container. See [Section 7.A](#).

In Wisconsin, mixed curd barrel markings are specified by state regulations. Mixed containers are defined as barrels or 640 style containers composed of curds from more than one vat or from curds manufactured on different days. It shall be acceptable to identify such differing vats or dates of production as follows or with similar markings which may be required by other States:

CHEDDAR CHEESE	or	CHEDDAR CHEESE
WISCONSIN		WISCONSIN
2804 VAT A, B		2804 VAT A, B
Aug 1 90		Aug 1 90, Aug 2 90

When no mixed curd containers are presented, the grader shall ask the applicant to explain how this is accomplished. It is acceptable for the applicant to assemble all mixed curd containers for separate disposition provided that the applicant can demonstrate they are properly designated and

segregated from product offered for official grading. See [Section 11.C.4.a.2](#) for guidance when draining and salting conveyors are used. Arbitrary full barrel cutoff is not acceptable.

When 40 pound blocks are cut from a mixed 640-pound container, each of the 16 blocks obtained shall be clearly marked “Mixed”.

Refer to [Section 7](#), Coding and Marking, for general coding and marking requirements.

5. Net Weight

Refer to [Section 9](#), Net Weight Determination, for inspection procedures used in determining net weight of all products.

a) Tare Weight Determination

(1) Cheese Barrels

If 10 empty barrels, lids and liners cannot be obtained, the following tare weights shall be used for cheese barrels.

	Grief Brothers			NORCO
	Mpls.	St. Louis		
Short (37 3/16”) solid fiberboard, 2 lids, 1 liner 2 straps and clip	17.5 lbs. (8.0 kg)	6” lid 17.2 lbs (7.8 kg)	5” lid 16 lbs (7.25 kg)	
Tall (39 3/16”) solid Fiberboard, 2 lids, 1 liner 2 straps and clip		16.5 lbs (7.5 kg)		17.0 lbs (7.7 kg)

(2) Cheese

(a) 40 Pound Block Cheese Wrappers

If the wrappers for 10 cases cannot be obtained, the following tare weights shall be used for 40-pound block cheese wrappers.

Type	W. R. Grace (Cryovac)	Milprint	Marathon	American Can	Ludlow
II (short hold)		4 oz. (124 gm)	4 oz. (124 gm)		
II (long hold)		5 oz. (156 gm)			
III		5 oz. (156 gm)	5 oz. (156 gm)		
IV		5 oz. (156 gm)			
VI		3 oz. (93 gm)		3 oz. (93 gm)	
VII	4 oz. (124 gm)		3 oz. (93 gm)		
VIII	1.5 oz. (47 gm)			2 oz. (62 gm)	2 oz. (62 gm)
IX	2 oz. (62 gm)		2 oz. (62 gm)		

(b) Miscellaneous Consumer Size Cheeses (Including Process Cheeses)

Follow the guidance in [Section 11.B.5.a.2](#), Print Butter.

6. Condition of Container

Refer to [Section 10](#), Condition of Container or Product, for general instructions for performing a condition of container examination.

a) Special Considerations for Process Cheese

Condition of container examination for loaf style cheese shall not be attempted unless the temperature of the cheese is less than 80° F. At elevated temperatures, the cheese is soft and flexible. Handling may cause the plastic wrapper or seal to crack or tear, thereby causing a defect during the inspection procedure.

b) Special Considerations for Shredded Cheese

These guidelines apply to any style of shredded cheese including but not limited to mozzarella, process cheese, natural cheeses, and blends of cheeses.

Sealed pouches of shredded cheese shall be checked for leakers by immersion of the pouch in a container of water. If a stream of bubbles becomes evident when slight pressure is applied, the pouch shall be considered a leaker.

7. Sampling

Refer to [Section 8](#), Sampling for sampling procedures applying to all products.

a) Age of Products

No official grade shall be assigned to cheese less than ten days after manufacture, except that:

Mozzarella and Lite Mozzarella cheeses shall not be graded less than five days after manufacture. Cheese graded for purchase by CCC may have a maximum age requirement established in the FSA Purchase Announcement or Invitation. Check the current FSA documents and follow the age requirements specified. (See [Section 4.B.1](#))

Shredded Mozzarella cheese which is frozen immediately after shredding may be graded immediately upon offering. The freezing process arrests all further development of the cheese so a delay in grading would serve no useful purpose.

Bulk cheese used for preparing the blends to be used in ribbon slice operations can be flavored less than 10 days old.

(1) Age determination

The date of manufacture shall not be included in the calculation to determine the date a product is eligible for grading or inspection unless the plant can produce accurate documentation to establish the actual time of manufacture. For example:

January	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15
Date of manufacture -----	+														
Date Mozzarella cheese eligible for inspection-----	+														
Date bulk cheese eligible for grading -----	+														

b) Special Considerations for Cheese Manufactured From Automated Systems

Continuous cheese making is defined as continuous, automated systems in which the components of the system preclude the ability to maintain discrete make vat identity.

The size of each vat shall not exceed 7,000 pounds of cheese.

c) Special Considerations for Cheese in Mixed Barrel and 640-Pound Containers

See [Section 11.C.4.a.3](#) for guidance on the proper markings to be applied to a barrel or 640 pound container which contains cheese from 2 vats.

When a mixed barrel or mixed 640-pound container is randomly selected as the sample, container number 2 from the same vat shall also be brought out for tempering. Container number 2 shall be used only for the sample for composition analysis. See [Exhibit 44](#). The mixed container is the official sample for grading purposes and to receive official markings.

d) Special Considerations for 40 Pound Blocks Cut From 640 Pound Blocks

When one of the blocks numbered 1 through 16 cut from a 640-pound block and marked “mixed” is selected as the sample, the block equal to the sample number plus one half of the total number of blocks in the vat shall also be selected and tempered. For example, a vat with 80 blocks is offered and the sample selected is block 12. The additional sample shall be block 52 ($12+40=52$). This will assure that a sample from the unmixed portion of the vat is available for grading.

The sample designated by the random number generator (in this example, sample 12) shall be used for testing of moisture, fat, pH, and all other analyses as necessary.

e) Special Considerations for Cream Cheese and Neufchatel Cheese

This inspection guidance also applies to low-fat and reduced fat varieties, varieties containing other foods, and related products including those products bearing official identification.

The size of each batch shall not exceed 7,000 pounds of cheese.

f) Laboratory Samples

(1) Composition Sampling

When required, samples for composition should be taken at the same time as grading. The samples shall be selected from individual vats in accordance with the car-lot weight guidelines specified in [Section 11.C.7.f.1.a.i](#). A duplicate set of samples shall be drawn to act as a reserve sample. At the applicant’s request, an additional third set may be prepared for their use.

The sample container shall be clean and provided with a tight fitting cover. Clearly mark the container with the:

- USDA Certificate number
- The name of the applicant
- The date of sampling
- The name of the grader
- The type of Cheese

See [Exhibit 35](#) for a sample of the label format.

The composition plugs shall be taken in as close proximity to each other as possible. See below for instructions on the use of the trier guide. Be sure to use the same portion of the plug for each of the duplicate samples. For example, if the middle portion of the plug is used for the original sample then the middle portion of subsequent plugs shall be used for the duplicate samples.

Each of the selected vat official samples shall be maintained separately for testing.

When the cheese is offered for sale under the price support program, an additional composite moisture sample is also required. Secure a plug from every sample presented for grading. The size of the sample plugs are to be adjusted so that the sample container is filled upon completion of the sampling.

For block cheese, sample the block in the same manner as for grading. See [Section 11.C.8.a.1.a.i.c](#) for guidance.

Samples of barrel cheese shall be taken using the trier guide to assure that samples are selected from the proper area near the edge of the barrel. The trier guide is designed to draw a plug at approximately an 11 degree angle starting at a point approximately 2 ¾ inches from the edge of the barrel.

To assure that the plug is in the proper location, there shall be no more than 2 inches of head space in the barrel. See [Section 11.C.8.a.1.c.vii](#), if the head space is greater than 2 inches or the barrel is 2 inches or more overfilled. DO NOT sample the barrel. This vat is not eligible for grading where composition analysis is required.

The withdrawn plug shall be between 10 and 12 inches long. Do not use shorter plugs. Draw new plugs as necessary.

From the top of the plug, use a ruler to measure down 4 ½ inches and remove this top portion and reinsert into the plug hole in the barrel. The next 4 inches of the plug shall be used for the composition sample.

Generally 640 pound containers are not graded for applications where composition testing is required. If requested to sample for composition analysis, contact the National Field Office for guidance.

(a) Bulk Cheddar and Cheese for Manufacturing

As appropriate, these instructions apply to the selection of laboratory samples for other natural cheeses, including Reduced Fat Cheddar Cheese and Mozzarella, in similar style packaging.

See [Section 11.C.7.c](#) Special Considerations for Cheese in Mixed Barrels and 640 Pound Containers. See [Section 11.C.7.f.1.f](#) Shredded Cheese.

The individual vat sample shall be collected in a 6 oz. container which utilizes a screw-on lid. Fill the 6 oz. container as full as possible. Identify the contents of the container with identification slips supplied by the National Field Office. List the individual vat samples on the DMS immediately following the entry of the composite moisture (no composite sample for Mozzarella cheese). The number of individual samples to be selected will depend on the plant's history. Two levels of testing are provided. The National Field Office has the responsibility to maintain records of each plant's history. When unsatisfactory test results are reported, the National Field Office will notify the grader of the appropriate sampling rate.

(i) Initial or Normal Sampling and Testing

The normal level shall be used whenever a plant has not offered cheese for grading on a routine basis or has not offered cheese for a period of six months. Select samples according to the following table:

<u>Weight of Car-lot</u>	<u>Number of Samples</u>
50,000 lbs or less	2 (If one vat presented, select as the sample)
50,001 to 100,000 lbs	3
100,001 to 150,000 lbs	4

If 20 percent additional random verification samples are required, take the individual vat samples from these samples. If the 20 percent random verification samples are not required, take the samples from the individual vat samples selected for grading.

(ii) Reduced Sampling and Testing

When 10 consecutively tested samples (not 10 car-lots) are satisfactory for pH, moisture, and fat, the number of randomly selected samples from each car-lot may be reduced. The number of randomly selected samples will be dependent on the marked net weight of the car-lot offered as follows:

<u>Weight of Car-lot</u>	<u>Number of Samples</u>
50,000 lbs or less	1 (If one vat presented, select as the sample)
50,001 to 100,000 lbs	2
100,001 to 150,000 lbs	3

Refer to [Section 8.J](#) concerning the selection of samples from the 20 percent random verification samples.

(b) Barrel Cheese

Samples shall be obtained using the USDA trier guide. Do not try and sample through the bung hole of a steel barrel. Remove all covers. Draw a plug 2 ¾ inches from the edge of the barrel. To assure the proper location, check that there is no more than 2 inches of head space in the barrel. The plug shall be 10 to 12 inches long when removed from the barrel. If this length is not obtained, draw another plug. If overfilled barrels prevent the proper use of the trier guide, this vat is not eligible for grading where composition analysis is required.

Use a ruler to make the following measurements.

Remove the top 4 ½ inches of the plug and use to seal the plug hole in the barrel. The next 4 inch segment (from the middle portion of the plug) shall be split and used to prepare the composite and reserve samples.

If the applicant requests a duplicate sample, the plug may be split lengthwise or a second plug may be drawn which is as close as possible to the location of the original plug.

Individual samples for moisture or pH shall be obtained using the same procedures as described above. When sampling individual vats, be sure to completely fill the sample container. Draw as many plugs as necessary.

(c) 40 Pound Blocks

Using a block cheese trier, insert the trier at a point about half the distance between the edge of the block and the center of the block at as close to a 90 degree angle to the surface of the cheese as possible and withdraw a plug of cheese. Break off approximately 1½ inch off the top of the plug and use this portion to seal the hole in the block. The remainder of the plug may be used for the composite sample.

If the applicant requests a duplicate sample, the plug may be split lengthwise or a second plug may be drawn which is as close as possible to the location of the original plug.

Individual samples for moisture or pH shall be obtained using the same procedures as described above. When sampling individual vats, be sure to completely fill the sample container. Draw as many plugs as necessary.

(d) Mozzarella Cheese

When a continuous make procedure causes vat identity to be lost, manufacturer's vat shall not be more than 7,000 pounds. See [Section 11.C.7.f.1.f](#) for Shredded Cheese.

(i) Meltability, Color, Stretchability, and Free Fat

Select four sample loaves from the car-lot for the laboratory to conduct the pizza test. See [Section 11.C.7.f.1.f](#) for Shredded Cheese.

(ii) Analysis for Moisture, Fat, Salt, and pH

See [Section 11.C.7.f.1.a](#) for sampling levels.

From the samples selected in [Section 11.C.7.f.1.d.i](#), select the appropriate number of samples for analysis of moisture, fat, salt and pH.

Cut a slice from the loaf at approximately ⅓ the distance from the end of the loaf. The thickness of the slice shall be dependent upon the size of the loaf and the amount of cheese necessary to fill the sample container at least ¾ full. The container shall have a tight fitting cover. There shall be sufficient sample to run all of the necessary tests, including enough for the pizza test.

Designate the samples to be tested for moisture, fat, salt, and pH with an asterisk on the DMS report.

(e) Process Cheese

Identify the first 4 random numbers generated when selecting samples for test weighing and condition of container. Select one loaf from each of these identified shipping containers. See [Section 11.C.7.f.1.f](#) for Shredded Cheese.

Cut each loaf into 4 equal portions and distribute as follows:

- One portion to be sent to the National Science Laboratory
- One portion to be held in reserve. See [Section 8.I.2](#)
- One portion to be used by the inspector as a cutting sample
- One portion returned to the applicant

The four individual portions from one car-lot for official analysis shall be combined into one package for mailing to the National Science Laboratory.

Complete the sample identification label and attach to each sample portion and reserve sample. See [Exhibit 35](#).

(i) Reserve samples

One quarter of the loaf selected per [Section 11.C.7.f.1.d.ii](#), for laboratory analysis shall be carefully wrapped, sealed (evidence tape or grip lock seal), identified, and retained as a reserve sample.

(f) Shredded Cheese

(i) Sample Preparation

For sampling levels see [Section 8.H.2.a.1](#) for cheese identified by vats, or see [Section 8.H.2.a.2](#) for cheese not identified by vats.

The NFO will maintain a record of each plant's lab result history. When an unsatisfactory test is found, the NFO will alert the grader to sample at the normal rate during the next grading assignment.

Before opening the selected sample containers, place on a clean, smooth, flat surface. Invert the sample three times. Additionally, roll gently for at least eight full revolutions. Use a scoop or large spoon to transfer approximately one pound to a suitable sample bag for transport to the lab.

(ii) Fines

Use the random number generator to select one of the samples to be tested by the lab for fines. Prepare an approximate one pound sample for the fines test. Identify the contents of the container with identifications slips supplied by the National Field Office (NFO). For purposes of uniformity and ease of use by Dairy Grading and the lab, only use the slips from the NFO. Indicate on the DMS which of the samples is for the fines test and the shred size as stated by the manufacturer, such as "1/8 by 1/8 shred size".

Send the samples to the lab using ice, dry ice, gel packs, etc. to assure delivery at 45° F. or less.

(iii) Meltability, Color, Stretchability, and Free Fat

Select four samples from the car-lot for the laboratory to conduct the pizza test (shredded mozzarella only.) It may be necessary to select additional samples over those selected in [Section 11.C.7.f.1.f.i](#), in order to have four. If the samples are less than 5 pounds, the entire bag

should be sent to the laboratory. The samples shall be large enough so that 65 grams of shredded cheese can be obtained to conduct the test. Prepare these samples separate from the moisture, fat, salt, and pH samples. Clearly identify them for the pizza test on the sample and the sampling report for the laboratory.

(iv) Analysis for Moisture, Fat, Salt, and pH

See [Section 11.C.7.f.1](#) for sampling levels.

From the samples selected in [Section 11.C.7.f.1.a.i](#), select the appropriate number of samples for analysis of moisture, fat, salt and pH. Select one bag from the sample container for each of the designated vats. The entire, unopened bag will be sent to the laboratory unless it is more than five pounds. If the sample container is greater than five pounds draw a representative sample. Select enough cheese to fill a 16 oz. plastic sample bag $\frac{3}{4}$ full.

Designate the samples to be tested for moisture, fat, salt, and pH with an asterisk on the DMS report.

(g) Cream Cheese and Neufchatel Cheese

(i) Analysis for Moisture, Fat, Salt, and pH

Using the random number generator, select one vat or batch from each car-lot offered for grading for laboratory analysis. If the containers are one pound or less, send the entire, unopened container to the laboratory, except when the containers are individual serving sizes, in which case send sufficient, properly identified, containers for the laboratory to have 10-12 oz. for analysis. If the sample container is greater than one pound, transfer cheese to fill a 16 oz. plastic sample bag $\frac{3}{4}$ full.

Designate the sample to be tested for moisture, fat, salt, and pH with an asterisk on the DMS report. Also identify the appropriate type of cheese as designated in Section 4.0 of the USDA Specifications for Cream Cheese, Cream Cheese with other Foods, and Related Products.

(ii) Special Considerations for Packages Bearing Official Identification

Follow the inspection guidance in [Section 11.B.7.c](#). Adjust the wording as appropriate to reflect Cream Cheese and Neufchatel cheese.

(h) Cottage Cheese and Dry Curd Cottage Cheese

(i) Analysis for Moisture, Fat, and pH

Using the random number generator, select one vat or batch from each car-lot offered for grading for laboratory analysis. If the containers are one pound or less, send the entire, unopened container to the laboratory, except when the containers are individual serving sizes, in which case send sufficient, properly identified, containers for the laboratory to have 10-12 oz. for analysis. If the sample container is greater than one pound, transfer cheese to fill a 16 oz. plastic sample bag $\frac{3}{4}$ full.

Designate the sample to be tested for moisture, fat, and pH with an asterisk on the DMS report. Also identify the appropriate type of cheese as designated in Section 4.0, of the USDA Specifications for Cottage Cheese and Dry Curd Cottage Cheese.

(2) Monthly Quality Samples

Each in-process packaging line for process cheese or contract to provide mozzarella cheese shall send one loaf sample or five pound package of shredded cheese to both the National Field Office and the Washington Office once each month. Additional samples may be requested as conditions warrant. The sample is to be prepared and sent by the first inspector assigned to the contract for the month.

Complete the sample identification label for each type of cheese as appropriate. See [Exhibit 35](#) (process cheese).

(3) Recording of Sample Selection Information

Mark the individual cheese vat on the worksheet from which samples were selected for analysis with a double asterisk in the remarks column. At the bottom of the worksheet clearly indicate the type of analysis that is to be performed, i.e., “Test FDB, Moisture and pH for individual vat sample and test for moisture only on the composite sample”. See [Exhibit 16](#). Complete the DMS on the laptop under the certificate number that the product will be graded under. On the DMS accompanying the samples to the laboratory clearly indicate for the laboratory the type of analysis that is to be performed, e.g. “** Test vat for FDB, Moisture and pH. Test composite for Moisture only.” See [Exhibit 29](#).

(4) Special Considerations for Cottage Cheese and Dry Curd Cottage Cheese

This inspection guidance also applies to low-fat and reduced fat varieties, varieties containing other foods, and related products including those products bearing official identification.

The size of each batch shall not exceed 7,000 pounds of cheese.

(a) Special Considerations for Packages Bearing Official Identification

Follow the inspection guidance in [Section 11.B.7.c](#). Adjust the wording as appropriate to reflect Cottage Cheese and Dry Curd Cottage Cheese.

8. Product Evaluation

a) Cheddar, Colby, Monterey, or Swiss Cheese and Bulk American Cheese (Including reduced fat varieties)

(1) Bulk Containers (Blocks, Barrels, and 640 Pound Containers)

Check that the cheese has been tempered to between 45° F and 55° F for grading. If the cheese is not within this specified temperature range, **DO NOT** begin grading. Record the grading temperature on the Graders Memorandum.

Make sure the identification of the cheese offered for grading are the same vat designations recorded on the grading manifest. Also make sure that the required moisture and pH results are recorded on the grading manifest. If antimycotics are used on bulk styles, be sure that the statement “Antimycotics Applied” is marked on the manifest.

Make sure the cheese is at least 10 days old, except that:

- Cheese used for slice process cheese production for sale to CCC is exempt from this age requirement.
- Cheese for military contracts is generally required to be at least 30 days old.

See [Section 11.C.7.a.1](#) for inspection guidance on calculating the age of product.

Make sure the individual cheeses are of relatively uniform size and weight and properly fit the containers.

(a) Grading Procedures

(i) Block Cheese

(a) Examination of the Wrappers or Coatings

Remove the cheese from the container so that all surfaces of the block may be examined.

If the cheese is paraffin coated, examine all the surfaces to determine the condition of the rind, adherence and appearance of the paraffin, placement of the bandage and circles, soiled surfaces, and the size and shape of the cheese. Particularly note conditions of the rind for soundness, cracks, checks, mold, rind rot, soft spots, wet rind, and lack of proper rind formation. The paraffin shall appear bright and clear. Also check the surface of the cheese for the presence of cheese mites. Record all of your observations on the Cheese Graders Memorandum and the Certificate.

If mites are observed, discontinue grading immediately. Do not assign a grade to any cheeses. Contact the National Field Office immediately to inform them that the plant is to be made Ineligible due to the presence of cheese mites. See [Section 6.A.3](#).

If the cheese is the rindless type, note and record the wrapper type. If an over-wrap is used, it shall be removed to permit full examination of the cheese surfaces. Examine the wrapper to assure they are tightly applied and adequately sealed to preclude the entrance of air and that they otherwise conform to the requirements for finish and appearance specified in the U.S. Standards for the type of cheese being graded. Carefully examine the cheese for a smooth surface. The wrapper shall be not more than slightly wrinkled and free from any cracks, openings, or improper seals, and shall adhere closely to the surface of the cheese.

Examine wrappers that use wax as the sealing agent to assure that sufficient heat has been applied to melt the wax and fuse the overlapping surfaces. When proper heat has been applied the wrapper will have a dark mottled, greasy appearance due to the melted wax in the kraft paper outer layer.

When general unsatisfactory conditions are found, discontinue grading and report the details to the National Field Office. If mites are observed, see information above.

(b) Mold

When a general condition of mold is found, discontinue grading and inform the National Field Office so a survey can be scheduled to determine the cause of the mold. When sporadic evidence of mold is observed proceed with the grading and use the following criteria:

When mold is found on the original samples of foil wrapped cheese, DO NOT assign a U.S. grade. The selection of random samples will not be required since visual examination will not be possible.

When mold is found on transparent wrappers for rindless cheese, assign a grade in accordance with the applicable U.S. Standards. For uniformity of application refer to [Section 11.B.8.a.1.c](#), for defining the degree of mold development.

(c) Withdrawing a Plug

Use care when plugging rindless cheese to avoid tearing the wrapper or pulling it from the cheese surface. To avoid pulling the wrapper loose, place your fingers on either side of the trier and hold the wrapper down while withdrawing the plug. When multiple plugs are necessary they should be taken in a limited area to avoid unnecessary mutilation of the sample and future trim loss.

Insert a number 8 trier about half the distance from the outside edge to the center of the cheese to remove the plug. Insert the trier perpendicular to the surface of the cheese. This will help to avoid hitting old plug holes if previous grading of the cheese has been done.

Break off about ½ inch from the top end of the plug and replace in the plug hole. All plug holes shall be carefully sealed with clean wax and the wax shall be completely covered with a clean sheet of waxed or parchment paper.

Grade the plug of cheese in accordance with the U.S. Standards for Grades for the type of cheese being graded.

Record all of your observations on the Cheese Graders Memorandum (See [Exhibit 51](#)), and the certificate. See [Exhibit 45](#).

Observe the entire length of the plug for overall uniformity, brightness, seaminess, and color variations. Carefully examine the plug for mechanical or gas openings. When Swiss Cheese is graded, determine the development of eye formation. Smell the entire length of the plug. Break off a sufficient portion to determine its flavor characteristics. Knead another portion of the plug between your thumb and forefinger to determine the degree of firmness and smoothness of the body.

(ii) Barrel Cheese

Barrel cheese may be graded according to the appropriate variety U. S. Grade Standards (such as the Cheddar standards or the Colby standards) or according to the U.S. Standards for Grades of Bulk American Cheese.

If the variety standard is selected, the barrel shall be graded according to all of the criteria. This will require removal of the cheese from the container for examination of all surfaces of the cheese.

Remove the top from the barrel so that the entire top surface of the cheese can be examined.

Follow the inspection guidance in [Section 11.C.8.a.1.a.i.b](#) for mold observed on block cheese.

Draw a trier sample for grading perpendicularly from the center of the barrel. Grade the plug in accordance with the U.S. Standards for Grades for the type of cheese graded.

Record all your observations on the Cheese Graders Memorandum (See [Exhibit 51](#)) and certificate. See [Exhibit 45](#).

(iii) 640 Pound Containers

640-pound containers are not eligible for purchase by CCC. Most commonly, 640-pound containers will be evaluated as a cheese source for direct purchase process cheese contracts. However, an applicant may request grading as documentation for a commercial sale.

When pre-grading 640-pound containers for use on a process cheese line, it is not necessary to remove the top press boards from the container unless there is no other way to gain access to the cheese. The condition of the cheese surfaces will be evaluated on the line prior to cleaning and grinding.

A barrel style trier shall be used to evaluate 640 pound containers. The trier may be inserted through any of the circular openings in the side panels of the container. The trier shall be inserted as deeply as possible into the cheese in order to obtain a full size plug.

Follow the inspection guidance of [Section 11.C.8.a.1.a.i.c](#), for evaluating the product characteristics of the plug.

When the applicant requests that a 640 pound container be fully graded, follow the inspection guidance for barrel cheese in [Section 11.C.8.a.1.c.iii](#).

(b) Assignment of Grade

Record all of your observations and assign the grade as appropriate on the Cheese Graders Memorandum and Certificate. The U. S. Grade shall be determined by examining the sample plug for flavor, body and texture. The appropriate grade shall be assigned in accordance with the defects listed in the applicable Standard for flavor, body and texture. See [Exhibit 45](#).

When using the U. S. Standards for Grades of Bulk American Cheese, show the individual ratings for flavor, body and texture by abbreviations, “Ext.” for Extra Grade, “Std.” for Standard Grade, and “Cml.” for Commercial Grade. Since these standards do not include requirements for color, finish and appearance, no comments shall be recorded in these columns. See [Exhibit 46](#) and [47](#).

When using the U. S. Standards for Grades of Cheddar Cheese and the cheese was not examined for color, finish and appearance, insert two asterisks in the U. S. Grade column and include under “Remarks” the following statement:

“The above cheese was graded for compliance with specification _____. It shall be understood that the above rating (and fat or moisture analysis) was assigned on the basis of a sample drawn from the top surface of the cheese (or from the bung hole) and is not necessarily indicative of the quality and condition

(and composition) of the entire cheese. No final grade is assigned because the cheese could not be inspected for compliance with grade factors for finish and appearance.”

Include in the statement those references in parentheses that are appropriate for the grading assignment.

(i) Cheese Not Meeting the Requirements of a U. S. Grade

Cheese which does not meet the requirements for a U. S. Grade as outlined in the appropriate, currently effective U.S. Standard, or cheese which is determined to be unwholesome, adulterated, or not in compliance with an Standard of Identity, shall be classified as “Below U. S. Grade Requirements”. Insert two asterisks in the U. S. Grade column on the Grader’s Memorandum and list the appropriate description of the condition or defect observed.

When it is determined that the cheese within a vat is not uniform, as may be the case with some continuous cheese making operations, inform the National Field Office so corrective follow-up action may be taken.

When it is determined that an abnormal condition is due to mishandling or the cheese has been subjected to conditions resulting in possible contamination, no U. S. Grade shall be assigned. For such instances, show two asterisks in the U. S. Grade column and under “Remarks” show two asterisks and follow with a description of the condition of the cheese and the circumstances causing the contamination.

Examples of such conditions include, but are not limited to, warehouse damage, wet containers, cheese mites, contamination with extraneous matter, etc.

(2) Special Considerations for Cheese offered to CCC

FSA purchase announcements require cheese offered to CCC to be accompanied by a certificate containing only the cheese to be offered to CCC.

The applicant is responsible for all decisions concerning the assembly of car-lots of cheese to be offered for grading and to CCC. Dairy Grading personnel are to be prepared to cooperate to the fullest extent possible to minimize the paperwork and time necessary to accomplish offers of cheese to CCC.

Follow the general guidance below:

During the course of grading, the applicant may add or subtract vats from the DA-201C in order to create car-lots suitable for offering provided that all other prerequisites for grading are met.

Stamping of samples with the USDA certificate numbers should be at a point after which the applicant has made all decisions and adjustments to the car-lot.

Take-off certificates may be used to establish car-lots. The issuance of Take-off certificates should be used as a last resort. An adjustment to the car-lot size at the time of original grading is more efficient. If the applicant, however, chooses to utilize Take-off certificates, the regular hourly rate shall be charged for the time necessary to prepare the certificates with a minimum of ½ hour charge.

If the applicant or a representative is not present at the time of grading and is unable to be contacted to make adjustments to the car-lots offered, certificates are to be prepared as presented, except that if a certificate has enough cheese on it that meets the purchase requirements for CCC the cheese not meeting the purchase requirements should be placed on an “off grade” certificate. The applicant may request that they be contacted before stamping of the containers with the USDA identification so that they can make adjustments to the car-lots.

A car-lot which does not contain sufficient weight for offering to CCC may be held until the next scheduled grading without re-grading so additional vats may be added, provided:

- The next grading is within 10 days of the first grading,
- The cheese is held for only one additional grading session, and
- There is no evidence of alteration of the number of packages or condition of the original cheese graded

Car-lots of cheese withdrawn from offering to CCC by the applicant may be identified on a certificate reflecting mixed grades.

Cheese offered for sale to CCC shall not be more than 60 days old on the date it is offered to FSA. The minimum car-lot size is 38,500 pounds (17,464 kg) and the maximum is 123,000 pounds (55,792 kg).

Show on the grader’s memorandum the storage lot number (if assigned)

If the cheese is moved from the place where originally graded and is offered to CCC at the new location, FSA requires the cheese to be graded again. When the original grading was within three weeks prior to the second request for grading, the test weight and compositional tests do not need to be repeated. These original results (except flavor) may be brought forward to the new certificate with appropriate cross-reference to the previous certificate.

If the original grading was more than three weeks prior to the second request, a complete grading from new samples shall be conducted.

(a) Cheese not Meeting Compositional Requirements

If the manifest shows any vats which are below or above legal composition range requirements for butterfat or moisture they shall be removed from the manifest and not graded. In addition, no final grade shall be assigned to the remaining vats unless the applicant agrees that USDA test every vat in the car-lot. Do not criticize if the applicant has removed vats prior to offering. The applicant is encouraged to conduct their own quality control procedures to assure that only cheese meeting the requirements is offered.

Refer to [Section 11.C.7.f](#), for guidance on the number of samples to be taken to verify compliance with the composition requirements of the applicable FSA announcement.

Each of the individual vat samples shall be officially tested for moisture, fat and pH. No further testing is required when the following criteria are satisfied:

- pH test result of 5.40 or below
- Moisture test results on barrels of 36.5% or below
- Moisture test results on blocks of 38.5% or below

- Fat test results of 50% Fat on Dry Basis (FDB) or above.

When test results indicate the cheese is out of specification (including reduced fat cheddar cheese) sampling shall revert to the normal levels as referenced in [Section 11.C.7.f.1.a.i.](#)

Show the results and the applicable charges for testing on the certificate.

When the results of a composition test indicates that the product does not meet minimum CCC purchase requirements one of the following follow-up actions below is required. See [Exhibit 48.](#)

1. Withdraw the car-lot from consideration for sale to CCC. Certificates are to be issued as follows:
 - When all test results for fat and moisture meet the U.S. Standard of Identity requirements of 39% moisture and 50% FDB, each vat shall be assigned a U.S. grade as appropriate. Show the test results in the comment column for the vats tested. The certificate shall state “Not eligible for sale to CCC.” Show laboratory charges for all tests.
 - When any of the results for fat or moisture do not meet the U.S. Standard of Identity requirements of 39% moisture and 50% FDB, all vats in car-lot shall show “**” in the U.S. grade column except those vats tested and found to comply with all of the Standard of Identity requirements. Those vats shall be assigned the appropriate U.S. grade. Show the test results in the comment column for each vat tested. The certificate shall state:

“** No U.S. Grade assigned because the car-lot fails tests for composition.”

Show laboratory charges for all tests performed.

2. Arrange for USDA to sample and analyze each vat in the car-lot for that factor found to be out of specification (moisture, fat, or pH). Separate certificates shall be prepared to reflect cheese eligible for sale to CCC, cheese of legal composition but not eligible for sale to CCC, or cheese which does not meet legal composition requirements. Show charges for all testing performed.

(b) Reduced Fat Cheese

All sampling and verification testing procedures apply for reduced fat cheese offered for sale to CCC. Indicate on the laboratory sampling report that the sample is reduced fat cheese and is to be tested for moisture, fat, salt, pH and meltability.

When testing of any individual vat reveals one or more vats to be of illegal composition, at least 10 individual vats shall be selected using the random number generator and submitted for testing. For car-lots of less than 10 vats, all vats shall be tested. This rate of sampling shall continue for each car-lot until test results from 5 consecutive car-lots indicate adequate composition control at which time normal testing may resume.

(c) Barrel Cheese

In the case of barrel cheese, all barrels shall be examined from the “filled end”. In addition, at least four of the samples (this may include the 20% random verification samples) shall be inverted and examined on the “sealed end” for cheese defects (such as mold, free whey, voids, etc.) and liner defects. When defects are noted on the inverted “sealed end” of the barrels, reject the vat as unacceptable for sale to CCC.

If any sample shows a liner defect, (torn liner), or a surface defect, (more than acceptable rough surface), examine at least 2 additional containers from the same vat. When any of the additional samples confirm the defect noted on the original sample, insert an asterisk after the grade in the U. S. Grade column on the Grader’s Memorandum and show under “Remarks” an appropriate statement. For Example:

“No final U.S. grade assigned because of torn liners”

“Not eligible for sale to CCC because of rough surface”

See [Exhibit 47](#).

When generalized conditions of poor workmanship are observed, discontinue grading on the car-lot and report the conditions to the National Field Office. Show the following statement on the Grader’s Memorandum:

“Car-lot not eligible for sale to CCC due to poor workmanship.”

(d) Loose Wrappers

The U.S. Grade Standards for the various styles of cheese require the wrappers to securely envelope the cheese.

To determine the point at which a wrapper does not meet these requirements, grasp the middle edge of the ear and lift the block straight up. If the wrapper is pulled away from the surface of the cheese by 1 inch or more, the vat shall not be accepted. Include the following statement on the graders worksheet:

“No final U.S. grade assigned because of loose wrappers.”

See [Exhibit 45](#).

(e) Loose Flaps

If the number of “loose flaps” on the 40 pound boxes, as observed during the cursory inspection of the lot conducted prior to grading, exceeds 5% of the total packages offered for grading DO NOT grade the product. Include the following statement on the graders worksheet:

“Not eligible for sale to CCC because of poor packaging workmanship.”

(f) Free Whey

If the volume of free whey observed between the cheese and the wrapper forms a pool(s) or puddle(s), the vat shall not be accepted. Include the following statement on the graders memorandum:

“Not eligible for sale to CCC because of free whey.”

See [Exhibit 47](#).

Minor amounts of whey observed in the ears of the wrapper should not be criticized.

For barrel cheese, minor droplets of whey clinging to the liner should not be criticized. If the whey forms pool(s) or puddle(s) on the surface of the cheese, or the droplets of whey clinging to the liner should cling together and run down the liner when lifted, the vat shall not be accepted. Include the following statement on the graders memorandum:

“Not eligible for sale to CCC because of free whey.”

(g) Container Fill

When a sample of barrel cheese exhibit 2 inches or more head space (under filled), the vat shall not be acceptable. Include the following statement on the graders worksheet:

“Not eligible for sale to CCC because of excessive head space.”

See [Exhibit 47](#).

When a sample of barrel cheese exhibit ½ inch or more of overfill, the vat shall not be accepted. Include the following statement on the graders worksheet:

“Not eligible for sale to CCC because of overfilling.”

See [Exhibit 47](#).

(h) Torn Barrel Liners

When a sample of barrel cheese exhibits a hole or tear in the liner which when held vertically the hole or tear is within 2 inches of the surface of the cheese, the vat shall not be acceptable. Include the following statement on the graders worksheet:

“No final U.S. grade assigned because of torn liners.”

See [Section 11.C.8.c.iii](#) for torn liners on the “inverted” end.

(3) Special Considerations for DPSC, VA, or Commercial Contracts

Do not provide any product grading services unless the applicant can provide you with a copy of the covering Contract and associated Solicitation for Bid which identifies the conditions and requirements of the contract.

When inspection services are approved, follow the appropriate inspection guidance for the activity as identified in [Section 11.C](#) and following subsections.

(4) Consumer Size Packages

Follow the inspection guidance for block style cheeses in [Section 11.C](#) and subsections as appropriate.

See [Section 11.C.7.f.1.f](#) for shredded style cheeses.

(5) Special Considerations for Cheese Packaged With Grade Labels

Follow the guidance of [Section 11.B.8.a.3.a.](#) for approval of the packaging plant, the grade labels, and grading in the finished package.

Follow the inspection guidance of [Section 11.C](#) and subsections as appropriate for consumer size containers.

b) Process Cheese and Related Products

(1) Pre-grading of Bulk Cheese

Follow the inspection guidance of [Section 11.C](#) and subsections as appropriate.

(2) Flavor

The process cheese shall be pleasing and characteristic of mild to medium cured Cheddar cheese and shall be free from undesirable flavors and odors. Cheese spread may possess a slight cooked or very slight emulsifier flavor and be characteristic of a product made with added milk or whey solids.

(3) Body and Texture

Samples at the time of slicing shall be between 70° F and 80° F. If the loaves need to be tempered to achieve this temperature, they shall be secured to maintain their integrity.

The body shall be smooth, medium firm, and resilient, with practically no pinholes or openings except those caused by trapped steam. The texture shall be close and free from uncooked cheese, lumps or graininess.

Each sample shall be sliced with a smooth (non-serrated) blade knife. The slice shall be a uniform 1/8 inch thick. The cheese shall slice freely, show no more than slight brittleness or roughness, and shall not stick to the knife or break when cut.

Cheese spread may possess a slightly softer body and may be slightly sticky when sliced. There is no provision to allow slight roughness in process cheese spread.

(4) Color

The color shall be a uniform, medium yellow and have no more than very slight color specks, very slight caramelized color (brownish), or very slight pinking. Use the U.S. Department of Agriculture Color Guide for Pasteurized Processed American Cheese to evaluate color intensity. Color determinations shall not be attempted without the use of the color guide.

Color defects such as pinking, caramelization, and color specks are usually visible when slicing samples are examined. Pinking is generally observed as a streak or band of pink product layered between normal color cheese. Caramelized cheese is observed as various shades of brown color that is generally uniform but is often darker toward the center of the loaf. Color specks are varying diameter spots of unnatural color within the loaf.

When color defects are observed, they are to be classified as:

- | | |
|-------------|---|
| Very slight | - When detected upon very critical examination. |
| Slight | - When detected upon critical examination. |
| Definite | - Not intense but detectable. |
| Pronounced | - So intense as to be easily identified. |

The U.S. Standard of Identity for Pasteurized Process Cheese permits the use of harmless artificial coloring. Dry coloring, containing dairy solids as a carrier, may be used provided it meets the following criteria:

1. The coloring is used at levels which are the minimum necessary to accomplish the stated purpose of the ingredient, i.e., coloring the cheese.
2. The dairy solids, which are not an identified optional ingredient in the Standard of Identity, meet the requirements of 21 CFR 130.8 (a).

“If it contains an ingredient for which no provision is made in such definition and standard, unless such ingredient is an incidental additive introduced at a nonfunctional and insignificant level as a result of its deliberate and purposeful addition to another ingredient permitted by the terms of the applicable standard and the presence of such incidental additive in unstandardized foods has been exempted from label declaration as provided in ‘101.100 of this chapter.’”

Therefore, dry coloring, if used, shall be of sufficient intensity to color the cheese using minimal quantities without the need for additional liquid coloring. The dairy solids can serve as a carrier for the color only. Use of dry color with dairy solids can not function to fortify the cheese blend with added solids.

(5) Meltability

Meltability is determined on the samples selected and submitted to the laboratory for analysis. See [Section 11.C.7.f.1.f.iii.](#) The laboratory will report a numerical classification and corresponding descriptive term to each sample. Transfer the laboratory results to the certificate under a column headed “MELT”. Report both the numerical classification and the descriptive term. The classifications and descriptive terms are as follows:

- | | | |
|---|---|-----------|
| 1 | — | Poor |
| 2 | — | Poor |
| 3 | — | Good |
| 4 | — | Very Good |
| 5 | — | Very Good |
| 6 | — | Very Good |

(6) Foreign Material Contamination

The condition of container samples may be used for this evaluation. However, the results of each examination shall be recorded separately. Do not combine the totals of the condition of container examination and the examinations for foreign materials.

When foreign materials are observed, carefully document the size, number, and composition (if clearly identifiable). Secure samples with evidence tape so they can be shown to plant management and are available if further investigations are required by the National Field Office.

Any time during the inspection of process cheese that foreign material is observed in or on the cheese, reject the car-lot.

The results of the foreign material examination shall be recorded in the body of the certificate as follows:

“Inspection lot unacceptable because particles of foreign material observed.”

(7) Temperature Checks of Finished Cheese

Check the temperature of the process cheese 24 hours after production each day that inspectors are assigned to the plant. Select 2 samples per car-lot. Record the temperatures on the inspector’s worksheet. This sampling is intended as a surveillance procedure so some inspection lots may not be evaluated due to duty assignment schedules.

(8) Certificate Statements

If the flavor or body and texture of the process cheese does not meet the FSA Announcement requirements, show the following statement on the certificate:

“Process American cheese from case _____ to case _____ does not meet the FSA Announcement requirements due to (_____ flavor or _____ body and texture defect).”

See [Exhibit 49](#).

If the normal color intensity of the process cheese is either lighter or darker than the colors indicated on the guide or if other color defects are observed and classified as slight, definite, or pronounced, show the following comment on the certificate:

“Process American cheese from case _____ to case _____ does not meet the FSA Announcement requirements due to (color outside the medium yellow range, _____ caramelized color, pinking, or _____ color specks).”

See [Exhibit 49](#).

c) Mozzarella Cheese

Check that the cheese age requirements are met (see [Section 11.C.7.a.1](#) and appropriate Purchase Announcement). The Mozzarella cheese shall be graded by either a number 8 trier inserted into the end of the sample loaf or by cutting a slice between ½ to 1 inch thick cut from approximately ⅓ the distance from either end of the loaf.

(1) Flavor

The cheese shall be slightly acid and essentially free from objectionable flavors. A vinegar or rancid (lipase) flavor are unsatisfactory. It shall have a slight to medium salty taste.

(2) Body and Texture

The body shall be smooth, medium firm, resilient, free from gas holes and openings, except for mechanical openings caused by trapped air. It shall be chewy but not gummy.

(3) Color

The cheese shall have a uniform white to slightly yellow color. Very slight wavy or mottled color defect shall be acceptable.

(4) Meltability, Stretchability, and Free Fat

These analyses will be conducted by the National Science Laboratory. Follow the sampling guidance in [Sections 11.C.7.f.1.e](#) and [11.C.7.f.1.f](#) for loaf and shredded cheese.

d) Shredded Cheese

All observations shall be recorded as satisfactory or unsatisfactory. Refer to the appropriate USDA Specifications for criteria for the shredded style cheeses.

(1) Flavor

From the samples being prepared for the laboratory, flavor a portion of the sample. Flavor a quantity of approximately a teaspoon.

(2) Free Flowing

The cheese shall flow freely when poured from the primary container. The consistency should be similar to pouring dry breakfast cereal from a box. The cheese shall pour from the container with not more than gentle shaking.

(3) Matting

Determine degree of matting in shredded cheese. Clumps which remain after the pouring, as referenced in [Section 11.C.8.d.2](#), should not exceed 1 inch in their largest dimension. The sample will be considered unsatisfactory if the clumps cannot be broken into individual shredded pieces by exerting very slight pressure.

e) Cream and Neufchatel Cheese and Related Products

(1) Grading Procedures

(a) Examination for Mold

Follow the inspection guidance in [Section 11.B.8.a.1.c](#). Adjust the wording as appropriate to reflect Cream and Neufchatel cheese.

(b) Evaluation of Flavor, Body, Texture, Color and Appearance

Quality characteristics of Cream or Neufchatel cheese shall be determined by evaluating the product against the quality requirements specified in the “USDA Specifications for Cream Cheese, Cream Cheese with Other Foods, and Related Products”.

Depending on the size of the container, a spoon or spatula should be used to obtain the sample. Upon opening the sample, observe the surfaces for appearance and color defects. When possible, avoid the surface areas when flavoring the sample. Make note of the body and texture characteristics of the cheese in your mouth as you are evaluating the flavor.

See [Exhibit 50](#)

(c) Cream and Neufchatel Cheese Packaged With Official Identification

In addition to the preceding requirements in [Section 11.C.8.e](#), the following also apply: [Sections 11.B.8.a.3.a.i](#), [11.B.8.a.3.a.ii](#), [11.B.8.a.3.a.iii](#) and [11.B.8.a.3.a.iv](#). Adjust the wording as appropriate to reflect Cream and Neufchatel cheese.

(d) Butterfat Testing

These procedures are required for Cream and Neufchatel cheese packaged with official identification but will also apply if requested for non-officially identified products. Follow the inspection guidance in [Section 11.B.7.d.2](#). Adjust the wording as appropriate to reflect Cream and Neufchatel cheese.

Butterfat requirements for the various styles of cheese are available in the “USDA Specifications for Cream Cheese, Cream Cheese with Other Foods, and Related Products”.

f) Cottage Cheese and Dry Curd Cottage Cheese

(1) Grading Procedures

(a) Examination for Mold

Follow the inspection guidance in [Section 11.B.8.a.1.c](#). Adjust the wording as appropriate to reflect cottage cheese and dry curd cottage cheese.

(b) Evaluation of Flavor, Body, Texture, Color and Appearance

Quality characteristics of cottage cheese or dry curd cottage cheese shall be determined by evaluating the product against the quality requirements specified in the “USDA Specifications for Cottage Cheese and Dry Curd Cottage Cheese”.

Depending on the size of the container, a spoon or spatula should be used to obtain the sample. Upon opening the sample, observe the surfaces for appearance and color defects. When

possible, avoid the surface areas when flavoring the sample. Make note of the body and texture characteristics of the cheese in your mouth as you are evaluating the flavor.

(c) Cottage Cheese and Dry Curd Cottage Cheese Packaged With Official Identification

In addition to the preceding requirements in [Section 11.C.8.f.1](#), the following also apply: [Sections 11.B.8.a.3.a.i](#); [11.B.8.a.3.a.ii](#); [11.B.8.a.3.a.iii](#) and [11.B.8.a.3.a.iv](#). Adjust the wording as appropriate to reflect cottage cheese and dry curd cottage cheese.

9. Re-grading of CCC-Owned Block or Bulk Cheese

For cheese regrading use all of the original samples for regrading.

a) Block Cheese

For the first cycle of re-grading of blocks, the specifications for “medium cured”, as set forth in the U.S. Standards for Grades of Cheddar Cheese shall be used. On subsequent re-gradings, apply the grade specifications for the average degree of cure for the car-lot. As a rule of thumb:

- 10 days to 3-month old cheese is fresh or current cure
- 3-month to 6-month old cheese is medium cure
- More than 6-month old cheese is aged cure.

Use the original sample whenever possible. The Reserve sample shall be used only when it is determined that the original is no longer representative of the lot due to repeated plugging and tempering. If any mold is observed on an original sample, the reserve sample for that vat shall be checked. If the mold is near an old plug hole or the wrapper is loose or wrinkled and the mold appears to have been the result of a prior plugging, check the reserve sample to confirm the condition.

If the cheese is foil wrapped, most of the surface conditions can not be observed. However, check the top of the plug and if possible the surface area immediately around the plug hole for mold.

If the reserve sample has already been utilized, select a new random sample from the lot for verification of the mold development observations.

b) Bulk Cheese

Bulk cheese shall be graded in accordance with the criteria set forth in the U.S. Standards for Grades of Bulk American Cheese.

Use a number 8 trier. The samples are stored with the “sealed end” up. All samples shall be plugged and graded from the “sealed end” except that 4 randomly selected samples shall be turned to examine the “filled end”.

When grading either end, carefully plug the cheese through the liner or the circular covering. DO NOT remove the liner or cover from the cheese surface. After the plug has been graded, insert the top portion of the plug into the hole, cover the plug hole with a sealing substance and square of parchment paper.

Evaluate the cheese for flavor, and body and texture defects according to the grade standards. Defects such as wet or smeary surface are rarely found, but make notations as appropriate.

In addition to the grade characteristics observed, determine the presence and extent of any mold development on the cheese. Follow the inspection guidance of [Section 11.B.8.a.1.c.](#) for determining the extent of mold development.

For barrel cheese, check for the degree of mold development and, where possible, the penetration into the cheese. Observations are to be made on the end used for grading. Determine if the degree of mold penetration can be determined from the top of the plug. Express the degree of mold penetration in inches. For example:

“Mold penetration of the top surface to a depth of 2 inches.”

(1) Consumer Size Packages

Follow the inspection guidance for block style cheeses in [Section 11.C](#) and subsections as appropriate.

See [Section 11.C.8.d.](#) for shredded style cheeses.

D. Dry Milk

1. Prerequisites

Refer to [Section 3](#), Prerequisites to Inspection and Grading, for guidance on eligibility for inspection and grading services.

2. Documents and Forms

- ▶ DA-137 Dairy Miscellaneous Sampling Report
- ▶ DA-201 Universal Grading Certificate

Refer to [Section 5](#), Documents and Forms, for guidance on appropriate standards, specifications, announcements and documents to use during product evaluations.

3. Monitoring

Refer to [Section 6](#), Monitoring, for additional instructions for monitoring the production of all products.

a) In-Process Inspection

Lactose used in the manufacture of Instant NDM shall emanate from a plant listed in *Dairy Plants Surveyed and Approved for USDA Grading Service*, Section I.

4. Coding and Marking

a) Sub-lot Designation

Sub-lot designations are used for the identification of nonfat dry milk, instant nonfat dry milk, other dry products, evaporated milk, and other miscellaneous products.

Nonfat dry milk or other dry milk products transported in bulk over the road tankers are not eligible for grading directly from the bulk tanker. Such product can be offered for grading using GRAND LOT procedures following repackaging into bags or other containers. See [Section 7.C](#).

Sub-lots of nonfat dry milk, instant nonfat dry milk, dry whole milk, or instant dry whole milk which have been graded in bulk packages and found to meet contract specifications may be repackaged (under continuous inspection) without regard to the original sub-lot designations. The weight of repackaged sub-lots shall not exceed the maximum established. (See [Section 7.B](#))

Sub-lot designations for batch blending of dry products shall be determined by the blender size. Each blending batch shall be a separate sub-lot designation.

Refer to [Section 7](#), Coding and Marking, for general coding and marking requirements.

5. Net Weight

Refer to [Section 9](#), Net Weight Determination, for inspection procedures used in determining net weight of all products.

a) Tare Weight Determination

(1) Miscellaneous Small Size Containers of Dry Products

This section applies only to single serving size containers for such products as dry cream substitute, cocoa beverage mix, etc. Follow the inspection guidance in [Section 11.B.5.a.3](#), Miscellaneous Butter Containers.

6. Condition of Container

Refer to [Section 10](#), Condition of Container or Product, for general instructions for performing a condition of container examination

The inner poly liner of nonfat dry milk and dry whole milk bags may be either heat sealed or tied with a “goose neck”. In either case the sealing is to be checked to assure that the liners are properly sealed.

Heat sealed liners shall be free of pin holes, unsealed areas, or torn areas where the liner has not broken away properly from the kraft bag.

“Goose neck” liners shall be tightly tied and free of product sifting from the liner.

a) Special Considerations for Nonfat Dry Milk Being Sold to CCC

(1) Vent Holes

FSA has issued a special directive for Condition of Container examinations for nonfat dry milk bags.

A memorandum from FSA, DACO, dated July 9, 1991, revised the packaging specifications for nonfat dry milk “Cap-Sac”, “Aire-Tite”, or similar type approved bags to permit two vent holes, small punctures, in the linear back seam of the polyethylene liner (one exterior and one interior) provided by the bag manufacturer.

When car-lots of nonfat dry milk packaged in this style bag which include the vent holes, meet all other criteria of the Condition of Container examination show the following statement on the certificate.

“Meets the Condition of Container Standards with exemption of vent holes as per FSA memo dated July 9, 1991.”

(2) Bag Closure Guides

In announcement *Dairy 6*, FSA included a requirement for bags containing NDM offered for sale to CCC must have a bag closure guide on the top of the bag. This closure guide is two parallel bars along the front of the bag. Visually identifying two bars or no bar on a sealed bag closure

would indicate improper bag closure. This is recorded as a major defect on the condition of container form.

7. Sampling

Refer to [Section 8](#), Sampling for sampling procedures applying to all products.

a) Sample selection

(1) Nonfat Dry Milk, Instant Nonfat Dry Milk, and Other Dry Products

(a) Original Grading

One sample shall be selected from each sub-lot in the car-lot.

Follow the guidance in [Sections 11.D.9](#) for opening and closing of “Cap Sac”, “Aire Tite”, “Peal Pak”, or similar approved bags.

(i) Penicillin Testing (Optional)

(a) Normal Level

The normal level of 2 samples per car-lot shall be used whenever the applicant has not offered product for grading on a routine basis or has not offered product for grading for a period of six months or a sample on the reduced level indicates a positive result for penicillin.

For those using the TI calculator, enter 1 as the low limit and the number of sub-lots in the car-lot as the high limit. Press the [D] key to select the required number of samples. The random numbers generated indicate the sub-lot numbers in the car-lot from which a sample is to be selected. For example, for a car-lot of twenty sub-lots and the random numbers generated are 3 and 17, select the laboratory samples from the 3rd and 17th sub-lots on the manifest.

Note: The procedures are the similar for the laptop and for the Casio and Hewlett-Packard calculators but the key strokes will be different.

(b) Reduced Level

When five consecutive car-lots show no evidence of penicillin, the reduced sampling level may be used. The reduced level of testing for penicillin shall be at the rate of one sample per car-lot. Select a sample for penicillin according to the guidance in [Section 11.D.7.a.1.a.i.a.](#)

(ii) Salmonella Testing (Optional)

Salmonella testing may be requested by the applicant on a specific car-lot. In may also be required under a Purchase Announcement. See [Section 16](#) for detailed guidance for the Salmonella Surveillance Program.

Eight sub-lots shall be selected from the car-lot to be sampled. The applicant may request sampling of more than 8 sub-lots, however, 8 is the minimum. If there are less than 8 sub-lots offered, it is acceptable to take a double sample from the available sub-lots as necessary to obtain a total of 8 samples for the car-lot.

Use the same seed number as for selecting the laboratory samples, reset the calculator for the number of sub-lots in the car-lot, select 8 sub-lots to be sampled. The salmonella test samples shall be taken from the product bags by aseptic means before the laboratory samples are withdrawn. Wash your hands before sampling and use careful sampling procedures. All product samples shall be drawn by using sterile, single service spoons or scoops. Single service spoons will be supplied by the National Field Office or by the plant during temporary duty assignments. At least ½ pound of product for each sample shall be placed into properly identified, 18-ounce whirl type sample bag supplied by the National Field Office.

Properly identify the sample bags and number them consecutively. For fee basis sampling, identify the samples on the numbered DMS, Form DA-137. Pack the samples in serial order in the same large plastic bag and shipping container used for the other laboratory samples.

(iii) Vitamin A Testing

(a) Normal Level

Use the random number generator to designate four of previously designated samples for vitamin testing. If there are less than four sub-lots in the car-lot, draw additional samples from the existing lots to obtain the total of four samples. Draw a separate sample and mark them with the manufacturer's lot number, date sampled, inspector's name, and the statement "Test for Vitamins". The laboratory shall test each sample individually.

(b) Reduced Level

When two consecutive inspection lots indicate that all four samples are in compliance with the purchase specifications, select one sample per car-lot following the guidance in [Section 11.D.7.a.1.a.iii.a.](#) If the test results are out of the purchase specification range, return to the normal sampling level.

8. Product Evaluation

a) Dry Milk and Dry Milk Products

This section refers to all dry milk and dry milk products. This may include but is not intended to be limited to nonfat dry milk, instant nonfat dry milk, dry whole milk, dry buttermilk, dry whey, dry whey concentrate, other dry whey fractions, lactose, and specialty products (i.e. dry cream substitute, cocoa beverage mix, milk shake mix, eggnog mix, etc)

The product characteristics for these dry products are determined by laboratory analysis of official samples submitted for testing. See [Section 8](#) for sample selection guidance. The grader shall perform the following, limited characteristic evaluations at the time of sampling.

b) Lumps or Lumpiness

The observations of lumps or generalized lumpiness are important to nonfat dry milk and other dry products where lumpiness has been identified as a defect. The grader shall determine the degree of lumpiness by determining the amount of pressure to break-up the lumps observed.

When lumps are observed they shall be classified as breaking-up with:

- | | | |
|-------------------|---|--|
| Slight pressure | - | When the lump disintegrates when attempting to pick it up with the gentlest possible pressure between the thumb and forefinger. |
| Moderate pressure | - | When a lump can be picked up without disintegration using the procedures outlined above, yet breaks-up when a fraction more pressure is applied. |

When the lumps observed break-up with very slight or slight pressure, no further action is required. Make no notation on the sampling report.

When the lumps observed break-up with moderate pressure, make an appropriate statement on the sampling report. Notify plant management of the condition observed.

In the case of nonfat dry milk, lumps which break-up with moderate pressure would classify the product as U.S. Standard grade. Place the following statement on the sampling report:

“Sub-lots _____, _____, and _____, are U.S. Standard grade due to slight lumpy condition.”

See [Exhibit 52](#).

c) Color

If the examination of the surface of the powder reveals non-uniform color, unnatural color, or visible dark particles, make note of the extent of the defects and document on the sampling report. Contact the National Field Office for additional guidance. See [Exhibit 52](#).

d) Insects

If insects are observed, show on the sampling report for each manufacturer's sub-lot involved, the number of insects observed and their location, i.e., on the outside of the poly liner, near the tie, or on the surface of the product.

Discontinue sampling, but continue to inspect all the sample containers previously selected for additional evidence of the infestation.

Place insect specimens in a vial with alcohol and forward to the National Field Office. Label the vial in pencil to avoid smearing of the information. Record the sub-lot number, location where the product was examined, name of the manufacturer, the sampler's name, and the date of the examination on the label.

e) Nonfat Dry Milk and Instant Nonfat Dry Milk

If the sub-lots contain the maximum 20,000 pounds (22,046 pounds if packaged in 25 Kilogram bags) allowed, indicate on the DMS that each sub-lot is to be tested for the appropriate Group I factors. The grader shall use the random number generator to select one sub-lot and designate it for testing for the appropriate Group II factors. See [Exhibit 52](#).

If the sub-lots contain less than the maximum 20,000 pounds allowed, use the random number generator to designate one sub-lot per 20,000 pounds or fraction thereof in the car-lot. For example, assume a car-lot of 100,000 pounds composed of twenty 5,000 pound sub-lots. Use the random number generator to select 5 sub-lots (100,000 divided by 20,000 = 5 samples). Of the 20 sub-lots available the random number generator may designate sub-lots 3, 10, 11, 18, and 20. Sub-lots randomly designated which are in close proximity to each other are satisfactory. Indicate on the DMS that these randomly designated samples are to be individually tested for the factors shown in Group I. Additionally one of these samples shall be designated to be tested for the appropriate Group II factors. See [Exhibit 52](#).

Send all of the individual samples to the laboratory. The laboratory has instructions which provide guidance for additional testing when unsatisfactory results are obtained. The laboratory will not composite any of the samples.

The testing parameters are listed in Table 1:

TABLE 1	
Group I	
Moisture	Coliform
Fat	Dispersability (when required)
Scorched Particles	Density (when required)
Standard Plate Count	
Test each designated sample for each of the above factors as appropriate, except that the Scorched Particle examination shall be performed on <i>every</i> sub-lot in the car-lot for Instant NDM.	
Group II	
Titratable Acidity	Flavor
Solubility Index	Whey Protein
DMCC	Nitrogen (WPN when required)
Perform one analysis on the designated sample for each of the above factors as appropriate to represent the entire car-lot.	

Penicillin

For penicillin analysis, follow the inspection guidance within [Section 11.D.7.a.1.a.i](#), Penicillin Testing.

Vitamins

For vitamin analysis, follow the inspection guidance within [Section 11.D.7.a.1.a.iii](#), Vitamin A Testing.

If all the test results are satisfactory, no further testing of the car-lot is necessary.

If any Group I test result is less than U.S. Extra grade or other purchase specification, then all samples not tested between those sub-lots which represent satisfactory results (good to good) shall be tested for the unsatisfactory factor(s) or other purchase specifications requested. For example, using the car-lot described above assume the sample for sub-lot 11 was less than U.S. Extra grade. Sub-lots 10 and 18 were tested and the results were satisfactory. Sub-lots 12, 13, 14, 15, 16, and 17 will require testing.

If any Group II test result is below U.S. Extra grade or other purchase specification, then all other designated (asterisked) samples shall be tested. When sub-lots are less than the maximum 20,000 pounds allowed, individual sub-lots will not be routinely tested unless the applicant specifically requests that these additional tests be performed.

Additional testing shall be in accordance with the following guidelines.

Moisture

If the moisture analysis is for CCC purchases, and is between 3.6% and 4.0%, test all sub-lots from “good to good” result for moisture only. Assign the U.S. grade and/or “Ineligible for sale to CCC” as appropriate.

For Instant NDM with high moisture, test all sub-lots from “good to good” result for moisture only. Assign the discount or “Ineligible for sale to CCC”, or U.S. Grade as appropriate.

Other Factors

For all other Group I factors, test all of the sub-lots between the “good to good” results for only the factor(s) or other purchase specifications requiring additional testing. For example, using the car-lot described above, assume the sample for sub-lot 11 was below U.S. Extra grade. Sub-lots 10 and 18 were tested and the results were satisfactory. Sub-lots 12, 13, 14, 15, 16, and 17 will require testing for the factor(s) in question.

For all other Group II factors, test only the remaining sub-lots designated with an asterisk for only the factor(s) or purchase specifications requiring additional testing.

Whey Protein Nitrogen

For the Group II Whey Protein Nitrogen (WPN) factor, assign the heat treatment classification indicated by the WPN test to the entire car-lot. No additional testing is required.

Vitamins

See [Section 11.D.7.a.1.a.iii](#) for sampling guidance. When vitamins are tested under the Normal Sampling (Four Tests per Car-lot) plan, the National Science Division laboratory will select any four of the samples designated with an asterisk(s) for testing. If the test results are within the discount range, assign the discount to all of the sub-lots from “good to good” result.

If, however, the test results are above or below the discount range, reject all the sub-lots from “good to good” result.

When the Reduced Testing (One Test per Car-lot) plan is used for vitamins, the Science Division laboratory will select the double asterisk sample for testing. If additional testing is required, test only the remaining randomly designated (single asterisk) samples for vitamins. Assign the discount or rejection of the sub-lots from “good to good” result as appropriate.

It is extremely important that the laboratory maintain the individual sub-lot sample bags until the initial testing is completed so that any required additional testing can be performed.

(1) Nonfat Dry Milk with Added Starch for Sale under DEIP

The Foreign Agriculture Service (FAS) accepts nonfat dry milk with up to 0.5% added, edible, food grade starch as a “tracing element” as an eligible commodity under the Dairy Export Incentive Program (DEIP).

No final U.S. grade is to be assigned. To be eligible, the nonfat dry milk must meet all of the grade criteria for U.S. Extra grade. No special allowances or exemptions are granted because of the added starch. Certificates with nonfat dry milk meeting the criteria shall have double asterisks placed in the grade column and bear the following statement:

“** The nonfat dry milk covered by this certificate meets all of the composition requirements of U.S. Extra grade.”

9. Re-grading of CCC owned Nonfat Dry Milk

Have the warehouse help stage all the sample bags for inspection. Using the random number generator, select one sub-lot per 20,000 pounds or portion thereof shown on the certificate for examination and sampling. For example, if the car-lot has 24, 5,000 pound sub-lots, (120,000 pounds), and the random number generator designates 8, 9, 7, 12, 6, and 4, select these bags as they are staged for re-inspection. As described below, the inspector is responsible for using either the original or reserve sample which is representative of the product. These designated sub-lots become the “sample” for all subsequent re-inspection activities.

For re-gradings performed before the NDM is 1½-years old, use the original sample bags. However, if an original sample bag is torn, damaged, water stained, missing, or otherwise unsatisfactory, use the appropriate “Reserve” sample bag. If for any reason the “Reserve Sample” is not available, select a new sample bag from that manufacturer’s sub-lot. (No reserve samples are required for fortified NDM because this product is intended for immediate use.)

For subsequent re-gradings, use the reserve samples. The repeated openings of the original sample bags may allow moisture increase, so that these samples would no longer be representative.

Stamp the “Reserve Sample” or new sample with the “Sample” stamp and the shield stamp showing the original inspection certificate number. Show the following statement on the covering DMS:

“Reserve Samples (or new samples) used from manufacturer’s sub-lot(s)”

Damaged or torn sample bags shall be rejected to the warehouse and Form WA-570 Inventory Adjustment Notice shall be prepared. See [Section 18.J](#) for further guidance.

When dry products are offered in “Cap-Sac”, “Aire Tite”, “Peal Pak”, or similar style bags use a shape knife to carefully cut through the kraft paper plies along the entire top seam of the bag to expose the inner heat sealed liner. Care must be taken not to puncture or cut the liner at this time.

Check the top heat seal of the liner for proper sealing, complete break away from the kraft bag, and the absence of pinholes. If any defects are noted, record them as part of the condition of the lot.

a) Evaluation for Mold

Examine each sample container for mold, which may be present on the exterior and/or interior of the container. Special attention should be paid to the condition of the poly liner and the product. When mold is found during the cursory inspection, the extent of the mold should be reported. Determine if the mold is restricted to a definite area of the warehouse storage lot, or, if contamination is a general condition throughout the car-lot. Also try to find the cause of the mold contamination.

If mold is found, the sub-lot is unsatisfactory and the following statement shall be shown on the covering certificate:

“No U.S. Grade assigned because of mold on the outside of the bag. The product may not be used for human consumption. It may be used for animal feed if tested negative for aflatoxin”

b) Inspection for Insects

Dermestid insects are a serious insect pest sometimes found in NDM plants, NDM warehouses and in stored NDM. These insects are usually found in three forms, adult (small brownish- black beetles), live larva, and cast skins. (See Agriculture Handbook Number 500, Stored-Grain Insects for further information).

The inspection should start with a cursory examination of the stacked bags in the warehouse. Using a flashlight, inspect the outer surfaces of the bags, especially at any wrinkles or crevices at the top and bottom of the bags. (Bags with product dust on them or torn bags are especially susceptible to insect infestation.)

In order to inspect for interior infestation, open the sample bags by cutting a 10-inch slit in the top kraft liner or over-tape, starting approximately 6 inches from the side of the bag. When the bags are opened, use a flashlight to inspect the inner bag area and between the poly liner and bag. Then inspect the poly liner gooseneck area, if applicable. (Later when you are ready to begin sampling, untie or open the poly liner, fold the liner over the kraft plies, and carefully check for insects in the liner tie or in the NDM for any off-condition such as mold as outlined in [Section 11.D.9.a](#) and for product lumping or caking as outlined in [Section 11.D.8.b](#) of this instruction.)

If dermestid or other insect pests are found in a sample bag, take specimens and make notes about your findings. Then continue with the examination of each sample bag from the

manufactures sub-lot to determine the extent of the infestation in the sample bags. Next, using your notes about the infested sample bags, examine any two additional bags from the same manufacturer's sub-lots. If any infestation (one or more live or dead insects or cast skins) is found inside one or both of the two additional bags, the entire car-lot is considered unsatisfactory. The process of selecting and examining two additional bags from "infested" sub-lots can be discontinued as soon as one of these additional bags is found infested.

If no insects are found in the two additional bags and dermestid or other insect pests are found in a sample bag of NDM from a car-lot that met the U.S. Standard for Condition of Food Containers, only the infested sample bag is considered unsatisfactory. (Infestation will be presumed due to opening for sampling.) Since it can be assumed that the insects infested the samples in the warehouse, fill out a WA-570, Inventory Adjustment Notice to cover the rejected bags (note: our rejection authority is limited to less than car-lot quantities). See [Exhibit 75](#).

It can be assumed that the remainder of the car-lot is adequately protected by the complying bag design and closure. Proceed with sampling. (For any sub-lot where the original sample bag is insect infested, the "reserve" sample bag shall be sampled for moisture and flavor tests.) The sampling report should not reference the infestation of the sample bags; however, there should be appropriate deduction of such bags.

Product that failed the U.S. Standards for Condition of Food Containers on the original inspection may be accepted by FSA at a discount and be shown as packaged in "X" bags. These storage lots are unsatisfactory if the inspection reveals one or more live or dead insects or cast skins inside one or more sample bags. (For "X" bags it is not necessary to examine two additional bags from the infested sub-lots.)

When NDM is rejected for insect infestation, representative specimens of each type of insects shall be sent to the National Field Office to be held for possible identification. Put the insect specimens into a plastic or glass vial and fill to the top with 70-80% ethyl alcohol. (Do not use isopropyl or methyl alcohol.) Be sure the cap is screwed on the vial tightly and that it does not leak. Label the vial.

If other insects such as silverfish, book lice, crickets, etc. are found on the bags or in the warehouse, inform management that corrections should be made. Do not report this type of insect problem on the DMS report or certificate, however, the condition should be shown on the warehouse inspection report. These insects are not serious pests of NDM; nevertheless, they should be eliminated as quickly as possible.

(1) Rejection of Damaged or Insect-Infested Containers

Containers rejected for any type of damage or because of insect infestation shall be reported on an Inventory Adjustment Notice, Form TW-570; the assumption being that the damage or insect infestation occurred at the warehouse. If warehouse management disagrees, contact the National Field Office. See [Section 18.J](#) for instructions on completion of Form TW-570

c) Inspection for Physical Appearance and Lumps

When the NDM is sampled, carefully observe the appearance of the powder for defects such as visible dark particles, non-uniform color, presence of lumps, or evidence of insects. If lumps are noted in the product follow the guidance found in [Section 11.D.8.b](#)

d) Sampling Procedures

Draw a sample from each sub-lot and place it in a one gallon, square, plastic container with a screw cap cover. Each sample from the sub-lots shall be of approximately equal quantity. The total car-lot sampling shall fill the one gallon container approximately $\frac{3}{4}$ full.

After sampling each sub-lot, tighten the cover on the container and vigorously tumble the container from corner to corner for not less than one minute to thoroughly mix the product.

Fill a foil lined NDM sample bag at least half full from the plastic container. Immediately seal the top of the sample bag. Discard the remaining product from the one gallon container.

e) Bag Sealing Procedures

If the sampling is conducted at a location where a sealer is available, the poly liner may be transferred to a new bag and run through the sealer. Confirm that the original bag markings and lot numbers are accurately transferred to the new bag.

If a sealer is not available follow the procedures below:

1. Remove any residual NDM on the outer surface of the liner.
2. Securely tape the open corner of the liner with a food grade, pressure sensitive tape. The tape shall be folded over the front and back, and shall extend over the sides of the liner. Once folded, the tape shall be pressed firmly against the liner, and together at the ends, to prevent channeling or leaking of the NDM from the closure.
3. Remove the filled liner from the kraft bag.
4. Place the filler liner into another, larger 3.0 mil liner.
5. Twist the outer liner and fold into a "gooseneck" position and tie securely as close as possible to the top of the inner liner using cotton tape, twine, or any other safe method used in commercial practice.
6. Place the secured liner into the original kraft bag, or a new, larger kraft bag. If a new bag is used monitor that the markings are accurately transferred to the new bag. The grader shall apply a shield stamp over the transferred markings to signify their accuracy. The markings may be transferred using an indelible ink marker, stamp, or stencil.
7. Tape the outer kraft paper bag closed in accordance with normal taping procedures.

E. Evaporated and Sweetened Condensed Milk

1. Prerequisites

Refer to [Section 3](#), Prerequisites to Inspection and Grading, for guidance on eligibility for inspection and grading services.

2. Documents and Forms

Refer to [Section 5](#), Documents and Forms, for guidance on appropriate standards, specifications, announcements and documents to use during product evaluations.

3. Monitoring

Refer to [Section 6](#), Monitoring, for additional instructions for monitoring the production of all products.

4. Coding and Marking

Refer to [Section 7](#), Coding and Marking, for general coding and marking requirements.

Sub-lots of evaporated milk shall represent each processing tank. Multiple tanks shall not be combined into one sub-lot.

5. Sampling

Refer to [Section 8](#), Sampling for sampling procedures applying to all products.

As the 30 random numbers are generated as specified in [Section 8.H.2.b.2](#), make a notation on the first 15 numbers generated as these will be the cases from which one can will be selected for determining product characteristics and the selection of laboratory samples. See [Exhibit 11](#).

Using the random number generator select one of the 15 cans designated above and send it to the laboratory for fat and total solids analysis. Any one of the remaining cans shall be provided to the applicant as a sample. Twelve of the remaining cans will be used to evaluate product characteristics and the remaining can will be held as a reserve sample.

a) Reserve Sample

One can from those selected above shall be identified and retained as a reserve sample.

6. Net Weight

Refer to [Section 9](#), Net Weight Determination, for inspection procedures used in determining net weight of all products.

7. Condition of Container

Refer to [Section 10](#), Condition of Container or Product, for general instructions for performing a condition of container examination

8. Product Evaluation

The product characteristics (fat and total solids) for evaporated milk are determined by laboratory analysis of official samples submitted for testing. See [Section 8](#) for sample selection guidance. The grader shall perform the following, limited characteristic evaluations at the time of sampling by opening and examining the contents of 12 of the cans selected under the [Section 11.E.5](#) guidance.

a) Flavor

The evaporated milk shall possess a sweet, pleasing, and desirable flavor with not more than a definite cooked flavor. It shall be free from scorched, oxidized, or other objectionable tastes and odors.

b) Color, Body and Texture

The evaporated milk shall be stabilized to produce a uniform color, consistency and appearance. It shall be smooth and free from fat or protein separation, lumps, clots, gel formation, coarse milk solids precipitate or sedimentation, and extraneous material.

Immediately after opening the can observe the surface of the evaporated milk for any off conditions such as unnatural color, wavy color, visible dark particles, lumps, fat or protein separation.

Next, insert a table spoon, spatula, or wire loop into the milk without stirring the contents of the can. When using a spoon, it should be inserted concave side down. Slowly withdraw the inserted implement, rotating slowly to form an air bubble with the milk. Look for lumps, coarse particles, streaks, etc. in the film of product producing the bubble and on the back side of the implement (spoon or spatula).

Next, slowly pour the contents from the can. Look for gel formation, lumps, visible dark particles, or sedimentation.

c) Can Interior Conditions

Finally, observe the condition of the interior of the can for the degree of burn-on or rust.

When burn-on is observed estimate the percentage of the inner can surfaces which may be covered by the condition. Be sure to include all the inner surfaces of the can including the lid removed to gain access to the can.

The sample shall be considered unsatisfactory if more than 75 percent of the interior surfaces are covered with burn-on or there is any evidence of rust.

d) Reporting Of Conditions Observed

If all 12 cans examined are satisfactory, show the following on the certificate:

“No off-condition in 12 cans.”

If off-conditions are observed, report the number of observations and the nature of the off-condition. For example:

“4 of 12 cans examined showed burn-on in excess of 75% of the interior can surfaces.”,

or

“6 of 12 cans examined showed fat separation and 3 of 12 cans showed coarse sediment particles.”

or

“One can showed gel formation and one can showed burn-on in excess of 75% of the interior can surfaces.”

See [Exhibit 54](#).

9. Re-grading of CCC owned Evaporated Milk

See [Section 8](#) for sample selection guidance.

Open one can from each sample case. Vary the pattern of selecting the cans to assure a representative sampling of all sections of the cases.

Examine the evaporated milk for the product characteristics using the inspection guidance of [Sections 11.E.8](#).

In addition, select 105 other cans from the sample cases and examine for evidence of bulging or open seams.

If all the samples are satisfactory show the following statement on the certificate:

“The evaporated milk covered by original certificate _____, dated _____, was re-inspected this date and remains in satisfactory condition.”

If unsatisfactory conditions are observed document the observations within the statement shown on the certificate:

“The evaporated milk covered by original certificate _____, dated _____, was re-inspected this date and _____ of _____ cans examined show slight fat separation.”

See [Exhibit 54](#).

F. Special Considerations for Grand Lots

The lowest grade determined for any one sample shall be assigned to the entire lot. See [Exhibit 36](#) and [55](#).

If laboratory analysis is required to establish compliance with a U.S. grade standard or specification, testing shall be performed on EACH sample selected. The lowest test result or acceptance value for each factor tested shall apply to all containers in the lot.

12. PREPARING SAMPLES FOR SHIPMENT TO A SCIENCE AND TECHNOLOGY PROGRAM OR RESIDENT PROGRAM LABORATORY

Within the Dairy Grading Branch, laboratory samples are routinely analyzed by either a Branch resident program laboratory or the National Science Laboratory. The National Science Laboratory receives samples for analysis from a variety of AMS inspection and grading programs.

This Section provides guidance for preparing samples for shipment to the laboratory for analysis. The criteria below shall be followed by Dairy Grading Branch graders to assure the testing laboratory (Branch Resident Programs or AMS, Science Programs) is properly informed concerning the samples submitted.

- All samples submitted shall be properly identified. See [Section 8](#) for additional guidance.
- All samples shall be properly protected during transit to assure they are received in a suitable condition for testing.

A. Resident Program Samples

Samples that are collected and maintained under the control of the resident grader at all times do not need to follow the special requirements for packaging samples for shipment to an off-site laboratory. However, the requirements for assuring secure container closures and proper markings on sample containers, in this section, shall be followed.

B. Fee Inspection Samples and Other Samples Sent to Either the National Science Laboratory or a Resident Program Laboratory

Resident programs are authorized to only issue certificates for fee grading samples for which they have performed official laboratory analysis. Worksheets for fee grading lots that do not require laboratory analyses shall be sent to the National Field Office (electronically if possible) for processing. For example, a fee grading assignment of four lots of butter may result in only one of the lots being selected for butterfat analysis. Only the car-lot requiring analysis can be sent to the resident program. The paperwork for the other three lots shall be sent to the NFO.

Prepare a separate sampling report (DMS) for each car-lot requiring laboratory samples. The DMS shall have clear and precise testing instructions and bear the same number as the covering certificate for the car-lot. See [Exhibits 29, 34](#) and [52](#)

All samples that are to be packaged in one shipping container shall be numbered serially. The sequence of numbers is to be continuous within the shipping container. The serial number for each sample is to be recorded on the sampling report or certificate which will accompany the samples. See [Exhibit 52](#).

Check all laboratory sample containers prior to packaging to assure that the containers are tightly sealed. As necessary, tape should be used to prevent container lids from popping open or becoming unscrewed during shipment.

Also, check that the sample containers bear all necessary markings to identify the product, the applicant, covering certificate number, the sampler, and serial number. Care is to be taken with the type of marker used to identify the containers. Some markers will smear when used on plastic containers or if they come in contact with butterfat. Use only markers that will remain legible during shipping and handling.

Verify that the samples to be sent are the correct samples and are properly recorded on the sampling report or certificate to be included with the samples.

Use appropriate shipping containers and packing materials to protect the samples from damage during transit. (e.g. ice packs for butter, cheese, etc.) Special care shall be taken when packaging breakable containers such as glass jars or plastic cups. For butter and dry product samples, line the shipping container with a plastic bag.

Pack the samples in sequential order according to the serial numbers on the sample containers. If some samples have special testing requirements or markings, they may be packaged out of sequence at the top of the container.

Shipping containers are to be limited to 30 pounds or less in weight. This will prevent damage to the samples from over packing and make the shipping containers easier to handle thus reducing potential damage during shipment.

The applicant, except FSA, is responsible for all shipping instructions and charges associated with official samples. Properly secured samples (sealed with evidence tape and grip-lock seals) may be left with the applicant for shipping.

If you control and mail the samples yourself, record all shipping charges on the inspection reports for billing these charges to the applicant. In such cases, a grip-lock seal is not required but may be used if desired.

Prior to sealing the plastic liner, if used, record the number of a grip-lock seal on the sampling report or certificate. Place one copy of the sampling report inside the plastic bag with the samples. Twist the plastic bag closed and tie shut with strong string as close as possible to the top of the samples. Tightly secure the knot of the string tie with the recorded grip-lock seal so that the string tie can not be removed and will show other attempted tampering. See [Exhibit 52](#)

If for some reason, the grip-lock seal must be destroyed by opening, record the new number on the sampling reports or certificate. The inspector shall include the following statement and sign the sampling report or certificate to document the change in seal number:

“The original grip-lock seal was destroyed by (insert name) for official purposes.
See below for new seal number applied.”

The shipping case may be closed by gluing or taping. Sealing is to be sufficient to assure that the container does not open during shipment to the laboratory.

If the samples are not secured in a plastic bag with a grip-lock seal, the entrance points of the shipping container (i.e. once at top and once at bottom closures) are to be secured with a length of USDA Evidence Tape sufficient to indicate tampering of the container closures. See [Exhibit 33](#).

Grip-lock seals and evidence tape shall remain under your direct control and custody at all times.

Failure to maintain control over grip-lock seals and evidence tape may result in disciplinary action. See [Section 4](#).

13. APPEAL GRADING, APPEAL INSPECTION, AND RETESTING

During the course of routine inspection and grading activities, differences of opinion will occur periodically between USDA and the applicant over the results of an official inspection or grade. This section provides guidance when an appeal grade, appeal inspection, or retest may be performed on officially inspected or graded product.

A. General

A request for an appeal grade, appeal inspection, or retest shall be made by the applicant to the National Field Office within 2 working days after the original grading or inspection, or notification of laboratory results. The National Field Director may grant an extension of additional time up to 5 days after the original grading. Extensions greater than 5 days shall be approved by the Branch Chief.

Only requests authorized by the National Field Office or the Branch Chief will be considered as official.

An appeal grading or appeal inspection shall not be approved if:

- The conditions under which the product is stored have been altered or changed.
- The product has been moved to a different location, excluding minor movements within the plant coolers or freezers.
- Any portion of the original lot is no longer available for evaluation.
- The product has been subject to any previous appeal grading or inspection.
- The reasons for the appeal are frivolous or not substantial.
- The product is determined to be contaminated with filth, decomposed material, foreign material, or offensive substances, or is found to be adulterated.

In addition to the above criteria, an appeal inspection for physical examinations shall not be approved if review of the sampling procedures used to select the original samples indicates no material error in sampling technique is determined to have occurred.

B. Appeal Grading

Appeal grading shall apply only to products which have been assigned an organoleptic grade (i.e. butter and cheese) according to U.S. grade standards, or have been organoleptically evaluated according to a purchase specification (i.e. mozzarella cheese, process cheese, evaporated milk, etc.).

The applicant shall provide a new manifest for the appeal grading. The new manifest shall duplicate the information from the original with a statement that the product is being presented for an appeal grading. The new manifest shall be signed by a representative of the applicant.

Check the new manifest against the original to assure that all the originally graded product is listed. If there are any differences or deviations from the original, do not continue with the appeal grading.

The original grader shall not be present during the appeal grading. The appeal grading shall be conducted by a qualified grader assigned by the National Field Director and whenever possible 2 graders will be assigned. The original grader shall be informed of the results of the appeal grading by their supervisor or the National Field Office.

The interested party requesting the appeal grading may be present during the appeal grading provided they do not disturb or distract the appeal grader(s).

The entire original lot presented for grading shall be evaluated during the appeal grading. All grade factors shall be evaluated for each sample. All products will be subject to alteration of the original grade as appropriate.

For an appeal grading of butter, the butter shall be graded at the same temperature as the original grading $\pm 2^{\circ}$ F (provided that the butter remains within the 45-55° F range so proper evaluation of the body characteristics can be obtained).

C. Appeal Inspection

Appeal inspection shall apply to products for which samples were selected to perform laboratory analysis or physical examination.

Examples of samples for laboratory analysis are:

- Samples obtained for the determination of grade such as for nonfat dry milk or evaporated milk.
- Samples for butterfat analysis of butter.
- Samples for moisture analysis of cheese or process cheese.
- Samples for determination of compliance with a purchase specification such as for Butteroil.

When an appeal of laboratory analysis is requested, a new sample shall be obtained from each of the original sample containers tested in the inspection lot. The appeal analysis may be conducted on one or more of the factors originally tested. For example, on the original certificate three samples were tested for butterfat content. The test results revealed two results acceptable and one result out of specification. For the appeal analysis, new samples must be obtained from all three original containers not just the container that was out of specification.

Reserve samples shall not be used for appeal inspections. Reserve samples shall be used only when the original samples are either lost in shipment or arrive at the laboratory in such condition that they are determined to be no longer representative of the car-lot.

The sampling report accompanying the samples to the laboratory shall clearly show the statement:

“Samples for Appeal Inspection. Test all the samples for the following factors only. (list factor(s) to be tested).”

See [Exhibit 56](#).

The test results for the appeal inspection shall supersede the results of the original inspection.

Examples of samples for physical examination are:

- Samples for test weights.
- Samples for condition of container examination.

Subpart A, section 58.22(b), provides that an appeal inspection shall be limited to a review of the sampling procedures used in the original inspection. If no material error in sampling techniques is determined the request for the appeal inspection shall be denied.

If a material error in sampling techniques is determined, new samples shall be randomly selected. The new samples shall be subjected to all of the testing, inspection, and grading procedures performed on the original samples.

When the appeal inspection discloses a material error was made during the sampling, the results of the appeal inspection shall supersede the original inspection.

D. Retest

A retest shall be limited to the analysis of the original sample submitted for testing. Retesting shall be requested through and authorized by the National Field Office for any or all quality factors tested.

If the original samples are no longer available at the laboratory for testing, the request for retesting shall be denied. The applicant may consider a request for an appeal inspection. See [Section 13.C.](#)

Reserve samples shall not be used for retesting. Reserve samples shall be used only when the original samples are either lost in shipment or arrive at the laboratory in such condition that they are determined to be no longer representative of the car-lot.

When a retest is conducted on the original sample, the retest result shall supersede the original test result.

E. Certificate Preparation

An appeal grade, appeal inspection, or retest of laboratory analysis shall supersede the results of the original grading or laboratory analysis.

The fee for the appeal inspection or analysis shall be at the hourly rate plus the expenses incurred for conducting the appeal grading or gathering of new samples.

An appeal grade shall be considered as confirming the original grade provided none of the original grade classifications are changed. Changes in defect identification which do not alter the grade classification shall not be considered as an error in the original grading.

If the original certificate has not been issued, use the original certificate and record the results of the appeal grading, appeal inspection, or retest on the certificate. The certificate shall clearly state it is an “Appeal Grade Certificate”, “Appeal Inspection Certificate”, or “Retest Certificate”. The certificate shall include the fees and expenses for both the original and appeal grade or retest. See [Exhibit 57.](#)

If the original certificate has been issued, issue a new certificate. If possible, all copies of the original certificate are to be retrieved from distribution. The new certificate shall clearly state it is an “Appeal Grade Certificate”, “Appeal Inspection Certificate”, or “Retest Certificate” and shall bear the following statement:

“This certificate supersedes original certificate number _____ dated _____.
All copies of the original certificate (have) (have not) been retrieved.”

See [Exhibit 58](#).

When all the copies of the original certificate are retrieved, the appeal certificate shall include the fees and expenses for both the original and appeal grading. The original certificate shall be destroyed without further processing.

When all copies of the original certificate are not retrieved the original certificate and the appeal certificate shall be billed separately and include the fees and expenses incurred for each assignment.

14. CHECK-LOADING

A. Check-loading

Check-loading is an optional service which may be requested by the applicant. When check-loading is requested, the following criteria and inspection guidance shall be followed.

It is the applicant's responsibility to provide sufficient advance notification to the National Field Office so inspection services can be provided.

The applicant shall not begin loading of the product until the USDA inspector or grader has evaluated the condition of the transport conveyance.

Check that the transport conveyance is suitable for the product to be loaded. The conveyance shall have tight fitting doors and the interior shall be free of accumulations of dirt or debris. The walls, floors and ceilings shall be in good repair, free from broken or jagged protrusions, exposed nail heads or other features which could damage the containers to be loaded.

The conveyance shall be free of any evidence of rodent, bird, insect, or other pest infestation and any off odors. If the conveyance is to be used to transport refrigerated or frozen products, it shall be pre-chilled prior to beginning loading.

If the conveyance does not meet these requirements DO NOT proceed with check-loading services. Check-loading may be resumed when an acceptable conveyance is provided by the applicant.

USDA check-loading services DO NOT include the proper loading and bracing of products in the conveyance. These activities are the sole responsibility of the applicant.

The inspector shall check the containers and markings of the product being loaded to make certain that the product and the containers are the same as previously inspected.

If check-loading is the only service requested by the applicant (i.e., the product has not been previously offered for inspection) the following requirements apply:

The product shall have been manufactured in a USDA approved plant.

- Products emanating from a plant listed in Section I of the publication *Dairy Plants Surveyed and Approved for USDA Grading Services* are eligible for check-loading services without additional inspection.
- Products from plants listed in Section II shall only be check-loaded if they are accompanied with a USDA certificate certifying they were produced under USDA inspection.

The plant shall provide a manifest showing the plant of manufacture, the type of product, the number and size of containers, and other identifying coding which can be used to accurately identify the product.

During the loading process the inspector shall make frequent spot checks of the loading procedures to determine that no damage to the packages is occurring during the loading. If damage occurs, the applicant is to remove the damaged containers and document the number of containers removed from the car-lot on the load manifest and other shipping documents.

Check-loading may certify to either an actual count of the containers loaded or to a reliable tally. Verify with the applicant or the contract specifications which certification is required. The covering certificate shall clearly state whether the check-loading is for an actual count or a reliable tally.

1. Actual Count

When an actual count is required, provide sufficient time at the loading area to assure that you can witness and count all of the containers being loaded. This can generally be accomplished best by counting each pallet as it is staged for loading and then witnessing its placement in the transport conveyance.

2. Reliable Tally

When a reliable tally is all that is required, the inspector shall make sufficient observations of the loading patterns to be able to calculate a reasonable tally of the total number of containers loaded. It is not the intent of this check-loading service to provide a certified, actual count.

There may be times when it is not possible to derive a reliable tally. Such situations are (1) the product is stacked to the ceiling of the conveyance, or (2) the product is loaded in such a haphazard way that it cannot be accurately counted or determine a loading pattern.

If such conditions are encountered the inspector shall not attempt to check-load the product. The inspector shall document the circumstances on the covering certificate with the following statement:

“No reliable tally of the containers loaded could be determined during check-loading because (state reason).”

See [Exhibit 59](#).

The inspector shall seal or be present to witness the sealing of the conveyance. The sealing shall be done immediately upon completion of the loading process. Record on the certificate the date check-loaded, the conveyance number (this may be the license number, railcar number, container ID number, etc.), and the seal numbers. See [Exhibit 60](#)

If the applicant requests that the conveyance not be sealed, such request shall be noted on the covering certificate. When the certificate is provided with designated boxes for check-loading information, show a double asterisk (**) in the “Seal Number” box and adding the following notation in the remarks section of the certificate:

“Not sealed by applicant’s request.”

When designated boxes are not provided on the certificate, record all of the necessary information in the body of the certificate. See [Exhibit 60](#)

15. DISPOSAL OF OFFICIAL SAMPLES

In the course of USDA grading work, we require considerable quantities of product samples. When the grading is completed, disposition of the samples shall be in accordance with the current revision of AMS Directive 265-1.

A. Policy

The primary policy provision of the Directive reads as follows:

“No employee will appropriate or permit another employee to appropriate for personal use any agricultural commodity belonging to the Government or under the custody or supervision of the Government. This applies whether or not such item has been ordered to be destroyed or abandoned. If any agricultural commodity is appropriated by an employee for personal use, the supervisor must take immediate action to recover the commodity or its value, and must report the offense in accordance with procedures in AMS Instruction 366-1, Reporting Misconduct and Other Offenses and Alleged or Suspected Bribery Attempts.”

Under no conditions may a Branch employee appropriate any samples, even if they will otherwise be destroyed. If any graders, inspectors, or supervisors are found to be violating this instruction, an investigation may be conducted and appropriate disciplinary action will be requested. The Dairy Grading Branch expects employees to follow the letter and the spirit of this instruction so there is no need for costly investigations into the propriety of sample disposition.

B. Methods of Disposition

Disposition of perishable commodity samples shall be by one of the following methods:

Return to the applicant for reworking. The samples must be fit for human consumption and handled in a sanitary manner. For example, process cheese samples added back to Government-owned product.

Donation to a government agency or to a public or private welfare institution.

When donations to charitable agencies are made by Branch employees, the required receipts should show the following information:

- Name and address of the charitable agency.
- Identification of the donated product(s) and their estimated weight.
- Name of USDA employee who made the donation.
- Date, and signature of person who received the product(s) as a representative of the charitable agency.

1. Destruction

Destruction shall mean placement in a suitable garbage container or dumpster for usual disposition as garbage. Special denaturing is not necessary.

C. Samples Requiring Disposition

The following listing is of typical samples generated at various points in dairy grading work together with guidance about disposition when the grading is completed.

1. Resident Programs

- Grade-labeled ¼ pound and 1 pound prints
Return the damaged butter to the plant. It may be melted and added to the cream for reprocessing.
- Butter keeping quality samples
The samples shall be destroyed. After the 7 day hold at 70° F., bacteria counts may be high.
- Butter lab test samples
Destroy.
- Leftover NDM samples after lab testing
Return the samples to the plant for destruction or for animal feed disposition at their option.
- NDM samples held temporarily for possible selection for check testing by a supervisor
Return samples to the plant for destruction or animal feed disposition at their option.
- Cheese plugs after grading
If the plugs have been handled in a sanitary manner, they may be returned to the plant for reprocessing. Otherwise, destroy the plugs.
- Laboratory samples of cheese
Return to the plant or destroy them at plant option.

2. Process Cheese Samples

- Loaves after 24 hour slicing
Return the sliced loaves to the plant.
- Reserve samples not sent to the USDA lab
Return these ¼ loaf sections of 5 pound loaves to the plant for destruction or recovery for rework at the option of the plant.

3. Original Grading of Fresh Bulk Butter and Cheese

- Butter plugs
Reinsert into the plug hole. Destroy any remaining portions.
- Butter keeping quality samples
Destroy.
In some instances, graders are expected to take butter keeping quality samples to their home for 7 day incubation and subsequent smell tests. Afterward, the samples shall be destroyed.

- Cheese plugs
If the plugs have been handled in a sanitary manner they may be returned to the plant for reprocessing. Otherwise destroy the plugs.
- “Reserve” cans of cheese plugs
Return to the plant or destroy at plant option.

4. Regrading of Government-owned Cheese

- Cheese plugs.
Destroy.

5. Sampling of Government-owned NDM

- Left-over NDM from the composite prepared in 1 gallon plastic containers.
Destroy.

6. Butteroil Plants Processing Government-owned Butter

- Reserve samples not sent to the USDA lab.
Return the sample jars containing the butteroil to the plant for recovery, reprocessing or destruction at their option.

7. Miscellaneous

On occasion, an inspector or grader may be requested to supply special samples or containers of dairy product for use in a grading demonstration, to show to potential foreign buyers, to check quality, etc. Such requests may originate from the Dairy Grading Branch staff or from other involved government agencies such as FSA, FCS, FAS, or OIG.

In the case of these special samples, report the request immediately by telephone to a supervisor or to the National Field Office.

If supplying the product is authorized, a written record shall be prepared to include the following information:

- Name and agency of person making the request
- Date of request
- Identity and amount of product supplied
- Supervisor who authorized the shipment
- Name of inspector or grader who supplied the product and where the samples were shipped

The record shall be in the form of a memo to the National Field Director, with one copy retained by the grader or inspector. The National Field Director shall maintain a file of such receipts, which shall be retained for two years.

8. National Field Office Samples

- Process cheese loaves for monthly inspection
Accumulate after inspection and then donate periodically to a local charitable organization or destroy. Obtain a receipt and maintain a file of such receipts for two years. See [Section 15.B](#)
- Butter keeping quality samples
Destroy.
- Check-grading samples of butter or cheese
Destroy or donate as in [Section 15.B](#).

9. Washington Office Samples

- Process cheese loaves for monthly inspection
Accumulate after inspection and then donate periodically to a charitable organization or destroy. Obtain a receipt and maintain a file of such receipts for two years. See [Section 15.B](#).

10. Miscellaneous samples

Destroy or donate as in [Section 15.B](#).

16. SALMONELLA SURVEILLANCE PROGRAM

A. Salmonella Surveillance Program

The Salmonella Surveillance Program is an integral part of the Branch's survey program for plants manufacturing nonfat dry milk (NDM), dry whole milk, dry buttermilk, dry whey, freeze dried cottage cheese, certain other dairy products, and plants packaging dry dairy or related products.

Eligibility for USDA grading service for a plant's product(s) depends on:

- Plant approval based on surveys performed at least twice a year,
- Quarterly Salmonella surveillance testing of product or environmental samples in accordance with this Instruction, and
- Cooperation with Dairy Grading Branch guidance and recommendations regarding facilities clean-up, product recalls, retesting, and product disposition in the event of Salmonella positive results.

The program provides a basis for surveillance of a plant's operation to determine its ability to control Salmonella contamination. The USDA Salmonella Surveillance program is intended to monitor the effectiveness of a plant's Salmonella control program and should not be considered by plant management as the primary or only means of checking a plant's production and facilities.

Plant management should be made aware that positive Salmonella test results necessitate considerable follow-up testing to determine the extent of contamination and to clear a plant's production. Since Salmonella tests take considerable time to complete, it is prudent for the plant manager to clean-up the facilities as soon as possible and also to "hold" all production before and after the suspect lot until results are obtained.

The criteria for acceptance of product is based on the report "*An Evaluation of the Salmonella Problem*", National Academy of Science (NAS) Publication 1683, December 1969. The report classifies dried milk products in Food Category II, and proposes acceptance of a lot on the basis of all negative results on 29 25-gram samples, or an equivalent of 725 grams. USDA, however, performs Salmonella testing on two product composites per lot. Each of the composites is made up of four 100-gram samples, for a total of 800 grams analyzed (one test per 400-gram composite sample). This procedure provides a sensitivity level comparable to that of the NAS test and also permits greater Salmonella surveillance at a reduced cost. This procedure is acceptable to FDA under the USDA/FDA Memorandum of Understanding, number 12-25-MU-260.

Samples for Salmonella surveillance testing shall be taken quarterly

When possible, the sampling will be done in conjunction with required surveys of the plant drying operations. If the plant has no product available at the time of the inspection, the inspector shall note this on the DMS report and inform plant managers that they shall contact the National Field Office when operations begin and product is once again available so the necessary samples can be obtained. The National Field Office shall review the DMS report and the plant's

history of sampling and test results and schedule a return inspection to obtain the necessary product samples within 30 days of the notification.

B. Responsibilities

1. Grader Responsibilities

Graders assigned to Salmonella Surveillance activities shall:

- Take product and environmental samples in accordance with these instructions,
- Take precautions to ensure that Aseptic sampling practices are used and samples are not contaminated,
- Document accurately and completely all information on the plant survey report and the sampling report, and
- Package samples for shipping in accordance with instructions to safeguard integrity.

2. National Field Office Responsibilities

The National Field Director or a staff member assigned by the National Field Director shall:

- Schedule all Salmonella Surveillance activities,
- Notify plant managers of positive Salmonella test results verbally and in writing,
- Consult with plant management on follow-up activities for all positive Salmonella results, and
- Keep open communications with the National Program Coordinator regarding Salmonella Surveillance Program positive result follow-up activities.

3. National Program Coordinator

The National Program Coordinator shall:

- Complete Salmonella Surveillance reports,
- Track results to identify trends within certain regions or specific dairy plants,
- Provide a monthly summary report of all Salmonella testing activities to the Food and Drug Administration, Center for Disease Control, trade associations and within the USDA,
- Notify the Food and Drug Administration of all positive Salmonella test results, and
- Monitor Salmonella Surveillance activities to ensure that quarterly sampling requirements are met.

C. Sample Selection

Graders shall take precautions to prevent contamination of the samples by first washing their hands and by using aseptic sampling procedures.

All product samples shall be drawn by using sterile, single service spoons or scoops. Single service spoons will be supplied by the National Field Office or by the plant during temporary duty assignments.

Plant managers may request to have their own plant or laboratory personnel draw product and environmental samples for Salmonella testing. This is acceptable only when samples are drawn **under direct USDA supervision.**

Samples of product and environment materials for laboratory testing, shall be placed into properly identified and sealed polyethylene 18-ounce twirl sample bags supplied by the National Field Office or the plant. See [Sections 16.H](#) and [16.I](#) regarding preparation of the sampling report and package for shipment to the USDA laboratory.

Whenever NDM (or other dry product) is sampled for Salmonella testing, the inspector shall recommend that the plant manager hold the sampled sub-lots of product from distribution until test results are reported. This precautionary measure is suggested in order to avoid product recall in the event of a positive result.

1. Sampling Procedures for Plants Requesting Approval for a D Code or an Asterisked W or S Code

a) Product Samples for Plants with One Dryer

Check the plant's approved codes to ensure that all product samples taken are of product for which the plant is approved.

Select four samples of product from each of three day's production (preferably consecutive days) for a total of twelve samples. If possible, the first and last bags from each day's production shall be selected, plus two samples from each day's remaining sub-lots in between.

Note: There may be instances where the plant does not have three days production on hand at the plant. In such cases, take the required number of samples from the one or two day's production which is on hand.

Samples must be taken in groups of four for any particular day. More than one group of four may be taken for the same day. For example, if only two days production is available, take eight samples from one day's production and four samples from the other. **DO NOT** take six samples from one day and six samples from the second day.

Use a separate, sterile spoon for obtaining each set of four samples of a day's production. Place at least one-half pound of product into an 18 ounce, polyethylene twirl sample bag. The bag should be at least $\frac{3}{4}$ filled with sample material. The laboratory will composite the four samples for each day, thereby making three composites of the product samples.

A single drying system may be used to make a number of dry products. In such cases, the inspector need not sample each product during the quarterly sampling because the testing of any approved product from the drying system demonstrates its ability to produce products which are safe from Salmonella contamination. This inference can be drawn because all fluid ingredients (both dairy and nondairy) must be pasteurized before they are dried.

b) Product Samples for Plants with Two or More Dryers

If the plant has one packaging line, select samples as outlined in the preceding section for plant with one dryer. If the plant has two or more packaging lines, obtain a copy of the previous sampling report to verify which packaging line was sampled by the last surveillance inspector.

Select a different drying system on each successive sampling in order to assure periodic checks of all systems. For future reference, be sure to record which drying system or packaging line was sampled on the current plant survey and sampling reports.

Under this arrangement, if one of the Salmonella product tests positive for Salmonella, twelve additional samples shall be taken immediately from three consecutive day's production from the system or systems which were not represented in the original sampling. To avoid the possibility of such additional sampling, management may optionally request separate sampling of each drying system at each quarterly visit.

c) Plants Making Dry Blended Product by Dry Mixing of All Dry Ingredients

If management requests listing in the Approved Plant Publication for a specific dry blended product with a "D" code or asterisked "S" code, quarterly USDA Salmonella surveillance sampling is required.

When the product is made by the dry blending procedure, it should be emphasized to the plant manager that a positive result on finished product could implicate any non-dairy ingredient materials and this might necessitate extensive follow-up testing. Management should be encouraged to have a Salmonella monitoring program on all ingredients in order to preclude or minimize the possibility of Salmonella positive results on the final product when USDA tests are made.

(1) Product Samples for Plants with One Dry Blending System

Sample product as outlined in [Section 16.C.1.a](#), when only one product is made.

When a number of products or formulas are made from the same basic ingredients, only one formulation needs to be sampled. For example: Plant X wants USDA approval for Dry Whey-Soya-Caseinate Blend (code S 25) and they make five different formulations using different proportions of the same ingredients. Only one set of 12 product samples from three different days from any of the five formulations would suffice.

It is very important, however, that when the plant wants USDA approval for two or more different dry product codes made by the dry blending process, a separate set of twelve product samples should be taken from each different finished product which contains casein, caseinate, or dry non-dairy ingredients such as soya flour. This procedure is necessary because the casein and non-dairy ingredients may originate from plants which do not have USDA Salmonella surveillance. Therefore, in order to have a meaningful Salmonella surveillance on dry blended finished products which contains these ingredients, it is necessary to sample and test the actual finished product. The situation is quite different from the monitoring of a drying system which makes a variety of finished products from pasteurized fluid ingredients.

(2) Product Samples for Plants with Two or More Dry Blending Systems

Per the explanation above in [Section 16.C.1c.1](#), the use of two or more dry blending systems would not affect the product sampling procedure. In other words, the emphasis is on sampling the finished product, not the system which produced it. The only change in this instance is that a separate set of environmental samples is required for each dry blending system.

There may be instances where the plant does not have three days production on hand at the plant. In such cases, take the required number of samples from the one or two day's production that is on hand.

Samples must be taken in groups of four for any particular day. More than one group of four may be taken for the same day. For example, if only two days production is available, take eight samples from one day's production and four samples from the other. **DO NOT** take six samples from one day and six samples from the second day.

When the plant has no product on hand, show a note to that effect on the sampling report. The National Field Director will review the report and the plant history of sampling and test results to decide if a special trip should be scheduled to obtain such samples or if the quarterly sampling should be waived.

2. Environmental Sample Procedures

Environmental samples are intended to evaluate the environment in which human food products are produced. Salmonella is prevalent in the environment in general and care must be taken to keep food processing areas free from potential contamination.

Samples shall be collected into polyethylene twirl sample bags, using a separate sterilized spoon for each sample. Filter material samples shall be collected with the use of sterilized scissors. Inspectors shall use extreme caution to avoid touching the sample portion of the filter with unsanitary hands.

Environmental samples shall be individually tested.

The samples shall be obtained from the following sources using the sampling method described below. In the event that the plant is not in production at the time of the survey, try to obtain at least one or more environmental samples.

a) Environment Samples for a Drying Operation

A minimum of three environmental samples are required.

1. Vacuum Cleaner Waste

Take a representative ½-pound sample of waste material from the vacuum cleaner collection chamber. If the vacuum cleaner system is empty, collect floor sweepings from the dry processing areas.

2. Air Filters

Obtain a section of powder - cooling air filter material. Place the folded filter sample in an individual sample bag. If it is necessary to cut a section of filter material, use sterilized scissors and tweezers to obtain a sample. The scissors can be soaked in alcohol or 400 parts per million chlorine solution for 30 minutes prior to use. Hands should be thoroughly washed and sanitized. If the filter material is not cloth or paper type and a portion cannot be removed for a sample, obtain as much material as is available by scraping the unit with a sterilized spoon.

Record the type and location of the filter sampled on the sampling report and on the plant survey report. If the filter is of the absolute type clearly indicate this on the DMS sampling and plant survey reports; as this affects the follow-up procedures.

3. Tailings

Take a representative ½-pound sample of sifter “tailings” from the collection container (usually a drum or bag).

4. Other Samples

During the inspection, if you observe any problem areas that could potentially result in a salmonella contamination select additional samples of this material. Clearly document the areas where the additional samples were obtained on the sampling report and the plant survey report. Problem areas may be, but are not limited to, excessively dusty or dirty areas, accumulations of damp or wet powder, wet or damp exposed insulation material, dirty pallets from other sources, etc.

b) Environment Samples for a Dry Blending Operation

A minimum of three environmental samples are required.

1. Air Filters

If dry ingredients are pneumatically conveyed, take a section of air filter material for testing. If the ventilation system for the dry blending department has air filtration, take a section of this filter material. If there is a separate dust control system at a bag or tote dumping station, take a sample of the material collected by the system.

2. Tailings

If the blending system utilizes a product sifter, take a sample of the oversize “tailings” material.

3. Vacuum cleaner

Take a sample of material collected by the vacuum cleaner which is used for cleaning walls, floors, stairways, etc.

4. Other Samples

Sample encrusted material which has accumulated in or on processing equipment, conveyors, walls, etc. Sample any material which appears to be unsanitary. Especially look for any

material or liquid associated with roof leaks. In the event that the plant is not in production at the time of the survey, try to obtain at least one or more environmental sample.

3. Sampling Procedures for Plants Requesting Approval for a Packaging or Processing “P” Code

To be eligible for a P code identified with an asterisk in Section II, *Dairy Plants Surveyed and Approved for USDA Grading Service*, quarterly USDA Salmonella analysis of three environmental samples is required. The testing of environmental samples does not constitute a USDA declaration that the operation’s finished products are free from Salmonella contamination.

(a) Environment Samples

The inspector shall not take environmental samples from product contact surfaces (e.g., encrusted materials on the interior surface of processing equipment). Also, the inspector shall not take environmental samples of “tailings” or the dryer filter used for air which comes into direct contact with product.

Follow the general guidance of [Section 16.C.2](#), for taking environmental samples at a dry blending plant. It is very important to keep in mind, the exceptions of where samples cannot be selected as outlined in the preceding paragraph.

Specific sample locations may be requested by management. This is acceptable as long as the locations are not in the excluded areas as outlined in the preceding paragraphs. Such optional sampling and testing of environmental samples does not constitute USDA surveillance on the Salmonella safety of finished products made by the operation; nevertheless, the testing may be helpful to management.

There is no provision for USDA follow-up on product in the event of positive results on environmental samples. However, if the USDA tests indicate a serious environmental problem, the information will be furnished to FDA or State officials for their attention.

D. Product Salmonella Testing (Optional)

In the event that the applicant requests Salmonella testing on a specific car-lot or Salmonella testing is required under the Purchase Announcement for the Commodity Credit Corporation, use the programmable calculator to select 8 sub-lots from the car-lot to be sampled. The applicant may request sampling of more than 8 sub-lots; however, 8 samples is the minimum. Use the same seed number as for selecting the laboratory samples, by resetting the calculator for the number of sub-lots in the car-lot, select the 8 sub-lots to be sampled.

Using aseptic techniques as described in [Section 16.C](#), obtain samples for Salmonella testing before obtaining regular laboratory samples.

E. Follow-up Action on Quarterly Sampling

When all product and environmental samples are reported negative, the National Field Office shall notify the plant of the satisfactory results and no further action is required.

1. Follow-up Action on a Positive Product Salmonella Result

When there is a product test that is positive on the 12 & 3 sampling, the following action is necessary:

The laboratory will immediately notify the National Field Office, who in turn will immediately notify the plant manager. A list of production back to at least two days prior to the positive lot and up to the special plant cleanup will be requested. The list should show the date of manufacture, lot number, number of containers in each lot, and the present location of the product. Because of possible serious contamination, the product shall be recalled from retail distribution channels and held for sampling and testing for Salmonella.

The plant has two follow-up options:

Option 1: The plant may reprocess the day's production represented by the positive lot and then have it re-sampled. 8 samples shall be taken from each day's reprocessed production. Each sample shall be an 18 ounce polyethylene bag. The laboratory will test the samples at the rate of eight 100 gram samples (two composites of four 100 gram samples).

Reprocessing must be under supervision of a regulatory agency such as USDA Dairy Grading or a State inspection agency. If USDA Dairy Grading is not the agency supervising the reprocessing, the plant must submit a reprocessing proposal to the Food and Drug Administration (FDA) describing the process and contact information for the regulatory agency they have selected for the supervision. Contact information for the Food and Drug Administration can be obtained by contacting the National Program Coordinator for the Salmonella Surveillance Program in the USDA Dairy Grading Washington, D.C. office.

Any lot (day's production) that has been declared positive can be reconstituted, reprocessed, and tested for Salmonella, as many times as a plant chooses.

Option 2: The plant may segregate the lot (day's production) from the rest of the plant's production and dispose of in such a manner that the lot will not constitute a health problem to humans or animals.

- The plant may dispose the product in a land fill that meets all State, Federal and Local requirements.
- The plant may contact the Food and Drug Administration, Center for Veterinary Medicine (FDA, CVM) and submit a proposal to reprocess the product into animal feed. Contact information for FDA, CVM can be obtained by contacting the National Program Coordinator for the Salmonella Surveillance Program in the USDA Dairy Grading Washington, D.C. office.

Disposition of a positive lot must be under the direct supervision of either the USDA or another regulatory agency, as elected by the plant management. If USDA is asked to supervise, documentation must be made using the Salmonella Surveillance Report ([See Exhibit 61](#)). If the plant elects to have a different regulatory agency supervise the disposition, complete the Salmonella Surveillance Report accordingly. The Washington office will inform FDA in accordance with the FDA/USDA memorandum of understanding.

a) Follow Up Testing for Product Positive Salmonella Result

Regardless of which option is chosen by the manager, follow-up testing is required on product made before and after the positive lot. Such follow-up testing shall be performed on eight 100 gram samples from product manufactured on each of the two days immediately preceding the day in which the positive product was manufactured. The same rate of sampling and testing shall also apply to each day's production following the positive production until the plant makes a complete cleanup of its drying facilities. If on the previous surveillance sampling, eight samples for any of these days were negative, then additional samples for the day are not required. If such testing reveals an additional positive result, this confirms that the plant has a Salmonella problem. The day's production represented by the additional positive test(s) shall be handled as outlined above.

If the test results on a day's production are negative, that product may be released for unrestricted use or distribution.

If a positive test is obtained on product for any day, all of the product for that day shall be disposed of in such a manner that the lot will not constitute a health problem to humans or animals.

Reprocessing and retesting (eight 100 gram samples) as outlined in [Section 16.E.1](#) is another alternative.

If any of the production made before and after the positive lot is unavailable or plant management refuses to allow the additional sampling, contact the National Field Office immediately. The National Field Office will explain to plant management that the FDA will be notified of the un-sampled production. In the case of plant refusal of the additional testing, the plant shall be assigned the ineligible status.

b) Plant Clean Up

The plant manager should arrange for a complete cleanup of the drying facilities as soon as practical. If desired by the manager, USDA inspection services are available during and after the plant cleanup. Effectiveness of the cleanup shall be ascertained by means of Salmonella tests on samples taken from the first three production days following the plant cleanup. The sampling rate shall be 24 product samples (8 product samples per day for 3 days production) and 3 environmental samples.

The Plant Survey cover letter is used to notify the plant manager of the positive test and document the follow-up action that will be taken. The Washington office shall complete the Salmonella Surveillance Report.

F. Environmental Material Positive

1. Tailings or Filter Material for Air in Direct Contact with Product

When there is a positive test on tailings or conventional type filter material, the National Field Office shall immediately notify the plant manager by telephone of the positive test result and confirm the call by letter listing recommendations for corrective action. A copy of the

notification letter shall be sent to the National program Coordinator in Washington. Advise the plant manager that the positive test indicates possible contamination of the product and requires a cleanup of the plant and equipment within seven days.

Following the plant cleanup of a drying operation, 24 product samples shall be taken at the rate of eight samples from each of the first three days' production. Also, three environmental samples shall be taken. For follow-up sampling at a dry blending operation, consult with the Washington office. The sampling regimen will be somewhat dependent on the nature of the operation, products made, etc.

When the air passes through a properly installed absolute type filter (removal of 99.9 percent of particles 0.3 micron or larger), a Salmonella positive result on such filter or upstream pre-filter will not require a special cleanup and product sampling. Instead advise the plant manager that the positive result indicates a potential environmental problem that needs attention.

2. Vacuum Cleaner Material

When there is a positive test on the vacuum cleaner waste material, the National Field Office shall notify the plant manager that there is a potential problem that needs attention.

Advise the plant manager to launder or replace the vacuum cleaner bags and thoroughly clean and sanitize the unit. The vacuum cleaner should be emptied and cleaned on a daily basis in an area apart from the dryer or packaging rooms or NDM warehouse. The waste material should be disposed of in such a manner as to prevent contamination of the plant premises.

If the plant uses a central vacuum system, the collector and air exhaust shall be located apart from the dryer, packaging, or storage areas to prevent possible cross-contamination. All waste materials should be removed and disposed of in such a manner as to prevent contamination of plant premises.

The floors, walls, and other areas on which the vacuum cleaner is used should be cleaned and sanitized. All brooms, brushes, and other cleaning tools and supplies which might re-contaminate areas should be replaced or sanitized.

No USDA follow-up check on the plant will be necessary until the next quarterly sampling.

3. Other Environmental Samples

The nature of follow-up action will depend on the source of the sample, its proximity to the product, and the likelihood of product contamination. The National Field Director may consult with the Washington staff about appropriate follow-up action.

G. Follow-up Action on the Results P Code Operations

When all samples test negative for Salmonella, the laboratory shall report these results to the National field Office, which in turn shall notify plant management. No further action is required.

When vacuum cleaner material tests positive, refer to [Section 16.F.2](#) for guidance. When any other sample other than the vacuum cleaner sample tests positive for Salmonella, the plant shall conduct a complete cleanup of the equipment and environment within seven days after the National Science Laboratory reports the positive result to the National Field Office.

After the plant cleanup of the equipment and environment (E.g., floors, walls, drains) and one production run, the inspector shall take at least three environmental samples for Salmonella analysis. USDA requires that the equipment, the environment cleaning regimen, and the additional testing is continued until each of the environmental samples (except for vacuum cleaner samples) taken after the cleanup are found to be negative. When recurring positive results are obtained, the inspector should encourage plant management to request a USDA sampling and Salmonella analysis of any ingredients in any of the finished products, regardless of whether they are seeking code approval for that product. The Washington Office shall complete the Salmonella Surveillance Report. See [Exhibit 61](#)

The inspector shall call the National Field Office for guidance in handling unusual situations.

H. DMS Report and Laboratory Certificate

List the samples on a numbered Dairy Miscellaneous Inspection Report, form DA-137. The report number shall be used to identify the samples and for the laboratory to report test results. See [Exhibit 62](#).

Show on the sampling report under “Remarks” the condition under which the samples were taken. For example:

“Samples for Salmonella tests taken during (date) survey”. (Record the survey number on the DMS.)

“Samples for Salmonella tests taken without survey”.

“Follow-up samples for previous Positive result”.

I. Sample preparation for shipment

- Properly identify the twirl sample bags and number them consecutively.
- Place the three environmental polyethylene twirl sample bags into one larger plastic bag.
- Place all product polyethylene twirl sample bags into one larger plastic bag, (separate from the environmental samples).
- Place both larger plastic bags in one shipping box for shipment to the USDA laboratory.
- Include a copy of the DMS sampling report in the shipping box.

For Salmonella Surveillance product and environmental samples, the plant is responsible for the cost of shipping the samples to the National Science Laboratory in Gastonia, NC.

The Business Reply Labels are only to be used for product samples collected for Commodity Credit Corporation Purchase Announcements.

17. DENATURING OF OFF CONDITION PRODUCTS

A. General

Occasionally during transportation or storage, food commodities are no longer suitable for use as human food. However, these products may be used for animal feed purposes.

Food product which will be used for other than human food shall be denatured according to the applicable FSA Announcement, Invitation for Offers, or other applicable specifications, and the instructions in this Section.

B. Facilities

There are no requirements for approval of facilities and equipment used to denature the product as long as the operations do not contaminate adjacent human food processing.

C. Procedures

The Dairy Grading Branch objective is to assure that the buyer of the food product uses procedures for denaturing the product which will render the product unsuitable for human food and permit an accurate certification of the amount of product which is denatured.

The inspector shall maintain accountability of all the product denatured. This shall be accomplished by verifying the amount and type of product delivered from the paperwork which accompanies the delivered product. The most accurate verification can be made from the contractor's copies of the original grading certificate covering the delivered product. However, a Bill of Lading, shipping manifest, warehouse tally sheet, or any other written verification that accurately identifies the product by the manufacturer's lot number may be used to document the product to be denatured.

All denaturing activities shall be conducted under continuous USDA inspection. Denaturing activities shall not begin until the inspector is on site and has verified that the product to be denatured is present and verified. Continuous inspection is necessary during the denaturing process to determine that the product is properly denatured. If during the operation, you cannot get the buyer's cooperation to comply with the provisions of the Announcement or other specification promptly notify the National Field Director. If compliance is not attained, do not issue a denaturing certificate.

The applicant for the inspection service shall be billed for all fees and expenses.

Denaturing of the product shall be by the addition of any denaturing ingredient meeting the guidelines of the U.S. Food and Drug Administration, or by any other method which will effectively prevent the product from re-entering human food products.

If the product is to be used for animal feed, the denaturing material (fish oil, anise oil, etc.) must be safe for animals and added in sufficient quantities so as to characterize the product so it can not be used for human food. For example, nonfat dry milk may be denatured by the addition of commercial vegetable oil, anise oil, or other denaturing material into the containers to render the milk unfit for human consumption. The procedure shall ensure denaturing all of the product in each container. Usually, this will mean 2 injections of fish oil, anise oil, etc., into a 50-pound bag of nonfat dry milk; one into the top half and another injection into the bottom half.

At the beginning of each day and after each rest or lunch break, the inspector shall physically examine and operate the injection equipment to assure that the equipment is functioning properly and that adequate volumes of denaturing fluids are being discharged by the equipment.

If the product is added to an animal feed blend without additional denaturing ingredients, observe the mixing and repackaging operation to determine that all of the product to be denatured is incorporated into the animal feed.

D. Obliteration of Markings

All government markings shall be obliterated and each container shall be clearly marked:

“Not For Use as Human Food”

The inspection shield on the sample bags must be obliterated but it is not necessary to obliterate the contract number stenciled on each bag. Acceptable methods of obliteration of markings are established by Article 62 of FSA document General Terms and Conditions for the Procurement of Agricultural Commodities or Services. They are as follows:

- Complete obliteration of all markings required under the original USDA contract with permanent opaque paint, or removal of labels which bear such markings, and overlaying or replacing markings so obliterated or removed with commercial markings.
- Placing a transparent pressure-sensitive sticker on all containers and container materials bearing USDA markings, which shall state in lettering of a prominent size:

“SALVAGE BY (insert Firm’s Name)”

directly over the “NOT TO BE SOLD OR EXCHANGED” legend wherever it appears on the containers and container materials.

- Drawing one or more X’s completely through the markings and with a permanent stamp conspicuously placing thereon the following legend:

“This container has not been used and shall not be used for shipment of Government commodities”

Any other actions approved by the FSA Contracting Officer which accomplishes the intent of the foregoing.

E. Certificate of Compliance

1. Government Owned Commodities

An Inspection Certificate, DA-201, shall be issued on the denatured product. Show the following statement:

“The (name of product) listed below was denatured in accordance with Announcement No. _____.”

Include the covering original certificate number(s), the Notice to Deliver number(s), the denaturing contract number, the number of bags or cases, and the weight of the product denatured. See [Exhibit 63](#).

2. Commercial Commodities

An Inspection Certificate, DA-201, shall be issued on the denatured product. Show the following statement:

“The (name of product) listed below was denatured under the supervision of the USDA.”

Include the covering original certificate number(s) if applicable or other identifying document, the number of bags or cases, and the weight of the product denatured. See [Exhibit 64](#).

18. CERTIFICATES AND RELATED REPORTS

A. General

This section describes uniform methods for the use, preparation, and distribution of certificates and related reports that document grading and inspection activities, to record the volume of the products graded or inspected, and the charges for the service performed. The documentation they provide can only be as accurate as the precision and care exercised in the control, preparation, and distribution of these documents.

B. Preparation of Inspection and Grading Documents

Graders and inspectors shall be responsible for the accurate preparation, distribution, and maintenance of graders' memoranda, sampling reports, survey reports, and certificates in accordance with the inspection guidance in all sections of these DA instructions, and shall bear the responsibility for their neat and accurate preparation.

All inspectors or graders who performed any portion of the inspection and grading activities or who are assigned to a multiple inspector assignment shall be identified by name and assigned grader number on the graders worksheet or memorandum.

The following inspection and grading activities may include one or more of the reports listed.

1. Fresh Grading

- Cheese Graders Memorandum (DA-201C)
- Application For Butter Grading Service (DA-201B)
- DMS Report, Dairy Miscellaneous Inspection Report (DA-137)
- Condition of Container Forms
- Condition of Container Cumulative Record
- Keeping Quality Record

2. Regrading

- Cheese Graders Memorandum (DA-201C)
- Application For Butter Grading Service (DA-201B)
- DMS Report, Dairy Miscellaneous Inspection Report (DA-137)
- A-570, Inventory Adjustment Notice
- WA-667, Certification of Labor
- DA-128, Warehouse Condition Checklist

3. In-Process Grading

- Graders Worksheet
- Test Weight Record (DA-153)
- DMS Reports - Dairy Miscellaneous Inspection Report (DA-137)
- Official Sample Labels
- Condition of Container Forms
- Condition of Container Cumulative Record
- Contract Worksheet (billing information)

4. Condition Inspections

- DMS Reports - Dairy Miscellaneous Inspection Report (DA-137)
- Condition of Container Form
- Condition of Container Cumulative Record

5. Cursory Inspections

- DA-28, Product Inspection and Grading Assignment (Cursory Inspection Report)
- Plant survey cover page and page Z plus any other survey page(s) necessary to document the conditions observed only when a change in plant status to Ineligible is made.

C. Product Identification

Proper product identification on inspection and grading documents is important for the final users of the certificates prepared covering the product. Only generally recognized abbreviations listed in [Section 18.C.1](#), are to be used. If unlisted, the full name of the product shall be used. The product identification shall also include appropriate descriptive terminology denoting the type or style of the product. For example: shredded, frozen, frozen shredded, sliced, lite, reduced fat, etc.

1. Abbreviations

The following abbreviations may be used with appropriate descriptive terminology on inspection and grading documents.

AMF	Anhydrous milkfat
BM	Buttermilk
DWM	Dry whole milk
DW	Dry whey
IDWM	Instant dry whole milk
INDM	Instant nonfat dry milk
IQF	Individually quick frozen
KQ	Keeping Quality
LMPS	Low moisture, part skim (Mozzarella cheese)

MOZ	Mozzarella cheese
NDM	Nonfat dry milk
TWS	Test Weight Shortage
WPC	Whey protein concentrate

The following products and any other product for which a generally recognized abbreviation has not been identified shall be fully identified by name with appropriate descriptive terminology on inspection and grading documents.

Butter	Butteroil
Cheddar cheese	Colby cheese
Cottage cheese	Cream cheese
Monterey cheese	Neufchatel cheese
Process cheese	Swiss cheese

D. Preparation, Distribution and Retention of DMS Reports

Preparation of the DMS, See [Exhibit 34](#) for an example.

Laboratory charges for each sample submitted for analysis shall be reflected on the certificate. See [Exhibits 14](#) and [15](#).

1. Distribution of the DMS

- Original to the National Science Laboratory
- One copy to the plant
- One copy to the NFO (results to be attached by NFO when they become available)
- One copy to the Grader's file

a) Retention

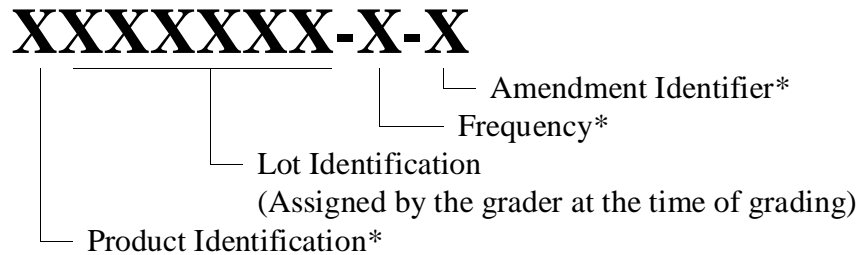
The grader shall maintain a file at the plant of all DMS reports as documentation of samples submitted. The copy of the DMS report for samples submitted to the laboratory for analysis shall be available to all graders assigned to that plant.

E. Certificate Preparation

1. Certificate Numbering Protocol

The Universal Certificate, Form DA-201, is not preprinted with a certificate number. Following is a description of the computer generated certificate numbers which will be used for the DA-201 certificates.

a) Certificate Number Components



- * These certificate number components are incorporated into the final certificate number at the time the certificate is entered. It is the graders responsibility to assure that the proper certificate number components are incorporated in the final certificate number.

(1) Product Identification

The first digit shall designate the product covered by the certificate, as listed below.

- 0 = Margarine
- 1 = Butter
- 2 = Butteroil/Anhydrous Milkfat
- 3 = Cheese
- 4 = Process Cheese
- 5 = Nonfat Dry Milk/Instant Nonfat Dry Milk
- 6 = Other Dry products
- 7 = Evaporated Milk
- 8 = Export Certificates
- 9 = Miscellaneous (including plant surveys)

(2) Lot Identification

The next 6 digits represent the core lot identification number for the product. These numbers are assigned to each grader or inspector by the National Field Office and are then applied by the grader or inspector at the time the products are graded or inspected. In the case of export certificates requested through electronic means, the certificate number will be assigned by the DBIGS system. These 6 numbers should be shown on packaging materials as the car-lot number whenever possible (especially for products processed under FSA contacts) and in the USDA shield stamp applied to samples. In Dairy 6, FSA incorporated the use of the certificate number into their system for tracking the product. This number will remain the same for the product as long as the product remains in the containers as originally graded or inspected. If the product is repackaged or converted into another product, a new core lot identification number will be assigned.

(3) Frequency

The number shown following the first dash, “-“, shall designate the number of times the product has been graded. For example:

0 = Original Grading
1 = First Regrading
2 = Second Regrading
:
8 = Export Certificate
9 = Appeal Grading

(4) Amendment Identifier

An alpha character shall follow a second dash, “-“, as appropriate and shall designate that the certificate has been amended. This character normally will not be shown unless an amendment has been issued. The amendments will be designated as follows:

A = First Amendment
B = Second Amendment
C = Third Amendment, etc.

Note: DBIGS will only support amendments up to the letter H. If you encounter a situation where you need an amendment beyond H call the National Field Director.

(5) Certificate Number Examples

Following are some examples of valid, complete certificate numbers:

100112345-0	Original grading of butter of lot 112345.
100112345-0-A	Amended original grading certificate.
100112345-1	First reggrading of butter lot 112345.
100112345-1-B	Second amendment re-grading certificate.
300167890-0	Original grading of cheese of lot 167890.

2. Preparation by the National Field Office

All certificates shall be issued by the National Field Office unless specific authorization for preparation has been granted to a field location. Field authorizations can be granted by the National Field Director to Resident Inspection Programs and long term in-process contract sites.

All certificates shall be prepared in accordance with the National Field Office Standard Operating Procedures for certificate preparation.

When errors occur in the assignment of certificate numbers that require change of the assigned number, the National Field Office will notify the grader and the applicant of the reassignment of the certificate number. See DA Instruction 918-S, section J.9.g for further guidance.

3. Preparation at Field Locations (Resident and Fee Sites)

Certificates may be prepared at field locations when authorized in accordance with [Section 18.E](#). Certificates prepared at field locations shall be prepared only when the inspector or grader is on site.

Blank watermarked certificate forms are accountable items. The inspector or grader shall be responsible for the control of all blank certificate forms. Plants typing certificates shall not have control over the supply of blank forms. The inspector or grader shall provide blank certificate forms only for the specific certificates to be prepared.

When certificates are prepared at field locations the inspector or grader signing the certificate shall be responsible for reviewing all associated documentation, proof-reading the certificate for accuracy, and signing the certificate.

The date of the certificate (Date Inspected) shall be the date on which all of the inspection or grading activities have been completed and the certificate is eligible for release, except that, for butter (including grade label) from a plant which has demonstrated a good history of keeping quality test results (See [Section 11.B.8.a.1.d.i](#)).

For products that require laboratory analysis (including analysis for grade factors, butterfat on butter, moisture on cheese, salmonella, antibiotics, or any other tests required for certification), the date of the certificate shall be the date that all the analyses are reported as completed NOT the date that the samples were selected or organoleptic grading was conducted.

4. Certificate Signing Authority

In process inspection certificates are issued when products are produced, packaged, or check loaded under the continuous inspection of one or more inspectors. Grading certificates, on the other hand, are used to describe inspection or grading of products which are presented for official U.S. grading service. According to 7 CFR Part 58, Subpart A, "An inspection or grading certificate shall be issued to cover a product inspected or graded in accordance with instructions issued by the Administrator and shall be signed by an inspector or grader."

a) Power Of Attorney

All inspectors and graders are requested to authorize a Power Of Attorney when they initially start employment with the Dairy Grading Branch and when staffing changes occur in the National Field Office. The Power of Attorney is for the signing of official certificates only.

The Power Of Attorney allows a National Field Office manager or supervisor to sign a certificate in the name of the inspector or grader who has performed the actual inspection and grading assignment.

Whenever a certificate is signed under a Power Of Attorney, the signature of the holder of the power shall appear beside or under the name of the employee who inspected or graded the product. For example, if A. Brown signs for the grader C. Green, the certificate shall be signed, "C. Green by A. Brown."

b) Single Inspector or Grader Duty Assignment

The inspector or grader performing the assignment shall sign the certificate at a field location or the certificate shall be signed in accordance with a Power Of Attorney as described in [Section 18.E.4.a.](#)

c) Multiple Inspector or Grader Duty Assignment

Any inspector or grader assigned to the duties performed shall initial or sign the supporting documentation (e.g., condition of container forms, test weight sheets, bulk certificates, grader's memoranda, etc.) describing the work the employee has either performed or observed while it was being performed.

The supporting documentation shall be:

- Secured in the USDA file at the inspection site, where it shall be available to any inspector or grader who must later sign a certificate; or
- Maintained in the National Field Office, where it shall be available to any person who must later sign a certificate under a Power Of Attorney.

The name of every inspector or grader who is on duty while a car-lot is being produced, packaged, check loaded, inspected, or graded should appear on the in-process inspection worksheet, or the covering grading memoranda.

The inspected by block on the certificate will accommodate only one of the names on the supporting documentation. Therefore, this block shall contain the name of the inspector or grader who signs the certificate.

Any inspector or grader identified on the supporting documentation whom holds an unrestricted license to perform the duties described is eligible to sign the certificate because that employee has access to all of the supporting documentation describing the production, packaging, inspection or grading of the product.

Since employees occasionally move to different duty assignments, an inspector or grader may be asked to input in-process inspection and grading certificates describing products that were produced, packaged, inspected, or graded when he or she was not present. This employee is also eligible to sign such certificates if he or she holds an unrestricted license for the duties described and has access to all of the supporting documentation. In such a case, the inspector or grader shall review the documentation, place their name in the inspected by block on the certificate, and sign it. This procedure is justified because the supporting documentation was signed or initialed by the inspector or grader who performed the work or observed the work being performed. The certification statement on the certificate attests that the identified inspection or grading procedures have been performed and the quality and condition of the product were as stated.

d) Certificates Signed in the National Field Office

Certificates may be signed by:

- Any National Field Office staff member who is not a licensed inspector or grader but who has a Power Of Attorney for an inspector or grader whose name appears on the certificate;

- Any National Field Office staff member who is a licensed inspector or grader and holds a Power Of Attorney for an inspector or grader whose name appears on the certificate; or
- Any National Field Office staff member who is a licensed inspector or grader and has access to the supporting documentation.

5. Take-Off Certificates

Take off certificates may be used to summarize information from one or more certificates. The date of the take off certificate shall be the date on which it is prepared. The dates of issuance and numbers of the parent certificates shall be recorded on the take off certificate.

All appropriate churning, vat, or sub-lot information shall be transferred to the take-off certificate, except for DEIP sales which require certification of the number of containers only. See [Section 18.E.5](#).

Special care shall be taken to assure that appropriate laboratory analyses are properly transferred. Laboratory results that are representative for the entire initial certificate or for the portions of the initial certificate being transferred are also to be transferred.

Take-off certificates may be issued within 30 days of the date of the original certificates provided the storage conditions of the product have not changed and products which require refrigeration have not been moved from their original storage location. The restrictions on movement do not apply for take-off certificates for DEIP sales.

a) Special Consideration for Take-off Certificates under the DEIP Program

Due to the nature of the DEIP program, special considerations for take-off certificates are appropriate to reduce Dairy Grading Branch workload and still provide the necessary information for FSA to make payment. The 30 day limitation in [Section 18.E.5.a](#), shall not apply to DEIP take-off certificates.

6. Retest Certificates

Retesting of products may be authorized by the National Field Director under specified conditions. In such instances, the original laboratory results are superseded by the retest results.

If the original certificate has not been issued, it may be issued using the retest results. It is important to date the retest certificate as of the date that the retest analysis was completed.

If the original certificate has been issued, efforts are to be made to have all the copies returned. Following the certificate numbering protocol described in [Section 18.E.1](#), the certificate shall be identified as a retest certificate with the number 9 in the frequency identifier position. The new certificate shall clearly state that it is a retest certificate, reference to the original certificate and date, and whether or not all of the original copies were returned. For example:

“RETEST CERTIFICATE

This certificate supersedes original certificate number DX-0096035, dated 6/15/08. All copies of the original certificate have not been retrieved.”

See [Exhibit 65](#).

Be sure to include all appropriate charges for the additional laboratory analyses on the retest certificate.

7. Appeal Inspection or Grading Certificates

Appeal inspection or grading of product may be authorized by the National Field Director under specified conditions. Generally an appeal must be requested within 48 hours of the original grade or analysis. However, the National Field Director or the Branch Chief may approve an appeal after longer time periods.

The original inspection or grading results are superseded by the appeal inspection or grading results. See [Section 13](#) for additional Guidance.

If the original certificate has not been issued, it should be issued using the appeal inspection or grading results. It is important to date the appeal certificate as of the date that the appeal inspection or grading was completed. This includes the date on which results are reported for any laboratory analyses required for the appeal.

If the original certificate has been issued, efforts are to be made to have all the copies returned. Following the certificate numbering protocol described in [Section 18.E.1](#), the certificate shall be identified as an appeal certificate with the number 9 in the frequency identifier position. Additionally, the statement “Appeal Grade Certificate” shall be placed in the body of the certificate. See [Exhibits 57](#) and [58](#).

Be sure to include all appropriate charges for the appeal grading or inspection including additional laboratory analyses, if required.

8. Condition Inspections

Frequently products which have entered the distribution systems are mishandled or involved in accidents that may materially affect their wholesomeness and usability to the final consumer. Dairy Grading Branch is often requested to evaluate the condition of these products.

Due to the unique nature of each request for a condition inspection, the inspector or grader is to coordinate their activities with the National Field Office or the Washington Office.

The objective of the Branch during these inspections is to clearly and concisely document observations of the condition of product or packaging. In addition, whenever possible from our observations, you are to recommend a suitable disposition of the products. As examples:

“Containers heavily water soaked and definite moldy. Product is to be destroyed in a manner that is acceptable to USDA, FDA, and local regulatory authorities.”

“Very slight denting of cans observed. The product is satisfactory for regular program use.”

“Butter cartons show very slight mold development. The butter may be reprocessed under continuous inspection to assure that the mold is properly removed.”

“No defects noted. Product is suitable for regular program use.”

See [Exhibit 66](#).

9. Export Certifications

The Branch offers certification services to USDA Approved plants, National Conference on Interstate Milk Shipments (NCIMS) listed plants, and plants approved by the FDA for export to the European Union (EU), to assist in the export of dairy and related products. These certifications include but are not limited to the following:

- Export Plant Letter (Generic)
- Sanitary Certificates (Load Specific)
- EU Health Certificates (Load Specific)
- EU Transit Certificates (Load Specific)
- EU Health Certificate to U.S. Military Installations (Load Specific)

The objective of the Branch is to be as flexible as possible when providing certifications for export. However, the Branch will only provide certifications for those products or conditions for which we have documentation or knowledge through plant and product inspections and grading. Except that export brokers may request DEIP take-off certifications as provided for under [Section 18.E.5.a](#).

When requested to provide export certificates, contact the National Field Office for guidance. All export certificates shall be issued by the National Field Office or the Washington D.C. Office.

a) Export Plant Letter

Export Plant Letters may be accepted by foreign inspection agencies (i.e., Customs, Ministry of Health, Import Agencies, etc.) prior to acceptance of products exported by approved plants. An Export Plant Letter is intended to be generic and essentially states that the plant complies with Dairy Programs inspection programs. The Export Plant Letter does not certify specific lots of product and is available only to USDA approved plants. See [Exhibit 67](#).

Export Plant Letters shall be prepared in accordance with the following requirements:

- The requesting plant shall have an approved USDA status.
- The letter shall be specific to the products or processes for which the plant is approved.
- The letter shall be specific as to the date on which the letter was issued and the date after which the letter is no longer valid. This is accomplished by projecting a date based on the plant status approval period assigned at the last plant inspection. For example, an Approved 3 Months status would project a date three months from the date of the survey.
- The format and content of the letter shall be standardized as shown on [Exhibit 67](#). The letter may be titled appropriately as an Export Plant Letter.
- The letter may contain any certification statement which can be validated by plant survey reports. For example, certification of freedom from animal disease*, “produced from milk from healthy cows”, pasteurization treatment, “fit for human consumption”, “eligible for free sale within the United States”, “same as consumed in the United States”, etc.

- * Freedom from animal diseases is verified by the Washington Staff with the USDA, Animal and Plant Health inspection Service (APHIS).

The Export Plant Letter is not suitable for shipments to the European Union (EU). For shipments to the EU each individual shipment shall be certified in accordance with the provisions of Annex B of EC Directive 92/46 EEC. See [Section 18.E.9.b.2](#).

The letter shall be prepared at the National Field Office or Washington Office and signed by the National Field Director or appropriate Washington staff.

b) Sanitary Certificates

Like an Export Plant Letter, a Sanitary Certificate is also often required by foreign inspection agencies prior to the acceptance of a specific shipment or lot of product exported by a plant on an approved listing or from government owned stocks.

The formats and contents of the export certification statements shall be as shown on [Exhibits 68](#) through [70](#). Sanitary Certificates shall be prepared in accordance with the following requirements.

Sanitary Certificates shall be billed at the rate of 1 hour of the currently published hourly rate for each copy issued.

(1) Special Considerations for Sanitary Certificates to Non-European Union Countries

The requesting plant shall have an approved USDA status, be listed in the IMS List “*Sanitation Compliance and Enforcement Ratings of Interstate Milk Shippers*”, or be listed on the FDA list of approved exporters for exporting of dairy and related product to the European Union (even though the product is not intended for export to the EU).

The applicant shall provide the necessary information as to origin, type of product, size of container, number of containers, etc., as necessary to complete the certificate. See [Exhibits 68](#), pages 1 and 2.

The certificate shall follow the format in [Exhibit 68](#), page 3.

(2) Special Considerations for Health Certificates to European Union Countries

These instructions establish the responsibilities and procedures to be used by the Dairy Grading Branch for providing official certification services and reviewing applicants for compliance for manufactured, processed and related dairy products exported to the European Union (EU). The EU somatic cell and standard plate counts for dairy products differ from those required by the United States. The program outlined in these instructions shall be used to certify compliance with the Council Directive 92/46/EEC allowing export of dairy products from the United States to the EU.

At the time of this issuance, the following 27 countries are members of the European Union:

Austria	Germany	The Netherlands	Belgium
Greece	Portugal	Denmark	Ireland
Spain	Finland	Italy	Sweden
France	Luxembourg	United Kingdom	Poland
Slovakia	Slovenia	Cyprus	Estonia
Czech Republic	Hungary	Latvia	Lithuania
Malta	Bulgaria	Romania	

In addition, the following EU aligned countries are also eligible to receive EU certificates:

Norway	Iceland	Liechtenstein	Switzerland
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(a) Products Covered

The requirement to provide an EU certificate is controlled by the importing country or port authority within the EU. Generally, all dairy products that are readily recognized as a dairy product, or require in their standard of identity that they originate from milk will require an EU certificate. In addition, composite milk products which either utilize a dairy product as a characterizing effect or contain dairy ingredients as an essential part of the product generally will require certification if exported to the EU. Where uncertainty exists as to which composite milk products require certification for export to the EU, the applicant should contact their importer to determine if a certificate is needed. All composite products containing cheese as an essential ingredient and intended for export to the EU require certification. Examples of dairy products and composite products that require certification are:

Milk	Cream	Butter	Cheese
Yogurt	Buttermilk	Kefir	Caseins
Butter Oil	Lactoserum	Dairy Fat Material	Ice Cream
Partially Dehydrated Milks		Totally Dehydrated Milks	

Examples of composite products identified as containing only a minimum part of milk or milk product and that generally do not require certification under 92/46/EEC are:

Milk Chocolate	Butter Crackers	Cookies	Creamed Spinach
Whiskey Cream	Breton Crepes		

(b) Dairy Plant Reference List

All domestic plants producing dairy or related products for export to the European Union must be identified on a list of plants (Dairy Plant Reference List) established by the Food and Drug Administration (FDA) and accepted by the EU. This list is maintained by the FDA and updated periodically. Plants wishing to request inclusion on this list can do so by contacting:

Food and Drug Administration
Regulations & Enforcement Branch (HFS-306)
Division of Programs and Enforcement Policy
Office of Plant and Dairy Foods and Beverages
Center for Food Safety and Applied Nutrition

5100 Paint Branch Pkwy
College Park, MD 20740
Tel: (301) 436-1492
Fax: (301) 436-2632

(c) Council Directive 92/46/EEC Requirements

The requirements for dairy products imported into the EU are detailed in Council Directive 92/46/EEC. This comprehensive directive addresses many issues relative to milk production and processing. Countries outside of the EU that wish to provide dairy products to that market are required to provide certificates that indicate compliance with the requirements of Council Directive 92/46/EEC (92/46/EEC).

As a result of the negotiations that have taken place with the European Commission, we are confident that milk produced and dairy products manufactured under the United States system provide safeguards at least equivalent to the requirements of 92/46/EEC. There are, however, two quality-related differences in the two systems. The somatic cell and bacterial standard plate count requirements, as well as the method of calculating somatic cell and bacteria averages (geometric mean), differ from the system in place in the United States. In order to certify dairy product shipments to the European Union, the Dairy Grading Branch will require dairy product manufacturers to certify compliance with the somatic cell and bacterial standard plate count requirements of 92/46/EEC. The requirements are as follows:

- The maximum somatic cell count in raw cow's milk for the production of heat-treated milk, milk products, and other milk-based products is 400,000 somatic cells per ml.
- The maximum bacterial standard plate count for raw cow's milk for the production of heat-treated milk, milk products, and other milk-based products is 100,000 bacteria per ml.

(d) Applicant's Responsibility

The applicant shall apply for and obtain certification for product destined to the EU. It is the responsibility of the applicant to ensure that the manufacturing plant is included on the list established by the Food and Drug Administration. They are also responsible to have records demonstrating that dairy products and all applicable dairy ingredients that are intended for export to the EU are produced in plants which can demonstrate and attest to compliance with the EU Directive regarding somatic cell and bacteria counts for raw milk. Dairy plants that supply dairy product(s) or ingredient(s) to an applicant but which do not ship dairy product directly to the EU would not be required to be on the Dairy Plant Reference list, but will be subject to Dairy Grading Branch reviews.

Applicants that utilize imported dairy products and ingredients intended to be used for the production of products that will be shipped to the EU must present an EU Milk HTB certificate issued by the regulatory agency of the country of origin certifying that these imported dairy products and ingredients meet Council Directive 92/46 regarding somatic cell and bacteria counts for raw milk.

The primary purpose of the EU export certificate is to certify that the products were manufactured under a system that is equivalent to the requirements of the EU Directives. Since differences exist in somatic cell and bacterial standards, the EU export certificate also must certify that the raw milk used in the production of products exported to the EU meets the requirements of the EU Council Directive 92/46/EEC. This certification is necessary for all dairy products and dairy ingredients that may be included in a product requiring an EU certificate issued by the Dairy Programs. It is the responsibility of the individual or firm requesting an export certificate to assemble and maintain the necessary production records and Certificates of Conformance for the products covered by each certificate. This policy and procedure was cooperatively developed and agreed upon by industry and trade association representatives who participated in an April 1997, Joint USDA/FDA/Industry Task Committee meeting.

The Dairy Grading Branch provides certificates based upon information provided by the applicant. This information includes a Certificate of Conformance that the products listed on the certificate comply with the EU Directive. Through the Dairy Programs review program, we are able to assess the accuracy of the documentation provided by the applicant. (See [Exhibit 69](#)).

The applicant shall submit the following information to the Dairy Grading Branch to begin the process of issuance of certificates:

- Certificate of Conformance on company letterhead signed by a responsible official for the applicant (See [Exhibit 69](#), P.3)
- All product information requested on the “Instructions For Completion of Health Certificate Worksheet For Export Certificates To The European Union.” (See [Exhibit 69](#), P.2)
- Each request for an EU export certificate shall include production lot identification codes and production dates for the products covered by the certificate. This information is necessary to facilitate the tracking of the products certified during the review procedures.
- Attestations or certificates from domestic and foreign suppliers of dairy products and ingredients, when required by USDA.

If production lot identification codes and production dates are not included in the request, issuance of certificates will be denied until the information is provided.

Failure to maintain adequate records and complete files of Certificates of Conformance, to substantiate each request for a certificate as determined during a review, will result in immediate ineligibility to receive EU export certificates. In order to resume the ability to receive future certificates, a review of the exporter or firm will be conducted by the Dairy Programs to determine if adequate documents and records are maintained prior to issuance of the future certificate. This process will delay issuance of the EU export certificate.

Applicants are advised that production codes and establishment numbers on product containers and shipping container seal numbers documented on the certificate are required by some importing countries or port authorities. There may also be other labeling requirements.

The exporter or firm requesting a certificate is solely responsible for assembling and maintaining all production records and Certificates of Conformance for the dairy products and dairy

ingredients used. The Certificates of Conformance shall provide an accurate record trail leading to the raw milk used for the dairy components requiring EU certification.

Certification fee shall be at the currently published rate for one hour.

Grade A cow's milk and Grade B cow's milk in the U.S. is regulated at a somatic cells count of 750,000 per ml. Grade A milk in the U.S. is already regulated at a bacterial standard plate count of 100,000 or less. The recommended regulatory bacterial level for Grade B cow's milk in the U.S. is 500,000 per ml. Testing of the milk supply will be necessary to document compliance (both grades of milk for somatic cell count and Grade B milk for bacterial counts) with these requirements for shipment of dairy products to the EU.

The Dairy Grading Branch will review the system used by the applicant to verify compliance with somatic cell and bacterial plate count requirements of 92/46/EEC. The dairy plant shall have somatic cell and bacterial standard plate count records available to confirm that sufficient raw milk meeting the somatic cell and plate count requirements is received at the facility manufacturing dairy products for shipment to the EU. While a number of different compliance systems devised by the applicant may result in compliance with this Instruction and the requirements of 92/46/EEC, the Dairy Grading Branch considers the following systems as minimal requirements:

1. The dairy plant randomly samples 10 percent of the tankers providing milk to a processing plant on one randomly selected day each month for somatic cell count and on two randomly selected days each month for bacterial standard plate count, as necessary, or
2. The dairy plant analyzes each individual bulk tanker sample of raw milk for somatic cell and bacterial standard plate count, as necessary. All sample results for somatic cell count or bacterial standard plate count taken on the same day are averaged together (arithmetic average or geometric mean at the applicant's option), producing one average value for the somatic cell count and one average value for bacteria count, or
3. Records are maintained that link the products exported to the EU with actual somatic cell count and bacterial counts to provide assurances on compliance to 92/46/EEC, or
4. Any other procedures which can be demonstrated to certify the conformance of the somatic cell and bacterial counts meet the EU requirements.

Through any of the above procedures, the dairy plant will be able to confirm that the geometric mean or arithmetic average for milk received during the:

- Prior two months and the current month (3 months total) for somatic cell counts, and
- The prior month and the current month (2 months total) for bacteria counts, meets the requirements of 92/46/EEC.

The following example would be considered minimally acceptable for a plant or broker utilizing dairy products or ingredients, but not producing them when the final composite food is intended for export to the EU.

1. The plant has on file and available for review, attestation from their dairy supplier that the dairy product(s)/ingredient(s) meet 92/46/EEC for somatic cell and bacterial standard plate count requirements. The attestation should at a minimum include:

- A clear statement that the dairy product(s)/ingredient(s) have been produced under a system that results in compliance with the somatic cell and bacterial requirements of 92/46/EEC,
 - The dates of production and processing of the raw milk,
 - Documentation of where this compliance can be obtained,
 - A signature establishing the company and individual attesting to these statements,
 - A date when the attestation was signed.
2. If the dairy product/ingredient(s) is imported into the United States from another country, the product(s)/ingredient(s) must have a certificate issued by the sovereign government of the exporting country providing the same assurance as the certificate issued by the Dairy Grading Branch of AMS (see [Exhibit 70](#), “Health Certificate”). This includes products/ingredient(s) imported from the EU or countries maintaining equivalency agreements with the EU.
 3. Records shall be maintained to link the products exported to the EU with attestations or certificates from the dairy product or ingredient supplier that provide assurances on compliance to 92/46/EEC equivalent to the Health Certificates provided by the Dairy Grading Branch.

(i) Calculation of Geometric Mean (G.M.)

The European Union (EU) uses a geometric mean that is a calculated average to determine compliance with the somatic cell and bacterial standard plate count requirements of 92/46 EEC. For purposes of Dairy Grading Branch (AMS) certification, the values used for calculation of the geometric mean are obtained from the average value of bulk tanker samples (10 percent) taken once per month over a three-month period for somatic cell count and twice per month over a two-month period for bacteria counts.

(a) Somatic Cell Count Example Calculations:

1. Determine the bulk tanker somatic cell count average for each of the prior two months and including the current month (3 months total).
2. Multiply each of the three monthly averages from 1 above together.
3. Compute the cube root of the result to obtain the geometric mean. (Note, many calculators have a key labeled “X1/y” which can be used to calculate the geometric mean. “X” equals the result from 2 above and “y” equals 3.)

<u>Somatic Cell Count Monthly Average</u>	<u>Geometric Mean</u>
Month #1 – 400,000	
Month #2 – 350,000	
Month #3 – 300,000	347,000 for Month #3
Month #4 – 600,000	397,000 for Month #4
Month #5 – 400,000	416,000 for Month #5
Month #6 – 450,000	476,000 for Month #6

$$G.M.(Somatic\ Cell\ Count) = \sqrt[3]{Month\ 1 \times Month\ 2 \times Month\ 3}$$

(ii) Bacterial Standard Plate Count Example Calculations:

1. Determine the bulk tanker bacterial standard plate count average from 10 percent of the tankers received on two separate randomly selected days per month. Obtain two bacterial averages from the current month and two from the prior month for a total of four.
2. Multiply each of these four most recent counts from 1 above together.
3. Compute the fourth root of the result to obtain the geometric mean. (Note, many calculators have a key labeled “X1/y” which can be used to calculate the geometric mean. “X” equals the result from 2 above and “y” equals 4.)

<u>Bacterial Standard Plate Count Average Values</u>	<u>Geometric Mean</u>
Month #1 – Sampling #1 (Month11) – 450,000	
Month #1 – Sampling #1 (Month12) – 250,000	
Month #1 – Sampling #1 (Month21) – 200,000	
Month #1 – Sampling #1 (Month22) – 150,000	241,028 for Month #2
Month #1 – Sampling #1 (Month31) – 700,000	
Month #1 – Sampling #1 (Month32) – 500,000	320,109 for Month #3

$$G.M. (Bact.) = \sqrt[4]{Month1_1 \times Month1_2 \times Month2_1 \times Month2_2}$$

G.M. = 241,028 for Month #2

(iii) Retention of Records

The plant shall retain documentation of all somatic cell and bacteria records or attestations for a minimum of 12 months after the date of shipment or since the last review, whichever is longer, and provide these records to Dairy Grading Branch during any on-site records review.

(iv) Minor Ingredients

Minor dairy ingredients making up a composite food may not require attestation or a certificate; however, this is under the control of the importing country. An example of a minor ingredient is starter culture used in cheese-making when the starter comprises 3 percent or less of the milk.

(e) Dairy Grading Branch Responsibility

(i) Reviews of the Compliance Systems

Reviews of Compliance Systems for Somatic Cell and Bacterial Plate Count Records: The Dairy Grading Branch will review the compliance system at each processing facility requesting certificate(s) for product shipment to the EU at least once per year, regardless of the frequency of shipment or amount of product shipped. The compliance system will be reviewed against the requirements of 92/46/EEC and this Instruction. See [Section 19](#) for further guidance for conducting the reviews for verifying the conditions for shipment to the EU.

(ii) Issuance of Certificates and Fees

Upon request, the Dairy Grading Branch will provide certificates to qualified applicants. Dairy Grading Branch will provide these certificates within five business days of the receipt of a properly completed request. If requested by the Applicant, the certificates can be express-mail delivered at the applicant's expense.

The Dairy Grading Branch will review and verify all information submitted by the applicant. Upon verification of necessary information, the certificate shall be completed, signed, and forwarded to the applicant.

(iii) Liaison with States

The Dairy Programs will continue to work closely with State regulatory agencies, National Association of State Departments of Agriculture (NASDA), and The Food and Drug Administration to determine if State records could provide somatic cell and plate count certification for the dairy producers and processors in a particular State. If this 92/46/EEC compliance system can be developed, it may not be necessary for AMS to conduct reviews of specific dairy plants in that particular State. (This is dependent upon the source of all raw milk processed by the applicant originating from a state or states operating a compliance system that the Dairy Grading Branch has determined to meet the somatic cell and bacterial standard plate count requirements of 92/46/EEC.) The development of a State compliance system would not preclude individual plants from establishing their own compliance systems for somatic cell and bacteria counts to verify compliance with 92/46/EEC.

(3) Special Considerations for Sanitary Certification to U.S. Military Installations in the European Union

Shipments to US military establishments in the EU only require the animal health attestation. This requirement can be met by the EU Animal Health Transit Certificate. The public health requirements are satisfied the same as if the military installation were in the United States. The products certified will not be sold to the general public in Europe. Follow the format of [Exhibit 71](#)

F. Disclaimer Statement for Unofficial Samples

The Dairy Grading Branch provides laboratory analysis service for unofficial samples submitted by an interested party. An unofficial sample is defined as any sample which is selected, collected, prepared and presented for analysis without the direct participation of a Dairy Grading Branch inspector or grader. Test results of unofficial samples are not eligible for presentation on a USDA grading certificate.

Documentation of unofficial sample test results and subsequent charges for billing for analysis shall be prepared in accordance with the following requirements.

Unofficial sample test results shall be documented for the applicant in a letter which clearly states that the document is not an official certificate and bears a disclaimer that the sample was not officially obtained. The format and content of the letter shall be as shown on [Exhibit 72](#).

A DX certificate shall be prepared for billing of laboratory analysis charges. The format and content of the certificate shall be as shown on [Exhibit 73](#), page 2. Resident program laboratories are exempt from preparing DX certificates for unofficial samples.

The letter and certificate may be signed by any grader, supervisor, or holder of Power of Attorney authorized to sign certificates.

G. Distribution of Grading Certificates and Reports

1. Grader's Memoranda, Forms DA-201B and 201C

The grader shall assemble the original Grader's memorandum and a copy of the manifest and any other supporting documents. This group of documents shall be sent to the National Field Office to support the documents that they entered and transmitted electronically to the National Field Office. In the case where the certificate is issued at the grading site, these documents shall be used as supporting documentation for issuing the certificate.

2. Form DA-137, Dairy Miscellaneous Inspection Report (DMS)

The sampler shall retain one copy for his/her files, send one copy to the National Field Office, and send the original Form DA-137 in the package of samples to be shipped to the laboratory.

3. Grading Certificates

a) Certificates Issued by a Resident Program Forms DA-201

Forms DA-201 shall be distributed as follows:

- The original to the applicant.
- One copy of the certificate (with an attached copy of the sampling report and other supporting documentation), shall be sent to the National Field Office.
- One copy shall be retained at the Resident Program.

b) Certificates Issued at an Inspection or Grading Site

DA-201 certificates may be issued at an inspection or grading site and shall be distributed in the following manner:

- The original to the applicant
- One copy, with the grader's memorandum, the company manifest and other supporting documentation attached, shall be forwarded to the National Field Office

The National Field Office shall distribute copies as follows:

- One copy of the certificate, the grader's memorandum, other supporting documentation and the manifest shall be maintained in the permanent file;

c) Take off, Appeal, and Retest Certificates

These certificates shall be distributed in the same way as the original certificates.

H. Form DA-128, Warehouse Condition Checklist

This form shall be completed whenever CCC owned products are inspected or regraded at warehouse facilities. The form shall be completed by the inspector who conducts the first inspection for the request.

Check the immediate warehouse area where lot(s) are stored against the items shown on the form. Follow the instructions on the form for accurate completion. Provide details in the remarks section of any deficiencies noted. If the warehouse makes corrections to deficiencies, these actions should also be documented under the remarks section. Include the name of the warehouse representative notified of the observed deficiencies. See [Exhibit 74](#).

Provide one copy of the report to the warehouse contact, include one copy with the inspection request records, and send the original to the National Field Office. The National Field Office shall send a copy to the Washington Office and the FSA commodity office. If a problem is noted on the report, The National Field Office shall attach a note to the FSA copy alerting them to the problem.

I. Form WA-667, Certification of Labor

This form shall be completed whenever warehouse personnel provide assistance during regrading or condition inspection activities. The amount of time approved shall be only for direct inspection assistance or for the drawing of new samples requested by Dairy Grading Branch. When new samples are pulled, record the number of samples selected.

This form shall not be used to certify the time necessary to obtain the samples from storage and move them to the grading or inspection area. This time is billed directly by the warehouse to CCC under the terms of the storage agreement. See [Exhibit 89](#).

Provide the original copy of the report to the warehouse contact, include one copy with the inspection request records, and send one copy to the National Field Office. The National Field Office will send a copy to the FSA Commodity Office.

J. Form WA-570, Inventory Adjustment Notice

This report shall be used to document any commodities which were observed to have been damaged while in storage or during the inspection or sampling procedures. Do not document damage reported by the warehouse for which you do not have direct knowledge.

Damaged commodity shall mean that the condition of the container no longer affords protection to the product against deterioration or contamination.

Contaminated commodity shall mean the product has become adulterated either with extraneous matter or through the presence of insects or rodents.

Whenever you determine that certain containers in a lot of CCC-owned product are damaged or contaminated and therefore unfit for continued storage, mark the containers as "REJECTED". Inform the warehouseman of the rejected containers.

Rejection authority shall be limited to less than car-lot quantities. If in the inspector's judgment an entire car-lot(s) warrants rejection, contact the National Field Office so guidance can be obtained from the FSA Kansas City Commodity Office.

Inspectors are not expected to perform extensive inventory checks on products stored under refrigeration for damaged containers. This does not exempt the inspector from conducting the required cursory inspection of the lot prior to re-grading. Rejection of these commodities will be limited to the samples supplied to the inspector. In the case of products in dry storage, the inspector shall make a cursory inspection of the periphery of the lots and reject any commodities that are damaged or contaminated. Complete a Form WA-570 with the appropriate information. See [Exhibit 75](#).

Have the warehouse representative sign and date the form to acknowledge the rejected commodity.

Provide one copy of the report to the warehouse contact, include one copy with the inspection request records, and send the original to the National Field Office. The National Field Office will send a copy to the FSA Commodity Office.

This report may also be used to document the removal of CCC owned product for the use as official grading clinic samples.

19. PROGRAM REVIEWS

A. Reviews of Plants Exporting Products to the European Union

1. Purpose

These instructions provide inspector guidance for the conduct of reviews of dairy processing plants and dairy ingredient users (including brokers and buyers of dairy products) exporting products to the European Union.

2. Scheduling

Each plant which has received an EU Health Certificate will be evaluated once every 12 months.

Each month a list of plants which have received EU Health Certificates, will be prepared to coordinate scheduling with the surveys of approved plants. Approved dairy plants will be scheduled for an evaluation for compliance with the provisions of [Section 18.C.9.b.2](#), during a routinely scheduled plant survey. Non-approved plants will be scheduled as appropriate to maintain efficiency and minimize cost to the industry.

3. Review Procedures

a) Dairy Processing Plant

Generally the Washington Office will provide the EU certificate history for the plant being evaluated when the inspector receives the schedule. However, if the information is not provided, the inspector shall request this information from the National Field Office before starting the review. The data shall include the certificate numbers, dates of certification, products certified, and the amounts certified.

Request from the applicant the production and shipment records of product certified for shipment to the EU or supplied as an ingredient to other users for subsequent certification to the EU. The data for certified product shall include the dates of certification, products certified and the amounts certified. For product supplied as an ingredient and covered by a Certificate of Conformance, the data shall include the dates of production, name of the ingredient product, amount covered by the Certificate of Conformance, and documentation of the source milk supply used for the products covered.

Request from the applicant their bacterial and somatic cell count records pertinent to milk that was certified to the EU or on a Certificate of Conformance since the last review. From these records, randomly select 2 months from those months in which certifications were issued and conduct whatever records reviews and calculations are necessary to confirm the accuracy of the averages and geometric means reported.

Randomly select records for at least 10 percent but not less than 2 shipments covered by certificates to the EU or a Certificate of Conformance and verify that sufficient volumes of qualifying milk was available during the production period to cover the product certified.

Complete the appropriate sections of the EUROPEAN UNION COMPLIANCE AUDIT CHECKLIST. See [Exhibit 79](#).

b) Dairy Ingredient User Plant

A dairy ingredient user plant may purchase dairy ingredients from various suppliers either for further processing or packaging or transshipment. It may also be a dairy processing plant which purchases other dairy products for use as an ingredient for further processing (For example; a whey drying plant that receives whey from multiple cheese plants, or a butter plant receiving cream from multiple sources.) The supply plants may require a subsequent review as described below.

Generally the Washington Office will provide the EU certificate history for the plant being evaluated when the inspector receives the schedule. However, if the information is not provided, the inspector shall request this information from the Washington Office before starting the review. The data shall include the certificate numbers, dates of certification, products certified, and the amounts certified.

Request from the applicant the production and shipment records of product certified for shipment to the EU or supplied as an ingredient to other users for subsequent certification to the EU. The data for certified product shall include the dates of certification, products certified and the amounts certified. For product supplied as an ingredient and covered by a Certificate of Conformance, the data shall include the dates of production, name of the ingredient product, amount covered by the Certificate of Conformance, and documentation of the source milk supply used for the products covered.

Request from the applicant the Certificates of Conformance for bacterial and somatic cell count pertinent to milk bearing products which were certified for export to the EU since the last review. From these records, randomly select 2 months for review. Check that each of the certificates for which ingredients were used has appropriate Certificates of Conformance covering those ingredients. Also, confer with the Washington Office or The National Field Office to determine if the supplying plants have been reviewed for compliance with the EU criteria.

Randomly select one supplier of ingredients that has not been reviewed for a follow-up review. Inform the plant that the supply plant will be reviewed to confirm that their records adequately cover the products shipped that were used for products certificated to the EU and verify that sufficient volumes of qualifying milk were available to cover the production.

If the dairy ingredient used emanates from a foreign source, the applicant shall have on file a Health Certificate indicating that the milk products meet the requirements of Annex B of EU Commission Directive 92/46 that is signed by the sovereign government of the country of origin.

Complete the appropriate sections of the EUROPEAN UNION COMPLIANCE REVIEW CHECKLIST. See [Exhibit 79](#).

c) Review Status

Assign one of the following status assignments to the review.

Eligible:

All records of milk meeting the EU requirements are confirmed.

Probationary - 90 Day Follow-up Required:

Minor deficiencies in records of milk supply or ingredients were observed and documented in the report. The plant will be provided 90 days to correct the deficiencies and be subjected to a follow-up review. When subsequent reviews reveal that some corrections to the prior deficiencies have been accomplished but the corrections are not complete a second 90 day period can be assigned. In no case shall there be more than two consecutive 90 day status assignments.

Ineligible:

1. If production lot identification codes and production dates are not included in the request, issuance of certificates will be denied until the information is provided, or
2. Failure to maintain adequate records and complete files of Certificates of Conformance to substantiate each request for a certificate will result in immediate ineligibility to receive EU export certificates. In order to resume the ability to receive future certificates, an review of the exporter or firm will be conducted by the Dairy Programs to determine if adequate documents and records are maintained prior to issuance of the future certificate, or
3. Substantial failure to correct deficiencies during the 90-day probationary period.

If an applicant repetitively fails to maintain adequate records or fails reviews, the Dairy Grading Branch shall recommend to the Food and Drug Administration that the applicant be removed from the list of plants approved for export to the EU.

d) Review Exit Meeting

At the conclusion of the review, arrange to meet with plant management to review the observations and findings. Inform the plant of the status of the review. Clearly identify any deficiencies in records availability or compliance with the requirements. Provide a copy of the audit report to the plant during the exit conference.

If the review requires the subsequent review of a supply plant, inform management that the results of the supply plant review, when completed, will have a direct bearing on the status of their review record. Also explain that when the supply plant is a USDA approved facility, there will be no charges for the subsequent review. However, if the supply plant is not a USDA approved facility or reviewed as an EU exporter themselves, the charges for the subsequent review of the supply plant will be billed to the user.

4. Calculation of Geometric Mean (GM)

The following procedure can be used on any calculator that has the appropriate keys to calculate the geometric mean:

- Multiply the numbers for which the geometric mean is to be calculated together.
- Press [=] for the last number.

- Press [Yx] or Press [Xy] (whichever key is available.)
- Enter the number of numbers multiplied together.
- Press [1/x].
- Press [=].
- The answer is the geometric mean.

5. Reports and Billing

a) Audit Reports

For each review complete the EUROPEAN UNION COMPLIANCE REVIEW CHECKLIST as shown in [Exhibit 79](#). Complete all heading information for a review in the same fashion as for a routine plant inspection. Complete the body sections for a *DAIRY PLANT* or *DAIRY INGREDIENT PLANT* as appropriate. In some instances, the review may require the completion of both sections. Explain the reasons for any line items not being completed in the comment section of the report. Provide additional pages as necessary to document the observations and findings of the review. Attach any worksheets used to validate the geometric or arithmetic means calculated. Attach any copies of other records or Certificates of Conformance that are collected to document observations or findings.

b) Billing

For USDA approved plants the review of records will be incorporated with a routine plant survey and no additional billing will be necessary.

For non-USDA approved plants, all hours for conducting the review, travel time to and from the review, and associated travel expenses shall be charged at the currently published rates.

When a supply plant is subsequently reviewed and is not a USDA approved plant or is not directly involved with export certifications, the fees and expenses shall be billed to the plant from which they were designated for subsequent review.

B. Reviews for Applicant Supplied Samples

1. Dairy Grading Branch Review of the Sampling Control Plan (SCP)

a) Desk review

The Branch Lead Auditor will evaluate the SCP (including revision to an existing SCP) as submitted by the applicant. In addition, past performance records of the applicant shall be considered for any matters that affect the standing of the Application for participation in the SCP service. If unsatisfactory or insufficient control procedures are determined during the desk review, the applicant may rework the SCP and resubmit it for evaluation.

b) Validation Review

Upon successful completion of the desk review by the Lead Auditor, a validation review of the described SCP will be conducted at the facilities identified in the SCP.

A validation review will be performed prior to the implementation of the SCP while the applicant continues to operate under traditional sample selection procedures. The review will determine if the proposed SCP will assure that all samples selected for official purposes meet all accuracy, representativeness, and integrity criteria. If nonconforming observations are noted during the review, the applicant will have the opportunity to correct the SCP. The validation review will be deemed successful if the review reveals no major or critical deficiencies. See [Section 19.B.7.](#)

The applicant may initiate collection of, or present, records for the validation review that were assembled prior to the desk review, provided they meet all of the requirements of the SCP. The records equivalent to 10 certificates shall be available for evaluation.

2. SCP Approval

The Lead Auditor, with concurrence of Dairy Grading Branch Management, will determine if the proposed SCP and sampling manual(s), are appropriate, are adequate and are effectively implemented. Written notification of approval for full participation in the applicant Supplied Samples service will be provided to the applicant with a copy of the initial validation review report.

3. SCP Up-dates and Changes

The applicant is required to submit all up-dates and changes to the SCP or procedures covered by the SCP for review and approval by the Branch prior to implementation, except as noted in [Section 19.B.4.](#)

4. Verification Reviews

A review conducted by the Branch under the SCP service is substantially dependent on the records and documentation maintained by the applicant. As a result, the lack of records or documentation, or the uncertainty of the accuracy of the information contained in an applicant's records or documentation, can seriously inhibit the conduct and outcome of the review. When a deficiency is noted by an applicant, they shall prepare a written explanation of the cause and the corrective action. This documentation, including the explanations, shall be retained for the next review. When a reviewer observes a deficiency, the availability of the written explanation may result in a less severe level of the nonconforming observation (for example, identified as a minor rather than a major nonconforming observation.)

a) Frequency

Verification review procedures will be performed according to the following frequency:

Level 1	Each grading or inspection duty assignment.
Level 2	Once per week.
Level 3	Once every two weeks*

- * If requests for inspection or grading service are at a rate of less than once every two weeks, the verification review frequency will be performed during each inspection or grading assignment.

b) Verification Review Plan

For a review to be both successful and cost effective, prior planning is essential. Verification reviews are to be planned to evaluate and determine if the SCP is being properly implemented and is effectively protecting the integrity of the samples.

Due to the frequency of verification reviews, it is not necessary to evaluate the entire SCP during each review. However during the course of routine reviews, all aspects of the SCP are to be evaluated over time. Reviewers or graders performing reviews shall not establish a pattern of reviews tasks which can be anticipated by the applicant or which fail to evaluate some aspect of the SCP.

Review the plant's SCP, prior review reports, and review plans to gain a historical perspective of which aspects of the SCP have been recently reviewed. Select aspects of the SCP which have not been recently reviewed or which indicate from recent reviews that follow-up evaluation is necessary.

Structure the review plan to review sufficient aspects of the SCP so that the review can be completed within an hour or two. The review should be conducted within the same duty assignment day as the grading assignment, whenever possible. However, reviews shall not be shortened to conform to regular duty assignment hours. As appropriate, overtime will be authorized to adequately conclude a review.

If the plant is on an infrequent grading cycle, the extent of the review should be expanded sufficiently to assure sample integrity.

Record the SCP aspects selected as your review plan on the review Report in the section provided for the REVIEW PLAN. The review plan statements do not need to be long but should be sufficiently descriptive to clearly define the proposed review. See [Exhibit 80](#).

Conduct the SCP review prior to beginning the grading or sampling assignment to assure that the SCP is functioning properly and that the sample integrity has been maintained.

c) Records Review

Records from the last review shall be made available for review. Depending on the provisions of the SCP, the following records should be reviewed.

Note: This listing is intended as a guideline only. All records, as determined to be pertinent to the review, shall be reviewed.

(1) Production Records

Volume of product produced as compared to the volume of product offered for inspection and grading. Volume of product produced with official identification as compared to the total volume of product offered for inspection and grading (both commercial and grade label). Test weight records from automatic test weighing or packaging machine scales.

(2) Shipping Records

Volume of product shipped compared to production records and products offered for inspection and grading. Records demonstrating control of product shipped prior to inspection and grading as allowed for under [Section 8.O.3](#).

(3) Sampling Records

Automatic sampler records as compared to the volume of product offered for inspection and grading and to production volume records. Random number generation and sample selection records. These records may include time selection procedures or documentation as provided in [Section 8.O.3](#).

d) Employee Interviews

Interview employees involved with the sample selection and handling process to determine that they understand the criteria and implementation of the SCP.

e) Classification of Deficiencies

(1) Critical Deficiencies

- Records requested not available to the inspector.
- Records that have been falsified.
- Seed numbers do not verify samples selected.
- Production lot not under the control of the applicant (second occurrence).
- Wrong samples intentionally selected.
- Major deficiency which has not been corrected or which has recurred indicating a corrective action was not effective.

(2) Major Deficiencies

- Records verified as inaccurate.
- Repeated minor records deficiencies that are the same or similar to deficiencies on previous reviews.
- Production lot not under the control of the applicant (first occurrence).
- Documented deficiencies not corrected by next review.
- Undocumented changes to the SCP or procedures which have not been submitted to the Branch for review and approval.
- Verification samples not meeting requirements. See [Section 19.B.5.b](#).

(3) Minor Deficiencies

- Record corrections which have not been properly initialed by the applicant.
- Records made by an unauthorized individual.
- Undocumented changes in the SCP or procedures that have not been submitted to the Branch for review and approval (when a written explanation of the reason for the change is on file)

5. Verification Samples

Verification samples shall be selected during each verification review.

Follow the general inspection guidance in [Section 8.H](#), with the following exceptions. The sampling rate will be one sample each from 20 percent of the production lots offered for grading but in no case less than one sample. The sample(s) will be evaluated for all of the inspection criteria to which the original samples were evaluated. For example, if the original samples are offered for grading, test weighing and condition of container examination, the verification sample shall also be graded, test weighed, and evaluated for condition of container.

a) Verification Samples Involving Laboratory Analysis

The verification sample(s) shall be selected from the same sub-lot, vat or churn as the official sample. Include the verification sample at the bottom of the DMS prepared for the official samples. The verification sample(s) are to be tested for all the criteria applied to the original lot samples. Identify the verification samples with the following statement “Verification SCP Samples. Test for (Identify tests to be performed such as Butterfat, or Group I and II, etc).” The applicant shall be billed for the verification laboratory analysis costs.

The National Field Office shall review the verification sample results against the official sample results. See [Section 19.B.5](#) for further guidance. As appropriate, the review frequency for the applicant shall be adjusted according to the verification sample results.

b) Interpretation of Verification Sample Results

The verification grading sample shall meet the same grade in the appropriate U.S. Grade Standards, or meet the criteria of any U.S. Specification, or Purchase Announcement requirements as the official sample.

When laboratory analyses are conducted, the verification sample laboratory analysis shall be considered as in compliance if they meet the allowable limits in [Section 20.G.1](#).

Test weight samples shall meet the marked weight.

The selected lot(s), upon condition of container examination, exhibit no more than one minor defect.

Keeping Quality Tests shall be satisfactory.

Milkfat tests shall meet minimum requirements for the product offered.

When verification samples do not meet the requirements of the above section, the discrepancy shall be recorded as a Major deficiency on the review Report.

When the verification samples include laboratory analyses, the associated review Report and review frequency shall be adjusted accordingly as soon as the analysis is available. Changes in review frequency shall be implemented immediately.

6. Documenting Review Findings

The observations and recommendations pertaining to the review shall be documented on a Review Report Form. See [Exhibits 80](#) and [81](#).

Enter the number of minor, major, or critical deficiencies in the spaces provided. Document the nature and severity of your observations at the bottom of the report.

Review the review findings with the applicant's representative and have the report properly signed and dated.

File a copy of the completed Review Report with the grading files at the manufacturing plant or the inspection site if different from the manufacturing plant. Send copies of the report to the National Field Office with the other grading assignment records.

7. Changes in Review Frequency

For an applicant to participate in the SCP service, the number of nonconforming observations found during the validation review shall not exceed the number allowed by Level 2 (See [Exhibit 80](#)). After a successful validation review, each applicant shall start at Level 1.

The applicant shall be assigned to the frequency level based on the total number of nonconforming deficiencies recorded in the SCP Service Audit Report, except that:

To move to a less frequent review level, the applicant shall have a minimum of two consecutive reviews (not including the validation review) which meet the requirements of the less frequent level.

A more frequent review level will be imposed on the first occurrence that the applicant exceeds the maximum number of nonconforming observations allowed for the current level. The frequency will be increased consistent with the number of nonconforming observations.

8. Charges for Verification Reviews

The verification review is to be assigned an appropriate portion of the fees and expenses on the review form in the same manner as the fees and expenses are divided between multiple sampling reports.

For a processing contract, the time and expenses are to be recorded on the contract worksheet and will be part of the monthly bill.

For a resident grading program assignment, the charges will be part of the monthly bill.

20. RESIDENT GRADING AND QUALITY CONTROL SERVICE PROGRAM

This section provides instructions that are specific to a Resident Grading and Quality Control Service Program. All other relevant duties, responsibilities, and requirements contained in other sections of DA Instruction 918-I are also applicable.

A. Prerequisites

The resident program objectives and parameters shall be reviewed by company officials and the National Field Director, the Dairy Grading Field Supervisor, and the National Program Coordinator for Resident Programs prior to initiation of service.

An “Application for Continuous Resident Inspection or Grading Service” shall be completed and signed by representatives of the applicant and the Dairy Grading Branch.

B. Responsibilities of Plants Utilizing Resident Services

The responsibilities listed in [Sections 3](#) and [Section 4.A](#), except for the provisions of [Section 4.A](#) that pertain to scheduling grading services, also shall apply to plants utilizing resident services. Additionally, resident plants shall fulfill the following responsibilities:

1. General Management

- Sign and abide by the terms of the “Application for Continuous Resident Inspection or Grading Service.”
- Acknowledge that the resident grader(s) assigned to the program shall be in charge of the USDA laboratory functions and shall have free and open access to all areas of the plant’s facilities, operations and associated records.
- Designate specific management individuals as contacts for the resident grader regarding reports, quality problems and survey items that require attention.
- Designate a qualified plant laboratory technician(s) to assist the resident grader with the required USDA analyses, if the National Field Director determines that additional laboratory help is necessary.
- Provide office space for the resident grader complete with furnishings, secure filing cabinets, a telephone and other appropriate items. The office space shall be within the laboratory or close to the laboratory as agreed on by the National Field Director.
- Provide secretarial assistance as requested by the resident grader.
- Provide all non accountable grading supplies consistent with Dairy Grading Branch instructions.
- Comply with routine plant inspections as part of the resident program.
- Correct deficiencies noted during inspection and grading, cursory inspections, plant survey inspections, and Science and Technology Program laboratory audits in a timely manner.

2. Laboratory Facilities

The resident plant shall furnish and maintain adequate laboratory facilities, safety equipment, and properly calibrated laboratory equipment to enable the safe, efficient and accurate performance of the required USDA analyses.

The laboratory shall comply with all OSHA requirements for safe operation which include, but shall not be limited to, the provision of safety items such as, thermal and chemical resistant gloves, goggles or face shields, eye wash stations, emergency showers, safety cans for explosive chemicals, fire blankets and extinguishers, and first aid kits.

The resident plant shall agree to a minimum of biannual inspections of laboratory procedures, equipment calibrations, and safety protocols to be conducted by the appropriate program area within AMS.

C. Resident Grader Responsibilities

In addition to the duties identified in [Section 4.B](#), the Resident Grader shall:

- Provide supervision of the required USDA analyses performed in the plant's laboratory.
- In accordance with the instructions presented in *DA Instruction 918-PS, Instructions for Dairy Plant Surveys*, perform a minimum of two surveys a year of the plant and its facilities, either independently or with the supervisor. If plant management requests additional surveys, the resident grader shall perform these surveys.
- Survey reports shall be finished and submitted promptly upon completion of the inspection according to the procedures established in DA Instruction 918-PS. Resident graders and resident plants may have to adjust their schedules to accommodate the survey inspection needs.

The National Field Director may approve extending the survey period for resident plants with multiple production departments to more than one week. In these instances, only part of the resident plant may be surveyed at one time and a partial survey report submitted. For example, the survey information for the butter, nonfat dry milk, and specialty drying operations of a plant could be on three separate reports.

If plant operations are scheduled separately for surveys based on their status assignments, care should be taken that no pattern develops when selecting operations for inspection.

- Make sufficient cursory surveys (daily, if possible) to check plant sanitation, condition of building, equipment, and housekeeping operations to assure production of high quality, wholesome products. A written report of such inspections shall be submitted to plant management and the appropriate Dairy Grading Branch field Supervisor each week. A copy of the cursory inspection report is to be kept on file at the resident plant for at least one year and then may be discarded when the resident grader determines that the report is no longer useful.

- Issue certificates or reports as may be required by USDA or plant management.

1. Laboratory Supervision

Perform laboratory analyses, keeping quality tests, and other applicable tests to check the composition, quality, and stability of finished products. For laboratory analysis procedures, refer to the most recent revision of the *DA 918-RL Instruction, Laboratory Methods and Procedures* and *Standard Methods for the Examination of Dairy Products*.

The resident grader shall monitor, instruct, and supervise, as applicable, the sampling, testing procedures, and analysis of all samples collected for official USDA testing. Additionally, the resident grader shall perform the following analyses:

- Read scorched particle pads
- Count DMCC slides
- Supervise/review the laboratory counts of Standard Plate Count dishes/films
- Conduct Flavor evaluation

The resident grader may perform as many of the other analyses as necessary or appropriate for program administration.

a) Retesting of Out-of-Specification Samples

The laboratory technician or resident grader, as applicable, will review the analytical procedure and results. If analytical procedures were followed, and the results obtained did not meet the specification of the sample, the sample must be analyzed again using the same procedure.

If the rechecked result agrees with the original result, i.e., the recheck result confirms that the sample is out-of-specification, then further testing is not necessary.

If the rechecked result is not in agreement with the original result, i.e., the recheck result shows that the sample is within specification, then a third analysis must be performed on the sample.

The average of the two analytical results that are in agreement, i.e., either the two results that are out-of-specification or the two results that are within specification, will be reported as the official result.

The resident grader shall be on duty whenever laboratory tests are conducted on products intended to be issued USDA certificates. In emergency cases, such as illness, when the resident grader is not available, the field supervisor may allow testing to continue. However, at least two verification tests (in addition to the standard weekly verification tests) shall be run on any product tested during the grader's absence. All verification testing shall be done when the resident grader is on duty at the plant.

Maintain, in accordance with established record procedures, a complete file of grader's memos, certificates, sampling reports, and keeping quality records for a period of six months. A document may be discarded after 6 months if the resident grader determines that the document is no longer useful.

When time permits and during decreased workloads, the resident grader may perform other quality related plant responsibilities, such as pre-grading, farm water tests, special line samples, etc. These additional responsibilities requested by plant management shall be proposed to the National Field Director or the field supervisor for approval prior to implementation. These services will be discontinued should they interfere with the resident grader's official duties.

As appropriate, the resident grader may conduct the tests on official USDA samples.

2. Resident Grader Standard Operating Procedures

The resident grader(s) shall develop and maintain a file containing the information for the standard operating procedures at the resident plant. This file is to be readily accessible to the relief grader and to Dairy Programs and other AMS personnel who may visit the plant. The file shall be entitled "Standard Operating Procedures" and shall contain at least the following information:

- A detailed work schedule and instructions about routine laboratory and resident plant(s) operations.
- The name and position or activity of all laboratory, plant management, and plant employees with whom the relief grader may expect to have contact.
- A general schedule of routine plant operations, sampling procedures, and office routines.
- The location of all equipment, supplies, files, instructions, standards, and announcements.
- A sketch of the plant layout and location of important processing, sampling, and grading locations, as well as emergency exits.
- All other appropriate or special instructions which will be needed by the relief grader.

D. Dairy Grading Branch Responsibilities

The Dairy Grading Branch shall:

- Sign and abide by the terms of the "Application for Continuous Resident Inspection or Grading Service."
- Conduct a thorough initial survey of plant and laboratory facilities to determine the plant's eligibility to participate in the program.
- Define the scope of the program in terms of samples from outside sources which shall be eligible for testing and how many USDA resident graders are necessary to accomplish the required analysis and inspection.
- Evaluate the qualifications of laboratory technicians for the purpose of designating those persons who may assist with USDA official testing.

E. Conducting Laboratory Tests for Other Plants

A resident plant may enter into a separate, private agreement with any other dairy plant to test official USDA samples received from the dairy plant, and to have a certificate issued by the resident grader for products tested in the resident plant laboratory. The USDA is not a party to

any private agreements entered into between plants and will not monitor or enforce these agreements.

1. Responsibilities of Resident Plants

A resident plant with an agreement(s) to test samples for an outside plant(s) shall sign and submit a letter of intent to the Dairy Grading Branch agreeing that the Branch shall establish the parameters of the outside testing program conducted at the resident plant. See [Exhibit 82](#). These parameters may include, but are not limited to:

- The scope of the testing that may be performed at the resident plant
- The training required of plant laboratory technicians; any costs to be paid by the plant associated with the expanded services, such as resident grader training, new equipment, supplies, etc.
- Procedures and priorities to be followed for the receipt, protection, and testing of samples and the issuance of related certificates.

A resident plant shall keep the National Program Coordinator for Resident Programs informed of all outside plants with which it has entered into an agreement to provide official laboratory testing. The notification shall include the kinds of tests to be conducted for each plant.

A resident laboratory may not provide the following tests:

- Any test procedure not approved or authorized by the Dairy Grading Branch;
- Any test procedure for which appropriate laboratory equipment, supplies, or technician training have not been provided and approved by the Dairy Grading Branch;
- Foreign material;
- Metal fragments; and,
- Salmonella, unless the resident plant is approved to perform salmonella testing.

2. Responsibilities of National Field Office

The National Field Office shall:

Communicate applicable information, such as Keeping Quality results and take-off certificate data, to the resident grader issuing the certificates, and applicable information, such as increased or decreased sampling frequency, to the fee graders.

- Ensure that the fees and expenses entered on the official certificate by the resident grader from the fee graders' memoranda are properly billed to the applicant.
- Inform the Branch Chief or National Program Coordinator for Resident Programs of the effects of an outside testing program on a resident program's ability to manage its own customary inspection, grading and testing workload.
- Provide sufficient guidance to fee graders so that the necessary paperwork, such as sampling reports (DMS) and graders' memoranda, for product to be tested at a resident plant laboratory, is sent promptly to the resident plant issuing the certificate.

3. Responsibilities of Resident Graders

Instructions issued by the Dairy Grading Branch to establish the responsibilities, guidelines, and procedures applicable to official sampling, grading, testing, and certification of dairy products shall apply to official testing of samples from outside plants by resident plants. Resident graders additionally are responsible for the following specific actions.

a) Receipt of Samples

Ensure that samples are received in suitable condition for testing. If the condition of the samples makes them unsuitable for testing, notify the National Field Office of the situation and request guidance on follow-up actions. The resident grader shall assure sample integrity by verifying that appropriate grip-lock seals and evidence tape, as described in [Section 12](#), are in place before the samples are opened for testing

b) Issuing Certificates

The guidelines provided in [Section 18](#), are applicable to certificates issued and distributed by resident graders for product represented by samples submitted by outside plants to the resident plant for testing. The resident grader shall be responsible for copying all fees, expenses, and other charges listed on the fee grader's memorandum to the official certificate. Certificates shall be completed and submitted promptly to the National Field Office. Additionally, the following instructions shall apply.

(1) Reporting of out-of-specification results

Resident graders shall immediately report to the National Field Office all out-of-specification results obtained from testing conducted on samples submitted by outside plants when the out-of-specification results will affect the sampling frequency at the outside plant. Correspondingly, follow-up test results should also be reported to the National Field Office when the results would permit the sampling frequency to be reduced. Examples that require reporting are butterfat tests, pH tests on bulk cheddar and cheese for manufacturing, and Vitamin A testing on dry milk products.

F. Sampling, Testing and Reporting NDM and Instant NDM

1. Sampling

Resident graders shall follow the sampling procedures specified in [Section 11.D.8.e](#), except that the samples are not sent to an outside laboratory because the tests are performed at the resident plant. The use of a DMS is not required in resident plants.

2. Testing

Resident graders shall disregard the references to asterisks and to the National Science Laboratory in [Section 11.D.8.e](#) and perform the tests at the resident plant on samples selected in accordance with the procedures described in that Section.

3. Laboratory Analysis Reporting Parameters for NDM and Instant NDM

The following chart delineates the significant figures which are to be used in reporting results on tests conducted in resident laboratories on NDM and Instant NDM. (If the number following the significant place is 0 through 4, the last significant number remains unchanged. If the number following the significant place is 5 through 9, the last significant number is increased by one).

PARAMETER	SIGNIFICANT FIGURES	EXAMPLES	
Percent Fat	3	1.04	0.80
Percent Moisture	2	3.2	4.0
Percent Titratable Acidity	3	0.115	0.120
Solubility Index (ml)	2	0.2	1.0
Scorched Particles (mg)	2-3	7.5	15.0
Vitamin A (IU/g)	Nearest 100	3000	5200
Standard Plate Count (m/g)	2	4.6	0.7
Direct Count (M/g)	Integer Only	2	13
WPN (mg/g)	2	2.2	7.0
Penicillin*		Neg.	Pos.
Grade	No Abbreviation	Extra	Standard
Flavor	Satis.	=	Satisfactory
	S.	=	Slight
	D.	=	Definite
	Spell out other descriptive terms.		

* For the monthly comparison test results, report penicillin results as the width of the disk and zone in millimeters when using the Disc Assay Method. For example, 16.4 mm.

G. Laboratory Verification Samples in Resident Plants

When plant laboratory personnel perform laboratory tests for USDA official grade, the resident grader shall present to plant laboratory personnel at least two “blind” samples of each product every week for verification testing.

The verification samples shall be selected from previously tested samples and tested by the plant personnel in a timely manner so that variations in test results with the original sample test results can be effectively evaluated. When practical, the verification sample selected shall have been tested originally no earlier than the previous workday.

As an option, the resident grader may select two samples each week from the products that have already been tested by plant personnel and retest them himself/herself for verification test.

The verification test results shall then be discussed with plant personnel in order to keep them informed about their test performance on the samples.

Records of all verification testing shall be kept on file. The supervisor will check these records during supervisory visits.

1. Interpretation of Verification Results

Verification test results performed by resident laboratory technicians shall be considered as high or low if they vary from the original test results by more than the following allowable limits:

Percent Fat	
Dry Products	.2
Butter	.2
Percent Moisture	.3
Standard Plate Count	.5 Thousand
Direct Microscopic Clump Count	10 Million
Whey Protein Nitrogen	.8 mg/g

When “occasional” high or low verification test results are observed, the resident grader shall evaluate the technician’s techniques and have the technician run the sample again. Refer to the above chart for the parameters of high and low test results. No other action shall be required. “Occasional” shall be interpreted as no more than one test result that is either above or below the verification sample result parameters listed above in any of the last five consecutive verification test results.

When high or low results are observed more often than “occasional” (i.e., in any two or more of the last five consecutive verification test results), the technician shall not perform official testing for the specific test procedure for which the unacceptable results were observed. Official testing may be resumed following remedial instruction and satisfactory results on 10 consecutive check samples. Refer to the above table for the parameters of high and low test results.

H. Monthly Laboratory Comparisons

1. Butter and Dry milk

a) Purpose

The monthly comparison tests are an important internal control procedure to assure the accurate testing and reporting of laboratory results by our resident inspection programs. This program provides the opportunity for each resident program to run analyses on “unknown” samples. A graph is to be prepared for each monthly sample factor tested for which the National Science Laboratory provides a standard deviation and a mean. The graph will provide a visual representation of testing consistency for the grader and for supervisor review.

b) Responsibilities

(1) National Science Laboratory

The National Science Laboratory shall send, on the first business day of each month, two samples of nonfat dry milk to each resident program that is testing and issuing certificates on nonfat dry milk. In addition, on the Monday closest to the first business day of each month, two samples of butter will be sent to each resident program that is testing and issuing certificates on butter. A laboratory worksheet entitled “Dry Milk Report,” or “Butter Report,” as applicable,

will accompany each set of samples. The completed, previous month's Laboratory Comparison Report, reflecting the test results as reported by the resident programs shall accompany these samples.

The Dry Milk or Butter Report accompanying the new samples shall specify that the resident results are to be received by the National Science Laboratory no later than the 25th day of the month. If results are not received from a resident program by that time, the National Science Laboratory will contact the National Field Office immediately and identify the late resident plant(s).

After receiving the results from the resident programs, the National Science Laboratory shall prepare the "Laboratory Comparison Report" for each sample. This report will show the results of all participating labs. A mean value and a standard deviation for the sample results will be calculated and listed for each of the 8 factors identified in [Section 20.H.1.b.5.c.2](#). These mean values identify the average of the applicable test results.

The distribution of the "Laboratory Comparison Report" shall be made by the National Science Laboratory as follows:

- one copy to each resident with the next months sample
- one copy to the Washington office
- one copy to the National Field Office, which will distribute copies to the applicable field supervisors

(2) Washington Dairy Grading Office

The Washington Office will review the results from each resident program and provide follow-up as necessary.

(3) National Field Office

The National Field Office will review the results and distribute the reports to the appropriate field supervisor.

(4) Field Supervisors

Each supervisor shall provide on-site supervision to any resident program which reports results which are outside normal parameters.

(5) Resident Graders

The resident grader is to test or supervise the testing of the "unknown" samples and send their results to the National Science Laboratory to assure receipt on or before the 25th day of each month. See [Section 20.F.3](#) for significant digits for reporting.

(a) Sample Analysis

In order to gain the ultimate benefit from the program, monthly comparison samples shall be analyzed according to the same procedures and techniques used for routine testing of samples.

DO NOT TREAT MONTHLY COMPARISON SAMPLES DIFFERENTLY. If a laboratory technician routinely performs specific test procedures, they shall also test the monthly comparison samples.

(b) Dissemination of Results

The resident grader shall share the monthly laboratory comparison sample results with the applicable laboratory technicians and the appropriate plant management contact.

(c) Follow-up

The resident grader shall provide sufficient follow-up and guidance to correct identified deficiencies and trends of inaccurate results.

c) Reports and Tables

(1) Laboratory Comparison Report

The National Science Laboratory will issue a summary of results as reported by the participating laboratories for each sample provided, i.e., "Laboratory Comparison Report". A copy of the report will be sent to each participating laboratory. See [Exhibit 83](#) for NDM and [Exhibit 84](#) for butter.

(2) Resident Program Graphs

Each month the resident grader shall graph the difference between the result reported by the resident program and the median value calculated by the National Science Laboratory. Each graph will ultimately reflect a calendar year. The graphs are to be maintained on file at the laboratory or the resident grader's office. See [Exhibit 85](#).

Graph paper used shall have 10 lines per inch, with a heavy line every inch.

The value listed below for each factor shall represent one inch on each graph.

Nonfat Dry Milk	One Inch Equals
Fat	0.10%
Moisture	0.10%
Bacterial Plate Count	1.000/gram
Bacterial Direct Count	1,000,000/gram
Whey Protein Nitrogen	1.0 mg
Butter	
Fat	0.10%
Moisture	0.10%
Salt	0.10%

(a) Graph Interpretation

The graphs in [Exhibit 85](#) show the graphing of moisture results for NDM with the following trends:

- Testing consistently high
- Testing consistently low
- Testing erratic, poor control
- Testing satisfactory, good control

2. Salmonella Comparison Samples

a) Purpose

The monthly comparison tests are an important internal control procedure to assure the accurate testing and reporting of salmonella results by our resident inspection programs.

The program provides the opportunity for the National Science Laboratory in Gastonia, NC and the Dairy Grading Branch resident laboratory to run a set of split samples to verify and compare the results of the two laboratories. Appropriate follow-up action shall be taken on any positive Salmonella test.

b) Responsibilities

(1) Resident Graders

The resident grader shall select 4 product and 1 environmental sample at the beginning of each month. The samples shall be "Split Samples". The four product samples shall be composited, well mixed and split into two samples, one for testing in the resident laboratory and one sent to the National Science Laboratory for comparison testing. The environmental sample should be well mixed and split into two samples one for testing in the resident laboratory and one sent to the National Science Laboratory for comparison testing. The samples should be held at the resident laboratory until the samples have reached the National Science Laboratory. An effort should be made to allow the National Science Laboratory to set up the samples on the same day as they are set up in the resident laboratory. Send the samples by overnight service and indicate on the DMS that the samples are split samples and the projected date the samples will be set up in the resident laboratory. An effort should also be made to keep the samples at similar temperatures. If necessary to maintain temperature, insulated (Styrofoam) boxes will be used to ship the samples.

Upon receipt of the results of the testing of the samples from the National Science Laboratory the resident shall prepare a DA-151, Plant Survey Report, showing the results and correct charges taken from the report for the monthly salmonella comparison samples. See [Exhibit 86](#). Attach a copy of the laboratory report and your DMS to the DA-151. Submit the DA-151 to the National Field Office for billing.

The resident grader shall maintain a file showing the results of the monthly salmonella comparison samples. Results of the test shall be sent to the National Program Coordinator for Resident programs and the National Field Office.

(2) Science and Technology Programs (STP) Laboratory

The National Science Laboratory shall test samples received from the resident programs each month. These samples will be sent at the beginning of the month. They will consist of one composite product sample and one environmental sample. The National Science Laboratory will test the two samples for salmonella and forward the results, along with information on the charges for the test to the appropriate resident program and the National Field Office.

(3) Washington Office

The Washington Office, National Program Coordinator, will review the results from each resident program and provide follow-up as necessary.

(4) National Field Office

The National Field Office will review the results and bill the appropriate applicants for the testing charges.

(5) Field Supervisors

Each supervisor shall review the results of the monthly salmonella comparison testing during on-site visits. Any discrepancy of the results between the laboratories will require follow-up actions. If one laboratory gets a “positive” result and the other laboratory does not, it will be handled as a positive test, with appropriate follow-up.

I. Standards Book and Recordkeeping

Records shall be maintained to document all work regarding reagent standardization, equipment checks, calibrations, equipment repairs, etc. Normality of solutions purchased from a private company should be verified and recorded. Analytical balances are to be checked daily before use and the results recorded.

Following are examples of situations which are to be entered in the standards book:

February 1, 2009	STP checked the RPM speed of centrifuge used for solubility index testing – xxxxx RPM
February 26, 2009	Sample (lot number xxx) received from American Dairy Products Institute for calibration of instruments used for whey protein analysis.
March 3, 2009	New curve prepared by Shannon Meyer for WPN per established instructions.
April 12, 2009	Vacuum pump for Mojjonier repaired by Mr. Brown, High Tech Instruments, Anytown, USA.
April 30, 2009	NaOH received from Walker Inc., Chicago, IL.

May 3, 2009	Normality of NaOH received 4/30 found satisfactory by Judy Smith
May 14, 2009	Silver Nitrate solution prepared by Tom Younker
May 22, 2009	Mettler balance technician serviced all balances in the lab

J. Laboratory Safety

1. Emergency Plan Evacuations

A sketch of the physical layout of the plant and the emergency evacuation routes shall be posted in several, conspicuous locations.

2. Chemical Hygiene Plans

A resident laboratory is considered to be a quality control lab within a production/manufacturing facility. A chemical hygiene plan that documents the necessary work practices, procedures and policies the company has in place to protect laboratory personnel from over exposure may be required to be on file. Inform plant management that guidance can be obtained from OSHA'S Laboratories Standard in 29 CFR 1910.1450.

3. Material Safety Data Sheets

These sheets are prepared by the manufacturer of a material and are generally included with the shipment of that material to the ultimate user. Subject matter may relate to storage requirements, expected shelf life, instructions for reacting to an accident with the material, and other pertinent information. These sheets shall be maintained in a convenient location that is available to all employees who use these chemicals.

4. Disposal of Chemicals

Any chemical used in the lab shall be disposed of in accordance with all Federal, State, and local regulations.

5. Disposal of Samples

See [Section 15](#), Disposal of Official Samples. Samples shall be disposed of in such a manner so that they do not return to regular distribution channels, unless reprocessing is allowed. Samples disposed of through donation channels shall be documented by date and name of recipient according to AMS Directive 265-1

6. Disposal of Bacteria Plates

Spent media used to culture bacteria shall be autoclaved sufficiently to render the material sterile. The recommended minimum requirements for autoclaving are 121° C for 15 minutes at 15 psi. Larger quantities (one liter or more) of spent media require a minimum of 20 minutes autoclave time at 121°C and 15 psi.

7. Use of Safety Glasses or Face Shields

Safety glasses or face shields shall be used whenever chemical reagents or glassware are used.

8. Use of Rubber Mats

Rubber mats decrease the probability of breakage when laboratory equipment is prepared, used, and cleaned in the laboratory setting. Rubber mats shall be used in sinks and on counters tops where glassware is used.

9. Availability and Location of Fire Blankets and Extinguishers

Fire fighting equipment shall be immediately available and clearly identified for use in the event of a mishap.

10. Availability of Eye Wash Stations

Eye wash stations shall be readily accessible and shall be checked on a routine basis for adequate pressure and/or legitimacy of eye wash solutions. Documentation of routine checks shall be maintained on file.

K. Science and Technology Program (STP) Audits

Each resident program will be audited by the STP approximately once every two years. The objective of the audit is to provide Dairy Grading Branch managers, resident graders and supervisors information on the observed strengths and deficiencies of each resident program.

1. Responsibilities

The scheduling of the audit will be initiated by the Science Division with the National Program Coordinator for Resident Programs in the Washington Office.

All observations and reports of the Science Division representative shall, at a minimum, be shared with the resident grader, plant management, and laboratory supervisors through an exit conference. Resident graders shall cooperate fully with the Science Division representative.

2. Activities of the Science Division Auditor

The Science Division auditor will spend sufficient time at the resident plant to thoroughly observe all aspects of the resident program.

a) Laboratory Techniques

The auditor will evaluate the laboratory techniques of all personnel who perform official USDA testing.

b) Calibration Checks

The auditor will perform calibration checks on the laboratory equipment, i.e., autoclaves, thermometers, centrifuges, timers, scales, blenders, and other equipment as appropriate. The findings will be documented in a report prepared by the Science Division auditor.

c) Records Review

The auditor will review the following records and make appropriate recommendations:

- Standards books
- Laboratory instructions and reference materials
- Verification sample results
- STP monthly comparison sample results

d) Laboratory Safety Checklist

The auditor will complete a written safety check in cooperation with plant/laboratory management and the resident grader. This checklist is a STP document entitled "Safety in the Laboratory, A Self Test".

3. Follow-up Procedures after an Audit

a) STP Actions

The Deputy Administrator of the Science Division will report the audit findings to the Deputy Administrator of the Dairy Programs. The Science Division will concurrently send copies to the resident grader, the applicable supervisor, the National Field Office, and the Chief of the Dairy Grading Branch.

b) Resident Grader Actions

The resident grader shall prepare a response to the audit to address the audit observations and recommendations. The "memo type" response will be directed to the National Program Coordinator and shall be prepared in cooperation with plant management, as appropriate. The response report shall be completed within one month of the date of the Science Division report to the Deputy Administrator of the Dairy Programs. Copies of the response shall also be directed to the Chief of the Dairy Grading Branch, the National Field Director, and the applicable Field Supervisor.

The sequence of subject matter items in the response to the audit report shall be presented in the same sequence as presented by the Science Division. When responding to a recommendation, reference that recommendation verbatim, followed by a plan of action for correction.

No response is required for narrative information given for explanation purposes. However, if the audit report presents statements that the resident grader or plant management knows to be incorrect, or gives the wrong impression, the memo may be used to clarify the discrepancy.

The response shall be signed by both parties: the USDA resident grader and a member of plant management. Follow the format for the response as presented in [Exhibit 87](#).

c) Field Supervisor Actions

The supervisor shall monitor corrective actions initiated by the resident program. Supervisory follow-up shall be documented on a DA 226 Supervisory Report within 2 months of the date of the resident grader's response and quarterly thereafter until all corrective actions are completed.

21. REGRADING

A. Inspection Request

The request for Commodity Inspection (Form KC-426) (FSA Request) will originate from FSA, Kansas City; however, the applicant for the re-inspection will be Commodity Credit Corporation, Washington, D.C. (CCC). The request will specify the warehouse name and address, warehouse code number, warehouse storage lot number, previous certificate number and date, quantity of product, and type of inspection requested.

The National Field Office will supply the inspector with a copy of the FSA Request and a copy of the original and most recent regrading certificates

B. Grading Facilities

The inspection and sampling/grading may be conducted in a suitable warehouse area that meets the criteria set forth in [Section 3.C](#). If the facilities provided are not satisfactory, prepare a form DA-128 (See [Section 18.H](#)) and describe the unsatisfactory conditions. If in the inspector's opinion, the deficiencies are such that the sampling should not be preformed, they should contact the National Field Office for guidance. Discuss any reported deficiencies with a responsible warehouse representative and show a reference to this contact on the report.

C. Cursory Inspection of Facilities and Product

Prior to sampling, and using Warehouse Condition Checklist, Form DA-128, as a guide, spot check the storage lots to determine the general condition of containers and the condition of the storage area. Check all lots on the inspection request. Each storage lot should be stored in one location of the warehouse/cooler under essentially the same type of conditions. If a car-lot is split, there shall be easy access to each part of the car-lot and both shall be properly identified.

The storage lot area and the car-lot to be sampled shall be clean, dry and free from mold, insects and vermin contamination. The product containers shall also be free from damage or other obvious defects that could cause user complaints. Whenever there is an unusual situation telephone the National Field Office for guidance. When unsatisfactory storage conditions are noted, the National Field Director will advise whether or not sampling/grading should continue.

Report unsatisfactory product container conditions on the sampling report and follow the procedures outlined in [Section 18.H](#). Inform the warehouse contact person of the unsatisfactory conditions, describe them on Form DA-128 and include the following statement on the report:

“The above unsatisfactory conditions were discussed with _____.”
(Also report any management response.)

When a serious unsatisfactory condition such as a health hazard is found, immediately notify the National Field Director. As directed, prepare the inspection report describing the unsatisfactory condition.

Example:

“The 14 car-lots of NDM stored in room 2A are subjected to a strong odor of insecticide. Eighty two barrels of “Pyrow” are located in the corner of the room. Two barrels are leaking.”

Prepare an original and two copies of the Form DA-128 and send them to the National Field Office.

When a progressive off-condition is noted, such as mold or water damage, immediately notify the National Field Director. The National Field Director will discuss the situation with FSA and decide how to proceed. The inspector will be informed of a decision so the recommendation may be included in the covering report and certificate. This information helps FSA program the product for processing or distribution before further deterioration occurs.

Check that the manufacture’s sub-lot number on the containers correspond to those shown on the original grading certificate. Also check that the storage lot number stamped on the containers by the warehouse personnel corresponds to the lot number on the FSA Request.

When an incorrect storage lot number identifies the containers, the storage lot number shown on the request should be shown in the “Storage Lot” block on the report together with an asterisk(*) referring to the following statement:

“Containers identified with storage lot _____.”

The certificate (contract) number, which is usually a 6 digit number, shall be stamped on each container by the manufacturing plant before shipment by the warehouse. Report on the covering report and requirements not met as follows:

“Contract _____ not shown on containers”

D. Net Weight

The net weight shown on the FSA Request shall be reported on the covering inspection certificate. Test weighing is not necessary unless it is specifically requested. In such event, contact the National Field Office for instructions.

E. Certification of Warehouse Labor

See [Section 18.I](#).

22. CERTIFICATE STATEMENTS

The following provides a reference listing of all comments to be used on memoranda and certificates from this instruction. Other statements should be used as appropriate.

8.J

“20 % sample numbers, seed .8140”

128D Box 20

131A Box 39

133B Box 11

8.J

“No 20% additional samples selected or examined”

9.E.3.b

“_____ Sample cases weighed _____, _____ pounds net weight. This is below the required minimum individual case weight of _____ pounds”

9.E.3.b

“Test weight shortage of car-lot exceeds _____percent”

9.F

“Car-lot withdrawn from grading at the request of plant management”

9.F

“Due to significant variation in test weights of (number) Random Verification Samples, plant management accepts the lowest test weight for all the samples weighed”

10.A.2

“Condition of Containers failed because 17 of 168 one pound print wrappers examined were dirty and smeared (Minor defect). Only 16 defects permitted.”

11.A

“(Number) random verification samples satisfactory”.

11.A.1

“_____ of _____ random verification samples inspected failed to confirm the condition or quality of the applicant assembled samples. No final US grade assigned.”

11.A.1.a.2

“Car-lot withdrawn from grading at the request of plant management.”

or

“Due to significant variation in test weights of (number) Random Verification Samples, plant management accepts the lowest test weight for all samples weighed.”

11.B.7.d.2

“Official USDA tests on each churning, as recorded on the manifest, indicate butterfat content 80.0% or higher.

11.B.7.d.2.a.ii

“**No flavor rating or U.S. grade assigned because butterfat content is below the 80 percent requirement”

11.B.8.a.1.a

“Very high color at the buyer’s request.”

11.B.8.a.1.c

“** No U. S. Grade assigned to any churning in this car-lot because of (slight, definite, or pronounced as appropriate) mold on surface of the butter, liners, or shipping container of churnings (list churning numbers).”

11.B.8.a.1.d

“** Below U. S. Grade requirements”

11.B.8.a.1.d

“(Asterisks as appropriate) No U. S. Grade assigned because of rancid or quality deterioration condition of churning _____. Keeping Quality tests are required for official grading.”

11.B.8.a.1.d.i

“Keeping Quality Tests on a sample from each churning were satisfactory”

11.B.8.a.1.d.i

“Keeping Quality tests to be completed on (Date).”

11.B.8.a.1.d.i

“(Asterisks as appropriate) No flavor rating or U. S. Grade assigned because of rancid quality deterioration on Keeping Quality tests.”

11.B.8.a.1.d.i

“Keeping Quality tests to be completed on (Date).”

11.B.8.a.1.e

“** Below U.S. Grade requirements”

11.B.8.a.1.f

“ Grand Lot

This lot of butter is classified as U. S. Grade _____, which is the lowest U. S. Grade assigned to any sample because the packages are not identified with churn numbers.”

11.B.8.a.1.g

“No U. S. Grade assigned to churning(s) _____ because (Type of Deterioration) quality deterioration noted in the sample as the result of Keeping Quality tests.”

11.B.8.a.1.g

“- Unsalted Butter”

or

“- Unsalted Butter with added culture” (or starter distillate, as appropriate).

11.B.8.a.2

“Churning _____ not eligible for sale to CCC because of (state reason for rejection).”

or

“Car-lot is not eligible for sale to CCC because of (state reason for rejection).”

11.B.8.a.2.a

“Lab Results: Churning XXX Coli XX Yeast & Mold X”

11.B.8.a.2.a

“Car-lot not eligible for sale to CCC because of (state reason).”

11.B.8.a.2.b

“No flavor rating or U.S. Grade assigned because butterfat content is below the 80 percent requirement.”

11.B.8.a.2.b

“No U.S. Grade assigned because the car-lot failed tests for butterfat content”

11.B.8.a.2.a.ii

“Contains previously failed low butterfat butter. Previous Certificate DB _____ dated _____.

11.B.8.a.3.a

“Original samples of churnings _____ were (very slight, slight, definite) moldy. Examination of (number) reserve samples revealed no mold. Mold shall be scraped from the sample cubes under USDA inspection prior to repackaging.”

11.B.8.a.3.a

“The U. S. Grade (A or AA) butter covered by original certificate DB-_____ dated _____ was regraded this date per Inspection Request _____ and the flavor of all churnings was rated _____. No U. S. Grade is assigned to churnings in this lot due to _____ mold on the original samples for churnings _____ and on reserve samples for churnings _____. Mold shall be scraped off under USDA inspection prior to repackaging.”

or

“The U.S. Grade (A or AA) print butter covered by original certificate DB-_____ dated _____ was regraded this date per Inspection Request _____ and the flavor of all churnings was rated _____. No U. S. Grade is assigned to churnings in this lot due to _____ mold on the original samples for churnings _____ and on additional samples for churnings _____. Moldy churnings are not suitable for distribution for regular program use.”

11.B.8.a.3.b

“We recommend churnings _____ be processed into butteroil or sold as off-condition product.”

11.B.8.a.3.c

“*Weight as shown on inspection request.”

11.B.8.a.3.e.i

“Special examination made of this warehouse lot by comparing _____ additional boxes with the _____ samples. No irregularities were observed.”

or

“Special examination made of this warehouse lot by comparing _____ additional boxes with the _____ samples. _____ of the additional samples did not agree with the original samples because (State reason).”

11.B.8.a.4.a.i.a.i

“No grade assigned due to butter not meeting the U.S. Grade declared on the label.”

11.C.3.a

“Process cheese identified with (indicate lot or sub-lot number) does not meet contract requirements. Pasteurization temperature could not be validated.”

11.C.8.a.1.b

“The above cheese was graded for compliance with specification _____. It shall be understood that the above rating (and fat or moisture analysis) was

assigned on the basis of a sample drawn from the top surface of the cheese (or from the bung hole) and is not necessarily indicative of the quality and condition (and composition) of the entire cheese. No final grade is assigned because the cheese could not be inspected for compliance with grade factors for finish and appearance.”

11.C.8.a.1.c.i

“** No U. S. Grade assigned because the car-lot failed tests for composition.”

11.C.8.a.1.c.iii

“No final U.S. grade assigned because of torn liners”

11.C.8.a.1.c.iii

“Not eligible for sale to CCC because of rough surface”

11.C.8.a.1.c.iii

“Car-lot not eligible for sale to CCC due to poor workmanship.”

11.C.8.a.1.c.iv

“No final U.S. grade assigned because of loose wrappers.”

11.C.8.a.1.c.v

“Not eligible for sale to CCC because of poor packaging workmanship.”

11.C.8.a.1.c.vi

“Not eligible for sale to CCC because of free whey.”

11.C.8.a.1.c.vii

“Not eligible for sale to CCC because of excessive head space.”

11.C.8.a.1.c.vii

“Not eligible for sale to CCC because of overfilling.”

11.C.8.a.1.c.viii

“No final U.S. grade assigned because of torn liners.”

11.C.8.a.1.d.

“Mold penetration of the top surface to a depth of 2 inches.”

11.C.8.b.6

“Inspection lot unacceptable because particles of foreign material observed”

11.C.8.b.8

“Process American cheese from case _____ to case _____ does not meet the FSA Announcement requirements due to (_____ flavor or _____ body and texture defect).”

11.C.8.b.8

“Process American cheese from case _____ to case _____ does not meet the FSA Announcement requirements due to (color outside the medium yellow range, _____ caramelized color, _____ pinking, or _____ color specks).”

11.D.6.a

“Meets the Condition of Container Standards with exemption of vent holes as per FSA memo dated July 9, 1991.”

11.D.8.b

“Sub-lots _____, _____, and _____, are U.S. Standard grade due to slight lumpy condition.”

11.D.8.e.1

“The nonfat dry milk covered by this certificate meets all of the composition requirements of U.S. Extra grade.”

11.D.9

“Reserve Samples (or new samples) used from manufacturer’s lot”

11.E.8.d

“No off-condition in 12 cans.”

11.E.8.d

“_____ of _____ cans examined showed burn-on in excess of 75% of the interior can surfaces.”

or

“_____ of _____ cans examined showed fat separation and _____ of _____ cans showed coarse sediment particles.”

or

“_____ can(s) showed gel formation and _____ can(s) showed burn-on in excess of 75% of the interior can surfaces.”

11.E.9

“The evaporated milk covered by original certificate _____, dated _____, was re-inspected this date and remains in satisfactory condition.”

11.E.9

“The evaporated milk covered by original certificate _____, dated _____, was re-inspected this date and _____ of _____ cans examined show slight fat separation.”

12.B

“The original grip-lock seal was destroyed by (insert name) for official purposes. See below for new sample number applied”

13.C

“Samples for Appeal Inspection. Test all the samples for the following factors only. (list factor(s) to be tested)”

13.E

“This certificate supersedes original certificate number _____dated_____. All copies of the original certificate (have) (have not) been retrieved.”

14.A.2

“No reliable tally of the containers loaded could be determined during check-loading because (state reason).”

14.A.2

“Not sealed by applicants request”

16.H

“Samples for Salmonella tests taken during (date) survey”

16.H

“Samples for Salmonella tests taken without survey”

16.H

“Follow-up samples for previous Positive result”

17.E.1

“The (name of product) listed below was denatured in accordance with Announcement No. _____.”

17.E.2

“The (name of product) listed below was denatured under the supervision of the USDA.”

18.E.6

“RETEST CERTIFICATE

This certificate supersedes original certificate number DX-0096035, dated 6/15/93. All copies of the original certificate have not been retrieved.”

18.E.8

“Containers heavily water soaked and definite moldy. Product is to be destroyed in a manner that is acceptable to USDA, FDA, and local regulatory authorities.”

“Very slight denting of cans observed. The product is satisfactory for regular program use.”

“Butter cartons show very slight mold development. The butter may be reprocessed under continuous inspection to assure that the mold is properly removed.”

“No defects noted. Product suitable for regular program use.”

21.C

“Containers identified with storage lot _____.”

“Contract _____ not shown on containers”

23. EXHIBITS

1. Cursory Inspection Report

U.S. DEPARTMENT OF AGRICULTURE
AGRICULTURAL MARKETING SERVICE
DAIRY PROGRAMS

PRODUCT INSPECTION AND GRADING ASSIGNMENT
(CURSORY INSPECTION REPORT)

CURSORY INSPECTOR DATE:	PLANT NAME AND NUMBER:
USDA INSPECTOR(S):	NAME OF PLANT REPRESENTATIVE:

INSTRUCTIONS: Conduct a brief, visual, run-time inspection of production, processing, packaging, and warehousing at the inspection or grading site. Also conduct a visual evaluation of the specific lots to be graded or inspected and the grading room area.

These activities are to assure compliance with Dairy Grading Branch requirements prior to commencing official inspection or grading

Activities. Record only serious deficiencies which would be categorized as level A or B on a plant survey.

No serious deficiencies noted: ☐ (If checked, the remainder of the form does not need to be completed).

	S	U	
1. Plant Premises and Exterior/Interior Construction	<input type="checkbox"/>	<input type="checkbox"/>	Observe areas such as: Building construction, lighting, Ventilation, floors, walls, ceilings, doors, windows, pipe Insulation, paint, etc.
2. Product Handling and Processing Procedures (including pasteurization)	<input type="checkbox"/>	<input type="checkbox"/>	Observe processes such as: Handling or raw products, product processing, product storage, pasteurization, product identification, approved product sources, waste and animal feed handling, etc.
3. Equipment Sanitation	<input type="checkbox"/>	<input type="checkbox"/>	Conduct a prestart-up inspection as appropriate.
4. Employee Practices and Overall Plant Housekeeping	<input type="checkbox"/>	<input type="checkbox"/>	Observe practices such as: Housekeeping, employee habits (use of hand washing facilities, hair nets, foot baths); storage of utensils; sanitary product handling; etc.
5. Pest Control Program	<input type="checkbox"/>	<input type="checkbox"/>	Observe areas such as: Open doors, missing screens, evidence of pests, etc.
6. Grading Facilities	<input type="checkbox"/>	<input type="checkbox"/>	Verify requirements for grading room or areas.
7. Product Storage and Refrigeration	<input type="checkbox"/>	<input type="checkbox"/>	Observe conditions in product storage areas where product(s) to be graded is stored.
8. Damaged Containers	<input type="checkbox"/>	<input type="checkbox"/>	Verify condition of lot(s) to be graded.

COMMENTS: (If plant status changed to Ineligible as a result of this cursory inspection, explain the reason(s) and Indicate the date the National Field Office was informed and who in the office was notified).

2. Grade Label Listing

USDA GRADE LABEL LISTING BY PLANT 02/02/07

Plant Number: 38-25

Code	Brand	Package			Grade & Style	Product
		Type	Size	Style		
130169	Stock	WRAPPER	1 LB	ELGIN PRINT	AA OTHER	BUTTER
140018	Cass Clay	WRAPPER	1 LB	PRINT	AA SALTED	BUTTER
140023	Hornbacher's	WRAPPER	1 LB	PRINT	AA SALTED	BUTTER
140175	Our Family	WRAPPER	1 LB	PRINT	AA SALTED	BUTTER
140486	Schroeder Gourmet	WRAPPER	1 LB	PRINT	AA SALTED	BUTTER
140487	Schroeder Gourmet	WRAPPER	1 LB	PRINT	AA UNSALTED	BUTTER
140489	Dan's Supermarket	WRAPPER	1 LB	PRINT	AA SALTED	BUTTER
140500	Flavorite	WRAPPER	1 LB	PRINT	AA SALTED	BUTTER
140516	Cass Clay	WRAPPER	1 LB	PRINT	AA UNSALTED	BUTTER
283000	Cass Clay	CUP	12 OZ		QUAL. APP'D	CHEESE
283001	Cass Clay	CUP	12 OZ		QUAL. APP'D	CHEESE
283002	Cass Clay	CUP	12 OZ		QUAL. APP'D	CHEESE
283004	Schroeder	CUP	12 OZ		OTHER 2%	CHEESE
283005	Schroeder	CUP	12 OZ		OTHER 4%	CHEESE
291000	Cass Clay	CUP	16 OZ		AA SALTED	BUTTER
291001	Crystal Farms	CUP	16 OZ		AA SALTED	BUTTER
322001	Cass Clay	TUB	22 OZ		QUAL. APP'D	CHEESE
322002	Cass Clay	TUB	22 OZ		OTHER DRY	CHEESE
322003	Cass Clay	TUB	22 OZ		OTHER 4%	CHEESE
324002	Schroeder	TUB	24 OZ		OTHER 2%	CHEESE
324003	Schroeder	TUB	24 OZ		OTHER 4%	CHEESE
324004	Sampson Dairy Foods	TUB	24 OZ		QUAL. APP'D	OTHER
400001	Cass Clay	LID			AA SALTED	BUTTER
445045	Schroeder	LID	5 LB		OTHER 2%	CHEESE
445046	Schroeder	LID	5 LB		OTHER 4%	CHEESE
445051	Glenview Farms 4%	LID	5 LB		QUAL. APP'D	OTHER
44052	Glenview Farms 1%	LID	5 LB		QUAL. APP'D	OTHER
815336	Our Family	CARTON	1 LB	ELGIN	AA SALTED	BUTTER
815609	Flavorite	CARTON	1 LB	ELGIN	AA SALTED	BUTTER
815643	Hornbacher's	CARTON	1 LB	ELGIN	AA SALTED	BUTTER
815673	Dan's Supermarket	CARTON	1 LB	ELGIN	AA SALTED	BUTTER
815677	Cass Clay	CARTON	1 LB	ELGIN	AA SALTED	BUTTER
815679	Schroeder Gourmet	CARTON	1 LB	ELGIN	AA SALTED	BUTTER
815680	Schroeder Gourmet	CARTON	1 LB	ELGIN	AA UNSALTED	BUTTER
815717	Lynn's Dakotamart	CARTON	1 LB	ELGIN	AA SALTED	BUTTER
815731	Schroeder	CARTON	1 LB	ELGIN	AA SALTED	BUTTER

* Temporary Approval

Page 1

3. Grade Label Butter Certificate, Metal Contamination

U.S. DEPARTMENT OF AGRICULTURE AGRICULTURAL MARKETING SERVICE GRADE LABEL BUTTER GRADING CERTIFICATE					CERTIFICATE NO. DB-100054321-0	
TO: APPLICANT (Name and address) BIG BUTTER FACTORY MILKANDHONEY, CA		SHIPPER OR SELLER (Name and address)		RECEIVER OR BUYER (Name and address)		DATE INSPECTED 07/05/07
INSPECTED AT (Name and address) BIG BUTTER FACTORY MILKANDHONEY, CA		INSPECTED BY JOHN E. ROCK		CONDITION OF CONTAINERS Applicable U.S. Standards for condition of Food containers		SAMPLE CONTAINERS STAMPED WITH USDA LOT NO. 54321
MANUFACTURED BY (Name and address) BIG BUTTER FACTORY MILKANDHONEY, CA		ANNOUNCEMENT NO.	CONTRACT NO.	SEED NO.	SIZE AND KIND OF CONTAINERS SEE BELOW	SERVICE DATE 07/05/07

[-----MANUFACTURER DATA (1)-----]

CHURN NUMBER	NO. CONT	DATE MFG	CLASSIFICATION FLAVOR COLOR	DEFECT RATING SALT BODY COLOR SALT TOTAL	U.S. GRADE	COMMENTS (S-SLIGHT, D-DEFINITE P-PRONOUNCED)	GRADE LABEL	%FAT
184-A	72	7/3/07			**		BIG BUTTER 1/4LB 36LB	
184-B	72	7/3/07			**		BIG BUTTER 1/4LB 36LB	
184-C	72	7/3/07			**		BIG BUTTER 1/4LB 36LB	
184-D	72	7/3/07			**		BIG BUTTER 1/4LB 36LB	
184-E	48	7/3/07			**		BIG BUTTER 1/4LB 36LB	
185-A	72	7/4/07			**		BIG BUTTER 1/4LB 36LB	
185-B	72	7/4/07			**		BIG BUTTER 1/4LB 36LB	
185-C	72	7/4/07			**		BIG BUTTER 1/4LB 36LB	

****BELOW GRADE DUE TO METAL FRAGMENT CONTAMINATION**

U.S. GRADE	NO CONT.	WEIGHT	FEES	I CERTIFY that in compliance with the regulations governing the inspection and grading of dairy products issued pursuant to the Agricultural Marketing Act of 1946, as amended (7 U.S.C. 1621 et seq.), the product described above was inspected on the date shown and that the quality and/or condition of said product, on said date, were as stated above		
BELOW	552	19,872 MARKED WEIGHT	INSPECTION	136.00	SIGNATURE OF OFFICIAL GRADER <i>John E. Rock</i> JOHN E. ROCK	
			EXPENSE	34.00		
			LABORATORY TOTAL	170.00		
					07/05/07	ADDRESS LEFSA, MN

DA-201 (09-03) Previous edition may be used. 1/AS STATED BY APPLICANT

This certificate is receivable in all courts of the United States as prima facie evidence of the truth of statements therein contained. It does not excuse failure to comply with any applicable Federal law.

4. DMS, Metal Fragments Inspection

[illegible]

5. FSA Contract Report



UNITED STATES DEPARTMENT OF AGRICULTURE

FSA CONTRACT EVALUATION REPORT

Plant:	<div>Name and Plant Number</div> <div>Address</div> <div></div>
Announcement No:	<div></div>
Contract No:	<div></div>
Product:	<div></div>
Date of Evaluation:	<div></div>

- Observations:
- A. Raw Product Storage
 - B. Raw Product Handling
 - C. Processing
 - D. Packaging
 - E. Finished Product Storage
 - F. General
 - G. Laboratory Results
 - H. Disclaimer

The aforementioned observations of satisfactory performance or identified deficiencies are indicative of only the period of time covered by this evaluation. No inference of the applicant’s performance for contract participation either before or after this evaluation can or should be made.

Inspector

6. Certificate of Conformance for Packaging Materials

Certificate of Conformance **For Packaging Materials**

All container or packaging material manufacturers participating in program administered under the supervision of DACO or KCCO must supply a C.O.C. for each type of container/packaging material offered for use under each contract awarded by KCCO.

For example, a C.O.C. is required for the parchment wrappers, chip boards and corrugated shipping containers for print butter, or, pouches, boxes, lids, and shipping containers for process cheese.

The C.O.C. shall read:

“THIS CONTAINER IS CONSTRUCTED IN COMPLIANCE WITH DACO PACKAGING REQUIREMENTS.”

or

“THIS PACKAGING MATERIAL IS CONSTRUCTED IN COMPLIANCE WITH DACO PACKAGING REQUIREMENTS.”

The C.O.C. may be printed directly on the container, or it may be provided in writing for review by the grader. When printed on the container, the C.O.C. shall be printed as small as possible but shall be legible.

7. Request to Display Special Statement

To: Chief
United States Department of Agriculture
Dairy Grading Branch, Room 2746-S, Mail Stop 0230
1400 Independence Avenue SW
Washington, DC 20090-6456

Date

We, the undersigned, request approval to display the statement shown below on the packaging material(s)

MANUFACTURED IN A PLANT PARTICIPATING IN THE
USDA DAIRY PLANT INSPECTION PROGRAM

We acknowledge that we will comply with the following criteria:

- a. Only the statement shown on this application will be used.
- b. The statement shall not be displayed should our plant lose its USDA approved status.
- c. Authorized packaging materials will not be used at other facilities without prior approval by USDA.
- d. This label will not be represented as an official declaration of compliance with any U.S. grade standards or specifications.
- e. Use of this statement, as contained in this application, does not excuse failure to comply with any applicable Federal or State law or municipal regulations.

Signature of Plant Manager _____

Typed or Printed Name of Plant Manager _____

Plant Name _____

Plant Location & Number _____

Product to be labeled	Package Size	Brand Name
_____	_____	_____
_____	_____	_____
_____	_____	_____

(Attach 2 samples of label for approval)

Authorization: _____
Chief, Dairy Grading Branch

_____ Date

8. Product Control Tag

PRODUCT CONTROL TAG

DA – 147
(06-99)



NO.

U.S. DEPARTMENT OF AGRICULTURE
AGRICULTURAL MARKETING SERVICE
DAIRY PROGRAMS



DO NOT REMOVE TAG
OR USE PRODUCT
WITHOUT AUTHORIZATION


For Information Contact:
Dairy Grading Branch
(630) 810-9999

(SEE REVERSE)

NO.

PRODUCT TAGGED

NO. OF CONTAINERS



The product(s) or container(s) to which this tag is attached is (are) controlled under authority of the Agricultural Marketing Act and is (are) not to be used, moved or altered in any manner without the expressed permission of an authorized representative of the United States Department of Agriculture. The unauthorized removal or alteration of this tag or utilization of the tagged product(s) is a violation of the Agricultural Marketing Act of 1946, as amended and regulations issued thereunder.

REMARKS

AUTHORIZED EMPLOYEE

DATE

PRODUCT CONTROL

LOCATION AND REMARKS

AUTHORIZED EMPLOYEE

DATE

DA – 147
(06-99)

REVERSE

9. Seed Number List

Seed	Date	Grader	Plant	Certificate	Lot
.998875	02/07/07	<i>John E. Rock</i>	<i>Big Cheese</i>	54321	1234
.22458	02/07/07	<i>John E. Rock</i>	<i>Big Cheese</i>	54322	1235
.125823	02/07/07	<i>John E. Rock</i>	<i>Big Cheese</i>	54323	1236
.802540	02/20/07	<i>John E. Rock</i>	<i>Little Tree Dairy</i>	11314	58951
.950011	02/20/07	<i>John E. Rock</i>	<i>Little Tree Dairy</i>	124775	Grade Label
.084595					
.785122					
.265544					
.454589					
.895002					
.021569					
.359281					
.859501					
.957502					
.895755					
.125498					
.562147					
.365280					
.351006					
.376995					
.334205					
.945398					
.685944					
.505747					

10. Cheese Graders Memorandum, Sample Selection, Page 1

DMB APPROVED – NO. 0581-0126

U.S. DEPARTMENT OF AGRICULTURE AGRICULTURAL MARKETING SERVICE										CERTIFICATE NO.								
CHEESE GRADER'S MEMORANDUM										12345								
TO: Applicant (Name and Address) QUALITY DAIRY CHICAGO, IL					SHIPPER OR SELLER (Name and Address) QUALITY DAIRY CHICAGO, IL					RECEIVER OR BUYER (Name and Address) CCC WASHINGTON, DC					DATE INSPECTED 05/25/07		NO. SAMPLES TAKEN 14	
INSPECTED AT (Name and Address) QUALITY DAIRY CHICAGO, IL					INSPECTED BY: JOHN E. ROCK (001)					CONDITION OF CONTAINERS Applicable U.S. standards for condition of food containers					SAMPLE CONTAINERS STAMPED WITH USDA LOT NO 12345			
MANUFACTURED BY (Name and Address) QUALITY DAIRY CHICAGO, IL					ANNOUNCEMENT NO.			CONTRACT NO.		SEED NO. ALT .2665		SIZE AND KIND OF CONTAINERS COLORED – 40 LB BLOCKS			STORAGE LOT		SERVICE DATE 05/25/07	
MOISTURE TEST	VAT NUMBER	YR 2006 MFG DATE	NO. PKGS	MARKED WEIGHT	TEST SHORTAGE	NET WEIGHT	DEFECT RATING				U.S. GRADE	COMMENTS (S-Slight, D-Definite, P-Pronounced)		FDB	% H ₂ O	pH		
42	36.5	4/15-D	72	3060.00			FLAVOR	BODY & TEXT	COLOR	FINISH								
22	36.5	-E	73	3042.00														
66	36.0	-F	74	3145.00														
55	35.8	-G	72	3078.00														
58	37.3	-H	78	3276.00														
12	35.8	-K	74	3089.50														
58	36.5	4/16-C	60	2595.00														
48	36.1	-E	73	3029.50														
41	35.6	-G	74	3108.00														
25	35.9	=H	75	3187.50														
52	36.7	-K	73	3029.50														
11	35.1	4/17-H	73	3047.55														
34	36.2	-K	72	3042.00														
75	37.0	-L	66	2788.50														
TOTAL				42516.25														
Seed number .7373, three Random verification samples selected					Seal #'s 22011 – samples, 22012 – reserve samples													
4/16-G																		
4/16-H																		
4/16-K																		
SIGNATURE OF AGENT FOR APPLICANT Charlie Cheesevat					U.S. GRADE		NO. OF PACKAGES				WEIGHT		FEES					
					GRADE						lbs		INSPECTION					
					GRADE						lbs		EXPENSE					
					GRADE						lbs		LABORATORY					
					GRADE		BELOW				lbs		TOTAL					

Exhibit 10 – Page Two

Step by Step Procedures for selecting samples using the alternative method on the Hewlett Packard 20s Calculator

1. Insert the seed number .2665. Press [XEQ] [\sqrt{X}]
2. Insert 1, press [XEQ][e^x] and insert 78, press [XEQ][LRN]
Note that vat 4/15 has the most boxes in the Car-lot.
3. Press [XEQ][y^x] (Sample 42)
4. Press [XEQ][y^x] (Sample 22)
5. Press [XEQ][y^x] (Sample 69)
6. Press [XEQ][y^x] (Sample 55)
7. Press [XEQ][y^x] (Sample 58)
8. Press [XEQ][y^x] (Sample 12)
9. Press [XEQ][y^x] (Sample 58)
10. Press [XEQ][y^x] (Sample 48)
11. Press [XEQ][y^x] (Sample 41)
12. Press [XEQ][y^x] (Sample 25)
13. Press [XEQ][y^x] (Sample 57)
14. Press [XEQ][y^x] (Sample 11)
15. Press [XEQ][y^x] (Sample 34)
16. Press [XEQ][y^x] (Sample 7) Box missing from vat
17. Press [XEQ][y^x] (Sample 75) This number is available, even though there are only 66 boxes in the vat. Boxes 21 to 30 are missing. The remaining boxes are numbered 1 to 20 and 30 to 76.

Procedures for selecting the random verification samples are the same as for the original samples. Select 3 vats first, then select a box from each of the designated vats.

11. Sample Number Worksheet

SAMPLE NUMBER WORKSHEET

SEED
NUMBER

.2665

001		801	
	34, 41		829**
	52		856, 863
	72		
100		900	
101		901	
	114, 123		940,946
	150		951
	183, 189		
200		1000	
201		1001	
	233		
	297		
300		1100	
301		1101	
	317*, 327**, 333		
	371, 382		
400		1200	
401		1201	
	420		
500		1300	
501	502	1301	
	557,569**		
	580		
600		1400	
601		1401	
	624**, 625		
	659,		
	681,696		
700		1500	
701		1501	
800		1650	

Notes:
If a duplicate number is generated, additional numbers must be generated to get the required 30 samples.
*Selected container missing. Additional number was generated in order to get the required 30 samples.
**Containers designated for selection of lab samples.

12. Application for Butter Grading Service

U.S. DEPARTMENT OF AGRICULTURE
AGRICULTURAL MARKETING SERVICE

APPLICATION FOR BUTTER GRADING SERVICE

CERTIFICATE NO.

12345

TO: APPLICANT (Name and Address) QUALITY DAIRY CHICAGO, IL		SHIPPER OR SELLER (Name and Address) QUALITY DAIRY CHICAGO, IL		RECEIVER OR BUYER (Name and Address) CCC WASHINGTON, DC		DATE INSPECTED 4/05/06		NO. SAMPLES TAKEN 9	
INSPECTED AT (Name and Address) SAME AS APPLICANT		INSPECTED BY: <i>JOHN E. ROCK (001)</i>			CONDITION OF CONTAINERS Applicable U.S. standards for condition of food containers		SAMPLE CONTAINERS STAMPED WITH USDA LOT NO.		
MANUFACTURED BY (Name and Address) SAME AS APPLICANT		ANNOUNCEMENT NO.		CONTRACT NO.		SEED NO. .2665		STORAGE LOT	
						SIZE AND KIND OF CONTAINERS		SERVICE DATE 04/25/07	

CHURN NUMBER	NO PKGS.	MFG. DATE	TEST WEIGHT	CLASSIFICATION			BODY	DEFECT RATING			U.S. GRADE	COMMENTS (S-Slight, D-Definite, P-Pronounced)	FAT	% H ² O	SALT
				FLAVOR	COLOR	SALT		COLOR	SALT	TOTAL					
41	857	35*	4/20/07												
21	858	74	4/20/07												
66	859	74	4/20/07									**			
12	860	38*	4/20/07												
56	861	67*	4/20/07												
46	862	74	4/21/07												
40	864	74	4/21/07									**			
25	866	74	4/21/07												
55	867	74	4/21/07												

Footnotes:

(1) Seed number

(2) Sample numbers chosen for churning

(3) Denotes lots with missing containers to be listed on the manifest

*Missing boxes

857 – boxes 25-28, 30

860 – box 16

861 – boxes 35-40

**Samples taken for butterfat, moisture, salt, pH testing 20%
verification samples, seed #.3871, Churn 858 – box 43
Churn 867 – box 26

SIGNATURE OF AGENT FOR APPLICANT <i>Jimmy Butterboat</i>	REMARKS Grading Temp °F Marked <input type="checkbox"/> Net Wt <input type="checkbox"/>	U.S. GRADE	NO. OF PACKAGES	WEIGHT	FEES
		GRADE AA		lbs	Inspection
		GRADE A		lbs	Expenses
		GRADE B		lbs	Laboratory
		BELOW GRADE		lbs	TOTAL

[illegible]

14. Grade Label Butter Certificate

U.S. DEPARTMENT OF AGRICULTURE AGRICULTURAL MARKETING SERVICE GRADE LABEL BUTTER GRADING CERTIFICATE					CERTIFICATE NO. DB-100054321-0		
TO: APPLICANT (Name and address) BIG BUTTER FACTORY MILKANDHONEY, CA		SHIPPER OR SELLER (Name and address)		RECEIVER OR BUYER (Name and address)		DATE INSPECTED 07/05/2007	NO. SAMPLES TAKEN 4
INSPECTED AT (Name and address) BIG BUTTER FACTORY MILKANDHONEY, CA		INSPECTED BY JOHN E. ROCK LEFSA, MN			CONDITION OF CONTAINERS Applicable U.S. Standards for condition of Food containers		SAMPLE CONTAINERS STAMPED WITH USDA LOT NO.
MANUFACTURED BY (Name and address) BIG BUTTER FACTORY MILKANDHONEY, CA		ANNOUNCEMENT NO.	CONTRACT NO.	SEED NO. .1234	SIZE AND KIND OF CONTAINERS SEE BELOW	STORAGE LOT	SERVICE DATE 07/02/2007

[-----MANUFACTURER DATA (1)-----]

CHURN NUMBER	NO. CONT	DATE MFG	CLASSIFICATION			DEFECT RATING			U.S. GRADE	COMMENTS (S-SLIGHT, D-DEFINITE P-PRONOUNCED	GRADE LABEL	%FAT
			FLAVOR	COLOR	SALT	BODY	COLOR	SALT				
163-1	228	06/12/07	AA	VL	-				AA		BIG SKY 1/4LB 36LB	80.2
163-2	210	06/12/07	AA	VL	-				AA		BIG SKY 1/4LB 36LB	
163-3	180	06/12/07	AA	VL	-				AA		BIG SKY 1/4LB 36LB	
163-4	205	06/12/07	AA	VL	-				AA		BIG SKY 1/4LB 36LB	

GRADING TEMP 50°F



U.S. GRADE	NO CONT.	WEIGHT	FEES	I CERTIFY that in compliance with the regulations governing the inspection and grading of dairy products issued pursuant to the Agricultural Marketing Act of 1946, as amended (7 U.S.C. 1621 et seq.), the product described above was inspected on the date shown and that the quality and/or condition of said product, on said date, were as stated above			
AA	823	29628	INSPECTION 136.00 EXPENSE 36.00 LABORATORY 25.70 TOTAL 197.70	SIGNATURE OF OFFICIAL GRADER <i>John E. Rock</i> JOHN E. ROCK			
		MARKED WEIGHT		07/05/07		ADDRESS LEFSA, MN	

DA-201Previous edition may be used.

1/ AS STATED BY APPLICANT

This certificate is receivable in all courts of the United States as prima facie evidence of the truth of the statements contained. It does not excuse the failure to comply with any applicable Federal law.

15. Grade Label Butter Certificate, Low Butterfat

U.S. DEPARTMENT OF AGRICULTURE AGRICULTURAL MARKETING SERVICE GRADE LABEL BUTTER GRADING CERTIFICATE											CERTIFICATE NO. DB-100054321-0				
TO: APPLICANT (Name and address) BIG BUTTER FACTORY MILKANDHONEY, CA			SHIPPER OR SELLER (Name and address)				RECEIVER OR BUYER (Name and address)				DATE INSPECTED 07/05/2007		NO. SAMPLES TAKEN 3		
INSPECTED AT (Name and address) BIG BUTTER FACTORY MILKANDHONEY, CA			INSPECTED BY JOHN E. ROCK				CONDITION OF CONTAINERS Applicable U.S. Standards for condition of Food containers				SAMPLE CONTAINERS STAMPED WITH USDA LOT NO.				
MANUFACTURED BY (Name and address) BIG BUTTER FACTORY MILKANDHONEY, CA			ANNOUNCEMENT NO.		CONTRACT NO.		SEED NO. .1234		SIZE AND KIND OF CONTAINERS SEE BELOW			STORAGE LOT		SERVICE DATE 07/02/2007	
[-----MANUFACTURER DATA (1)-----]															
CHURN NUMBER	NO. CONT	DATE MFG	CLASSIFICATION FLAVOR COLOR		SALT	DEFECT RATING BODY COLOR		SALT	TOTAL	U.S. GRADE	COMMENTS (S-SLIGHT, D-DEFINITE P-PRONOUNCED)	GRADE LABEL		%FAT	
163-5	120	06/12/07	AA	VL	-					AA		BIG SKY 1/4LB 36LB			
163-6	120	06/12/07	AA	VL	-					AA		BIG SKY 1/4LB 36LB			
163-7	120	06/12/07	**	VL	-					**		BIG SKY 1/4LB 36LB		79.8	
NO FLAVOR OR U.S. GRADE ASSIGNED BECAUSE BUTTERFAT CONTENT IS BELOW 80%															
GRADING TEMP 50°F															
USDA															
U.S. GRADE		NO CONT.	WEIGHT		FEES		I CERTIFY that in compliance with the regulations governing the inspection and grading of dairy products issued pursuant to the Agricultural Marketing Act of 1946, as amended (7 U.S.C. 1621 et seq.), the product described above was inspected on the date shown and that the quality and/or condition of said product, on said date, were as stated above								
AA		240	8640		INSPECTION 136.00 EXPENSE 36.00 LABORATORY 25.70 TOTAL 197.70		SIGNATURE OF OFFICIAL GRADER <i>John E. Rock</i> JOHN E. ROCK				ADDRESS LEFSA, MN				
BELOW			4320 MARKED WEIGHT				07/05/07								

DA-201 (03-01) Previous edition may be used.

1/ AS STATED BY APPLICANT

This certificate is receivable in all courts of the United States as prima facie evidence of the truth of the statements contained. It does not excuse the failure to comply with any applicable Federal law.

DMB APPROVED – NO. 0581-0126

U.S. DEPARTMENT OF AGRICULTURE
AGRICULTURAL MARKETING SERVICE

102651

14

05/25/07

* Vat sample taken for FDB, Moisture, pH
Composite sample taken for moisture only

Seal #'s 22011 – Samples, 22013 – Reserve Samples
Vat 4/15-G withdrawn by Applicant

lbs	INSPECTION
lbs	EXPENSE
lbs	LABORATORY
lbs	TOTAL

23-276

17. Sample Selection and Check Weighing Record

SAMPLE SELECTION AND TEST WEIGHING RECORD

(Make all entries in ink)

CONTRACTORS NAME ABC CREAMERY		INSPECTION LOCATION DALE CITY, PA		PRODUCT BUTTER		DATE 04/15/07	
CONTRACT NO. KC-DP-46162		PACKAGE TYPE 36 1# PRINTS		SEED NO. .9422		CERTIFICATE NO. 41025	
	CONTAINER NO	GROSS WEIGHT	TOTAL GROSS WEIGHT (Sum of Gross Weights)			1082.82	
1	21	36.68	NUMBER OF SAMPLES WEIGHED		30		
2	59	36.18	AVERAGE GROSS (Total Gross Weights Divided by WEIGHT Number of Samples Weighed)			36.09	
3	85	36.11	RANDOM TARE WEIGHTS				
4	122	36.61	CONTAINER NO.		WEIGHT		
5	147	36.13					
6	177	36.13					
7	193	36.15					
8	246	36.15					
9	257	36.21					
10	336	34.68*					
11	370	36.18					
12	395	36.13					
13	450	36.13					
14	465	36.25	Total Weight of 10 Random Containers		0.90		
15	482	36.13	Total Weight of Primary Packaging Material on 10 Random Containers				
16	496	36.31	Total Weight of Strapping Material on 10 Random Containers				
17	615	34.68*	TOTAL TARE WEIGHT		0.90		
18	644	36.18	AVERAGE TARE WEIGHT (Total Tare Weight Divided by 10)			0.09	
19	748	36.18	AVERAGE NET WEIGHT (Average Gross Weight minus Average Tare Weight)			36.00	
20	776	36.18	NUMBER OF CONTAINERS IN CAR-LOT			1067	
21	785	34.63*	CAR-LOT NET WEIGHT (Number of Containers Multiplied by Average Net Weight)			38412.00	
22	825	36.13	MISSING CONTAINER NUMBERS/CODING IRREGULARITIES				
23	842	36.21	<p>*Three sample cases weighed 34.68, 34.68, 34.63 pounds net weight. This is below the required minimum individual case weight of 36.75 pounds.</p> <p>Scale tare adjusted for the use of a .94lb plastic flipping plate.</p>				
24	873	36.71					
25	922	36.31					
26	977	36.18					
27	995	36.71					
28	1005	36.19					
29	1031	36.19					
30	1050	36.18					
INSPECTOR'S SIGNATURE			MINIMUM INDIVIDUAL NET WEIGHT REQUIREMENT (As Stated in ASCS Announcement)				
John E. Rock (001)			36.75				
			MINIMUM GROSS WEIGHT REQUIREMENT (Average Tare Weight Plus Minimum Individual Net Weight Requirement)				
			35.84				

FORM DA – 153 (4/89) (Previous editions obsolete)

U.S. DEPARTMENT OF AGRICULTURE AGRICULTURAL MARKETING SERVICE										CERTIFICATE NO.						
APPLICATION FOR BUTTER GRADING SERVICE										50659						
TO: APPLICANT (<i>Name and Address</i>) BIG BUTTER INC. COWVILLE, MN				SHIPPER OR SELLER (<i>Name and Address</i>) BIG BUTTER INC. COWVILLE, MN				RECEIVER OR BUYER (<i>Name and Address</i>) CCC WASHINGTON, DC				DATE INSPECTED		NO. SAMPLES TAKEN 10		
INSPECTED AT (<i>Name and Address</i>) SAME AS APPLICANT				INSPECTED BY: <i>JOHN E. ROCK (001)</i>				CONDITION OF CONTAINERS Applicable U.S. standards for condition of food containers				SAMPLE CONTAINERS STAMPED WITH USDA LOT NO. 50659				
MANUFACTURED BY (<i>Name and Address</i>) SAME AS APPLICANT				ANNOUNCEMENT NO. DAIRY 5		CONTRACT NO.		SEED NO. .9999		SIZE AND KIND OF CONTAINERS 25 KG C/F BOXES		STORAGE LOT		SERVICE DATE 04/01/07		
CHURN NUMBER		NO PKGS.	MFG. DATE	TEST WEIGHT	CLASSIFICATION			DEFECT RATING				U.S. GRADE	COMMENTS (S-Slight, D-Definite, P-Pronounced)	FAT	% H ₂ O	SALT
41	HH	80	3/20/07	OK	AA	VL	M					AA				
21	II	80	3/20/07	OK	AA	VL	M					**	HOLE IN LINER			
66	A	80	3/20/07	OK	AA	VL	M					AA				
12	B	80	3/20/07	OK	AA	VL	M					AA				
56	C	80	3/20/07	OK	AA	VL	M					AA				
46	D	80	3/21/07	.12	AA	VL	M					AA				
40	E	80	3/21/07	OK	AA	VL	M					AA				
25	F	80	3/21/07	OK	AA	VL	M					AA				
55	G	80	3/21/07	.22	AA	VL	M					AA				
72	H	80	3/21/07	OK	AA	VL	M					AA				
**NO FINAL U.S. GRADE ASSIGNED BECAUSE OF HOLE IN LINER.																
CHURNING 21 INELIGIBLE FOR SALE TO CCC BECAUSE OF PACKAGING DEFICIENCIES																
MARKED WEIGHT				44092.00												
TEST SHORTAGE				27.20												
NET WEIGHT				44064.80												
SIGNATURE OF AGENT FOR APPLICANT				REMARKS Grading Temp 48°F Marked <input type="checkbox"/> Net Wt <input checked="" type="checkbox"/>				U.S. GRADE		NO. OF PACKAGES		WEIGHT		FEES		
<i>J M Good</i>								GRADE AA		800		44065lbs		Inspection _____		
								GRADE A				lbs		Expenses _____		
								GRADE B				lbs		Laboratory _____		
								BELOW GRADE				lbs		Total _____		

19. DMS, Nonfat Dry Milk Inspection, Completed

UNITED STATES DEPARTMENT OF AGRICULTURE AGRICULTURE MARKETING SERVICE						TYPE OF PRODUCT NDM - SPRAY		DATE 03/22/07		DMS 28985	
						SIZE AND KIND OF CONTAINERS 35 KG CAP SAC BAGS					
DAIRY MISCELLANEOUS INSPECTION REPORT						SHIPPER OR SELLER (Name, Address, Zip) SAME AS APPLICANT				RECEIVER OR BUYER (Name, Address, Zip)* CCC WASHINGTON, DC	
To: Applicant (<i>Name, Address, Zip</i>) DUSTY MILK CO-OP (16-445) DRY WELLS, ID						CONDITION OF CONTAINERS (Check one) <input checked="" type="checkbox"/> meets or applicable U.S. Standards for condition of Food Containers <input type="checkbox"/> fails				SAMPLE CONTAINERS STAMPED WITH USDA LOT NO. 28985	
INSPECTED AT: (Name, Address, Zip) SAME AS APPLICANT						ANNOUNCEMENT NO. DAIRY 6		CONTRACT NO.		STORAGE LOT NO INSPECTION REQUEST NO	
MANUFACTURED BY (Name, Address, Zip)* SAME AS APPLICANT						NO. SAMPLES TAKEN 20		SEED NO .2665		SAMPLER (Signature and Address) JOHN E. ROCK (001), LEESA, MN	
MFR'S LOT NO.	DATE MFR'D 2006	NO CONTAINERS IN LOT*	SERIAL NO. OF SAMPLES	NO. CON-TAINERS WEIGHED	WEIGHT (Pounds)			NET	LABORATORY NO.		
					MARKED*	TEST SHORTAGE					
				SAMPLES		TOTAL					
62-8	03/03/07	80	1	1	4409.20	OK		4409.20			
-9	03/03/07		2 *								
-10			3								
-11			4								
-12			5								
			6								
			7 *								
			8								
			9 **								
			10								
			11 *								
			12								
			13			↓	0.10 8.00	4401.20	↓		
			14			↓	OK	4409.20	↓		
			15			↓					
			16			↓					
			17			↓					
			18 *			↓	0.10 8.00	4401.20	↓		
			19			↓	OK	4409.20	↓		
			20			↓			↓		
		1600 ↓		↓	88184 ↓		16.00	88168 ↓			
		* Test samples for Group I factors									
		** Test samples for Group I and Group II Factors and WPN									
Inspection Fee Expense Laboratory Fee Total		136.00 38.00 174.00	USDA SEAL NO. 54321		REMARKS						

U.S. DEPARTMENT OF AGRICULTURE AGRICULTURAL MARKETING SERVICE										CERTIFICATE NO. 44876					
APPLICATION FOR BUTTER GRADING SERVICE															
TO: APPLICANT (Name and Address) OTHER BUTTER CO. BULLDALE, WI				SHIPPER OR SELLER (Name and Address) SAME AS APPLICANT				RECEIVER OR BUYER (Name and Address) CCC WASHINGTON, DC				DATE INSPECTED 04/01/07		NO. SAMPLES TAKEN 10	
INSPECTED AT (Name and Address) SAME AS APPLICANT				INSPECTED BY: <i>John E. Rock (001), Lefsa, MN</i>				CONDITION OF CONTAINERS Applicable U.S. standards for condition of food containers				SAMPLE CONTAINERS STAMPED WITH USDA LOT NO. 44876			
MANUFACTURED BY (Name and Address) SAME AS APPLICANT				ANNOUNCEMENT NO. PBA-1		CONTRACT NO.		SEED NO. .9999		SIZE AND KIND OF CONTAINERS 36 – 1 LB PRINTS		STORAGE LOT		SERVICE DATE 04/01/07	
CHURN NUMBER	NO PKGS.	MFG. DATE	TEST WEIGHT	CLASSIFICATION			DEFECT RATING				U.S. GRADE	COMMENTS (S-Slight, D-Definite, P-Pronounced)	FAT	% H ² O	SALT
1760	110	03/11/07	OK	AA	VL	M					AA				
1761	110	03/11/07	OK	AA	VL	M					AA				
1762	49	03/11/07	0.27	AA	VL	M					AA				
1772	116	03/11/07	OK	AA	VL	M					AA				
1773	110	03/11/07	OK	AA	VL	M					AA				
1774	110	03/11/07	OK	AA	VL	M					AA				
1775	110	03/11/07	OK	AA	VL	M					AA				
1776	110	03/11/07	OK	AA	VL	M					AA				
1777	110	03/11/07	OK	AA	VL	M					AA				
1778	22	03/11/07	OK	AA	VL	M					AA				
			MARKED WEIGHT	38,412.00											
			TEST SHORTAGE	13.23											
			NET WEIGHT	38,398.77											
			ONE SAMPLE CASE WEIGHED 35.73. THIS IS BELOW THE MINIMUM NET WEIGHT REQUIREMENT OF 35.75 LBS NET WEIGHT												
SIGNATURE OF AGENT FOR APPLICANT <i>J M Good</i>			REMARKS Grading Temp 48°F Marked <input type="checkbox"/> Net Wt <input checked="" type="checkbox"/>				U.S. GRADE GRADE AA GRADE A GRADE B BELOW GRADE		NO. OF PACKAGES 1067		WEIGHT 38399lbs		FEES Inspection _____ Expenses _____ Laboratory _____ TOTAL _____		

DMB APPROVED – NO. 0581-0126

U.S. DEPARTMENT OF AGRICULTURE AGRICULTURAL MARKETING SERVICE												CERTIFICATE NO.					
CHEESE GRADER'S MEMORANDUM												102651					
TO: Applicant (Name and Address) BEST CHEESE CO. LEFSA, MN				SHIPPER OR SELLER (Name and Address) SAME AS APPLICANT				RECEIVER OR BUYER (Name and Address) CCC WASHINGTON, DC				DATE INSPECTED 05/25/07		NO. SAMPLES TAKEN 15			
INSPECTED AT (Name and Address) SAME AS APPLICANT				INSPECTED BY: <i>John E. Rock, (001) Lefsa,, MN</i>				CONDITION OF CONTAINERS Applicable U.S. standards for condition of food containers				SAMPLE CONTAINERS STAMPED WITH USDA LOT NO 102651					
MANUFACTURED BY (Name and Address) SAME AS APPLICANT 9#27-450)				ANNOUNCEMENT NO.		CONTRACT NO.		SEED NO. .1234		SIZE AND KIND OF CONTAINERS COLORED – 40 LB BLOCKS		STORAGE LOT		SERVICE DATE 05/25/07			
MOISTURE TEST	VAT NUMBER	YR 200Z MFG DATE	NO. PKGS	MARKED WEIGHT	TEST SHORTAGE	NET WEIGHT	DEFECT RATING				U.S. GRADE	COMMENTS (S-Slight, D-Definite, P-Pronounced)	FDB	% H ₂ O	pH		
36.0	60-1	03/01	51	2131.75	0.75	2093.50	A					**					
36.3	-2	03/01	49	2032.25	OK	2032.25	A					**					
35.8	-3	03/01	50	2072.00	OK	2072.00	A					**					
36.0	-4	03/01	50	2064.25	OK	2064.25	A					**					
36.1	-5	03/01	50	2051.25	OK	2051.25	A					**					
36.3	61-1	03/02	51	2100.50	OK	2100.50	A					**					
36.3	-2	03/02	51	2101.25	OK	2101.25	A					**					
35.9	-3	03/02	51	2100.25	OK	2100.25	A					**					
36.0	-5	03/02	53	2181.50	OK	2181.50	A					**					
35.7	62-1	03/03	51	2100.75	OK	2100.75	A					**					
35.8	-2	03/03	50	2056.75	OK	2056.75	A					**					
35.8	-3	03/03	50	2047.00	OK	2047.00	A					**					
36.0	-4	03/03	50	2014.50	OK	2014.50	A					**					
36.3	63-1	03/04	51	2062.75	OK	2062.75	A					**					
36.5	-2	03/04	51	2126.75	1.0	2076.75	A					**					
			759	31243.50		31154.25											
							**1 OF 5 RANDOM VERIFICATION SAMPLES FAILED TO CONFIRM THE CONDITION OF QUALITY OF THE APPLICANT SELECTED SAMPLES. NO FINAL GRADE ASSIGNED.										
SIGNATURE OF AGENT FOR APPLICANT					U.S. GRADE		NO. OF PACKAGES			WEIGHT		FEES					
Vinnie Vatman					GRADE					lbs		INSPECTION		204.00			
					GRADE					lbs		EXPENSE		36.00			
					GRADE					lbs		LABORATORY					
					GRADE					lbs		TOTAL		240.00			
					GRADE		BELOW			759			31154lbs				

23-281

22. Butter Grading Certificate, In Process

U.S. DEPARTMENT OF AGRICULTURE AGRICULTURAL MARKETING SERVICE IN-PROCESS INSPECTION CERTIFICATE					CERTIFICATE NO. DI-40001026-0		
TO: APPLICANT (Name and address) ABC CREAMERY DALE CITY, PA		SHIPPER OR SELLER (Name and address) ABC CREAMERY DALE CITY, PA		RECEIVER OR BUYER (Name and address) CCC WASHINGTON, DC		DATE INSPECTED 04/18/2007	NO. SAMPLES TAKEN 4
INSPECTED AT (Name and address) ABC CREAMERY DALE CITY, PA		INSPECTED BY JOHN E. ROCK		CONDITION OF CONTAINERS MEETS Applicable U.S. Standards for condition of Food containers		SAMPLE CONTAINERS STAMPED WITH USDA LOT NO. 41026	
MANUFACTURED BY (Name and address) ABC CREAMERY DALE CITY, PA		ANNOUNCEMENT NO. PBP-1	CONTRACT NO.	SEED NO. .1234	SIZE AND KIND OF CONTAINERS 36 LB C/F BOXES	STORAGE LOT	SERVICE DATE 04/18/2007

-----AVE WEIGHT OF CASE-----

-----LABORATORY TESTS-----

PACKAGING CODE	DATE PACKAGED 2007	NO. OF CASES IN LOT	GROSS	TARE	NET	NET WEIGHT IN EACH LOT	PERCENT MOISTURE	PERCENT FAT	PERCENT SALT	CASE NUMBER
41026	4-16	197								103
	4-17	667								
	4-18	203								
		1067	37.05	1.12	35.93	38,337				

MARKED WEIGHT: 38412 SHORTAGE: 74.69 NET WEIGHT: 38,337.31

36 LB CASES 1# PRINTS PRINT BUTTER

TEST WEIGHT SHORAGE OF CAR-LOT EXCEEDS .01 PERCENT

THREE SAMPLE CASES WEIGHTED 35.59, 35.59 AND 35.63 POUNDS NET WEIGHT. THIS IS BELOW THE REQUIRED INDIVIDUAL MINIMUM CASE WEIGHT OF 35.75 POUNDS

U.S. GRADE	NO CONT.	WEIGHT	FEES	I CERTIFY that in compliance with the regulations governing the inspection and grading of dairy products issued pursuant to the Agricultural Marketing Act of 1946, as amended (7 U.S.C. 1621 et seq.), the product described above was inspected on the date shown and that the quality and/or condition of said product, on said date, were as stated above		
			INSPECTION 136.00	SIGNATURE OF OFFICIAL GRADER <i>John E. Rock</i> JOHN E. ROCK 04/18/07 LEFSA, MN		
			EXPENSE 34.00			
			LABORATORY			
	1067 NET WEIGHT	38,337	TOTAL 170.00			

DA-201 (03-01) Previous edition may be used.

1/ AS STATED BY APPLICANT

This certificate is receivable in all courts of the United States as prima facie evidence of the truth of the statements contained. It does not excuse the failure to comply with any applicable Federal law.

TABLE VII – FLEXIBLE CONTAINERS (PLASTIC, CELLO, PAPER, TEXTILE, ETC.)			PRODUCT TYPE AND SIZE OF CONTAINERS									
NAME AND ADDRESS OF APPLICANT			LOT NO.				LOT SIZE*				CONTRACT NO.	
			INSPECTION STATUS OF LOT* <input type="checkbox"/> ORIGINAL <input type="checkbox"/> RESUBMITTED						INSPECTION POINT			
			CODES AND APPROXIMATE NO. OF CONTAINERS PER CODE*									
			*As stated by applicant									
SAMPLING PLAN USED <input type="checkbox"/> NORMAL <input type="checkbox"/> REDUCED		<input type="checkbox"/> TIGHTENED CODE _____ First sample _____ Second sample _____ Total sample _____	NO OF SAMPLE UNITS	CRITICAL AQL: 0.25 If other, specify _____ Ac _____ Re _____			MAJOR AQL: 1.5 If other, specify _____ Ac _____ Re _____			TOTAL (Minor, Critical, and Major) AQL: 6.5 If other, specify _____ Ac _____ Re _____		
DEFECT NO.	TYPE OF DEFECT			1 st Sample	2 nd Sample	Defect No.	TYPE OF DEFECT			1 st Sample	2 nd Sample	
	Type or size of container or component parts not as specified			NONE	PERMITTED	106	WET OR DAMP (<i>continued</i>): (a) Materially affecting usability			MAJOR		
101	CLOSURE NOT SEALED, CRIMPED, STITCHED, OR FITTED PROPERLY (a) Primary container			MAJOR		107	OVERWRAP (<i>when required</i>): (a) Missing			MAJOR		
201	(b) Other than primary container			minor		206	(b) Loose, not sealed or closed			minor		
202	Dirty, stained, or smeared container			minor		207	(c) Improperly applied			minor		
203	Unmelted gels in plastic			minor		108	SEALING TAPE, STRAPPING OR ADHESIVES (<i>when required</i>) (a) Missing			MAJOR		
204	TORN CONTAINER: (a) Materially affecting appearance but not usability			minor		208	(b) Improperly placed, applied, torn, or wrinkled			minor		
102	(b) Materially affecting usability			MAJOR		109	TAPE OVER BOTTOM AND TOP CLOSURES (<i>when required</i>) (a) Not covering stitching			MAJOR		
103	Product sifting or leaking			MAJOR		110	(b) Torn (<i>exposing stitching</i>)			MAJOR		
1	Moldy area			CRITICAL		111	(c) Wrinkled (<i>exposing stitching</i>)			MAJOR		
104	Individual packages sticking together or to Shipping cases (<i>tear when separated</i>)			MAJOR		112	(d) Not adhering to bag: 1. Exposing stitching			MAJOR		
105	Not fully covering product			MAJOR		209	2. Not exposing stitching			minor		
205	WET OR DAMP (<i>excluding ice packs</i>) (a) Materially affecting appearance but not usability			minor		210	(e) Improper placement			minor		
TABLE VIII – LABEL, MARKING, OR CODE												
101	Not specified method			MAJOR		203	Text illegible or incomplete			minor		
102	Missing (<i>when required</i>)			MAJOR		204	Incorrect			minor		
103	Torn or scratched, obliterating any markings on the label (<i>military purchase</i>)			MAJOR		205	In wrong location			minor		
201	Loose or improperly applied			MAJOR		OTHER (<i>Specify</i>)						
202	Torn or mutilated			minor								
		Minor	Major	Critical	Total	ACTION TAKEN BASED ON FIRST SAMPLE <input type="checkbox"/> LOT ACCEPTED <input type="checkbox"/> LOT REJECTED <input type="checkbox"/> SECOND SAMPLE						
First Sample						ACTION TAKEN ON SECOND SAMPLE (<i>If required</i>) <input type="checkbox"/> LOT ACCEPTED <input type="checkbox"/> LOT REJECTED						
Second Sample						SIGNATURE OF INSPECTOR						
Grand Total												

24. Condition of Container, Glass Container

U.S. DEPARTMENT OF AGRICULTURE CONTAINER EXAMINATION WORKSHEET (TABLE V – GLASS CONTAINERS)			PRODUCT		TYPE AND SIZE OF CONTAINERS			
			LOT NO.		LOT SIZE*		CONTRACT NO.	
			INSPECTION STATUS OF LOT* <input type="checkbox"/> ORIGINAL <input type="checkbox"/> RESUBMITTED				INSPECTION POINT	
			CODES AND APPROXIMATE NO. OF CONTAINERS PER CODE*					
NAME AND ADDRESS OF APPLICANT			*As stated by applicant					

SAMPLING PLAN USED <input type="checkbox"/> NORMAL <input type="checkbox"/> TIGHTENED <input type="checkbox"/> REDUCED CODE _____ First sample Second sample Total sample		NO OF SAMPLE UNITS	CRITICAL		MAJOR		TOTAL (Minor, Critical, and Major)	
			AQL: 0.25 If other, specify _____		AQL: 1.5 If other, specify _____		AQL: 6.5 If other, specify _____	
			Ac	Re	Ac	Re	Ac	Re

DEFECT NO.	TYPE OF DEFECT	1 st Sample	2 nd Sample	Defect No.	TYPE OF DEFECT	1 st Sample	2 nd Sample
	Type or size of container or component parts not as specified	NONE	PERMITTED	1	Bird Swing (<i>glass appendage inside Container</i>)	CRITICAL	
101	Closure not sealed, crimped, or fitted properly	MAJOR		2	Broken or leaking container	CRITICAL	
201	Dirty, stained, or smeared container	minor		207	CAP (<i>nonheat processed</i>) (a) Cross-threaded	minor	
202	Chip in glass	minor		208	(b) Loose but not leaking	minor	
203	Stone (<i>unmelted material</i>) in glass	minor		106	(c) Pitted rust	MAJOR	
204	Pits in surface of glass	minor		3	CAP (<i>heat processed</i>) (a) Cross-threaded or loose	CRITICAL	
205	Sagging surface	minor		107	(b) Pitted rust	MAJOR	
206	BEAD (<i>bubble within glass</i>) (a) 1/8" to 1/16" in diameter	minor		209	SEALING TAPE OR CELLO BAND (<i>when required</i>): (a) Improperly placed	minor	
102	(b) exceeding 1/8" in diameter	MAJOR					
103	Checked	MAJOR		108	(b) Not covering juncture of cap and glass	MAJOR	
104	Thin spot in glass	MAJOR		109	(c) Ends overlap by less than 1/2"	MAJOR	
105	(b) Blister (<i>structural defect</i>)	MAJOR		110	(d) Loose or deteriorating	MAJOR	

101	Not specified method	MAJOR		202	Torn or mutilated	minor	
102	Missing (<i>when required</i>)	MAJOR		203	Text illegible or incomplete	minor	
103	Text illegible or incomplete (<i>military purchase</i>)	MAJOR		204	In wrong location	minor	
304	Incorrect	MAJOR		OTHER (<i>Specify</i>)			
201	Loose or improperly applied	minor					

	Minor	Major	Critical	Total	ACTION TAKEN BASED ON FIRST SAMPLE
First Sample					<input type="checkbox"/> LOT ACCEPTED <input type="checkbox"/> LOT REJECTED <input type="checkbox"/> SECOND SAMPLE
Second Sample					ACTION TAKEN ON SECOND SAMPLE (<i>If required</i>)
					<input type="checkbox"/> LOT ACCEPTED <input type="checkbox"/> LOT REJECTED
Grand Total					SIGNATURE OF INSPECTOR

25. Condition of Container, Metal Containers

U.S. DEPARTMENT OF AGRICULTURE CONTAINER EXAMINATION WORKSHEET (TABLE IV – METAL CONTAINERS)			PRODUCT		TYPE AND SIZE OF CONTAINERS		
			LOT NO.		LOT SIZE*		CONTRACT NO.
			INSPECTION STATUS OF LOT* <input type="checkbox"/> ORIGINAL <input type="checkbox"/> RESUBMITTED		INSPECTION POINT		
			CODES AND APPROXIMATE NO. OF CONTAINERS PER CODE*				
NAME AND ADDRESS OF APPLICANT			*As stated by applicant				

SAMPLING PLAN USED <input type="checkbox"/> NORMAL <input type="checkbox"/> TIGHTENED <input type="checkbox"/> REDUCED CODE _____ First sample Second sample Total sample		NO OF SAMPLE UNITS	CRITICAL		MAJOR		TOTAL (Minor, Critical, and Major)	
			AQL: 0.25 If other, specify _____		AQL: 1.5 If other, specify _____		AQL: 6.5 If other, specify _____	
			Ac	Re	Ac	Re	Ac	Re

DEFECT NO.	TYPE OF DEFECT	1 st Sample	2 nd Sample	Defect No.	TYPE OF DEFECT	1 st Sample	2 nd Sample
	Type or size of container or component parts not as specified	NONE	PERMITTED	108	RUST (continued) (b) Rust stain (<i>military purchases</i>)	MAJOR	
101	Closure incomplete, not located correctly or not sealed, crimped, or fitted properly	MAJOR		109	(c) Pitted rust	MAJOR	
201	Dirty, stained, or smeared container	minor		207	Wet cans (<i>excluding refrigerated containers</i>)	minor	
102	KEY OPENING METAL CONTAINERS (when req): (a) Key missing	MAJOR		208	DENT: (a) Materially affecting appearance but not usability	minor	
103	(b) Key does not fit tab	MAJOR		110	(b) Materially affecting usability	MAJOR	
104	(c) Tab of opening band insufficient to provide accessibility to key	MAJOR		209	BUCKLE: (a) Not involving end seam	minor	
105	(d) Improper scoring (<i>band would not be removed in one continuous strip</i>)	MAJOR		111	(b) Extending into the end seam	MAJOR	
106	OPEN TOP WITH PLASTIC OVERCAP (when req): (a) Plastic overcap missing	MAJOR		112	Collapsed container	minor	
107	(b) Plastic overcap warped (<i>making opening Or reapplication difficult</i>)	MAJOR		210	Paneled side materially affecting appearance but not usability	minor	
202	OUTSIDE TINPLATE OR COATING (when req): (a) Missing or incomplete	minor		113	Solder missing when required	MAJOR	
203	(b) Blistered, flaked, sagged, or wrinkled	minor		114	Cable cut exposing seam	MAJOR	
204	(c) Scratched or scored	minor		115	Improper side seam	MAJOR	
205	(d) Fine cracks	minor		1	Swell, springer, or flipper (<i>not applicable to gas or pressure packed product nor frozen products</i>)	CRITICAL	
206	RUST: (<i>rust stain confined to the top or bottom double seam or rust that can be removed with a soft cloth is not scored as a defect</i>) (a) Rust stain (<i>nonmilitary purchases</i>)	minor		2	Leaker or blown container	CRITICAL	
				211	FROZEN PRODUCTS ONLY: (a) Bulging ends 3/16" to 1/4" beyond lip	minor	
				116	(b) Bulging ends more than 1/4" beyond lip	MAJOR	

TABLE VIII – LABEL, MARKING, OR CODE							
101	Not specified method	MAJOR		202	Torn or mutilated	minor	
102	Missing (<i>when required</i>)	MAJOR		203	Text illegible or incomplete	minor	
103	Text illegible or incomplete (<i>military purchase</i>)	MAJOR		204	In wrong location	minor	
304	Incorrect	MAJOR		OTHER (<i>Specify</i>)			
201	Loose or improperly applied	minor					

	Minor	Major	Critical	Total	ACTION TAKEN BASED ON FIRST SAMPLE
First Sample					<input type="checkbox"/> LOT ACCEPTED <input type="checkbox"/> LOT REJECTED <input type="checkbox"/> SECOND SAMPLE
Second Sample					ACTION TAKEN ON SECOND SAMPLE (<i>If required</i>) <input type="checkbox"/> LOT ACCEPTED <input type="checkbox"/> LOT REJECTED
Grand Total					SIGNATURE OF INSPECTOR

26. Condition of Container, Rigid and Semi Rigid Containers

TABLE VI – RIGID AND SEMIRIGID CONTAINERS CORRUGATED OR SOLID FIBERBOARD, CHIPBOARD, WOOD, ETC. (EXCLUDING GLASS AND METAL)				PRODUCT		TYPE AND SIZE OF CONTAINERS	
NAME AND ADDRESS OF APPLICANT				LOT NO.		LOT SIZE*	
				CONTRACT NO.			
				INSPECTION STATUS OF LOT* <input type="checkbox"/> ORIGINAL <input type="checkbox"/> RESUBMITTED		INSPECTION POINT	
CODES AND APPROXIMATE NO. OF CONTAINERS PER CODE*							
*As stated by applicant							
SAMPLING PLAN USED <input type="checkbox"/> NORMAL <input type="checkbox"/> REDUCED	<input type="checkbox"/> TIGHTENED CODE _____ First sample _____ Second sample _____ Total sample _____	NO OF SAMPLE UNITS	CRITICAL AQL: 0.25 If other, specify _____ Ac Re	MAJOR AQL: 1.5 If other, specify _____ Ac Re	TOTAL (Minor, Critical, and Major) AQL: 6.5 If other, specify _____ Ac Re		
DEFECT NO.	TYPE OF DEFECT	1 st Sample	2 nd Sample	Defect No.	TYPE OF DEFECT	1 st Sample	2 nd Sample
	Type or size of container or component parts not as specified	NONE	PERMITTED	105	SEPARATION OF LAMINATION (continued) (a) Materially affecting usability	MAJOR	
101	Component part missing	MAJOR		106	Product sifting or leaking	MAJOR	
102	CLOSURE NOT SEALED, CRIMPED, OR FITTED PROPERLY: (a) Primary container	MAJOR		206	NAILS OR STAPLES (when required) (a) Not as required, insufficient number or improperly positioned	minor	
201	(b) Other than primary container	minor		107	(b) Nails or staples protruding	MAJOR	
202	Dirty, stained, or smeared container	minor		108	GLUE OR ADHESIVE (when required); NOT HOLDING PROPERLY, NOT COVERING AREA SPECIFIED, OR NOT COVERING SUFFICIENT AREA TO HOLD PROPERLY:	MAJOR	
203	WET OR DAMP (excluding ice packs) (a) Materially affecting appearance but not usability	minor			(a) Primary container		
103	(b) Materially affecting usability	MAJOR		207	(b) Other than primary container	minor	
1	Moldy area	CRITICAL		208	FLAP: (a) Projects beyond edge of container more Than ¼ inch	minor	
204	CRUSHED OR TORN AREA: (a) Materially affecting appearance but not usability	minor		209	(b) Does not meet properly, allowing space of more than ¼ inch	minor	
104	(b) Materially affecting usability	MAJOR		109	SEALING TAPE OR STRAPPING (when required):	MAJOR	
205	SEPARATION OF LAMINATION (corrugated fiberboard): (a) Materially affecting appearance but not usability	minor		210	(e) Improperly placed or applied	minor	

TABLE VIII – LABEL, MARKING, OR CODE							
101	Not specified method	MAJOR		202	Torn or mutilated	minor	
102	Missing (when required)	MAJOR		203	Text illegible or incomplete	minor	
103	Text illegible or incomplete (military purchase)	MAJOR		204	In wrong location	minor	
104	Incorrect	MAJOR		OTHER (Specify)			
201	Loose or improperly applied	minor					

	Minor	Major	Critical	Total	
First Sample					ACTION TAKEN BASED ON FIRST SAMPLE <input type="checkbox"/> LOT ACCEPTED <input type="checkbox"/> LOT REJECTED <input type="checkbox"/> SECOND SAMPLE
Second Sample					ACTION TAKEN ON SECOND SAMPLE (If required) <input type="checkbox"/> LOT ACCEPTED <input type="checkbox"/> LOT REJECTED
Grand Total					SIGNATURE OF INSPECTOR

FORM AD – 748 (Reverse)

FORM AD - 749
(11/77)

PACKER

CONTAINER

CUMULATIVE ORIGINAL INSPECTIONS OF CONDITION OF CONTAINER

LOCATION OF PLANT

AQL'S
☐ 0.25 ☐ 1.5 ☐ 6.5
☐ OTHER (*Specify*)

INSTRUCTIONS: Keep a separate record on inspection.
Lots by (1) source, (2) style, (3) size, (4) type of container,
and (5) specified combination of AQL's.

Do not record resubmitted lots. If double sampling plans are used, all sample units inspected will be recorded, not "first" samples only.

INSPECTOR'S NOTE:									
THIS SECTION IS COMPLETED <u>ONLY</u> FOR									
NORMAL INSPECTIONS. DO NOT FILL IN THESE									
COLUMNS DURING REDUCED INSPECTIONS.									
WHEN A CARLOT IS REJECTED, ALL									
FIGURES MUST BEGIN AT ZERO. SEE EXAMPLE									
BELOW.									

UNITED STATES DEPARTMENT OF AGRICULTURE AGRICULTURE MARKETING SERVICE				TYPE OF PRODUCT NDM - SPRAY			DATE 07/10/07		DMS 08098		
				SIZE AND KIND OF CONTAINERS 25 KG CAP SAC BAGS							
DAIRY MISCELLANEOUS INSPECTION REPORT				SHIPPER OR SELLER (Name, Address, Zip) SAME AS APPLICANT					RECEIVER OR BUYER (Name, Address, Zip)* CCC WASHINGTON, DC		
To: Applicant (Name, Address, Zip) MEGA CO-OP (06-9876) MILKWOOD, CA				CONDITION OF CONTAINERS (Check one) <input type="checkbox"/> meets or applicable U.S. Standards for condition of Food Containers <input checked="" type="checkbox"/> fails					SAMPLE CONTAINERS STAMPED WITH USDA LOT NO. 08098		
INSPECTED AT: (Name, Address, Zip) SAME AS APPLICANT				ANNOUNCEMENT NO. DAIRY 6		CONTRACT NO.		STORAGE LOT NO.		INSPECTION REQUEST NO.	
MANUFACTURED BY (Name, Address, Zip)* SAME AS APPLICANT				NO. SAMPLES TAKEN 20		SEED NO. .54321		SAMPLER (Signature and Address) <i>John E. Rock (001), Lefsa, MN</i>			
MFR'S LOT NO.	DATE MFR'D 2006	NO CONTAINERS IN LOT*	SERIAL NO. OF SAMPLES	NO. CON- TAINERS WEIGHED	WEIGHT (Pounds)			NET	LABORATORY NO.		
					MARKED*	TEST SHORTAGE					
						SAMPLES	TOTAL				
190-1	03/03/06	80	1	1	4409.20	OK		4409.20			
-2	03/03/06		2								
-3	03/03/06		3								
-4	03/03/06		4								
-5	03/03/06		5								
-6	03/03/06		6								
-7	03/03/06		7								
-8	03/03/06		8								
-9	03/03/06		9								
-10	03/03/06		10								
-11	03/03/06		11								
-12	03/03/06		12								
-13	03/03/06		13			0.10	8.00	4401.20			
-14	03/03/06		14			OK		4409.20			
-15	03/03/06		15								
-16	03/03/06		16								
-17	03/03/06		17								
-18	03/03/06		18			0.10	8.00	4401.20			
-19	03/03/06		19			OK		4409.20			
-20	03/03/06		20								
		1600			88184.00		16.00	88168.00			
CONDITION OF CONTAINERS FAILS BECAUSE 18 OF 84 BAGS WITH TAPERED SEALS OR TORN FLAPS (MAJOR DEFECTS), ONLY 3 DEFECTS PERMITTED											
Inspection Fee		187.00	USDA SEAL NO.		REMARKS						
Expense		74.00	54321								
Laboratory Fee											
Total		261.00									

29. DMS Cheddar Cheese, Lab Samples

[illegible]

30. Application for Butter Grading Service, Verification Samples

U.S. DEPARTMENT OF AGRICULTURE
AGRICULTURAL MARKETING SERVICE

APPLICATION FOR BUTTER GRADING SERVICE

CERTIFICATE NO.

44876

TO: APPLICANT (Name and Address) OTHER BUTTER CO. BULLDALE, WI	SHIPPER OR SELLER (Name and Address) SAME AS APPLICANT	RECEIVER OR BUYER (Name and Address) BETTER BAKER INC. KITCHEN, IL 66366	DATE INSPECTED 04/01/07	NO. SAMPLES TAKEN 11
--	--	--	-----------------------------------	--------------------------------

INSPECTED AT (Name and Address) SAME AS APPLICANT	INSPECTED BY: <i>John E. Rock (001), Lefsa, MN</i>	CONDITION OF CONTAINERS Applicable U.S. standards for condition of food containers	SAMPLE CONTAINERS STAMPED WITH USDA LOT NO. 44876
---	---	---	---

MANUFACTURED BY (Name and Address) SAME AS APPLICANT	ANNOUNCEMENT NO.	CONTRACT NO.	SEED NO. .9999	SIZE AND KIND OF CONTAINERS 25 KG C/F BOXES	STORAGE LOT	SERVICE DATE 04/01/07
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
CHURN NUMBER	NO PKGS.	MFG. DATE	TEST WEIGHT	CLASSIFICATION			DEFECT RATING				U.S. GRADE	COMMENTS (S-Slight, D-Definite, P-Pronounced)	FAT	% H ² O	SALT
	42-61	36	02/11/07	OK	AA	VL	M				AA				
	-62	36	02/11/07	OK	AA	VL	M				AA				
	-63	36	02/11/07	OK	AA	VL	M				AA				
	-64	36	02/11/07	OK	AA	VL	M				AA				
	-65	36	02/11/07	OK	AA	VL	M				AA				
	-66	71	02/11/07	OK	AA	VL	M				AA				
	-67	72	02/11/07	OK	AA	VL	M				AA				
	-68	72	02/11/07	OK	AA	VL	M				AA				
	-69	72	02/11/07	OK	AA	VL	M				AA				
	-70	72	02/11/07	OK	AA	VL	M				AA				
	-71	72	02/12/07	OK	AA	VL	M				AA				
DUE TO SIGNIFICANT VARIATION IN TEST WEIGHT OF 1 RANDOM VERIFICATION SAMPLE, PLANT MANAGEMENT ACCEPTS THE LOWEST TEST WEIGHT FOR ALL SAMPLES WEIGHED.															
	42-66			.36	AA	VL	M				AA				
	42-67			OK	AA	VL	M				AA				
	42-70			OK	AA	VL	M				AA				

SIGNATURE OF AGENT FOR APPLICANT <i>Robert Greasy</i>	REMARKS Grading Temp 48°F Marked <input type="checkbox"/> Net Wt <input checked="" type="checkbox"/>	U.S. GRADE GRADE AA GRADE A GRADE B BELOW GRADE	NO. OF PACKAGES 611	WEIGHT 33400lbs lbs lbs lbs	FEES Inspection 102.00 Expenses 4.50 Laboratory TOTAL 106.50
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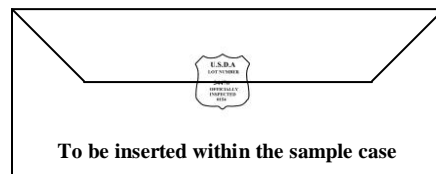
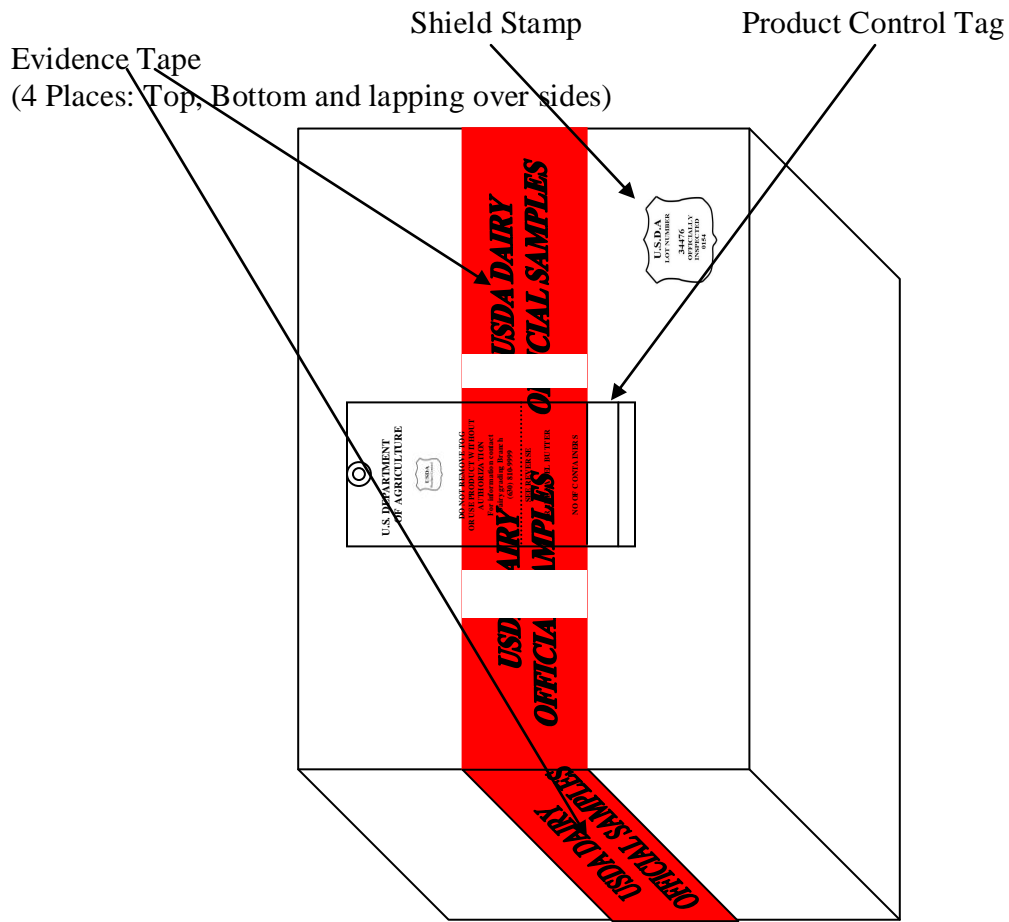
32. Product Control Tag

PRODUCT CONTROL TAG

DA – 147 (06-99)		NO. 375
U.S. DEPARTMENT OF AGRICULTURE AGRICULTURAL MARKETING SERVICE DAIRY PROGRAMS		
		
DO NOT REMOVE TAG OR USE PRODUCT WITHOUT AUTHORIZATION For Information Contact: Dairy Grading Branch (630) 810-9999		
(SEE REVERSE)		
NO. 375		
PRODUCT TAGGED		
GRADE LABEL BUTTER		
NO. OF CONTAINERS		
1		

	
The product(s) or container(s) to which this tag is attached is (are) controlled under authority of the Agricultural Marketing Act and is (are) not to be used, moved or altered in any manner without the expressed permission of an authorized representative of the United States Department of Agriculture. The unauthorized removal or alteration of this tag or utilization of the tagged product(s) is a violation of the Agricultural Marketing Act of 1946, as amended and regulations issued thereunder.	
REMARKS	
GRADE LABEL BUTTER	
SAMPLED 07/10/07	
BOX 1 OF 4	
<i>John E. Rock (001)</i>	07/10/07
AUTHORIZED EMPLOYEE	DATE
PRODUCT CONTROL	
LOCATION AND REMARKS	
BOX 1/4	
<i>John E. Rock (001)</i>	07/10/07
AUTHORIZED EMPLOYEE	DATE
DA – 147 (06-99)	REVERSE

33. Evidence Tape Placement



[illegible]

35. Cheese Sample Labels

USDA NO. 67891DRUM NO. 222USDA NO. 12345CASE NO. 640PROCESS CHEESE ☐BUTTEROIL ☒PROCESS CHEESE ☒BUTTEROIL ☐APPLICANT **BUTTER REFINING CO.**CONTRACT NO. KC-B-66541TIME OF SAMPLING 9:00amMFG'D AT Same as ApplicantDATE 07/29/07SUPERVISED BY JLRAPPLICANT **BIG CHEESE CO.**CONTRACT NO. KC-C-55555TIME OF SAMPLING 10:00amMFG'D AT Same as ApplicantDATE 07/29/07SUPERVISED BY JLR

IDENTIFICATION FOR PROCESS AMERICAN CHEESE

USDA LOT NO. 86909 SUB-LOT NO. _____ TIME OF MFR 9:00am DATE OF MFR 6/29/07

NAME AND ADDRESS

OF VENDOR

AVE. AGE

OF BLEND 60 Days

WEIGHT OF

CHEESE IN BATCH 5700

WEIGHT OF

SALT PER BATCH 50 lb

COOKING

TEMPERATURE 166°F

USDA

INSPECTOR John E. Rock

REMARKS _____

Best Cheese Inc., Clair, MN

RAW MATERIAL

PERCENT U.S. GRADE A _____

CONTRACT

NUMBER

KC-MF-66555

GRADE B _____

GRADE C _____

KIND AND WEIGHT OF

EMULSIFIER IN BATCH 198

AMOUNT AND KIND OF

COLOR PER BATCH 7 lbs Beta Carotene

TIME HELD AT

HIGHEST TEMPERATURE _____

OFFICIAL CHEESE SAMPLE

CERT

NO.

DC-34476

SUBLOT OR VAT NO.

3-17-06 V32

CONTRACT NO.

KC-MF-4064

DATE

3/21/07DMS NO. 34476USDA STAMP & LOT NO. 34476APPLICANT **PIZZA CHEESE CO. PASTA, CA**

WHERE

GRADED

SAME AS APPLICANTGRADER John E. Rock

(Attach with Scotch Tape or Rubber Band)

NATURAL ☐
PROCESS ☐
MOZARELLA ☒

36. Butter Grading Certificate, Grand Lot

U.S. DEPARTMENT OF AGRICULTURE AGRICULTURAL MARKETING SERVICE BUTTER GRADING CERTIFICATE					CERTIFICATE NO. DB-100054321-0		
TO: APPLICANT (Name and address) BIG BUTTER FACTORY BLUE RIVER, WI		SHIPPER OR SELLER (Name and address)		RECEIVER OR BUYER (Name and address)		DATE INSPECTED 07/05/2007	NO. SAMPLES TAKEN 80
INSPECTED AT (Name and address) BOB'S TRADING CO. SLIPPERY, NY		INSPECTED BY JOHN E. ROCK			CONDITION OF CONTAINERS Applicable U.S. Standards for condition of Food containers		SAMPLE CONTAINERS STAMPED WITH USDA LOT NO. 54321
MANUFACTURED BY (Name and address) BIG BUTTER FACTORY BLUE RIVER, WI		ANNOUNCEMENT NO.	CONTRACT NO.	SEED NO. .9999	SIZE AND KIND OF CONTAINERS 25 KG C/F BOXES	STORAGE LOT	SERVICE DATE 07/05/2007

[-----MANUFACTURER DATA (1)-----]

CHURN NUMBER	NO. CONT	DATE MFG	CLASSIFICATION FLAVOR	COLOR	SALT	DEFECT RATING BODY	COLOR	SALT	TOTAL	U.S. GRADE	COMMENTS (S-SLIGHT, D-DEFINITE P-PRONOUNCED)	%SALT	%MOIST	%FAT
81		07/03/06	AA	M	L					A				
81		07/03/06	AA	M	L					A				
81		07/03/06	A	M	L					A	S. COARSE			
600														

NOTE: SAMPLING REQUIREMENTS FOR A GRAND LOT OF 600 CONTAINERS REQUIRES THAT 80 SAMPLES BE TAKEN. IN THIS EXAMPLE, THERE WOULD BE 77 MORE SAMPLES REQUIRED. THOSE 77 SAMPLES WOULD BE IN THE RANGE OF "AA" TO "A" WITH THE "A" GRADE AS THE LOWEST GRADE OF THE LOT.

GRAND LOT

THIS LOT OF BUTTER IS CLASSIFIED AS U.S. GRADE A WHICH IS THE LOWEST GRADE OF THE LOT ASSIGNED TO ANY SAMPLE BECAUSE PACKAGES ARE NOT IDENTIFIED WITH CHURN NUMBERS

U.S. GRADE	NO CONT.	WEIGHT	FEES	I CERTIFY that in compliance with the regulations governing the inspection and grading of dairy products issued pursuant to the Agricultural Marketing Act of 1946, as amended (7 U.S.C. 1621 et seq.), the product described above was inspected on the date shown and that the quality and/or condition of said product, on said date, were as stated above	
AA	600	33069	INSPECTION	136.00	SIGNATURE OF OFFICIAL GRADER <i>John E. Rock</i> JOHN E. ROCK
A			EXPENSE	34.00	
B			LABORATORY		
BELOW			TOTAL	170.00	
		MARKED WEIGHT			ADDRESS LEFSA, MN

DA-201 (03-01) Previous edition may be used.

1/ AS STATED BY APPLICANT

This certificate is receivable in all courts of the United States as prima facie evidence of the truth of the statements contained. It does not excuse the failure to comply with any applicable Federal law.

37. Butter Grading Certificate, Low Butterfat

U.S. DEPARTMENT OF AGRICULTURE AGRICULTURAL MARKETING SERVICE BUTTER GRADING CERTIFICATE						CERTIFICATE NO. DB-100043215-0	
TO: APPLICANT <i>(Name and address)</i> BOB'S TRADING CO. SLIPPERY, NY		SHIPPER OR SELLER <i>(Name and address)</i>		RECEIVER OR BUYER <i>(Name and address)</i>		DATE INSPECTED 04/11/2007	NO. SAMPLES TAKEN 9
INSPECTED AT <i>(Name and address)</i> BOB'S TRADING CO. SLIPPERY, NY		INSPECTED BY JOHN E. ROCK			CONDITION OF CONTAINERS Applicable U.S. Standards for condition of Food containers	SAMPLE CONTAINERS STAMPED WITH USDA LOT NO. 43215	
MANUFACTURED BY <i>(Name and address)</i> BIG BUTTER FACTORY BLUE RIVER, WI		ANNOUNCEMENT NO.	CONTRACT NO.	SEED NO. .9999	SIZE AND KIND OF CONTAINERS 25 KG BOXES	STORAGE LOT	SERVICE DATE 04/11/2007

[-----MANUFACTURER DATA (1)-----]

CHURN NUMBER	NO. CONT	DATE MFG	TEST WT.	CLASSIFICATION			DEFECT RATING					U.S. GRADE	COMMENTS (S-SLIGHT, D-EFINITE P-PRONOUNCED)	%SALT	%MOIST	%FAT
FLAVOR	COLOR	SALT	BODY	COLOR	SALT	TOTAL										
855	90	03/06/07		AA	M	L						**				
856	90	03/06/07		**	M	L						**				79.8
857	90	03/06/07		AA	M	L						**				
858	90	03/06/07		AA	M	L						**				
859	90	03/06/07		AA	M	L						**				
860	90	03/06/07		AA	M	L						AA				80.1
861	90	03/06/07		AA	M	L						**				
862	90	03/06/07		AA	M	L						**				
863	90	03/06/07		AA	M	L						**				

****NO FLAVOR RATING ASSIGNED TO CHURN 856 BECAUSE BUTTERFAT IS BELOW THE 80 PERCENT REQUIREMENT.**

****NO U.S. GRADE ASSIGNED BECAUSE THE CARLOT FAILED TEST FOR BUTTERFAT CONTENT.**

CARLOT NOT ELIGIBLE FOR SALE TO CCC BECAUSE BUTTERFAT IS BELOW THE 80 PERCENT REQUIREMENT

U.S. GRADE	NO CONT.	WEIGHT	FEES		I CERTIFY that in compliance with the regulations governing the inspection and grading of dairy products issued pursuant to the Agricultural Marketing Act of 1946, as amended (7 U.S.C. 1621 et seq.), the product described above was inspected on the date shown and that the quality and/or condition of said product, on said date, were as stated above		
AA	90	4960	INSPECTION	136.00			
A			EXPENSE	34.00			
B			LABORATORY				
BELOW	720	39683	TOTAL	170.00	SIGNATURE OF OFFICIAL GRADER <i>JOHN E. ROCK</i> JOHN E. ROCK		ADDRESS LEFSA, MN
		NET WEIGHT			04/11/07		

DA-201 (03-01) Previous edition may be used.

1/ AS STATED BY APPLICANT

This certificate is receivable in all courts of the United States as prima facie evidence of the truth of the statements contained. it does not excuse the failure to comply with any applicable Federal law.

38. Butter Grading Certificate, Regrading

U.S. DEPARTMENT OF AGRICULTURE AGRICULTURAL MARKETING SERVICE BUTTER GRADING CERTIFICATE					CERTIFICATE NO. DB-100019958-1		
TO: APPLICANT (Name and address) CCC WASHINGTON, DC		SHIPPER OR SELLER (Name and address)		RECEIVER OR BUYER (Name and address)		DATE INSPECTED 06/12/2007	NO. SAMPLES TAKEN 4
INSPECTED AT (Name and address) JOE'S BIG BOX WAREHOUSE STORAWAY, KS		INSPECTED BY JOHN E. ROCK		CONDITION OF CONTAINERS Applicable U.S. Standards for condition of Food containers		SAMPLE CONTAINERS STAMPED WITH USDA LOT NO. 19958	
MANUFACTURED BY (Name and address) BIG BUTTER FACTORY BLUE RIVER, WI		ANNOUNCEMENT NO.	CONTRACT NO.	SEED NO. .9999	SIZE AND KIND OF CONTAINERS 25 KG BOXES	STORAGE LOT 10011	SERVICE DATE 06/12/2007

[-----MANUFACTURER DATA (1)-----]

CHURN NUMBER	NO. CONT	DATE MFG	TEST WT.	CLASSIFICATION		SALT	DEFECT RATING		SALT	TOTAL	U.S. GRADE	COMMENTS (S-SLIGHT, D-EFINITE P-PRONOUNCED)	%SALT	%MOIST	%FAT
005-1-F	192	01/05/05		AA	VL	M	½			½	AA	S. LEAKY			
005-1-G	192	01/05/05		AA	VL	M	½			½	AA	S. LEAKY			
005-1-I	192	01/05/05		AA	VL	M	½			½	AA	S. LEAKY			
005-1-J	192	01/05/05		AA	VL	M	½			½	AA	S. LEAKY			

ORIGINAL SAMPLES OF CHURNINGS 005-1-F AND 005-1-J WERE VERY SLIGHT MOLD. EXAMINATION OF FOUR RESERVE SAMPLES REVEALED NO MOLD. MOLD SHALL BE SCRAPPED FROM THE SAMPLE CUBES UNDER USDA SUPERVISION PRIOR TO REPACKAGING OR PROCESSING INTO BUTTEROIL.

WEIGHT AS SHOWN ON INSPECTION REQUEST.

ORIGINAL CERTIFICATE DB-100019958-1 DATED 01/17/05.

SPECIAL EXAMINATION OF THIS WAREHOUSE LOT BY COMPARING 10 ADDITIONAL BOXES WITH THE ORIGINAL SAMPLES. NO IRREGULARITIES OBSERVED.

U.S.	NO	WEIGHT	FEES			
AA	90	4960	INSPECTION 136.00	I CERTIFY that in compliance with the regulations governing the inspection and grading of dairy products issued pursuant to the Agricultural Marketing Act of 1946, as amended (7 U.S.C. 1621 et seq.), the product described above was inspected on the date shown and that the quality and/or condition of said product, on said date, were as stated above		
A			EXPENSE 34.00			
B			LABORATORY			
BELOW	720	39683	TOTAL 170.00	SIGNATURE OF OFFICIAL GRADER JOHN E. ROCK		ADDRESS LEFSA, MN
		NET WEIGHT		04/11/07		

DA-201 (03-01) Previous edition may be used.

1/ AS STATED BY APPLICANT

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39. Butter Grading Certificate, Regrading

U.S. DEPARTMENT OF AGRICULTURE AGRICULTURAL MARKETING SERVICE BUTTER GRADING CERTIFICATE						CERTIFICATE NO. DB-10033657-1	
TO: APPLICANT (Name and address) CCC WASHINGTON, DC		SHIPPER OR SELLER (Name and address)		RECEIVER OR BUYER (Name and address)		DATE INSPECTED 4/12/2007	NO. SAMPLES TAKEN 4
INSPECTED AT (Name and address) JOE'S BIG BOX WAREHOUSE STORAWAY, KS		INSPECTED BY JOHN E. ROCK, LEFSA, MN			CONDITION OF CONTAINERS Applicable U.S. Standards for condition of Food containers	SAMPLE CONTAINERS STAMPED WITH USDA LOT NO. 33657	
MANUFACTURED BY (Name and address) BIG BUTTER FACTORY BLUE RIVER, WI		ANNOUNCEMENT NO.	CONTRACT NO.	SEED NO.	SIZE AND KIND OF CONTAINERS 25 KG BOXES	STORAGE LOT 10011	SERVICE DATE 4/12/2007

[---MANUFACTURER DATA (1)---]

CHURN NUMBER	NO. CONT	DATE MFG	TEST WT.	CLASSIFICATION			DEFECT RATING			TOTAL	U.S. GRADE	COMMENTS (S-SLIGHT, D-DEFINITE P-PRONOUNCED)	%SALT	%MOIST	%FAT
				FLAVOR	COLOR	SALT	BODY	COLOR	SALT						
006-1-A	192	1/6/2006		AA	VL	M					AA	S. LEAKY			
006-1-B	192	1/6/2006		**	VL	M					**	RANCID			
006-1-C	192	1/6/2006		**	VL	M					**	RANCID			
006-1-D	192	1/6/2006		AA	VL	M					AA				

****BELOW U.S. GRADE REQUIREMENTS.**

WEIGHT AS SHOWN ON INSPECTION REQUEST.

WE RECOMMEND CHURNINGS 006-1-B AND 006-1-C BE REPROCESSED INTO BUTTEROIL OR SOLD AS OFF-CONDITION PRODUCT.

CONTRACT KC-DF-53304 NOT SHOWN ON BOXES.

PREVIOUS CERTIFICATE DB-10033657-0 DATED 01/12/06.

INSPECTION REQUEST KC-B-1377

U.S. GRADE	NO CONT.	WEIGHT	FEES		I CERTIFY that in compliance with the regulations governing the inspection and grading of dairy products issued pursuant to the Agricultural Marketing Act of 1946, as amended (7 U.S.C. 1621 et seq.), the product described above was inspected on the date shown and that the quality and/or condition of said product, on said date, were as stated above	
AA	384	21164	INSPECTION	136.00		
A			EXPENSE	36.00		
B			LABORATORY			
BELOW	384	21164	TOTAL	172.00	SIGNATURE OF OFFICIAL GRADER <i>John E. Rock</i> JOHN E. ROCK	ADDRESS LEFSA, MN
		NET WEIGHT			4/12/07	

DA-201 (03-01) Previous edition may be used.

1/ AS STATED BY APPLICANT

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40. Special Examination

SPECIAL EXAMINATION

WAREHOUSE LOT _____ REQUEST KC – _____

WAREHOUSE _____

NO. OF CONTAINERS _____ TYPE OF CONTAINER _____

A. COMPARISON GRADING

YES

NO

1. Does the product grade correspond to the original samples?
(Graded additional containers
from different churns or vats.)

☐☐

B. Interior Examination of 6 Containers

☐☐

2. Are the liners or wrappers of the same
type as the sample?

☐☐

3. Is the surface of the product and the
condition of the liners or wrappers
consistent with the samples?

☐☐

4. Is the product color and appearance
the same as the samples?

☐☐

A. Box-by-box Examination of Containers

☐☐

5. Are the containers the same type and
condition?

☐☐

6. Are the container markings consistent
with the samples?

☐☐

7. Are the container markings satisfactory?
(None erased, changed, or obliterated)

☐☐

8. Are the churn or vat numbers consistent
with the certificate?

☐☐

B. Remarks (Use reverse side or additional sheets as necessary)

Grader _____

Date _____

41. Grade Label Butter Grading Certificate, Butter Not Meeting Grade Label

U.S. DEPARTMENT OF AGRICULTURE AGRICULTURAL MARKETING SERVICE GRADE LABEL BUTTER GRADING CERTIFICATE					CERTIFICATE NO. DB-100054321-0	
TO: APPLICANT (Name and address) BIG BUTTER FACTORY MILKAND HONEY, CA		SHIPPER OR SELLER (Name and address)		RECEIVER OR BUYER (Name and address)		DATE INSPECTED 7/5/2007
INSPECTED AT (Name and address) BIG BUTTER FACTORY MILKAND HONEY, CA		INSPECTED BY John E. Rock			CONDITION OF CONTAINERS Applicable U.S. Standards for condition of Food containers	SAMPLE CONTAINERS STAMPED WITH USDA LOT NO. 54321
MANUFACTURED BY (Name and address) BIG BUTTER FACTORY MILKAND HONEY, CA		ANNOUNCEMENT NO.	CONTRACT NO.	SEED NO.	SIZE AND KIND OF CONTAINERS SEE BELOW	SERVICE DATE 7/5/2007

[-----MANUFACTURER DATA (1)-----]												
CHURN NUMBER	NO. CONT	DATE MFG	CLASSIFICATION		DEFECT RATING		U.S. GRADE		COMMENTS (S-SLIGHT, D-DEFINITE P-PRONOUNCED)		GRADE LABEL	%FAT
FLAVOR	COLOR	SALT	BODY	COLOR	SALT	TOTAL						
164-1	228	6/13/07	AA	L	M		AA				BIG BUTTER 1/4LB 36LB	
164-2	210	6/13/07	A	L	M		**		S. COARSE		BIG BUTTER 1/4LB 36LB	
164-3	180	6/13/07	AA	L	M		AA				BIG BUTTER 1/4LB 36LB	
164-4	205	6/13/07	AA	L	M		AA				BIG BUTTER 1/4LB 36LB	

****NO GRADE ASSIGNED DUE TO BUTTER NOT MEETING THE U.S. GRADE DECLARED ON LABEL**

U.S. GRADE	NO CONT.	WEIGHT	FEES		I CERTIFY that in compliance with the regulations governing the inspection and grading of dairy products issued pursuant to the Agricultural Marketing Act of 1946, as amended (7 U.S.C. 1621 et seq.), the product described above was inspected on the date shown and that the quality and/or condition of said product, on said date, were as stated above	
AA	613	22068	INSPECTION	136.00	SIGNATURE OF OFFICIAL GRADER <i>John E. Rock</i> JOHN E. ROCK	
			EXPENSE	34.00		
BELOW	210	7560	LABORATORY			
		MARKED WEIGHT	TOTAL	170.00	7/5/07	ADDRESS LEFSA, MN

DA-201 (03-01) Previous edition may be used. 1/ AS STATED BY APPLICANT This certificate is receivable in all courts of the United States as prima facie evidence of the truth of the statements contained. It does not excuse the failure to comply with any applicable Federal law.

42. Butter Grading Certificate, Unwrapping Below Grade Butter

U.S. DEPARTMENT OF AGRICULTURE AGRICULTURAL MARKETING SERVICE BUTTER GRADING CERTIFICATE				CERTIFICATE NO. DB-100167432-0	
TO: APPLICANT (Name and address) BIG BUTTER CO. BLUE RIVER, WI	SHIPPER OR SELLER (Name and address)		RECEIVER OR BUYER (Name and address)	DATE INSPECTED 2/5/2007	NO. SAMPLES TAKEN 5
INSPECTED AT (Name and address) BIG BUTTER CO. BLUE RIVER, WI	INSPECTED BY John E. Rock		CONDITION OF CONTAINERS Applicable U.S. Standards for condition of Food containers	SAMPLE CONTAINERS STAMPED WITH USDA LOT NO.	
MANUFACTURED BY (Name and address) BIG BUTTER CO. BLUE RIVER, WI	ANNOUNCEMENT NO.	CONTRACT NO.	SEED NO.	SIZE AND KIND OF CONTAINERS 36# 1/4# PRINTS	SERVICE DATE 2/5/2007

CHURN NUMBER	NO. PKGS	DATE MFGD	DATE UNWRAPPED	CONTROL TAG NUMBER	ORIGINAL CERTIFICATE NUMBER
BIG BUTTER					
026-210	60	1/26/2007	2/6/2007	015555	DB-1000131313-0
026-211	60	1/26/2007	2/6/2007	015556	DB-1000131313-0
026-212	60	1/26/2007	2/6/2007	015557	DB-1000131313-0
026-213	60	1/26/2007	2/6/2007	015558	DB-1000131313-0
026-214	60	1/26/2007	2/6/2007	015559	DB-1000131313-0

**THE BUTTER LISTED ON THIS CERTIFICATE WAS UNWRAPPED AND REPROCESSED UNDER USDA SUPERVISION
BECAUSE IT DID NOT MEET THE REQUIREMENTS OF THE U.S. GRADE LISTED ON THE WRAPPER.**

U.S. GRADE	NO CONT.	WEIGHT	FEES		I CERTIFY that in compliance with the regulations governing the inspection and grading of dairy products issued pursuant to the Agricultural Marketing Act of 1946, as amended (7 U.S.C. 1621 et seq.), the product described above was inspected on the date shown and that the quality and/or condition of said product, on said date, were as stated above	
AA			INSPECTION	136.00	SIGNATURE OF OFFICIAL GRADER <i>John E. Rock</i> JOHN E. ROCK 2/5/07	
A			EXPENSE	36.00		
B			LABORATORY			
BELOW	600	10800	TOTAL	172.00		
		MARKED WEIGHT			ADDRESS LEFSA, MN	

DA-201 (03-01) Previous edition may be used.


1/ AS STATED BY APPLICANT

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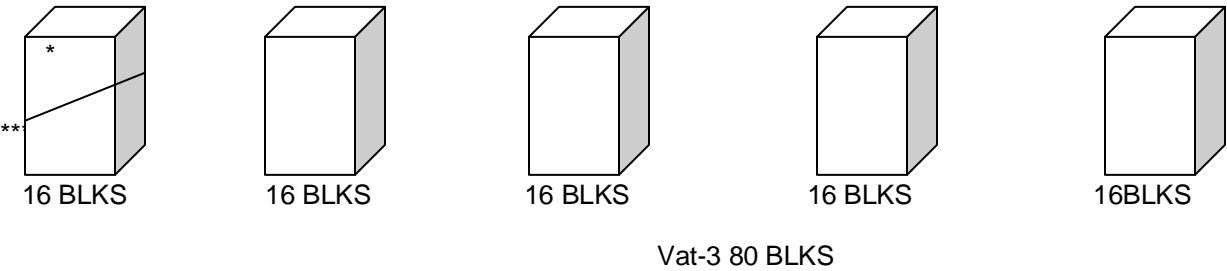
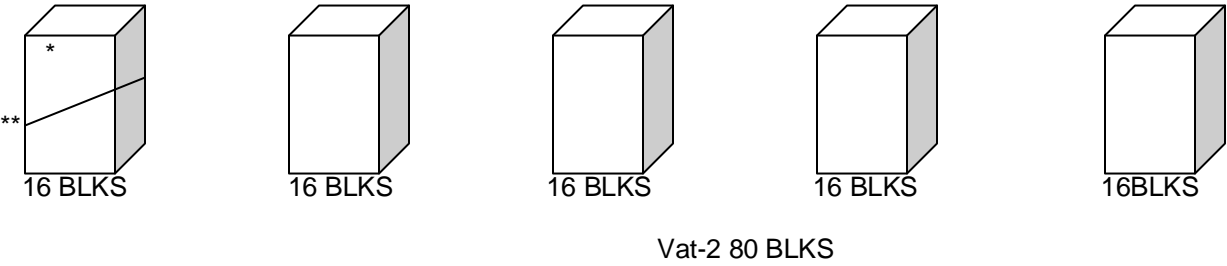
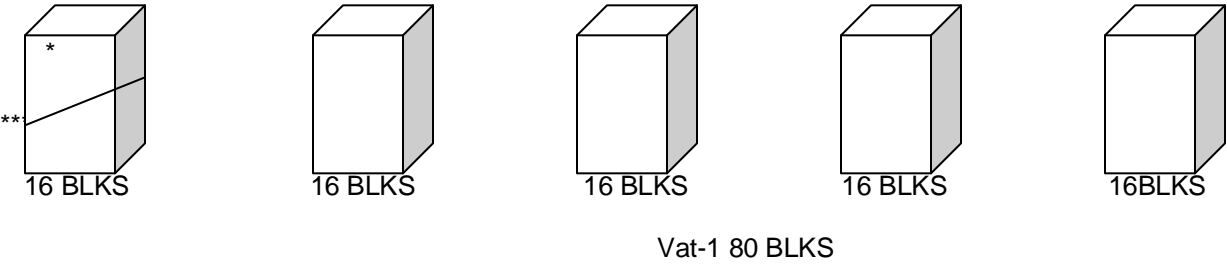
43. Product Control Tags

PRODUCT CONTROL TAG

DA – 147 (06-99)		NO. 1234
U.S. DEPARTMENT OF AGRICULTURE AGRICULTURAL MARKETING SERVICE DAIRY PROGRAMS		
		
DO NOT REMOVE TAG OR USE PRODUCT WITHOUT AUTHORIZATION For Information Contact: Dairy Grading Branch (630) 810-9999		
(SEE REVERSE)		
NO. 1234		
PRODUCT TAGGED		
BUTTER		
NO. OF CONTAINERS		
5 BOXES		

 The product(s) or container(s) to which this tag is attached is (are) controlled under authority of the Agricultural Marketing Act and is (are) not to be used, moved or altered in any manner without the expressed permission of an authorized representative of the United States Department of Agriculture. The unauthorized removal or alteration of this tag or utilization of the tagged product(s) is a violation of the Agricultural Marketing Act of 1946, as amended and regulations issued thereunder.	
REMARKS	
WASTE BUTTER	
NOT FOR	
HUMAN CONSUMPTION	
5 BOXES – MACHINE SCRAP	
<i>John E. Rock (001)</i> 05/12/07	
AUTHORIZED EMPLOYEE	DATE
PRODUCT CONTROL	
LOCATION AND REMARKS	
5 BOXES SCRAP BUTTER	
SHIPPED FOR ANIMAL FEED	
<i>John E. Rock (001)</i> 05/12/07	
AUTHORIZED EMPLOYEE	DATE
DA – 147 (06-99)	REVERSE

44. Block Interface



* Mixed curd 640 (Vat 1 may contain curd from prior day)

** Interface

45. Cheese Grading Certificate

U.S. DEPARTMENT OF AGRICULTURE AGRICULTURAL MARKETING SERVICE CHEESE GRADING CERTIFICATE					CERTIFICATE NO. DC-300102651-0	
TO: APPLICANT (Name and address) QUALITY DAIRY COWVILLE, MN		SHIPPER OR SELLER (Name and address)		RECEIVER OR BUYER (Name and address)		DATE INSPECTED 05/05/2007
INSPECTED AT (Name and address) QUALITY DAIRY COWVILLE, MN		INSPECTED BY John E. Rock		CONDITION OF CONTAINERS Applicable U.S. Standards for condition of Food containers		SAMPLE CONTAINERS STAMPED WITH USDA LOT NO. 102651
MANUFACTURED BY (Name and address) QUALITY DAIRY COWVILLE, MN		ANNOUNCEMENT NO.	CONTRACT NO.	SEED NO. .2665	SIZE AND KIND OF CONTAINERS 40 LB BLOCKS	SERVICE DATE 05/05/2007

[-----MANUFACTURER DATA (1)-----]

VAT NUMBER	DATE MFGD	NO CONT	MARKED WEIGHT	TEST WT	FLAVOR	BODY TEX	COLOR	FINISH	U.S. GRADE	COMMENTS	%MOIST	%FDB	%FAT
415-D	4/15/07	72	3060.00		A				A	S. FEED			
415-E	4/15/07	73	3042.00		A				A		36.5	50.1	5.4
415-F	4/15/07	74	3145.00		A	b			B	D. CURDY			
415-H	4/15/07	78	3276.00	0.5	A				A				
415-K	4/15/07	74	3089.50		A		c		C	D. WAVY			
416-C	4/16/07	60	2595.00		A				A		36.4	50.3	5.3
416-E	4/16/07	73	3029.50		A				A				
416-G	4/16/07	74	3108.00	0.2	A			b	B	D. LOPSIDED			
416-H	4/16/07	75	3187.50		B				B	S. FRUITY			
416-K	4/16/07	73	3029.50		A				A				
417-H	4/17/07	73	3047.75	0.6	B				**	S. ACID			
417-K	4/17/07	72	3042.00		A				A				
417-L	4/17/07	66	2788.50		A				A				

MARKED WEIGHT 39,439.75 TEST SHORT 97.60 NET WEIGHT 39,342.15

GRADING TEMP 48°F

** NO FINAL GRADE BECAUSE OF LOOSE WRAPPERS

COLOR CHEESE

U.S. GRADE	NO CONT.	WEIGHT	FEES	I CERTIFY that in compliance with the regulations governing the inspection and grading of dairy products issued pursuant to the Agricultural Marketing Act of 1946, as amended (7 U.S.C. 1621 et seq.), the product described above was inspected on the date shown and that the quality and/or condition of said product, on said date, were as stated above		
A	567	23824	INSPECTION 204.00	SIGNATURE OF OFFICIAL GRADER <i>John E. Rock</i> JOHN E. ROCK 5/05/07		
B	223	9426	EXPENSE 34.00			
C	74	3090	LABORATORY 180.00			
BELOW	73	3048	TOTAL 418.00			
		NET WEIGHT		ADDRESS LEFSA, MN		

DA-201 (03-01) Previous edition may be used.

1/ AS STATED BY APPLICANT

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46. Cheese Grading Certificate, Lab Results

U.S. DEPARTMENT OF AGRICULTURE AGRICULTURAL MARKETING SERVICE CHEESE GRADING CERTIFICATE					CERTIFICATE NO. DC-300103316-0	
TO: APPLICANT (Name and address) BEST CHEESE CO. LEFSA, MN		SHIPPER OR SELLER (Name and address)		RECEIVER OR BUYER (Name and address) CCC WASHINGTON, DC		
INSPECTED AT (Name and address) BEST CHEESE CO. LEFSA, MN		INSPECTED BY JOHN E. ROCK LEFSA, MN		DATE INSPECTED 4/04/2007	NO. SAMPLES TAKEN 12	
MANUFACTURED BY (Name and address) BEST CHEESE CO. LEFSA, MN		ANNOUNCEMENT NO.	CONTRACT NO.	SEED NO. .2665	CONDITION OF CONTAINERS Applicable U.S. Standards for condition of Food containers 500 LB BARRELS	
				SIZE AND KIND OF CONTAINERS	SAMPLE CONTAINERS STAMPED WITH USDA LOT NO. 103316	
				STORAGE LOT	SERVICE DATE 3/25/2007	

[-----MANUFACTURER DATA (1)-----]

VAT NUMBER	DATE MFGD	NO CONT	MARKED WEIGHT	TEST WT	FLAVOR	BODY TEX	COLOR	FINISH	U.S. GRADE	COMMENTS	%MOIST	%FDB	%FAT
70-1	3/11/07	6	3015.50		EXT				EXTRA		35.6	50.1	5.2
70-2	3/11/07	7	3505.00		EXT				EXTRA				
70-3	3/11/07	6	3010.00	3.5	EXT				EXTRA				
70-4	3/11/07	6	3027.35		EXT				EXTRA				
71-1	3/12/07	7	3520.50		EXT				EXTRA				
71-2	3/12/07	6	3012.00	1.5	EXT				EXTRA		35.5	50.2	5.2
71-3	3/12/07	6	3010.25		EXT				EXTRA				
71-4	3/12/07	7	3519.75		EXT				EXTRA				
71-5	3/12/07	7	3530.50		EXT				EXTRA				
72-3	3/13/07	6	3041.25	0.5	EXT				EXTRA		35.3	50.1	5.1
73-3	3/14/07	7	3553.50		EXT				EXTRA				
73-4	3/14/07	6	3015.50		EXT				EXTRA		35.0	50.3	5.1

MARKED WEIGHT 38,761.10 SHORTAGE 33.00 NET WEIGHT 38,728.10
GRADING TEMP 52°F

U.S. GRADE	NO CONT.	WEIGHT	FEES		I CERTIFY that in compliance with the regulations governing the inspection and grading of dairy products issued pursuant to the Agricultural Marketing Act of 1946, as amended (7 U.S.C. 1621 et seq.), the product described above was inspected on the date shown and that the quality and/or condition of said product, on said date, were as stated above		
EXTRA	77	38,728	INSPECTION	204.00			
STANDARD			EXPENSE	130.55	SIGNATURE OF OFFICIAL GRADER <i>John E. Rock</i> JOHN E. ROCK 3/25/07		
COMMERCIAL			LABORATORY	382.50			ADDRESS LEFSA, MN
BELOW			TOTAL	717.05			
		NET WEIGHT					

DA-201 (03-01) Previous edition may be used.

1/ AS STATED BY APPLICANT

This certificate is receivable in all courts of the United States as prima facie evidence of the truth of the statements contained. It does not excuse the failure to comply with any applicable Federal law.

47. Cheese Grading Certificate, CCC Purchase Kick Outs

U.S. DEPARTMENT OF AGRICULTURE AGRICULTURAL MARKETING SERVICE CHEESE GRADING CERTIFICATE					CERTIFICATE NO. DC-30013317-0		
TO: APPLICANT (Name and address) QUALITY DAIRY COWVILLE, MN		SHIPPER OR SELLER (Name and address)		RECEIVER OR BUYER (Name and address) CCC WASHINGTON, DC		DATE INSPECTED 4/05/2007	NO. SAMPLES TAKEN 3
INSPECTED AT (Name and address) QUALITY DAIRY COWVILLE, MN		INSPECTED BY JOHN E. ROCK		CONDITION OF CONTAINERS Applicable U.S. Standards for condition of Food containers		SAMPLE CONTAINERS STAMPED WITH USDA LOT NO. 13317	
MANUFACTURED BY (Name and address) QUALITY DAIRY COWVILLE, MN		ANNOUNCEMENT NO.	CONTRACT NO.	SEED NO. .2665	SIZE AND KIND OF CONTAINERS 500 LB BARRELS	STORAGE LOT	SERVICE DATE 4/05/2007

[-----MANUFACTURER DATA (1)-----]

VAT NUMBER	DATE MFGD	NO CONT	MARKED WEIGHT	TEST WT	FLAVOR	BODY TEX	COLOR	FINISH	U.S. GRADE	COMMENTS	%MOIST	%FDB	%FAT
72-3	3/13/07	6	2999.50		EXT				EXTRA	FREE WHEY			
73-1	3/14/07	6	3005.00		EXT				EXTRA	EXCESSIVE HEADSPACE			
73-2	3/14/07	7	3510.00		EXT				EXTRA	OVERFILL			

VAT 72-3 NOT ELIGIBLE FOR SALE TO CCC BECAUSE OF FREE WHEY.
VAT 73-1 NOT ELIGIBLE FOR SALE TO CCC BECAUSE OF EXCESSIVE HEAD SPACE.
VAT 73-2 NOT ELIGIBLE FOR SALE TO CCC BECAUSE OF OVERFILLING.

U.S. GRADE	NO CONT.	WEIGHT	FEES	I CERTIFY that in compliance with the regulations governing the inspection and grading of dairy products issued pursuant to the Agricultural Marketing Act of 1946, as amended (7 U.S.C. 1621 et seq.), the product described above was inspected on the date shown and that the quality and/or condition of said product, on said date, were as stated above	
EXTRA	19	9515	INSPECTION 34.00		
STANDARD			EXPENSE 15.00		
COMMERCIAL			LABORATORY		
BELOW		MARKED WEIGHT	TOTAL 49.00	SIGNATURE OF OFFICIAL GRADER <i>John E. Rock</i> JOHN E. ROCK	ADDRESS LEFSA, MN
				4/5/07	

DA-201 (03-01) Previous edition may be used.

1/ AS STATED BY APPLICANT

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48. Cheese Grading Certificate, Lab Results

U.S. DEPARTMENT OF AGRICULTURE AGRICULTURAL MARKETING SERVICE CHEESE GRADING CERTIFICATE					CERTIFICATE NO. DC-300103461-0	
TO: APPLICANT (Name and address) BEST CHEESE CO. LEFSA, MN		SHIPPER OR SELLER (Name and address)		RECEIVER OR BUYER (Name and address)		DATE INSPECTED 04/05/2007
INSPECTED AT (Name and address) BEST CHEESE CO. LEFSA, MN		INSPECTED BY JOHN E. ROCK		CONDITION OF CONTAINERS Applicable U.S. Standards for condition of Food containers		SAMPLE CONTAINERS STAMPED WITH USDA LOT NO. 103461
MANUFACTURED BY (Name and address) BEST CHEESE CO. LEFSA, MN		ANNOUNCEMENT NO.	CONTRACT NO.	SEED NO. .2665	SIZE AND KIND OF CONTAINERS 40 LB BLOCKS	SERVICE DATE 04/01/2007

[-----MANUFACTURER DATA (1)-----]

VAT NUMBER	DATE MFGD	NO CONT	MARKED WEIGHT	TEST WT	FLAVOR	BODY TEX	COLOR	FINISH	U.S. GRADE	COMMENTS	%MOIST	%FDB	%FAT
60-1	3/1/07	51	2131.75		A				**				
60-2	3/1/07	49	2032.25		A				**				
60-3	3/1/07	50	2072.00		A				A		35.5	50.1	5.4
60-4	3/1/07	50	2064.25		A				**				
60-5	3/1/07	50	2051.25		A				**		36.6	49.8**	5.3
61-1	3/2/07	51	2100.50		A				**				
61-2	3/2/07	51	2101.25		A				A		35.4	50.2	5.3
61-3	3/2/07	51	2100.25		A				**				
61-5	3/2/07	53	2181.50		A				A		35.8	50.2	5.4
62-1	3/3/07	51	2100.75		A				**				
62-2	3/3/07	50	2056.75		A				**				
62-3	3/3/07	50	2047.00		A				**				
62-4	3/3/07	50	2014.50		A				**				

**NO U.S. GRADE ASSIGNED BECAUSE CARLOT FAILS TEST FOR COMPOSITION.

**NO FINAL GRADE ASSIGNED TO VAT 60-5 BECAUSE TESTS SHOWED ILLEGAL COMPOSITION.

CARLOT INELIGIBLE FOR SALE TO CCC

U.S. GRADE	NO CONT.	WEIGHT	FEES	I CERTIFY that in compliance with the regulations governing the inspection and grading of dairy products issued pursuant to the Agricultural Marketing Act of 1946, as amended (7 U.S.C. 1621 et seq.), the product described above was inspected on the date shown and that the quality and/or condition of said product, on said date, were as stated above		
A	154	6355	INSPECTION 204.00	SIGNATURE OF OFFICIAL GRADER <i>John E. Rock</i> JOHN E. ROCK 4/01/07		
B			EXPENSE 34.00			
C			LABORATORY 180.00			
BELOW	605	24,889	TOTAL 418.00			
		MARKED WEIGHT		ADDRESS LEFSA, MN		

DA-201 (03-01) Previous edition may be used.

1/ AS STATED BY APPLICANT

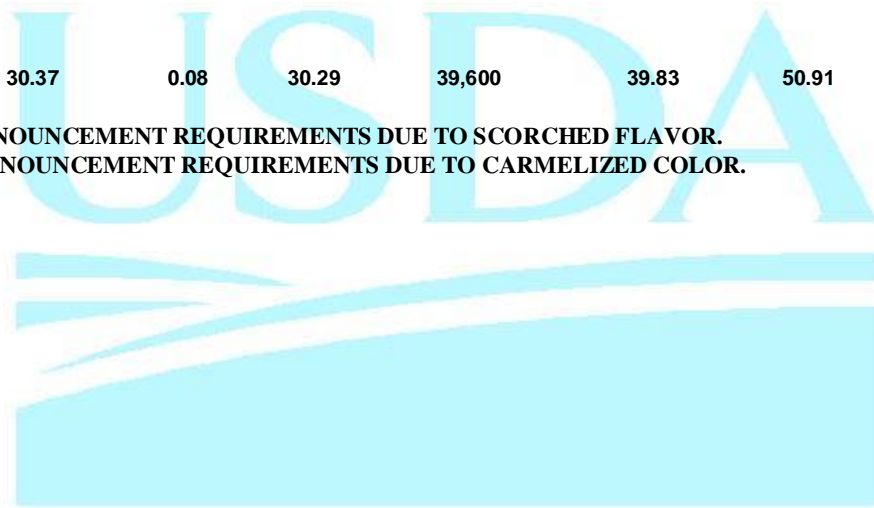
This certificate is receivable in all courts of the United States as prima facie evidence of the truth of the statements contained. It does not excuse the failure to comply with any applicable Federal law.

49. Process American Cheese Grading Certificate

U.S. DEPARTMENT OF AGRICULTURE AGRICULTURAL MARKETING SERVICE PROCESS AMERICAN CHEESE GRADING CERTIFICATE					CERTIFICATE NO. DI-400114104-0	
TO: APPLICANT (Name and address) COOKED CHEESE CO. CRACKERS, WI		SHIPPER OR SELLER (Name and address) COOKED CHEESE CO. CRACKERS, WI		RECEIVER OR BUYER (Name and address) CCC WASHINGTON, DC		DATE INSPECTED 10/20/2007
INSPECTED AT (Name and address) COOKED CHEESE CO. CRACKERS, WI		INSPECTED BY JOHN E. ROCK, LEFSA, MN		CONDITION OF CONTAINERS Applicable U.S. Standards for condition of Food containers		SAMPLE CONTAINERS STAMPED WITH USDA LOT NO. 140104
MANUFACTURED BY (Name and address) COOKED CHEESE CO. CRACKERS, WI		ANNOUNCEMENT NO. PCD-4	CONTRACT NO. VDOC-006080	SEED NO. .2665	SIZE AND KIND OF CONTAINERS 6/5 LB SLICED LOAVES/ 30LB CASE	STORAGE LOT 10/20/2007

[-----MANUFACTURER DATA (1)-----]			AVERAGE WT. OF CASE			LABORATORY TESTS						
PACKAGING CODE	DATE PACKAGED	NO CONT	GROSS	TARE	NET	NET WEIGHT IN EACH LOT	PERCENT MOISTURE	PERCENT FAT	MELT	SALT	pH	CASE NUMBER
114104-1	10/11/07	743										456
114104-2	10/12/07	577										651
		1320	30.37	0.08	30.29	39,600	39.83	50.91	6(VG)			864
												1279

SUBLOT 114104 DOES NOT MEET FSA ANNOUNCEMENT REQUIREMENTS DUE TO SCORCHED FLAVOR.
SUBLOT 11104-2 DOES NOT MEET FSA ANNOUNCEMENT REQUIREMENTS DUE TO CARMELIZED COLOR.



U.S. GRADE	NO CONT.	WEIGHT	FEE	I CERTIFY that in compliance with the regulations governing the inspection and grading of dairy products issued pursuant to the Agricultural Marketing Act of 1946, as amended (7 U.S.C. 1621 et seq.), the product described above was inspected on the date shown and that the quality and/or condition of said product, on said date, were as stated above
	1320	39600	INSPECTION EXPENSE LABORATORY TOTAL	
		NET WEIGHT	SEE MONTHLY BILL	
				SIGNATURE OF OFFICIAL GRADER <i>John E. Rock</i> JOHN E. ROCK
				ADDRESS LEFSA, MN

DA-201 (03-01) Previous edition may be used. 1/ AS STATED BY APPLICANT This certificate is receivable in all courts of the United States as prima facie evidence of the truth of the statements contained. It does not excuse the failure to comply with any applicable Federal law.

50. Cream Cheese Grade Label Certificate

U.S. DEPARTMENT OF AGRICULTURE AGRICULTURAL MARKETING SERVICE GRADE LABEL CREAM CHEESE GRADING CERTIFICATE					CERTIFICATE NO. DC-300456790-0	
TO: APPLICANT (Name and address) CREAM CHEESE CO. BAGEL CITY, CA		SHIPPER OR SELLER (Name and address) CREAM CHEESE CO. BAGEL CITY, CA		RECEIVER OR BUYER (Name and address)		
INSPECTED AT (Name and address) CREAM CHEESE CO. BAGEL CITY, CA		INSPECTED BY JOHN E. ROCK, LEFSA, MN		CONDITION OF CONTAINERS Applicable U.S. Standards for condition of Food containers		
MANUFACTURED BY (Name and address) CREAM CHEESE CO. BAGEL CITY, CA		ANNOUNCEMENT NO.		CONTRACT NO.		
		SEED NO. .2665		SIZE AND KIND OF CONTAINERS 30-8OZ LOAVES PER CASE		
				STORAGE LOT		
				SERVICE DATE 01/16/2007		
				DATE INSPECTED 01/16/2007		
				NO. SAMPLES TAKEN 13		
				SAMPLE CONTAINERS STAMPED WITH USDA LOT NO. 456790		

[-----MANUFACTURER DATA (1)-----]

-----DEFECT RATING-----

PACKAGING CODE	DATE PACKAGED	NO CASES IN LOT	FLAVOR	BODY & TEXTURE	COLOR & APPEARANCE	COMMENTS	GRADE LABEL	%FAT
3-1	02/02/2007	120	U	S	S	D. BITTER	SMALL SKY 8 OZ	
3-2	02/02/2007	120	S	S	S		SMALL SKY 8 OZ	
3-3	02/02/2007	120	S	S	S		SMALL SKY 8 OZ	
3-4	02/02/2007	120	S	U	S	D. GRITTY	SMALL SKY 8 OZ	
3-5	02/02/2007	120	S	S	S		SMALL SKY 8 OZ	32.8
3-6	02/02/2007	120	S	S	S		SMALL SKY 8 OZ	
3-7	02/02/2007	120	S	S	S		SMALL SKY 8 OZ	
3-8	02/02/2007	120	S	S	S		SMALL SKY 8 OZ	
3-9	02/02/2007	120	S	S	S		SMALL SKY 8 OZ	
3-10	02/02/2007	120	S	S	U	D. WAVY	SMALL SKY 8 OZ	
3-11	02/02/2007	120	S	S	S		SMALL SKY 8 OZ	
3-12	02/02/2007	120	S	S	S		SMALL SKY 8 OZ	
3-13	02/02/2007	120	S	S	S		SMALL SKY 8 OZ	

PACKAGE 3-1 DOES NOT MEET U.S. SPECIFICATIONS FOR CREAM CHEESE BECAUSE OF DEFINITE BITTER FLAVOR.

PACKAGE 3-3 DOES NOT MEET U.S. SPECIFICATIONS FOR CREAM CHEESE BECAUSE OF DEFINITEGRITTY TEXTURE.

PACKAGE 3-5 DOES NOT MEET U.S. SPECIFICATIONS FOR CREAM CHEESE BECAUSE OF LOW FAT.

PACKAGE 3-10 DOES NOT MEET U.S. SPECIFICATIONS FOR CREAM CHEESE BECAUSE OF DEFINITE WAVY COLOR.

PRODUCT SHALL BE WITHHELD FROM MARKET AND UNWRAPPED UNDER USDA SUPERVISION.

GRADING TEMP 49°F

U.S. GRADE	NO CONT.	WEIGHT	FEES	I CERTIFY that in compliance with the regulations governing the inspection and grading of dairy products issued pursuant to the Agricultural Marketing Act of 1946, as amended (7 U.S.C. 1621 et seq.), the product described above was inspected on the date shown and that the quality and/or condition of said product, on said date, were as stated above	
	1560	23,400	INSPECTION 136.00 EXPENSE 12.00 LABORATORY 85.00 TOTAL 233.00	SIGNATURE OF OFFICIAL GRADER <i>John E. Rock</i> JOHN E. ROCK	ADDRESS LEFSA, MN
		MARKED WEIGHT		4/5/07	

DA-201 (03-01) Previous edition may be used.

1/ AS STATED BY APPLICANT

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51. Cheese Grader's Memorandum

DMB APPROVED – NO. 0581-0126

Page 1 of 1

U.S. DEPARTMENT OF AGRICULTURE AGRICULTURAL MARKETING SERVICE CHEESE GRADER'S MEMORANDUM												CERTIFICATE NO. 102651					
TO: Applicant (Name and Address) QUALITY DAIRY COWVILLE, MN					SHIPPER OR SELLER (Name and Address)				RECEIVER OR BUYER (Name and Address)				DATE INSPECTED 05/05/2007		NO. SAMPLES TAKEN 13		
INSPECTED AT (Name and Address) QUALITY DAIRY COWVILLE, MN					INSPECTED BY: <i>JOHN E. ROCK</i>				CONDITION OF CONTAINERS Applicable U.S. standards for condition of food containers			SAMPLE CONTAINERS STAMPED WITH USDA LOT NO 102651					
MANUFACTURED BY (Name and Address) QUALITY DAIRY COWVILLE, MN					ANNOUNCEMENT NO.		CONTRACT NO.		SEED NO. .2665		SIZE AND KIND OF CONTAINERS 40 LB BLOCKS			STORAGE LOT		SERVICE DATE 05/05/2007	
SAMPLE NO.	MOISTURE TEST	VAT NUMBER	MFG DATE	NO. PKGS	MARKED WEIGHT	TEST SHORTAGE	NET WEIGHT	DEFECT RATING			U.S. GRADE	COMMENTS (S-Slight, D-Definite, P-Pronounced)	FDB	% H ₂ O	pH		
42	36.5	415-D	04/15/07	72	3060.00	OK	3060.00	A			A	S.Feed					
22	36.8	415-E	04/15/07	73	3042.00	OK	3042.00	A			A	*					
66	36.0	415-F	04/15/07	74	3145.00	OK	3145.00	A	b		B	D. Curdy					
58	37.3	415-H	04/15/07	78	3276.00	0.5	3237.00	A			A						
12	35.8	415-K	04/15/07	74	3089.50	OK	3089.50	A		C	C	D. Wavy					
58	36.5	416-C	04/16/07	60	2595.00	OK	2595.00	A			A	*					
48	36.1	416-E	04/16/07	73	3029.50	OK	3029.50	A			A						
41	35.6	416-G	04/16/07	74	3108.00	0.2	3093.20	A			B	D. Lopsided					
25	35.9	416-H	04/16/07	75	3187.50	OK	3187.50	B			B	S. Fruity					
57	36.7	416-K	04/16/07	73	3029.50	OK	3029.50	A			A						
11	35.1	417-H	04/17/07	73	3047.75	0.6	3003.95	B			**	S. Acid					
34	36.2	417-K	04/17/07	72	3042.00	OK	3042.00	A			A						
75	37.0	417-L	4/17/07	66	2788.50	OK	2788.50	A			A						
MARKED WEIGHT					39,439.75	TEST SHORT	97.60	NET WEIGHT		39342.15							
GRADING TEMP 48°F																	
**NO FINAL GRADE BECAUSE OF LOOSE WRAPPERS																	
COLORED CHEESE																	
*VAT SAMPLE TAKEN FOR FDB, MOISTURE, PH																	
COMPOSITE SAMPLE TAKEN FOR MOISTURE ONLY																	
SIGNATURE OF AGENT FOR APPLICANT <i>Vinnie Vatman</i>						U.S. GRADE		NO. OF PACKAGES		WEIGHT		FEES					
						GRADE											
						GRADE	A				567	23823lbs	INSPECTION	\$204.00			
						GRADE	B			223	9425lbs	EXPENSE	\$34.00				
						GRADE	C			74	3090lbs	LABORATORY	180				
						GRADE	BELOW			73	3004lbs	TOTAL	\$418.00				

DA – 201C (06-03) (Destroy previous edition DA – 132 dated 01-95)

52. DMS, Nonfat Dry Milk Inspection, Lumpy Powder

UNITED STATES DEPARTMENT OF AGRICULTURE AGRICULTURE MARKETING SERVICE				TYPE OF PRODUCT NDM - SPRAY		DATE 04/15/07		DMS 135501	
DAIRY MISCELLANEOUS INSPECTION REPORT				SIZE AND KIND OF CONTAINERS 25 KG CAP SAC BAGS					
To: Applicant (Name, Address, Zip) DUST MILK CO. (16-445) DRY WELLS, ID				SHIPPER OR SELLER (Name, Address, Zip) SAME AS APPLICANT		RECEIVER OR BUYER (Name, Address, Zip*) CCC WASHINGTON, DC			
INSPECTED AT: (Name, Address, Zip) SAME AS APPLICANT				CONDITION OF CONTAINERS (Check one) <input checked="" type="checkbox"/> meets or <input type="checkbox"/> fails <small>applicable U.S. Standards for condition of Food Containers</small>				SAMPLE CONTAINERS STAMPED WITH USDA LOT NO. 135501	
MANUFACTURED BY (Name, Address, Zip)* SAME AS APPLICANT				ANNOUNCEMENT NO. DAIRY 6		CONTRACT NO.		STORAGE LOT NO	
				NO. SAMPLES TAKEN 20		SEED NO .4567		SAMPLER (Signature and Address) <i>John E. Rock (001) Lefsa, MN</i>	

MFR'S LOT NO.	DATE MFR'D 2006	NO CONTAINERS IN LOT*	SERIAL NO. OF SAMPLES	NO. CON- TAINERS WEIGHED	WEIGHT (Pounds)		NET	LABORATORY NO.
					MARKED*	TEST SHORTAGE SAMPLES TOTAL		
97-A	04/07/07	100	1	1	5511.05	OK	5511.05	
-B	↓	↓	2	↓	↓	↓	↓	
-C	↓	↓	3*	↓	↓	↓	↓	
-D	↓	↓	4	↓	↓	↓	↓	
-F	↓	↓	6	↓	↓	↓	↓	
-G	↓	50	6	↓	2755.75		2755.75	
98-A	04/07/07	100	7		5511.05		5511.05	
-B	↓	↓	8	↓	↓	↓	↓	
-C	↓	↓	9	↓	↓	↓	↓	
-D	↓	↓	10**	↓	↓	↓	↓	
-E	↓	↓	11*	↓	↓	↓	↓	
-F	↓	↓	12	↓	↓	↓	↓	
99-A	04/09/07		13			0.25	25.00	5486.50
-B	↓	↓	14	↓	↓	OK		5511.05
-C	↓	↓	15	↓	↓	↓	↓	
-D	↓	↓	16*	↓	↓	↓	↓	
-E	↓	↓	17	↓	↓	↓	↓	
100-A	04/10/07		18*			0.25	25.00	5486.50
-B	↓	↓	19	↓	↓	OK		5511.05
-C	↓	↓	20*	↓	↓	↓	↓	
TOTALS		1950			107474.25		50.00	1074424.00
SUBLOTS 98-A, 98-B AND 98-C ARE U.S. STANDARD GRADE DUE TO MODERATE LUMPY CONDITION.								
SUBLOT 100-B HAS PRONOUNCED VISIBLE DARK PARTICLES.								
Inspection Fee		\$102.00	USDA SEAL NO.		REMARKS *TEST THESE SAMPLES FOR ALL GROUP I GRADE FACTORS **TEST THIS SAMPLE FOR ALL GROUP II GRADE FACTORS			
Expense		\$25.00	556541					
Laboratory Fee								
Total		\$127.00						

53. Evaporated Milk Grading Certificate

U.S. DEPARTMENT OF AGRICULTURE AGRICULTURAL MARKETING SERVICE EVAPORATED MILK GRADING CERTIFICATE					CERTIFICATE NO. DX-700129687-0		
TO: APPLICANT (Name and address) THICK MILK CO. FROSTBITE FALLS, MN		SHIPPER OR SELLER (Name and address) THICK MILK CO. FROSTBITE FALLS, MN		RECEIVER OR BUYER (Name and address)		DATE INSPECTED 6/6/2007	NO. SAMPLES TAKEN 30
INSPECTED AT (Name and address) THICK MILK CO. FROSTBITE FALLS, MN		INSPECTED BY JOHN E. ROCK			CONDITION OF CONTAINERS Applicable U.S. Standards for condition of Food containers		SAMPLE CONTAINERS STAMPED WITH USDA LOT NO. 29637
MANUFACTURED BY (Name and address) THICK MILK CO. FROSTBITE FALLS, MN		ANNOUNCEMENT NO. EVD-1	CONTRACT NO. VDOM00243316	SEED NO. .3906	SIZE AND KIND OF CONTAINERS 48 – 12 FL OZ CAN/40# CASE	STORAGE LOT	SERVICE DATE 05/28/2007

LOT NUMBER

5286XL-1

DATE MANUFACTURED

5/27/2007

NUMBER OF CONTAINERS

1732

% MILK FAT **6.6**
 % TOTAL SOLIDS **23.2**
 SOLIDS NOT FAT **16.6**
 FLAVOR, BODY, TEXTURE, COLOR **SATISFACTORY**

THREE SAMPLE CASES WEIGHED 39.75 AND 39.69 POUNDS NET WEIGHT. THIS IS BELOW THE REQUIRED MINIMUM INDIVIDUAL CASE WEIGHT OF 40.0 LBS.

MARKED WEIGHT 69,280 SHORTAGE 0 NET WEIGHT 69,280

U.S. GRADE	NO CONT.	WEIGHT	FEES		I CERTIFY that in compliance with the regulations governing the inspection and grading of dairy products issued pursuant to the Agricultural Marketing Act of 1946, as amended (7 U.S.C. 1621 et seq.), the product described above was inspected on the date shown and that the quality and/or condition of said product, on said date, were as stated above	
	1732	69,280	INSPECTION	544.00	SIGNATURE OF OFFICIAL GRADER <i>John E. Rock</i> SIGNED BY <i>Super Visor</i> JOHN E. ROCK 6/06/07	
			EXPENSE	268.00		
			LABORATORY	90.00		
			TOTAL	902.00		
		NET WEIGHT			ADDRESS LEFSA, MN	

DA-201 (03-01) Previous edition may be used.

1/ AS STATED BY APPLICANT

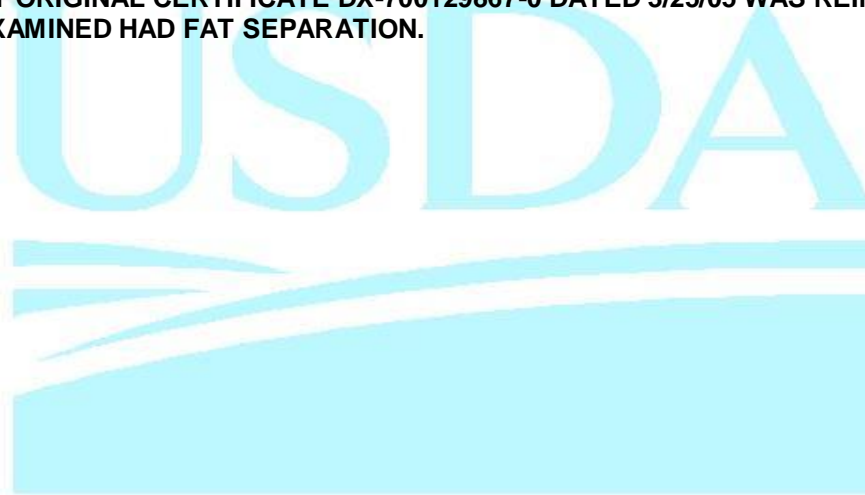
This certificate is receivable in all courts of the United States as prima facie evidence of the truth of the statements contained. It does not excuse the failure to comply with any applicable Federal law.

54. Evaporated Milk Certificate, Regrading

U.S. DEPARTMENT OF AGRICULTURE AGRICULTURAL MARKETING SERVICE EVAPORATED MILK GRADING CERTIFICATE					CERTIFICATE NO. DX-700129687		
TO: APPLICANT <i>(Name and address)</i> CCC WASHINGTON, DC		SHIPPER OR SELLER <i>(Name and address)</i>		RECEIVER OR BUYER <i>(Name and address)</i>		DATE INSPECTED 06/03/2007	NO. SAMPLES TAKEN 15
INSPECTED AT <i>(Name and address)</i> AMERICOLD CORP. KANSAS CITY, MO		INSPECTED BY JOHN E. ROCK		CONDITION OF CONTAINERS Applicable U.S. Standards for condition of Food containers		SAMPLE CONTAINERS STAMPED WITH USDA LOT NO. 29867	
MANUFACTURED BY <i>(Name and address)</i> THICK MILK CO. FROSTBITE FALLS, MN		ANNOUNCEMENT NO.	CONTRACT NO.	SEED NO.	SIZE AND KIND OF CONTAINERS 48 – 15 OZ CANS	STORAGE LOT	SERVICE DATE 06/03/2007

THE EVAPORATED MILK COVERED BY ORIGINAL CERTIFICATE DX-700129867-0 DATED 3/25/05 WAS REINSPECTED THIS DATE AND SAMPLES SELECTED SHOWED 5 OF 21 CANS EXAMINED HAD FAT SEPARATION.

INSPECTION REQUEST KCM-15443



U.S. GRADE	NO CONT.	WEIGHT	FEES		I CERTIFY that in compliance with the regulations governing the inspection and grading of dairy products issued pursuant to the Agricultural Marketing Act of 1946, as amended (7 U.S.C. 1621 et seq.), the product described above was inspected on the date shown and that the quality and/or condition of said product, on said date, were as stated above	
	1732	77,940	INSPECTION	102.00	SIGNATURE OF OFFICIAL GRADER <i>John E. Rock</i> SIGNED BY <i>NAT F. DIRECTOR</i> JOHN E. ROCK 06/03/07	
			EXPENSE	58.00		
			LABORATORY			
			TOTAL	160.00		
		NET WEIGHT			ADDRESS LEFSA, MN	

DA-201 (03-01) Previous edition may be used.

1/ AS STATED BY APPLICANT

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55. Nonfat Dry Milk Certificate, Grand Lot

U.S. DEPARTMENT OF AGRICULTURE AGRICULTURAL MARKETING SERVICE NON FAT DRY MILK GRADING CERTIFICATE					CERTIFICATE NO. DM-500108096-0		
TO: APPLICANT (Name and address) ABC TRADING CO. KANSAS CITY, KS		SHIPPER OR SELLER (Name and address)		RECEIVER OR BUYER (Name and address)		DATE INSPECTED 01/23/2007	NO. SAMPLES TAKEN 32
INSPECTED AT (Name and address) ABC TRADING CO. KANSAS CITY, KS		INSPECTED BY JOHN E. ROCK			CONDITION OF CONTAINERS Applicable U.S. Standards for condition of Food containers		SAMPLE CONTAINERS STAMPED WITH USDA LOT NO. 108096
MANUFACTURED BY (Name and address) DUSTY MILK CO. DRY WELLS, MN		ANNOUNCEMENT NO.	CONTRACT NO.	SEED NO. .88396	SIZE AND KIND OF CONTAINERS 25 KG PEEL PAK BAGS	STORAGE LOT 53029	SERVICE DATE 01/16/2007

[-----MANUFACTURER DATA (1)-----]

LOT NUMBER	DATE MFGD	NO CONT	MARKED WT.	TEST WT SHORT	%FAT	%MOIST	TITR ACID	SOL INDEX	SCORCH PART	PLATE M/GM	DMCC MIL/GM	COL/GM	IU VIT A /1000	PENICILLIN	FLAVOR	U.S. GRADE
		260	13778.7 6		0.58	4.7	0.130	0.1	7.5	1.1	4.0	<10			SATIS	STANDARD
MARKED WEIGHT			SHORTAGE	WPN 5.82	HEAT MEDIUM											

GRAND LOT INSPECTION

THE 250 BAGS OF NDM HAVE BEEN ASSEMBLED INTO STORAGE LOT 53029

U.S. GRADE EXTRA STANDARD BELOW	NO 250	WEIGHT 13779	FEEES	I CERTIFY that in compliance with the regulations governing the inspection and grading of dairy products issued pursuant to the Agricultural Marketing Act of 1946, as amended (7 U.S.C. 1621 et seq.), the product described above was inspected on the date shown and that the quality and/or condition of said product, on said date, were as		
			INSPECTION 68.00	SIGNATURE OF OFFICIAL GRADER <i>John E. Rock</i> JOHN E. ROCK		
			EXPENSE 34.00			
			LABORATORY TOTAL 102.00			
		MARKED WEIGHT		01/16/07		ADDRESS LEFSA, MN

DA-201 (03-01) Previous edition may be used.

1/ AS STATED BY APPLICANT

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[illegible]

57. Butter Grading Certificate, Appeal Grade

U.S. DEPARTMENT OF AGRICULTURE AGRICULTURAL MARKETING SERVICE BUTTER GRADING CERTIFICATE						CERTIFICATE NO. DB-100147801-1	
TO: APPLICANT (Name and address) BIG BUTTER CO. BLUE RIVER, WI		SHIPPER OR SELLER (Name and address) BIG BUTTER CO. BLUE RIVER, WI		RECEIVER OR BUYER (Name and address) CCC WASHINGTON, DC		DATE INSPECTED 12/11/2007	NO. SAMPLES TAKEN 9
INSPECTED AT (Name and address) BOB'S TRADING CO. SLIPPERY, NY		INSPECTED BY JOHN E. ROCK, LEFSA, MN			CONDITION OF CONTAINERS Applicable U.S. Standards for condition of Food containers		SAMPLE CONTAINERS STAMPED WITH USDA LOT NO. 147801
MANUFACTURED BY (Name and address) BIG BUTTER CO. BLUE RIVER, WI		ANNOUNCEMENT NO.	CONTRACT NO.	SEED NO.	SIZE AND KIND OF CONTAINERS 25 KG BOXES	STORAGE LOT 10011	SERVICE DATE 12/11/2007

[----MANUFACTURER DATA (1)----]

CHURN NUMBER	NO. CONT	DATE MFG	TEST WT.	CLASSIFICATION		SALT	BODY	DEFECT RATING		TOTAL	U.S. GRADE	COMMENTS (S-SLIGHT, D-DEFINITE P-PRONOUNCED)	%SALT	%MOIST	%FAT
FLAVOR	COLOR			COLOR	SALT										
163-1	60	11/10/07		AA	VL	M					AA				
163-2	59	11/10/07		AA	VL	M					AA				
163-3	58	11/10/07		AA	VL	M					AA				
163-4	60	11/10/07		A	VL	M					A	S. COARSE			
163-5	60	11/10/07		A	VL	M					A	S. COARSE			
164-1	59	11/11/07		AA	VL	M	½			½	AA	S. LEAKY			
164-2	60	11/11/07		AA	VL	M	½			½	AA	S. LEAKY			
164-3	50	11/11/07		AA	VL	M	½			½	AA	S. LEAKY			
164-4	59	11/11/07		AA	VL	M	½			½	AA	S. LEAKY			

MARKED WEIGHT 28,935 SHORTAGE 0 GRADING TEMP 50°F
 APPEAL GRADE CERTIFICATE
 KEEPING QUALITY TESTS ON SAMPLES TAKEN FROM EACH CHURNING WERE SATISFACTORY

U.S. GRADE	NO CONT.	WEIGHT	FEES		I CERTIFY that in compliance with the regulations governing the inspection and grading of dairy products issued pursuant to the Agricultural Marketing Act of 1946, as amended (7 U.S.C. 1621 et seq.), the product described above was inspected on the date shown and that the quality and/or condition of said product, on said date, were as stated above	
AA	405	22,321	INSPECTION	136.00		
A	120	6,614	EXPENSE	22.00		
B			LABORATORY			
BELOW			TOTAL	158.00	SIGNATURE OF OFFICIAL GRADER	
		NET WEIGHT			ADDRESS	
					John E. Rock	
					JOHN E. ROCK	
					12/11/07	
					LEFSA, MN	

DA-201 (03-01) Previous edition may be used.

1/ AS STATED BY APPLICANT

This certificate is receivable in all courts of the United States as prima facie evidence of the truth of the statements contained. I does not excuse the failure to comply with any applicable Federal law.

58. Cheese Grading Certificate, Appeal Grade

U.S. DEPARTMENT OF AGRICULTURE AGRICULTURAL MARKETING SERVICE CHEESE GRADING CERTIFICATE					CERTIFICATE NO. DC-100102651-9		
TO: APPLICANT (Name and address) QUALITY DAIRY COWVILLE, MN		SHIPPER OR SELLER (Name and address)		RECEIVER OR BUYER (Name and address) COMMODITY CREDIT CORPORATION WASHINGTON D.C.		DATE INSPECTED 05/0520/07	NO. SAMPLES TAKEN 13
INSPECTED AT (Name and address) QUALITY DAIRY COWVILLE, MN		INSPECTED BY JOHN E. ROCK		CONDITION OF CONTAINERS Applicable U.S. Standards for condition of Food containers		SAMPLE CONTAINERS STAMPED WITH USDA LOT NO. 102651	
MANUFACTURED BY (Name and address) QUALITY DAIRY COWVILLE, MN		ANNOUNCEMENT NO.	CONTRACT NO.	SEED NO. .2665	SIZE AND KIND OF CONTAINERS 40 LB BLOCKS	STORAGE LOT	SERVICE DATE 05/01/2007

[-----MANUFACTURER DATA (1)-----]

VAT NUMBER	DATE MFGD	NO CONT	MARKED WEIGHT	TEST WT	FLAVOR	BODY TEX	COLOR	FINISH	U.S. GRADE	COMMENTS	%MOIST	%FDB	%FAT
4 /15-D	4/15/07	72	3060.00		A				A	S. FEED			
4/15-E	4/15/07	73	3042.00		A				A		36.5	50.1	5.4
4/15-F	4/15/07	74	3145.00		A				A				
4/15-H	4/15/07	78	3276.00	0.5	A				A				
4/15-K	4/15/07	74	3089.50		A				A				
4/16-C	4/16/07	60	2595.00		A				A		36.4	50.3	5.3
4/16-E	4/16/07	73	3029.50		A				A				
4/16-G	4/16/07	74	3108.00	0.2	A				A				
4/16-H	4/16/07	75	3187.50		A				A				
4/16-K	4/16/07	73	3029.50		A				A				
4/17-H	4/17/07	73	3047.75	0.6	A				A				
4/17-K	4/17/07	72	3042.00		A				A				
4/17-L	4/17/07	66	2788.50		A				A				

MARKED WEIGHT 39,342 SHORTAGE 97.60 NET WEIGHT 39,342.15 GRADING TEMP 48°F COMPOSITE MOISTURE 36.3

APPEAL GRADE CERTIFICATE. THIS CERTIFICATE SUPERCEDES ORIGINAL CERTIFICATE NUMBER DC-100102651 DATED 01/25/07.
ALL COPIES OF THE ORIGINAL CERTIFICATE HAVE NOT BEEN RETRIEVED.

U.S. GRADE	NO CONT.	WEIGHT	FEES	I CERTIFY that in compliance with the regulations governing the inspection and grading of dairy products issued pursuant to the Agricultural Marketing Act of 1946, as amended (7 U.S.C. 1621 et seq.), the product described above was inspected on the date shown and that the quality and/or condition of said product, on said date, were as stated above		
A	937	39,342	INSPECTION 204.00			
B			EXPENSE 34.00			
C			LABORATORY 180.00			
BELOW			TOTAL 418.00	SIGNATURE OF OFFICIAL GRADER		ADDRESS
		NET WEIGHT		John E. Rock JOHN E. ROCK		LEFSA, MN
				5/05/07		

DA-201 (03-01) Previous edition may be used.

1/ AS STATED BY APPLICANT

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59. Process American Cheese In-Process Inspection Certificate

U.S. DEPARTMENT OF AGRICULTURE AGRICULTURAL MARKETING SERVICE PROCESS AMERICAN CHEESE IN-PROCESS GRADING CERTIFICATE						CERTIFICATE NO. DI-400114104-0	
TO: APPLICANT (Name and address) COOKED CHEESE CO. CRACKERS, WI		SHIPPER OR SELLER (Name and address) COOKED CHEESE CO. CRACKERS, WI		RECEIVER OR BUYER (Name and address) CCC WASHINGTON, DC		DATE INSPECTED 10/24/2007	NO. SAMPLES TAKEN 4
INSPECTED AT (Name and address) COOKED CHEESE CO. CRACKERS, WI		INSPECTED BY JOHN E. ROCK		CONDITION OF CONTAINERS MEETS Applicable U.S. Standards for condition of Food containers		SAMPLE CONTAINERS STAMPED WITH USDA LOT NO. 14104	
MANUFACTURED BY (Name and address) COOKED CHEESE CO. CRACKERS, WI		ANNOUNCEMENT NO. PCD-5	CONTRACT NO. VDOC-006080	SEED NO. .2665	SIZE AND KIND OF CONTAINERS 6/5 LB SLICED LOAVES 30LB CASE	STORAGE LOT	SERVICE DATE 10/24/2007

[-----MANUFACTURER DATA (1)-----]

PACKAGING CODE	DATE PACKAGED	NO CONT	GROSS	TARE	NET	NET WEIGHT IN EACH LOT	PERCENT MOISTURE	PERCENT FAT	MELT	SALT	pH	CASE NUMBER
114104-1	10/22/07	680										456
114104-2	10/23/07	640										651
		1320	32.03	1.93	30.10	39,600	39.83	50.91	6(VG)			864
												1279

MARKED WEIGHT 39,600 SHORTAGE 0

NO RELIABLE TALLY OF THE CONTAINERS LOADED COULD BE DETERMINED BECAUSE OF STACKING TIGHT TO TRUCK ROOF.

U.S. GRADE	NO	WEIGHT	FEES	I CERTIFY that in compliance with the regulations governing the inspection and grading of dairy products issued pursuant to the Agricultural Marketing Act of 1946, as amended (7 U.S.C. 1621 et seq.), the product described above was inspected on the date shown and that the quality and/or condition of said product, on said date, were as stated above
	1320	39600	INSPECTION SEE EXPENSE MONTHLY LABORATORY BILL TOTAL	
		NET WEIGHT		
			SIGNATURE OF OFFICIAL GRADER John E. Rock JOHN E. ROCK	ADDRESS LEFSA, MN
			10/24/2007	

DA-201 (03-01) Previous edition may be used.

1/ AS STATED BY APPLICANT

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60. Process American Cheese In-Process Inspection Certificate, Check-Loading

U.S. DEPARTMENT OF AGRICULTURE AGRICULTURAL MARKETING SERVICE PROCESS AMERICAN CHEESE IN-PROCESS GRADING CERTIFICATE						CERTIFICATE NO. DI-400114104-0	
TO: APPLICANT (Name and address) COOKED CHEESE CO. CRACKERS, WI		SHIPPER OR SELLER (Name and address) COOKED CHEESE CO. CRACKERS, WI		RECEIVER OR BUYER (Name and address) CCC WASHINGTON, DC		DATE INSPECTED 10/25/07	NO. SAMPLES TAKEN 4
INSPECTED AT (Name and address) COOKED CHEESE CO. CRACKERS, WI		INSPECTED BY JOHN E. ROCK		CONDITION OF CONTAINERS MEETS Applicable U.S. Standards for condition of Food containers		SAMPLE CONTAINERS STAMPED WITH USDA LOT NO. 14104	
MANUFACTURED BY (Name and address) COOKED CHEESE CO. CRACKERS, WI		ANNOUNCEMENT NO. PCD-5	CONTRACT NO. VDOC-00680	SEED NO. .2665	SIZE AND KIND OF CONTAINERS 6/5 LB SLICED LOAVES/ 30LB CASE	STORAGE LOT	SERVICE DATE 10/25/07
[-----MANUFACTURER DATA (1)-----]		AVERAGE WT. OF CASE		LABORATORY TESTS			
PACKAGING CODE	DATE PACKAGED	NO CONT	GROSS	TARE	NET	NET WEIGHT IN EACH LOT	CASE NUMBER
						PERCENT MOISTURE	
						PERCENT FAT	
						MELT	
						SALT	
						pH	

CHECK-LOADING – ACTUAL COUNT
CHECK-LOADED 10/25/2007 RAIL CAR CRX15663, NOT SEALED BY APPLICANT'S REQUEST



U.S. GRADE	NO	WEIGHT	FEES	I CERTIFY that in compliance with the regulations governing the inspection and grading of dairy products issued pursuant to the Agricultural Marketing Act of 1946, as amended (7 U.S.C. 1621 et seq.), the product described above was inspected on the date shown and that the quality and/or condition of said product, on said date, were as stated above	
	1320	39600	INSPECTION EXPENSE LABORATORY TOTAL	SEE MONTHLY BILL	
			SIGNATURE OF OFFICIAL GRADER John E. Rock JOHN E. ROCK		ADDRESS LEFSA, MN
			10/25/2007		

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1/ AS STATED BY APPLICANT

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61. Salmonella Surveillance Report

SALMONELLA SURVEILLANCE REPORT		
1. Name of Applicant		Date of laboratory notification:
		Date applicant notified:
2. Routine Surveillance	Product	Environmental
Date Sampled:		
No. Samples Tested:		
No. Positive Tests:		
Date Positive Was Manufactured:		
Identity of Positive (Lots) (Samples):		
3. Verification Testing	Product	Environmental
Date Sampled:		
Sample Report Number:		
No. Samples Tested:		
No. Positive Tests:		
Date Positive Was Manufactured:		
4. Testing Before and After Positive Until Special Cleanup (List lots, date mfgd, pos., or neg.)		
5. Testing After Special Cleanup	Product	Environmental
Date of Cleanup:		
Date Sampled:		
Sample Report Number:		
Type of Product:		
No. Samples Tested:		
No. Positive Tests:		
Date Positive Was Manufactured:		
6. Disposition of Positive Product		
Lots:		
Disposition:		
Covering Certificate(s):		
7. Remarks		
Signature:		Date:

62. DMS, Salmonella Sampling

UNITED STATES DEPARTMENT OF AGRICULTURE AGRICULTURE MARKETING SERVICE DAIRY MISCELLANEOUS INSPECTION REPORT				TYPE OF PRODUCT NDM SPRAY		DATE 01/02/07		DMS 15491			
				SIZE AND KIND OF CONTAINERS							
To: Applicant (Name, Address, Zip) ABC MANUFACTURING (66-176) ANYTOWN, USA				SHIPPER OR SELLER (Name, Address, Zip)		RECEIVER OR BUYER (Name, Address, Zip*)					
INSPECTED AT: (Name, Address, Zip) SAME AS APPLICANT				CONDITION OF CONTAINERS (Check one) <input type="checkbox"/> meets or <input type="checkbox"/> fails applicable U.S. Standards for condition of Food Containers		SAMPLE CONTAINERS STAMPED WITH USDA LOT NO.					
MANUFACTURED BY (Name, Address, Zip)* SAME AS APPLICANT				ANNOUNCEMENT NO.		CONTRACT NO.		STORAGE LOT NO.			
				NO. SAMPLES TAKEN 15		SEED NO.		SAMPLER (Signature and Address) J. M. GRADER (002) WORKIN,			
MFR'S LOT NO.		DATE MFR'D 2006	NO CONTAINERS IN LOT*	SERIAL NO. OF SAMPLES	NO. CON- TAINERS WEIGHED	WEIGHT (Pounds) MARKED*		TEST SHORTAGE SAMPLES TOTAL		NET	LABORATORY NO.
175	416-24A	12/15/07		1							
449	-24B	12/15/07		2							
534	-24C	12/15/07		3							
747	-24D	12/15/07		4							
605	417-24A	12/16/07		5							
239	-24B	12/16/07		6							
261	-24C	12/16/07		7							
288	-24D	12/16/07		8							
261	418-24A	12/17/07		9							
76	-24B	12/17/07		10							
323	-24C	12/17/07		11							
742	-24D	12/17/07		12							
CENTRAL VAC				13							
AIR FILTER				14							
SIFTER TAILINGS				15							
TEST COMPOSITES 1-4, 5-8, AND 9-12 FOR SALMONELLA ONLY. TEST ALL OTHER SAMPLES FOR SALMONELLA ONLY											
SEND RESULTS TO NATIONAL FIELD OFFICE , LISLE, IL FAX RESULTS TO I. M. CHARGE, PLANT MANAGER @ (123) 456-7890											

Inspection Fee Expense Laboratory Fee Total	SEE	USDA SEAL NO. 54321	REMARKS Quarterly salmonella surveillance samples taken during 01/01/2007 survey.
	SURVEY		
	REPORT		

63. Nonfat Dry Milk Certificate, Denaturing – Government Owned NDM

U.S. DEPARTMENT OF AGRICULTURE AGRICULTURAL MARKETING SERVICE NON FAT DRY MILK GRADING CERTIFICATE					CERTIFICATE NO. DM-900134432-0		
TO: APPLICANT <i>(Name and address)</i> BIGGER PET FOOD MOOCOW, WI		SHIPPER OR SELLER <i>(Name and address)</i>		RECEIVER OR BUYER <i>(Name and address)</i>		DATE INSPECTED 08/01/2007	NO. SAMPLES TAKEN
INSPECTED AT <i>(Name and address)</i> BIGGER PET FOOD MOOCOW, WI		INSPECTED BY JOHN E. ROCK		CONDITION OF CONTAINERS Applicable U.S. Standards for condition of Food containers		SAMPLE CONTAINERS STAMPED WITH USDA LOT NO. 134432	
MANUFACTURED BY <i>(Name and address)</i> BIGGER PET FOOD MOOCOW, WI		ANNOUNCEMENT NO.	CONTRACT NO.	SEED NO.	SIZE AND KIND OF CONTAINERS 25 KG PEEL PAK BAGS	STORAGE LOT	SERVICE DATE 08/01/2007

THE NON FAT DRY MILK LISTED BELOW WAS DENATURED IN ACCORDANCE WITH ANNOUNCEMENT KC-M-2068

CONTRACT NUMBER KC(FS) 82319
 N/D NUMBER VD OC0215567
 CERTIFICATE NUMBER DM-500121556-0
 DM-500156944-0
 DM-500178961-0
 NUMBER OF BAGS: 6,285
 NUMBER OF POUNDS 346,398 LBS



U.S. GRADE	NO CONT.	WEIGHT	FEES		I CERTIFY that in compliance with the regulations governing the inspection and grading of dairy products issued pursuant to the Agricultural Marketing Act of 1946, as amended (7 U.S.C. 1621 et seq.), the product described above was inspected on the date shown and that the quality and/or condition of said product, on said date, were as stated above	
BELOW	6285	346,398 MARKED WEIGHT	INSPECTION	544.00		
			EXPENSE	96.00		
			LABORATORY			
			TOTAL	640.00		
			SIGNATURE OF OFFICIAL GRADER		ADDRESS	
			John E. Rock JOHN E. ROCK		08/01/2007 LEFSA, MN	

DA-201 (03-01) Previous edition may be used.

1/ AS STATED BY APPLICANT

This certificate is receivable in all courts of the United States as prima facie evidence of the truth of the statements contained. It does not excuse the failure to comply with any applicable Federal law.

64. Certificate, Denaturing - Commercial

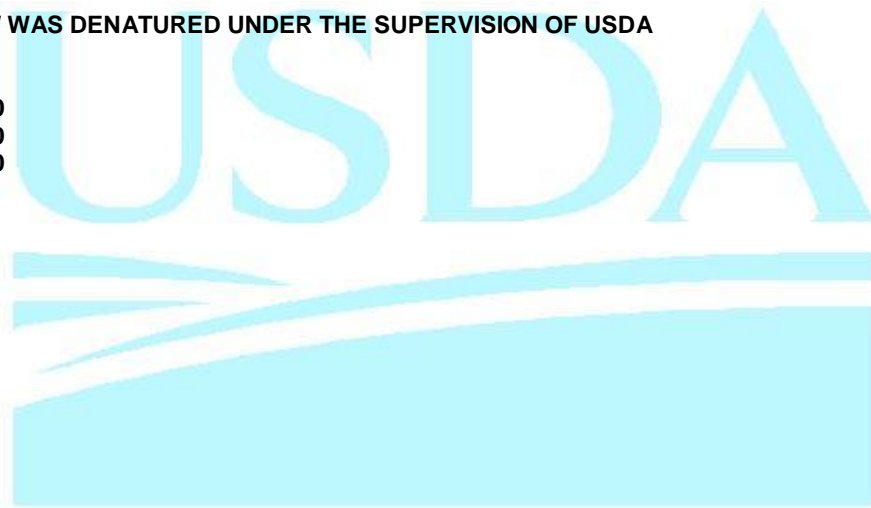
U.S. DEPARTMENT OF AGRICULTURE AGRICULTURAL MARKETING SERVICE NON FAT DRY MILK GRADING CERTIFICATE					CERTIFICATE NO. DM-900126767-0		
TO: APPLICANT <i>(Name and address)</i> BIGGER PET FOOD MOOCOW, WI		SHIPPER OR SELLER <i>(Name and address)</i>		RECEIVER OR BUYER <i>(Name and address)</i>		DATE INSPECTED 09/13/2007	NO. SAMPLES TAKEN
INSPECTED AT <i>(Name and address)</i> BIGGER PET FOOD MOOCOW, WI		INSPECTED BY JOHN E. ROCK			CONDITION OF CONTAINERS Applicable U.S. Standards for condition of Food containers		SAMPLE CONTAINERS STAMPED WITH USDA LOT NO. 134432
MANUFACTURED BY <i>(Name and address)</i> BIGGER PET FOOD MOOCOW, WI		ANNOUNCEMENT NO.	CONTRACT NO.	SEED NO.	SIZE AND KIND OF CONTAINERS 25 KG PEEL PAK BAGS	STORAGE LOT	SERVICE DATE 09/13/2007

THE NON FAT DRY MILK LISTED BELOW WAS DENATURED UNDER THE SUPERVISION OF USDA

CERTIFICATE NUMBER **DM-500135214-0**
DM-500175051-0
DM-500147794-0

NUMBER OF BAGS: **6,325**

NUMBER OF POUNDS **348,602 LBS**



U.S. GRADE	NO CONT.	WEIGHT	FEES		I CERTIFY that in compliance with the regulations governing the inspection and grading of dairy products issued pursuant to the Agricultural Marketing Act of 1946, as amended (7 U.S.C. 1621 et seq.), the product described above was inspected on the date shown and that the quality and/or condition of said product, on said date, were as stated above		
BELOW	6285	348,602	INSPECTION	544.00	SIGNATURE OF OFFICIAL GRADER <i>John E. Rock</i> JOHN E. ROCK		ADDRESS LEFSA, MN
			EXPENSE	96.00			
			LABORATORY				
			TOTAL	640.00			
		MARKED WEIGHT			09/13/07		

DA-201 (03-01) Previous edition may be used. 1/ AS STATED BY APPLICANT

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65. Nonfat Dry Certificate, Retest

U.S. DEPARTMENT OF AGRICULTURE AGRICULTURAL MARKETING SERVICE NON FAT DRY MILK GRADING CERTIFICATE					CERTIFICATE NO. DM-500108096-9		
TO: APPLICANT (Name and address) DRY COW CREAMERY WILSON, IA		SHIPPER OR SELLER (Name and address)		RECEIVER OR BUYER (Name and address)		DATE INSPECTED 12/30/2007	NO. SAMPLES TAKEN 4
INSPECTED AT (Name and address) DRY COW CREAMERY WILSON, IA		INSPECTED BY JOHN E. ROCK			CONDITION OF CONTAINERS Applicable U.S. Standards for condition of Food containers		SAMPLE CONTAINERS STAMPED WITH USDA LOT NO. 108096
MANUFACTURED BY (Name and address) DRY COW CREAMERY WILSON, IA		ANNOUNCEMENT NO.	CONTRACT NO.	SEED NO. .88396	SIZE AND KIND OF CONTAINERS 25 KG PEEL PAK BAGS	STORAGE LOT	SERVICE DATE 12/22/2007

[-----MANUFACTURER DATA (1)-----]

LOT NUMBER	DATE MFGD	NO CONT	MARKED WT.	TEST WT SHORT	%FAT	%MOIST	TITR ACID	SOL INDEX	SCORCH PART	PLATE M/GM	DMCC MIL/GM	COL/GM	IU VIT A /1000	PENICILLIN	FLAVOR	U.S. GRADE
3557-6	12/20/07	400	22046.00		0.90	3.4			7.5	1.6		<5			SATIS	EXTRA
3557-7	12/21/07	400	22046.00		0.92	3.3			7.5	1.6		<5			SATIS	EXTRA
3567-1	12/22/07	400	22046.00	.31	0.89	3.3	.115	0.1	7.5	0.8	13	<5			SATIS	EXTRA
3567-2	12/22/07	400	22046.00		0.97	3.4			7.5	0.7		<5			SATIS	EXTRA

MARKED WEIGHT 88,184 SHORTAGE 124.00 WPN: 7.7 HEAT: LOW

RETEST CERTIFICATE

THIS CERTIFICATE SUPERCEDES ORIGINAL CERTIFICATE DM-500159580-0 DATED 12/26/07

U.S. GRADE	NO CONT.	WEIGHT	FEES	I CERTIFY that in compliance with the regulations governing the inspection and grading of dairy products issued pursuant to the Agricultural Marketing Act of 1946, as amended (7 U.S.C. 1621 et seq.), the product described above was inspected on the date shown and that the quality and/or condition of said product, on said date, were as stated above		
EXTRA STANDARD BELOW	1600	88060	INSPECTION 544.00 EXPENSE 63.00 LABORATORY 2643.00 TOTAL 3250.00	SIGNATURE OF OFFICIAL GRADER <i>John E. Rock</i> JOHN E. ROCK		ADDRESS LEFSA, MN
		MARKED WEIGHT		12/30/07		

DA-201 (03-01) Previous edition may be used.

1/ AS STATED BY APPLICANT

This certificate is receivable in all courts of the United States as prima facie evidence of the truth of the statements contained. It does not excuse the failure to comply with any applicable Federal law.

66. Certificate, Condition Inspection

U.S. DEPARTMENT OF AGRICULTURE AGRICULTURAL MARKETING SERVICE MISCELLANEOUS GRADING CERTIFICATE				CERTIFICATE NO. DX-100141014-0	
TO: APPLICANT <i>(Name and address)</i> FOOD AND NUTRITION SERVICE ALEXANDRIA, VA	SHIPPER OR SELLER <i>(Name and address)</i> 		RECEIVER OR BUYER <i>(Name and address)</i> 		DATE INSPECTED 11/05/2007
INSPECTED AT <i>(Name and address)</i> BIG BLOW CO. BATON ROUGE, LA	INSPECTED BY JOHN E. ROCK		CONDITION OF CONTAINERS Applicable U.S. Standards for condition of Food containers		SAMPLE CONTAINERS STAMPED WITH USDA LOT NO. 141014
MANUFACTURED BY <i>(Name and address)</i> BIG BUTTER FACTORY MILKANDHONEY, CA	ANNOUNCEMENT NO.	CONTRACT NO.	SEED NO.	SIZE AND KIND OF CONTAINERS	STORAGE LOT 769
					SERVICE DATE 11/05/2007

CONDITION INSPECTION

813 CASES OF PRINT BUTTER WERE EXAMINED AT BIG BLOW COMPANY, 601 NEOSHO AVE, BATON ROUGE, LA
 THERE IS MOLD ON THE CASES AND ON THE WRAPPERS
 THE BUTTER IS UNSATISFACTORY FOR REGULAR PROGRAM USE
 WE RECOMMEND THAT THE BUTTER BE SOLD AS OFF CONDITION PRODUCT

ORIGINAL CERTIFICATE DB-100159798-0 DATED 06/23/2006
 STORAGE TEMPERATURE 0° F

U.S. GRADE	NO CONT.	WEIGHT	FEES	I CERTIFY that in compliance with the regulations governing the inspection and grading of dairy products issued pursuant to the Agricultural Marketing Act of 1946, as amended (7 U.S.C. 1621 et seq.), the product described above was inspected on the date shown and that the quality and/or condition of said product, on said date, were as stated above	
			INSPECTION 544.00	SIGNATURE OF OFFICIAL GRADER <i>John E. Rock</i> JOHN E. ROCK	ADDRESS LEFSA, MN
			EXPENSE 34.00		
			LABORATORY TOTAL 678.00		
				11/05/07	

DA-201 (03-01) Previous edition may be used.

1/ AS STATED BY APPLICANT

This certificate is receivable in all courts of the United States as prima facie evidence of the truth of the statements contained. It does not excuse the failure to comply with any applicable Federal law.

67. Plant Letter



United States
Department of
Agriculture

Agricultural
Marketing
Service

Dairy Grading
Branch

2150 Western Court, Suite
100

Lisle, IL 60532-3900

October 1, 2009

To whom it may concern

With regard to: Big Cheese Factory, plant number 55-1234
Dairyland, WI

For the period July 10, 2007 to January 10, 2008.

This is to certify that:

- (1) The product(s) listed below—hereinafter called “the product”—was manufactured in the United States, in accordance with its laws and regulations
- (2) The product was prepared from pure milk obtained from holdings under official sanitary control
- (3) During preparation of the products a heat treatment has been applied or adequate safeguards have been taken with the aim of avoiding public health hazards arising from pathogenic organisms associated with milk
- (4) The product was manufactured in premises and processing plants inspected and approved by the United States Department of Agriculture and subjected to regular audits or inspections
- (5) The product has been subjected to a general surveillance scheme including laboratory tests to validate the microbial and compositional quality
- (6) To the best of our knowledge, the product contains no harmful levels of contaminants and is fit for human consumption
- (7) Identification and description of the goods is the responsibility of the manufacturer or exporter.

Products covered by this letter:

C3	American (Cheddar, Colby, Grandular Curd or Washed Curd)
M3	Whey Cream
W3	Dry Whey

Sincerely,

Ken Vorgert
National Field Director
USDA AMS DGB

68. Instructions for Completion of Health Certificate Worksheet for Export Certificate



United States
Department of
Agriculture

Agricultural
Marketing
Service

Dairy
Grading
Branch

800 Roosevelt Rd
Building A, Suite 370
Glen Ellyn, IL 60137

INSTRUCTIONS FOR COMPLETION OF HEALTH CERTIFICATE WORKSHEET FOR EXPORT CERTIFICATE

- Complete all the information on the attached worksheet on a single sheet.
 - The number of packages and total net weight is for the entire shipment covered by the certificate. Show units of weight (e.g. Kg, lbs.) All the information shall be provided on a single sheet in the format provided. Worksheets not properly completed will not be processed. It is the exporter's responsibility to verify all documentation requirements for shipments.
- Signature and date by the responsible official for the company is required on the worksheet.
- Completed documents for requests will be returned to the applicant.
 - If you require special handling of the completed certificate, such as special mailings or tracking, we request that you provide the required air bills. (Federal Express is the only express service that makes daily scheduled stops at our office. Packages for other services may not be picked up daily.)

Mail or fax the completed documents to:

Export Processing
USDA, Agricultural Marketing Service
Dairy Division, Dairy Grading Branch,
Room 2746-S
1400 Independence Avenue, SW
Washington, D.C. 20250-0230

Fax Number: 202-720-2643
Phone Number: 202-720-
7473

Health Certificates will be billed at the rate of one hour of the currently published hourly rate for each copy issued.

Allow 5 days for processing.

WORKSHEET FOR SANITARY CERTIFICATE FOR EXPORTS

For heat-treated, milk based products made from heat-treated milk or heat-treated milk based products intended for human consumption.

I. Exporter (*Name and Address*)

II. Identification of the Dairy Products (*Information Supplied by the Manufacturer or Exporter*)

Product Description _____
Condition or Kind of Treatment: _____
Type of Packaging _____
Number of Packages _____
Total Net Weight _____
Required Temperature, Storage, and Transportation _____
Validity Date (Shelf Life): _____

III. Manufacturer of the Product (*Information Supplied by the Manufacturer or Exporter*)

Name: _____
City: _____
Plant Number: _____

IV. Product Destination (*Information Supplied by the Manufacturer or Exporter*)

Origin: _____
Destination: _____
Method of Transport: _____

Signature of Applicant

Date

Return Address

Company Name _____

Contact Name _____

Address _____

City, State _____

Telephone _____
☐ US Mail
☐ Federal Express Contract No. _____

Billing

Information

Company Name: _____

Tax ID Number _____

Billing Address _____

Point of Contact _____

Phone Number _____

Fax Number _____



UNITED STATES OF AMERICA



SANITARY CERTIFICATE FOR EXPORTS

Country of Origin: **USA**

Certification Authority: **U.S. Department of Agriculture, Agricultural Marketing Service**

Reference Number of this Certificate: [CertNo]

I. Exporter (Name and Address)

[ExportName]

[ExportAddr]

[ExportCitySt]

II. Identification of the Dairy Products (Information Supplied by the Manufacturer or Exporter)

Product [Description]

Description:

Condition or Kind of [Condition]

Treatment:

Type of Packaging: [PkgType]

Number of [NumPkgs]

Packages:

Total Net [NetWt]

Weight:

Required Temperature, Storage and [ReqTemp]

Transportation:

Validity Date (Shelf Life): [ShelfLife]

III. Origin of the Products: (Information Supplied by the Manufacturer or Exporter)

[OriginName]

[OriginCity]

Plant Number: [OriginNo]

IV. Product Destination: (Information Supplied by the Manufacturer or Exporter)

Origin: [DestName]

[DestAddr]

Destination [Destination]

:

Method of [Transport]

Transport:

V. Sanitary Certification

- (1) The United States of America is free from Foot & Mouth Disease and Rinderpest
- (2) The product was manufactured in facilities inspected and approved by the competent authority and subjected to regular audits or inspections aimed at ensuring that the processing is properly and hygienically carried out, to produce a product that is fit for human consumption.
- (3) The product was manufactured from milk that received a pasteurization treatment or adequate safeguards have been taken with the aim of avoiding public health hazards arising from pathogenic organisms associated with milk.
- (4) To the best of our knowledge, the product contains no harmful levels of contaminants.

[Date]

[Name]

[Title]

USDA, Dairy Grading

Date Signed

69. Instructions for European Health Certificate Worksheet

INSTRUCTIONS FOR COMPLETION OF HEALTH CERTIFICATE WORKSHEET FOR EXPORT CERTIFICATE TO THE EUROPEAN UNION

Applicants for health certifications will be subjected to annual reviews to verify compliance in accordance with DA Instruction 918-I, [Section 18.E.9.B.2](#).

- **Complete all the information on the attached worksheet on a single sheet.**
 - All information is required except “Code number” of product. The number of packaging units and net weight is for the entire shipment covered by the certificate. Show units of weight (e.g. Kg, lbs.) All the information shall be provided on a single sheet in the format provided. Worksheets not properly completed will not be processed. It is the exporter’s responsibility to verify all documentation requirements for shipments intended for export to the EU.
- **Signature and date by the responsible official for the company is required on the worksheet.**
- **Provide a copy of the appropriate “Certificate of Conformance” with your request.**
 - Transfer the attached “Certificate of Conformance” to your company’s letterhead paper and complete the appropriate certification section(s). Requests without a completed “Certificate of Conformance” will not be processed. Requests for multiple certificates in the same request require only one “Certificate of Conformance”, provided the information is applicable to the entire request.
- **Certificates may be issued upon request in any of the European Union official languages.**
 - In order for the worksheet information to be provided in the requested language, the applicant shall provide the necessary wording in English and in the requested language.
- **Completed documents for requests will be returned to the applicant.**
 - If you require special handling of the completed certificate, such as special mailings or tracking, we request that you provide the required air bills. (Federal Express is the only express service that makes daily scheduled stops at our office. Packages for other services may not be picked up daily.)
- **Mail or fax the completed documents to:**

Export Processing
USDA, Agricultural Marketing Service
Dairy Division, Dairy Grading Branch,
Room 2746-S
1400 Independence Avenue, SW
Washington, D.C. 20250-0230

Fax Number: 202-720-2643
Phone Number: 202-720-7473

- **EU Health Certificates will be billed at the rate of one hour of the currently published hourly rate for each copy issued.**

Allow 5 days for processing.

WORKSHEET FOR EUROPEAN UNION HEALTH CERTIFICATE

All information must be properly completed

Consignor (Name and Address in full)	Consignee (Name and Address in full)

Manufacturer of Product Being Exported	Intended Destination of Product
Plant Name _____	EU Member State _____
EU Plant Number _____	Place of Destination _____
Place of Loading for Exportation _____	

Means of Transport & Consignment ID	Consignment Identification Details
<input type="checkbox"/> Ship <input type="checkbox"/> Air <input type="checkbox"/> Rail <input type="checkbox"/> Truck	
Ship Name, Flight Number, Registration Info, Container Number _____	

Identification of Product	
Code Number (as appropriate) _____	Number of Pkg Units _____
	Net Weight _____
Packaging _____	
Date of Manufacture (For Review Purposes, Not Shown on Certificate) _____	

I declare the above information is true and correct to the best of my knowledge

Signature of agent for applicant _____

Date _____

Return Address	Billing Information
Company Name _____	Company Name _____
Contact Name _____	Tax I.D. Number _____
Address _____	Billing Address _____
City, State _____	Point of Contact _____
Telephone _____	Phone Number _____
<input type="checkbox"/> Fed Ex Contract # _____	Fax Number _____
<input type="checkbox"/> U.S. Mail _____	

(This Certificate of Conformance must be provided with each request for sanitary certificates provided by the Dairy Grading Branch, Dairy Programs, Agricultural Marketing Service, United States Department of Agriculture, for shipment to the EU. **The Certificate of Conformance shall be provided on company letterhead that includes company name, address and phone number.** This Certificate of Conformance shall be signed and dated for each shipment of product; "blanket certificates" are not acceptable.)

Certificate of Conformance

Applicant European Union Certification:

I hereby certify that all of the dairy products and/or dairy ingredients used for the production of the products included in the attached request for certification were produced from raw milk meeting the somatic cell (400,000 per ml.) and bacterial standard plate count (100,000 per ml.) requirements of the European Commission Council Directive 92/46/EEC Annex A, Chapter IV.

The signer of this Certificate of Conformance acknowledges sole responsibility for maintaining adequate records to trace the production and Certificates of Conformance for all dairy products or ingredient use in the products presented for certification. Failure to maintain such records will cause ineligibility to receive certifications to the European Union.

_____(Signature and Title of
Individual Providing Certification) (Date)

LOT NUMBERS AND MANUFACTURING DATES COVERED BY THIS CERTIFICATE OF CONFORMANCE ARE LISTED BELOW:

(This Certificate of Conformance must be obtained for supplier with each shipment of dairy ingredients used in product manufactured for shipment to the EU. **The Certificate of Conformance shall be provided on company letterhead that includes company name, address and phone number.** This Certificate of Conformance shall be signed and dated by the supplier for each shipment of product; "blanket certificates" are not acceptable. All lot number must be traceable to the production records of product certified by Dairy Grading Branch, Dairy Programs, Agricultural Marketing Service, United States Department of Agriculture for shipment to the EU.)

Certificate of Conformance

Dairy Ingredient Supplier:

I hereby certify that the dairy products included in the attached manifest were produced from raw milk meeting the somatic cell (400,000 per ml.) and bacterial standard plate count (100,000 per ml.) requirements of the European Commission Council Directive 92/46/EEC Annex A, Chapter IV.

(of Individual Providing Certification)

(Date)

(Signature and Title)

LOT NUMBERS AND MANUFACTURING DATES COVERED BY THIS CERTIFICATE OF CONFORMANCE ARE LISTED BELOW.

70. European Health Certificate Example

1. Consignor (name and address in full) 	<p align="center">HEALTH CERTIFICATE</p> <p align="center">for heat-treated milk, milk-based products made from heat-treated milk or heat-treated milk-based products for human consumption from third countries or parts of third countries authorised in Column B of Annex I of Commission Decision [2004/438/EC*] intended for consignment to the European Community</p> <p align="center">No ORIGINAL</p>	
2. Consignee (name and address in full) 	3. Origin of the milk and milk-based products 3.1 ISO code and name of Country: <u>US</u> United States of America 3.2 Code of territory: _____ 3.3 Name(s) and official approval number(s) of treatment and/or processing establishment(s) approved for export to the Community: _____ 	
5. Intended destination of the milk and milk-based products 5.1 EU Member State: _____ 5.2 Place of destination: _____ 	4. Competent Authority 4.1 Ministry: <u>United States Department of Agriculture</u> 4.2 Service: <u>Agricultural Marketing Service</u> 4.3 Local/Regional level: _____ 6. Place of loading for exportation 	
7. Means of transport and consignment identification 7.1 Ship _____ 7.2 Registration number(s), ship name or flight number: _____ 	7.3 Consignment identification details: _____ 	
8. Identification of the milk and milk-based products 8.1 Milk From: <u>Cow</u> (animal species) 8.2 Code Number (as appropriate): _____ 8.3 Packaging: _____ 8.4 Number of packaging units: _____ 8.5 Net weight: _____		
9. Animal Health Attestation I, the undersigned official veterinarian, hereby certify: 9.1 that the milk-based product made from heat-treated milk described above has been obtained from animals: (a) under the control of the official veterinary service, (b) which were in a country or region that has been free of foot-and-mouth disease and of rinderpest for at least 12 months, and where vaccination against foot-and-mouth disease has not been carried out for at least 12 months, (c) belonging to holdings which were not under restrictions due to foot-and-mouth disease or rinderpest, and, (d) subject to regular veterinary inspectors inspections to ensure that they satisfy the animal health conditions laid down in Annex A, Chapter I of Directive 92/46/EEC, with the exception of those in paragraph 1 (a) (i) and (b) (i) ; 9.2 that I am familiar with the animal health requirements of Directive 92/46/EEC.		
10. Official stamp and signature Done at _____ on _____ <div style="display: flex; justify-content: space-between;"> <div style="width: 45%;"> (stamp) </div> <div style="width: 45%;"> <div style="border-bottom: 1px solid black; margin-bottom: 5px;"></div> <div style="border-bottom: 1px solid black; margin-bottom: 5px;"></div> <div style="border-bottom: 1px solid black; margin-bottom: 5px;"></div> </div> </div> <div style="display: flex; justify-content: space-between; margin-top: 10px;"> <div style="width: 45%;"></div> <div style="width: 45%;"> <div style="border-bottom: 1px solid black; margin-bottom: 5px;"></div> <div style="border-bottom: 1px solid black; margin-bottom: 5px;"></div> <div style="border-bottom: 1px solid black; margin-bottom: 5px;"></div> </div> </div> <div style="display: flex; justify-content: space-between; margin-top: 10px;"> <div style="width: 45%;"></div> <div style="width: 45%;"> <div style="border-bottom: 1px solid black; margin-bottom: 5px;"></div> <div style="border-bottom: 1px solid black; margin-bottom: 5px;"></div> <div style="border-bottom: 1px solid black; margin-bottom: 5px;"></div> </div> </div>		

11. Public Health attestation

I, the undersigned official inspector, hereby certify:

11.1 that the milk-based product made from heat-treated milk described above:

- (a) was manufactured from raw milk
 - (i) not, according to the findings of monitoring plans at least equivalent to those provided for in Directive 92/46/EEC, containing residues of anti-microbial substances in excess of the limits laid down in Annexes I and III to Regulation (EEC) No 2377/90, as amended,
 - (ii) not, according to the findings of monitoring plans at least equivalent to those provided for in Directive 92/46/EEC, containing pesticide residues in excess of the maximum levels laid down in Annex II to Directive 86/363/EEC, as amended,
 - (iii) not, according to the findings of monitoring plans at least equivalent to those provided for in Directive 92/46/EEC, containing contaminants in excess of the maximum tolerances laid down in the Community list provided for in Article 2(3) of Regulation (EEC) No 315/93,
 - (iv) which comes from registered and checked holdings meeting the hygiene conditions laid down in Chapter II of Annex A to Directive 92/46/EEC,
 - (v) which was obtained, collected, cooled, stored and transported in accordance with the specific hygiene conditions laid down in Chapter III of Annex A to Directive 92/46/EEC,
 - (vi) which meets the plate and somatic cell count standards laid down in Chapter IV of Annex A to Directive 92/46/EEC, and
 - (vii) which was collected and standardized, where necessary, in accordance with the hygiene conditions laid down in Chapters I, III and IV of Annex B to Directive 92/46/EEC
- (b) comes from a treatment establishment and/or processing establishment offering equivalent guarantees to those laid down in Chapter II of Directive 92/46/EEC shown on the list of establishments authorized to export to the European Community and which is subject to supervision by the competent authority in accordance with the provisions of Chapter VI of Annex C to Directive 92/46/EEC;
- (c) has undergone heat treatment during manufacture in accordance with the specific requirements of Chapter I of Annex C to Directive 92/46/EEC;
- (d) meets the relevant microbiological criteria laid down in Chapter II of Annex C to Directive 92/46/EEC;
- (e) has been wrapped and packaged in accordance with Chapter III of Annex C to Directive 92/46/EEC;
- (f) was stored and transported in accordance with the requirements of Chapter V of Annex C to Directive 92/46/EEC, and;
- (g) was transported, where appropriate, in tanks as described in Article 16 (2) of Directive 92/46/EEC;

11.2 that I am aware of the provisions contained in Directive 92/46/EEC, Annexes I and III to Regulation (EEC) No 2377/90, Annex II to Directive 86/363/EEC and Regulation (EEC) No 315/93.

12. Official stamp and signature

Done at WASHINGTON, DC USA

on _____

(stamp)

(signature of official inspector)

CARRIE KAYSER, NATIONAL PROGRAM COORDINATOR

(name in capital letters, qualifications and title)

71. European Union Animal Health Certificate Example

1. Consignor (name and address in full) 	<p align="center">ANIMAL HEALTH CERTIFICATE For milk and milk-based products for transit in the European Community</p> <p>No. _____ ORIGINAL</p>
2. Consignee (name and address in full) 	
5. Intended transit destination of the milk and milk-based products 5.1 Storage in: _____ EU Member State: _____ Name and address of the establishment: _____ 5.2 Final third country of destination after transit: _____ Exit Community BIP name and address: _____ 	3. Origin of the milk and milk-based products 3.1 ISO code and name of country <u>US</u> United States of America 3.2 Code of territory _____ 3.3 Name and official approval or registration number of production holding(s): _____ Plant # _____
	4. Competent Authority 4.1 Ministry: <u>United States Department of Agriculture</u> 4.2 Service: <u>Agricultural Marketing Service</u> 4.3 Local/Regional level: _____
7. Means of transport and consignment identification: 7.1 Means of transport: Ship 7.2 Registration number(s), ship name, or flight number: _____ 	6. Place of loading for exportation 7.3 Consignment identification details: _____
8. Identification of the milk and milk-based products 8.1 Milk from: <u>Bovine</u> _____ (animal species) 8.2 Code Number (as appropriate): _____ 8.3 Packaging: _____ 8.4 Number of packaging units: _____ 8.5 Net weight: _____ 	
9. Animal Health attestation I, the undersigned official inspector, hereby certify, that the milk described above: 9.1 comes from a country or region authorized for imports into the EC of milk and milk-based products as laid down in Annex I to Commission Decision 2004/438/EC; 9.2 complies with the relevant animal health conditions for the products concerned as laid down in the animal health attestation in section 9 of the model certificate Milk-HTB in Part 2 of Annex II to Commission Decision 2004/438/EC; 9.3 was produced on or between _____ 	
10. Official stamp and signature Done at <u>WASHINGTON, DC USA</u> on _____ <div style="display: flex; justify-content: space-between;"> <div style="width: 45%;"> (stamp) </div> <div style="width: 45%;"> (signature of official veterinarian) (name in capital letters, qualifications and title) </div> </div>	

72. Example of Letter of Analysis



**United States
Department of
Agriculture**

**Agricultural
Marketing
Service**

**Dairy
Grading
Branch**

**2150 Western Ct
Suite 100
Lisle, IL 60532-3900**

December 27, 2007

Big Dairy Company
1 Main Street
Cowtown, Minnesota 59001

Dear Sir:

The following samples of Nonfat Dry Milk were submitted by Big Dairy Company, Cowtown, MN, for laboratory testing on December 12, 2007.

THIS IS NOT AN OFFICIAL CERTIFICATE

Lot No.	%fat	%moist	%acid	SI	SP	SPC	DMC	coli	flavor	Grade
340-1										
340-2										
340-3										
340-4										
340-5	.78	3.10	.135	0.1	7.5	3.2		<5	SATIS.	Extra
340-6										
340-7										
340-8										
340-9										
341-1		.85	3.05	.135	0.1	7.5	2.4		<5	SATIS. Extra
341-2										
341-3										
341-4										
341-5		.90	3.20	.135	0.1	7.5	6.0	12	<5	SATIS. Extra

The quality or grade of the sub-lots covered by this letter is based on the samples furnished by the manufacturer or interested party and, therefore, apply only to the samples examined and not to the sub-lots from which they were taken.

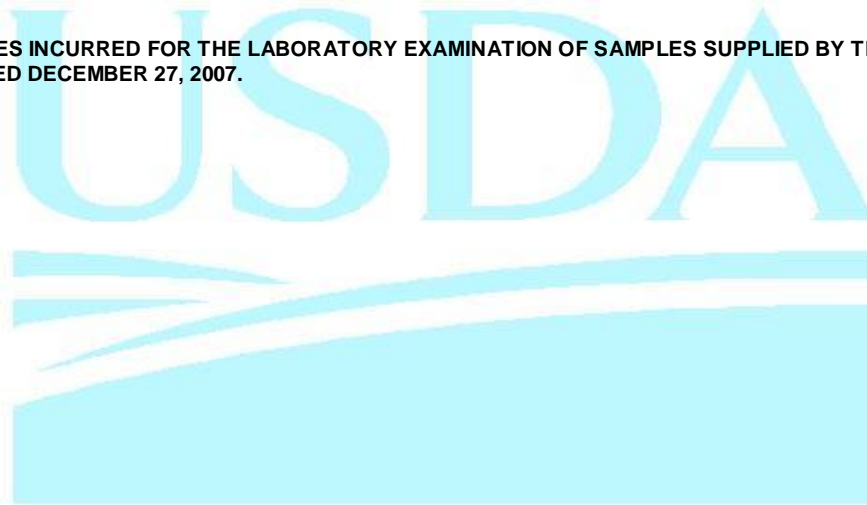
Sincerely,

Lars Lefsa
Resident Grader

73. Certificate, Laboratory Billing

U.S. DEPARTMENT OF AGRICULTURE AGRICULTURAL MARKETING SERVICE INSPECTION AND LABORATORY CERTIFICATE					CERTIFICATE NO. DX-900198979-9	
TO: APPLICANT <i>(Name and address)</i> BIG DAIRY COMPANY COWTOWN, MN	SHIPPER OR SELLER <i>(Name and address)</i>		RECEIVER OR BUYER <i>(Name and address)</i>		DATE INSPECTED 12/27/2007	NO. SAMPLES TAKEN
INSPECTED AT <i>(Name and address)</i> BIG BUTTER FACTORY MILKANDHONEY, CA	INSPECTED BY JOHN E. ROCK		CONDITION OF CONTAINERS Applicable U.S. Standards for condition of Food containers		SAMPLE CONTAINERS STAMPED WITH USDA LOT NO. 54321	
MANUFACTURED BY <i>(Name and address)</i> BIG DAIRY COMPANY COWTOWN, MN	ANNOUNCEMENT NO.	CONTRACT NO.	SEED NO.	SIZE AND KIND OF CONTAINERS	STORAGE LOT	SERVICE DATE 12/27/2007

THIS CERTIFICATE COVERS THE TIME AND EXPENSES INCURRED FOR THE LABORATORY EXAMINATION OF SAMPLES SUPPLIED BY THE MANUFACTURER.
 THE RESULTS ARE REPORTED IN THE LETTER DATED DECEMBER 27, 2007.



U.S. GRADE	NO CONT.	WEIGHT	FEES	I CERTIFY that in compliance with the regulations governing the inspection and grading of dairy products issued pursuant to the Agricultural Marketing Act of 1946, as amended (7 U.S.C. 1621 et seq.), the product described above was inspected on the date shown and that the quality and/or condition of said product, on said date, were as stated above	
			INSPECTION EXPENSE LABORATORY 1560.60 TOTAL 1560.60	SIGNATURE OF OFFICIAL GRADER Nat F Director	ADDRESS Big City, IL

DA-201 (03-01) Previous edition may be used.

1/ AS STATED BY APPLICANT

This certificate is receivable in all courts of the United States as prima facie evidence of the truth of the statements contained. not excuse the failure to comply with any applicable Federal law.

74. Warehouse Condition Checklist

U.S. DEPARTMENT OF AGRICULTURE AGRICULTURAL MARKETING SERVICE WAREHOUSE CONDITION CHECKLIST CCC-OWNED DAIRY PRODUCTS INSTRUCTIONS: (1) Prepare a separate report for each building where product is stored. (2) Show N/A after each item not applicable. (3) Explain under remarks the extent or degree and exact location of any unsatisfactory conditions checked in shaded boxes. (4) Mail original and two copies to Glen Ellyn Office.		NAME AND ADDRESS OF WAREHOUSE Sumers Warehouse, Inc. 305 N. Central Ave Hatfield, WI	
		PRODUCT(S) STORED Spray, NDM	INSPECTION REQUEST NO. MP-M-540
		DATE 10/31/07	SIGNATURE OF USDA GRADER <i>H. H. House (008)</i>

HOUSEKEEPING <table style="width: 100%;"> <tr> <th></th> <th style="text-align: center;">YES</th> <th style="text-align: center;">NO</th> </tr> <tr> <td>1. Is there any evidence of moisture or dampness in warehouse?</td> <td style="text-align: center;"><input type="checkbox"/></td> <td style="text-align: center;"><input checked="" type="checkbox"/></td> </tr> <tr> <td>2. Are any of the containers open or damaged?</td> <td style="text-align: center;"><input checked="" type="checkbox"/></td> <td style="text-align: center;"><input type="checkbox"/></td> </tr> <tr> <td>3. Is there any trash in or near warehouse or are conditions such that pests may be harbored?</td> <td style="text-align: center;"><input type="checkbox"/></td> <td style="text-align: center;"><input checked="" type="checkbox"/></td> </tr> <tr> <td>4. Is warehouse maintained in a clean, neat, and orderly manner?</td> <td style="text-align: center;"><input checked="" type="checkbox"/></td> <td style="text-align: center;"><input type="checkbox"/></td> </tr> </table>		YES	NO	1. Is there any evidence of moisture or dampness in warehouse?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	2. Are any of the containers open or damaged?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	3. Is there any trash in or near warehouse or are conditions such that pests may be harbored?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	4. Is warehouse maintained in a clean, neat, and orderly manner?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	WAREHOUSING CONTINUED <table style="width: 100%;"> <tr> <th></th> <th style="text-align: center;">YES</th> <th style="text-align: center;">NO</th> </tr> <tr> <td>9. Is the product subject to damage because of it's location in the warehouse?</td> <td style="text-align: center;"><input type="checkbox"/></td> <td style="text-align: center;"><input checked="" type="checkbox"/></td> </tr> <tr> <td>10. Is the product on pallets or dunnage?</td> <td style="text-align: center;"><input checked="" type="checkbox"/></td> <td style="text-align: center;"><input type="checkbox"/></td> </tr> <tr> <td>11. Is product stored in basement room(s)?</td> <td style="text-align: center;"><input type="checkbox"/></td> <td style="text-align: center;"><input checked="" type="checkbox"/></td> </tr> </table>		YES	NO	9. Is the product subject to damage because of it's location in the warehouse?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	10. Is the product on pallets or dunnage?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	11. Is product stored in basement room(s)?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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REMARKS: Item 2: Five (5) bags located on periphery of Lot #53 and four (4) from Lot #59, had torn outer liners. Warehouse promptly repaired the bags by applying tape over the tears. Item 5: Live larvae found in area of storage lots #53 and #54. Warehouse is in process of fumigating those lots and storage areas. Insect specimens were sent to Glen Ellyn Office.																												

Above deficiencies were discussed with M. R. Letterhouse, V. President of Warehouse

75. Inventory Adjustment Notice

70 (10-08-85) U.S. DEPARTMENT OF AGRICULTURE Agricultural Stabilization and Conservation Service				1. CLAIM NO.		2. CONTROL ORDER NO.	
INVENTORY ADJUSTMENT NOTICE				3. COMMODITY DATE		4. STORAGE START DATE	
<input checked="" type="checkbox"/> REJECTION <input checked="" type="checkbox"/> ACKNOWLEDGEMENT OF LIABILITY <input type="checkbox"/> UPWARD ADJUSTMENT <input type="checkbox"/> SHORT SHIPMENT				5. PROGRAM CODE		6. PROGRAM YEAR	
NOTE: ➡ This report is authorized by law (7 CFR 1423-4). While you are not required to respond, the Commodity Credit Corporation may cancel the Uniform Storage Agreement.				7. DOCKET CODE			
12. NAME AND ADDRESS OF WAREHOUSEMAN ABC Warehouse Company, Inc. 825 E. 8th Street St. Paul, MN 55101				13. WAREHOUSE CODE 0166		8. TOTAL NET WEIGHT 9. TOTAL GROSS WEIGHT	
14. WAREHOUSE LOCATION 925 E. 8th Street St. Paul, MN 55101				10. PRICE PER POUND		11. TOTAL VALUE	
15. IDENTITY OF ORIGINAL SHIPMENT(S) AND QUANTITY REJECTED TO YOU							
A. COMMODITY Bulk Butter				B. SIZE PACKAGE 68 lbs. C/F Box			
LOT NO. C	INBOUND ORDER NO. D	ORIGINAL NO OF UNITS E	NO UNITS REJECTED F	NET LBS. G	SHIPPER NAME & ADDRESS H		
B-140	30929-2	720	2	136	Land O Lakes – Rice, WI		
627	30929-2	720	2	136	Land O Lakes – Rice, WI		
677	31768-1	680	1	68	Land O Lakes – Rice, WI		
720	32765-2	680	3	204	Armour Creameries – Bloomington, MN		
722	32765-3	680	1	68	Armour Creameries – Bloomington, MN		
723	32765-4	680	1	68	Armour Creameries – Bloomington, MN		
I. REASON FOR REJECTION Warehouse damaged – Contents exposed							
NOTE ➡ Disposition of the rejected commodity must be made in accordance with all local, State, and Federal laws and regulations, including the Food, Drug and Cosmetic Act. All Government markings must be obliterated within 10 days and prior to disposition. Rejected containers shall be removed from USDA stocks within 10 days and set apart for final disposition.							
16. THE FOLLOWING CHECKED SHORT IN YOUR WAREHOUSE				17. THE FOLLOWING WAS SHIPPED SHORT FROM YOUR WAREHOUSE			
A. COMMODITY				A. COMMODITY			
B. UNITS		C. SIZE		B. UNITS		C. SIZE	
18. IF SHIPPED SHORT, GIVE:	A. OUTBOUND ORDER NO.	C. EXPLAIN DIFFERENCE IN ORDERED AND SHIPPED QUANTITIES					
	B. SHIPPING DATE						
D. IS UNSHIPED QUANTITY AVAILABLE FOR FUTURE SHIPMENT? YES <input type="checkbox"/> NO <input type="checkbox"/>		E. IF "NO" EXPLAIN					
19. BY COMMODITY INSPECTOR				20. BY WAREHOUSE EXAMINER			
SIGNATURE <i>John Doe (012)</i>			DATE 9/8/07	SIGNATURE			DATE
21. A. <input checked="" type="checkbox"/> Receipt of rejected items and liability for loss and/or damage are hereby acknowledged				B. <input type="checkbox"/> I certify that the commodity was shipped short as indicated above			
22. SIGNATURE <i>Allen B. Smith</i>				TITLE WAREHOUSEMAN		DATE 9/8/07	

76. Record of Accountable and Non-Accountable Items

RECORD OF ACCOUNTABLE AND NON-ACCOUNTABLE ITEMS

Employee Name: John J. Smith
Duty Station: 1235 Mill Road
Lefsa, MN 55123

Supervisor: Jane Doe

Accountable Items List:

A. USDA Official Stamp

Serial No (s).	Date Issued	Dates Checked	Remarks
0017	9/30/84	10/25/06	Good

B. Other Accountable Items

Item	Dates Issued	Dates Checked	Remarks
Evidence Tape	9/30/84, 9/1/06	10/25/06	Needs more tape
Key No(s). 00195	9/30/84	10/25/06	
Lock Box	9/30/84	10/25/06	Serial No. 1258
Certificates			No applicable
Seed Nos.	9/30/84, 9/1/06	10/25/06	Records OK
Laptop	7/23/04	10/25/06	Dell - numerous dings and dents.

C. Non-accountable Items List

Item	Dates Issued	Dates Checked	Remarks
Calculator	9/30/84	10/25/06	TI-66
Clipboard	9/30/84	10/25/06	
Flashlight	9/30/84	10/25/06	
Thermometer	9/30/84	10/25/06	Needs to be calibrated
USDA Color Standards	9/30/84	10/25/06	2 panels cracked
No. 8 Cheese Trier	9/30/84	10/25/06	
Butter Trier	9/30/84	10/25/06	
Sample Stamp	9/30/84	10/25/06	Wore out needs replacement
Reserve Stamp	9/30/84	10/25/06	
Grip Lock Seals	9/30/84	10/25/06	Good Supply
Brief Case	9/30/84	10/25/06	Lock checked – okay

Employee Signature: _____

Date: _____

Supervisor Signature: _____

Note: This is an example only. Any comparable record containing the same or similar information is acceptable

77. Guidelines for Physical Control and Storage of Accountable Items

GUIDELINES FOR PHYSICAL CONTROL AND STORAGE OF ACCOUNTABLE ITEMS

Graders and inspectors bear the primary responsibility for the proper use, control, and care of all assigned grading and certification equipment at all times. Accountable items shall be used and stored in a manner which ensures reasonable protection and safety, in accordance with the instructions in DA Instruction 918-I [Section 4.B.2.c](#). The following methods may be used to accomplish this goal.

A. When in use during working hours, keep all accountable items:

1. in your personal possession; or
2. within sight.

B. When not in use during working hours, store accountable items:

1. in a lockable carrying case; or
2. in an approved locked cabinet, file, drawer, locker, or another secure location.

C. Store accountable items which you are not using:

1. in a locked cabinet, file, locker, drawer, or room;
2. in your home; or
3. in a carrying case that you have placed inside your locked car.

78. Transmittal Record

TO:	Jane Grader 394 Evans St West Point, NE 68121	DISPATCH DATE: 8/29/07	ADDRESSEE'S COPY
FROM:	National Field Office 800 Roosevelt Rd Ste A370 Glen Ellyn, IL 60137	RECEIVING DATE: 8/29/07	
TRANSMITTAL OF: Official Stamp Ser. No. 0042; evidence tape, key; lock box; Form DA-126; seed nos.; padlock, grip lock seals; stamp pad; bulk butter trier; print butter trier; Reserve stamp; Sample stamp; butter color standards; thermometer			
U.S. DEPARTMENT OF AGRICULTURE			
TRANSMITTAL RECORD			
		FORM AD-690 (1-76)	

79. European Union Audit Report

U.S. DEPARTMENT OF AGRICULTURE AGRICULTURAL MARKETING SERVICE DAIRY DIVISION		DP-123456
APPLICANT (Name and Address) Way-Out Whey Co. 116 W. Maple Johnson, MN	TYPE OF PLANT Dry Whey	DATE: 05/23/2007
	MANAGER Mr. S. Mart Alec	FEE: \$408.00
		EXPENSE: \$155.75
PLANT SURVEYED (Name and Address) Flintstone Dairy Cooperative Wilson, NY		TOTAL: \$563.75
PURPOSE OF SURVEY EUROPEAN UNION COMPLIANCE AUDIT		USDA AUDITOR AND AUDIT TEAM John E. Rock (002)

EUROPEAN UNION COMPLIANCE AUDIT CHECKLIST

DAIRY PLANT:

A. EU Certificate production data received from the applicant. (yes/no) N/A														
B. Bacterial count and Somatic Cell count data received from the applicant. (yes/no) YES														
<table border="0"> <tr> <td>C. <u>Milk Quality</u></td> <td> <u>Bacterial Counts:</u> <u>Month 1 Month 2</u> </td> <td> <u>Somatic Cell Counts:</u> <u>Month 1 Month 2</u> </td> </tr> <tr> <td>Percentage of tankers tested (Day 1/Day 2)</td> <td><u>10/10 10/10</u></td> <td><u>10 10</u></td> </tr> <tr> <td>Arithmetic or Geometric Mean of tankers correct (yes/no/NA)</td> <td><u>YES/YES YES/YES</u></td> <td><u>YES YES</u></td> </tr> <tr> <td>Rolling geometric average correct (yes/no/NA)</td> <td><u>YES/YES YES/YES</u></td> <td><u>YES YES</u></td> </tr> </table>			C. <u>Milk Quality</u>	<u>Bacterial Counts:</u> <u>Month 1 Month 2</u>	<u>Somatic Cell Counts:</u> <u>Month 1 Month 2</u>	Percentage of tankers tested (Day 1/Day 2)	<u>10/10 10/10</u>	<u>10 10</u>	Arithmetic or Geometric Mean of tankers correct (yes/no/NA)	<u>YES/YES YES/YES</u>	<u>YES YES</u>	Rolling geometric average correct (yes/no/NA)	<u>YES/YES YES/YES</u>	<u>YES YES</u>
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Arithmetic or Geometric Mean of tankers correct (yes/no/NA)	<u>YES/YES YES/YES</u>	<u>YES YES</u>												
Rolling geometric average correct (yes/no/NA)	<u>YES/YES YES/YES</u>	<u>YES YES</u>												
Calculation of Geometric Mean: The following procedure can be used on any calculator that has the appropriate keys. ★ Multiply the numbers for which the geometric mean is to be calculated together ★ Press [=] for the last number. ★ Press [Y^x] or [X^y] (whichever key is available.) ★ Enter the number of numbers multiplied together. ★ Press [1/x]. ★ Press [=]. ★ The answer is the geometric mean.														
D. Number of shipments selected 6 MONTHS		Records verify sufficient volume available (yes/no) YES												
Comments: Flintstone Cooperative provides WPC to Way-Out Whey Co. located in Johnson, MN. Flintstone Cooperative receives milk from 200-250 of their own producers. Producer milk is tested twice each week for SCC and once per month for SPC. The raw milk is being tested at appropriate levels. The monthly averages for SCC and SPC are within the EU requirements of 100,000/ml for SPC and 400,000/ml for SCC. All SCC and SPC counts are below the EU required limits. Certificate of Conformances provided to Way-Out Whey Co. were reviewed. They were lot specific, on company letterhead, signed and dated. Flintstone Cooperative maintains good records. An ELIGIBLE status is assigned.														
Audit Status: <input checked="" type="checkbox"/> Eligible <input type="checkbox"/> Probationary (requires follow-up) <input type="checkbox"/> Ineligible														

See reverse side for Dairy Ingredient User Plant checklist

DAIRY INGREDIENT PLANT:

A. EU Certificate production data received from the applicant. (yes/no) YES			
B. Number of shipments selected: 3		Certificate Numbers Audited: 8111111, 8222222, 8333333	
C. Source plants for dairy components			
<u>Name</u>	<u>Ingredient</u>	<u>C.O.C. (yes/no)</u>	
Flintstone Cooperative Johnson, MN	WPC	YES	
 Rubble's Cheese Co. Barney, NY	WPC	YES	
 Dino's Cheese StoneAge, PA	WPC	YES	
D. Source plant selected for subsequent audit by National Field Office: Flintstone Cooperative			
E. Imported products covered by Health Certificates issued by country of origin.			
<u>Company</u>	<u>Country of Origin</u>	<u>Ingredient</u>	<u>Certificate</u>

Comments:

Way-Out Whey manufactures whey products that are shipped to the European Union.

Three certificates were selected for review. Production and shipping records verify that the products listed on the EU certificates were manufactured and shipped by Way-Out Whey.

Certificates of Conformance (CoC) are maintained on file at the plant. A review of some of these CoC's showed that they are being done correctly.

CoC's from each of the ingredient suppliers were on file. They were lot specific, on company letterhead and were dated and signed.

Way-Out Whey keeps excellent records and and ELIGIBLE status is being assigned.

Audit Status: ☒ Eligible ☐ Probationary (requires follow-up) ☐ Ineligible

80. Audit Report

U.S. DEPARTMENT OF AGRICULTURE AGRICULTURAL MARKETING SERVICE DAIRY PROGRAMS AUDIT REPORT		RA-
APPLICANT (Name and Address):	TYPE OF PLANT:	DATE:
	MANAGER:	FEE:
		EXPENSE:
		LAB:
PLANT AUDITED (Name and Address):	PURPOSE OF AUDIT: <input type="checkbox"/> Validation <input type="checkbox"/> Verification Other:	
		TOTAL:
		USDA INSPECTOR, GRADER, OR AUDITOR:

Purpose: To determine whether the applicant is in compliance with their the Audited Applicant Supplied Samples Service requirements.
 Scope: Audit of the applicant's SCP.
 Authority: Agricultural Marketing Act of 1946, 7 CFR Part 58, Application for Participation in the Audited Applicant Supplied Samples Service.
 Performance Standards: The applicant's SCP Manual(s) and Audited Applicant Supplied Samples Service requirements.

Audit Rating:

Frequency Level (circle one each line)

Previous Audit (Date)	Audit Rating				
1.	Level 3	Level 2	Level 1	Non SCP	
2.	Level 3	Level 2	Level 1	Non SCP	
Observations: This Audit	Minor	Major	Critical		
Number of observations					
Applicant Rating	Audit Frequency	Number of Observations Allowed			
Level 3	Once every two weeks	1	0	0	
Level 2	Once per week	2	0	0	
Level 1	Every Inspection and Grading Assignment	2	1	0	
Current Audit Rating: (Circle one)		Level 3	Level 2	Level 1	Non SCP
Audit Frequency - Next Audit: (Circle One)		Level 3	Level 2	Level 1	Non SCP
Observations (Add additional pages as appropriate):			Audit Plan:		
Inspector/Grader Date		Applicant Representative Date			

81. Audit Report

U.S. DEPARTMENT OF AGRICULTURE AGRICULTURAL MARKETING SERVICE DAIRY PROGRAMS AUDIT REPORT		RA-9344363	
APPLICANT (Name and Address): BIG BUTTER COMPANY COWTOWN, CA	TYPE OF PLANT: BUTTER	DATE: 8/25/2006	
	MANAGER: MR. I DON'T CARE	FEE: \$136.00	
		EXPENSE: \$90.00	
		LAB:	
PLANT AUDITED (Name and Address): SAME AS APPLICANT	PURPOSE OF AUDIT: <input type="checkbox"/> Validation <input checked="" type="checkbox"/> Verification Other:	TOTAL: \$226.00	
		USDA INSPECTOR, GRADER, OR AUDITOR: John E. Rock (001)	

Purpose: To determine whether the applicant is in compliance with their the Audited Applicant Supplied Samples Service requirements.
 Scope: Audit of the applicant's SCP.
 Authority: Agricultural Marketing Act of 1946, 7 CFR Part 58, Application for Participation in the Audited Applicant Supplied Samples Service.
 Performance Standards: The applicant's SCP Manual(s) and Audited Applicant Supplied Samples Service requirements.

Audit Rating:

Frequency Level (circle one each line)

Previous Audit (Date)		Audit Rating			
1.	8/11/2006	Level 3	Level 2	Level 1	Non SCP
2.	8/18/2006	Level 3	Level 2	Level 1	Non SCP
Observations: This Audit		Minor	Major	Critical	
Number of observations		1	1	0	
Applicant Rating	Audit Frequency	Number of Observations Allowed			
Level 3	Once every two weeks	1	0	0	
Level 2	Once per week	2	0	0	
Level 1	Every Inspection and Grading Assignment	2	1	0	
Current Audit Rating: (Circle one)		Level 3	Level 2	Level 1	Non SCP
Audit Frequency - Next Audit: (Circle One)		Level 3	Level 2	<u>Level 1</u>	Non SCP
Observations (Add additional pages as appropriate): Lot DB-100128835 released for distribution before official grading completed (Major) Production records 8/23/2006 changed from 8/22/2006 and not properly initialed by the responsible record keeper. (Minor)			Audit Plan: Audit production records for 8/20, 8/23 and 8/24 Audit shipping records for 8/20, 8/23 and 8/24		
INSPECTOR/GRADER <i>John E. Rock</i>	DATE 8/25/2007	APPLICANT/REPRESENTATIVE <i>Walter Mittee</i>	DATE 8/25/2007		

82. Resident Laboratory Request to Test Outside Samples

_____, Chief
Dairy Grading Branch
USDA/AMS/Dairy Programs
PO Box 96456, Room 2746-S
Washington, D.C. 20090-6456

Dear _____,

In compliance with DA Instruction 918–I, [Section 20.E](#), (Name of Resident Plant), located at (Billing Address), herein notifies the USDA/AMS/Dairy Grading Branch that an agreement has been entered into with the following company to initiate official USDA laboratory testing in our resident laboratory for samples received from the company. The company with which the agreement has been established is not included within the scope of our current Resident Program contract with USDA. The agreement becomes effective on _____.

(Name of company)

(Address)

(Contact information)

At this time, the agreement covers the following dairy products and the following analyses:

Products: _____

Analyses: _____

I agree to notify the Dairy Grading Branch in Washington, D.C., prior to initiating any additional official USDA testing for this company.

Furthermore, I agree that all outside testing is to be conducted under the supervision of the USDA Resident Grader in accordance with the requirements, guidelines, and parameters established by the Dairy Grading Branch for the testing of samples under this program and the Resident Program. I understand that the resident plant is responsible for all costs, such as resident grader training and new equipment, associated with these expanded services.

Please contact me if you have any questions or concerns. Thank you.

Sincerely,

For Official Use Only:

Concurrence

Date

83. Laboratory Comparison Report on Non-Fat Dry Milk

LABORATORY COMPARISON REPORT ON NON-FAT DRY MILK

DATE (MONTH) AUG 1999

SAMPLE NO. 2

Submitted By: _____

Lab Number	% Fat	% Moisture	Titrateable Acidity	Solubility Index	Scorched Particles	Coliform	Bacterial Count Plate	Direct	Penicillin	WPN	Flavor	Grade
4	20.75	2.83	0.117	0.1	7.5	< 10	0.4	46	< 12.7	5.59	SATIS	N.G.
7	20.61	3.16	0.120	0.1	7.5	< 5	0.5	7	< 12.7	4.59	SATIS	N.G.
13	15.90	3.40	0.120	0.2	7.5	< 5	0.6	1	NEG	4.80	SATIS	N.G.
15	13.73	3.30	0.110	0.2	7.5	< 5	0.6	3	< 12.5	6.90	SATIS	N.G.
23	20.28	3.40	0.100	0.2	7.5	< 1	0.9	19	NEG	4.60	SATIS	N.G.
26	20.46	3.15	0.100	0.2	7.5	< 5	0.8	3	< 12.7	5.10	SATIS	N.G.
28	20.32	3.20	0.110	0.1	15.0	< 2		1	< 12.7	4.70	SATIS	N.G.
30	20.41	3.38	0.100	0.1	7.5	< 5	0.4	8	< 12.7	4.30	SATIS	N.G.
Mean =		19.0575	3.2275				0.6000	11.0000		5.0725		
Std. Dev. =		2.6862	0.1917				0.1915	15.3157		0.8345		

Results not received by the 25th of the month will not be included.

84. Laboratory Comparison Report on Butter

LABORATORY COMPARISON REPORT ON BUTTER

DATE (MONTH) SEP 1999

SAMPLE NO. 2

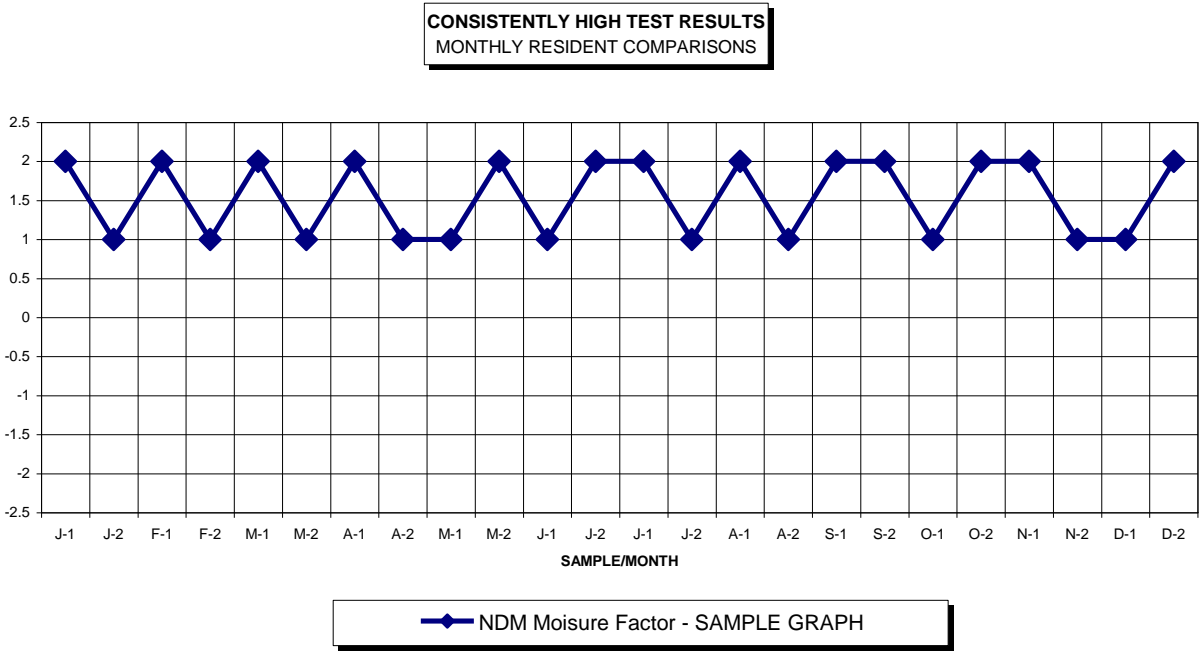
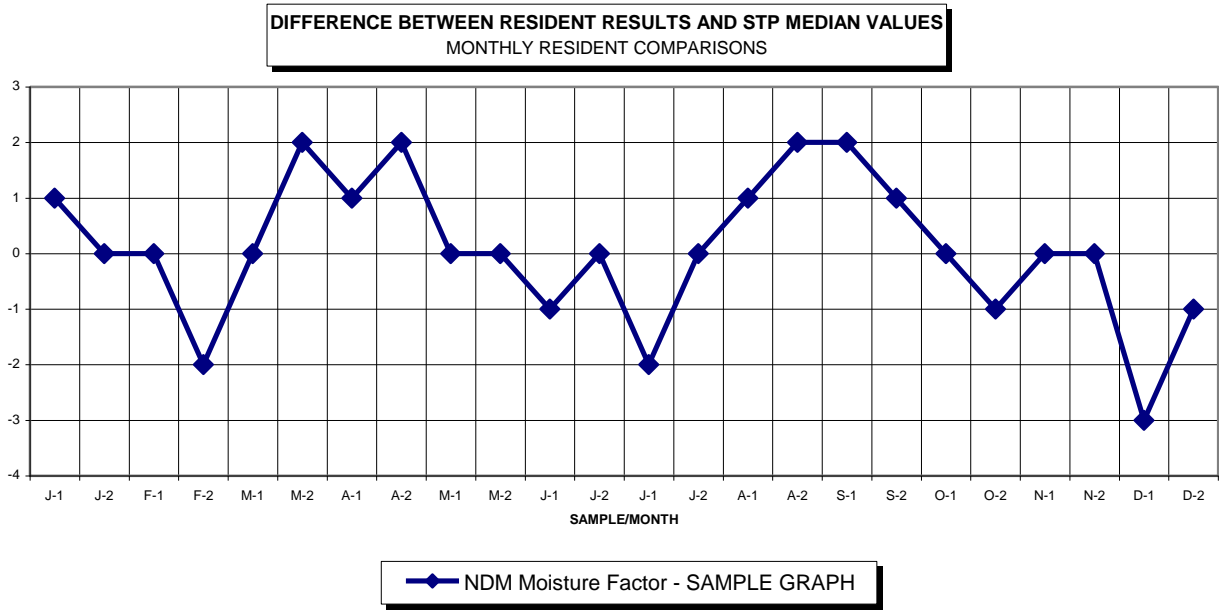
Submitted By: _____

Lab Number	% Fat	% Moisture	% Salt
4	80.82	17.05	0.91
5	80.36	17.29	1.20
7	80.63	17.05	1.18
9	80.43	17.25	1.24
10	80.60	16.90	1.18
11	80.70	17.00	1.10
23	80.65	17.04	1.10
26	80.57	17.11	1.25
28	80.57	16.97	1.18
30	80.45	17.10	1.25

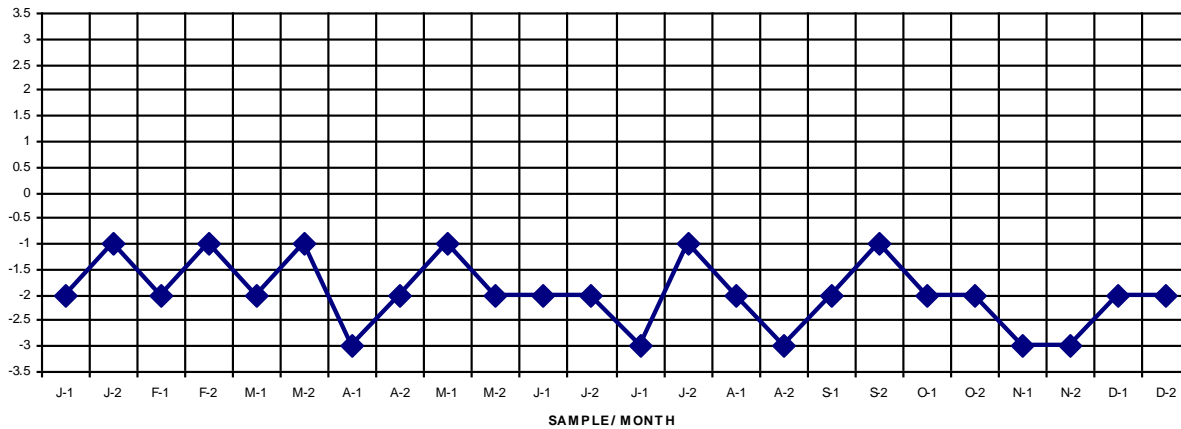
Mean =	80.57800	17.07600	1.15900
Std. Dev. =	0.13653	0.11946	0.10279

Results not received by the 25th of the month will not be included.

85. Z Score Graphs

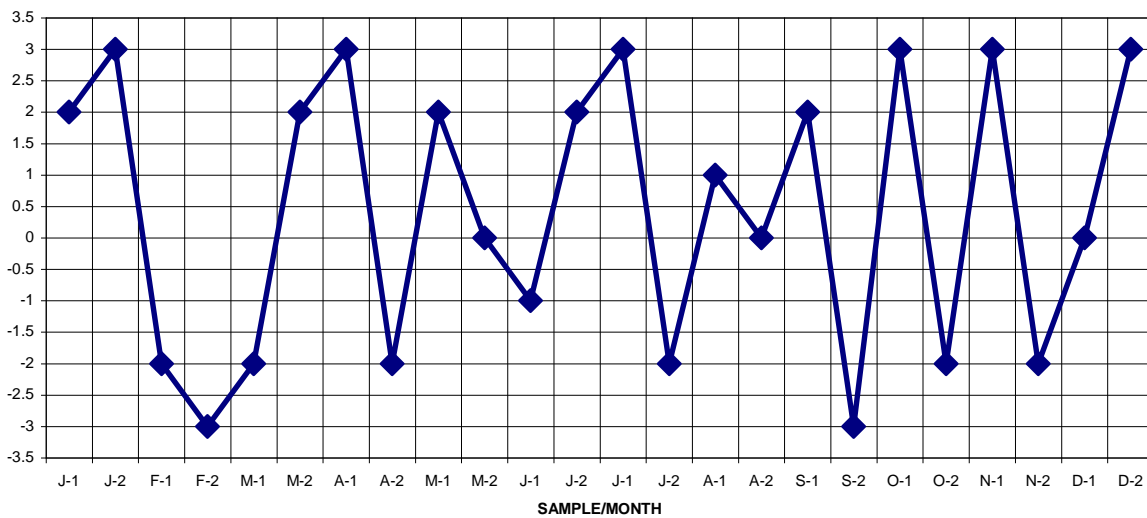


CONSISTENTLY LOW TEST RESULTS
MONTHLY RESIDENT COMPARISONS



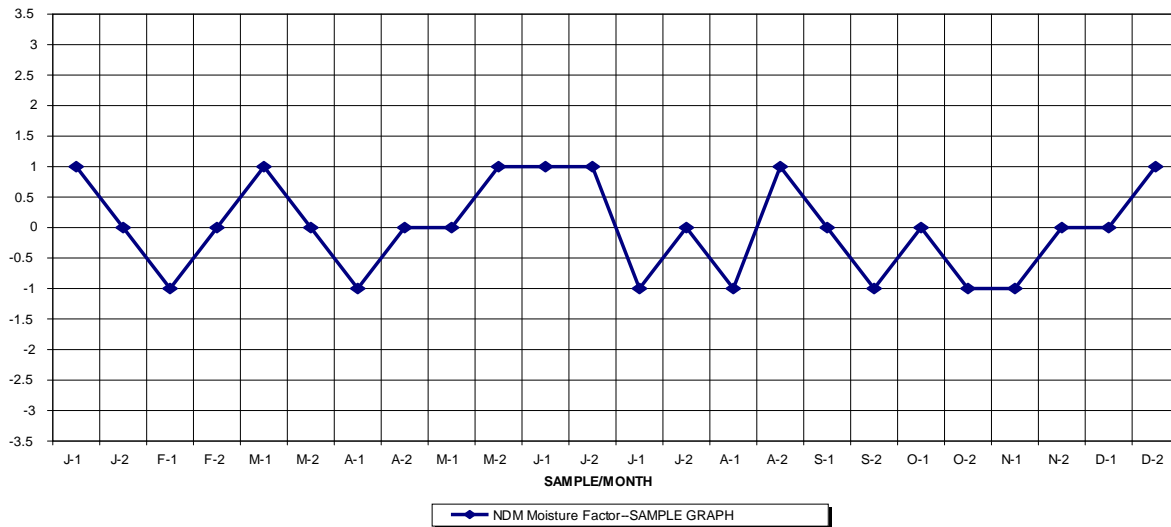
—◆— NDM Moisture Factor--SAMPLE GRAPH

ERRATIC TEST RESULTS, POOR CONTROL
MONTHLY RESIDENT COMPARISONS



—◆— NDM Moisture Factor--SAMPLE GRAPH

TESTING SATISFACTORY, GOOD CONTROL
MONTHLY RESIDENT COMPARISONS



86. Plant Survey Report

U.S. DEPARTMENT OF AGRICULTURE AGRICULTURAL MARKETING SERVICE DAIRY DIVISION		DP- 123456	
PLANT SURVEY REPORT			
APPLICANT (Name and Address) ABC Dairy Cowtown, WI	TYPE OF PLANT Powder	DATE 11/12/07	
		FEE: Contract	
	MANAGER	EXPENSE: Contract	
		LAB: \$160.70	
PLANT SURVEYED (Name and Address)	PURPOSE OF SURVEY Monthly Salmonella Comparison Samples	TOTAL: \$160.70	
		USDA INSPECTOR	
		<i>John Rock</i> (001)	

87. Response to Science Division Review

January 3, 2008

TO: NATIONAL PROGRAM COORDINATOR FOR RESIDENT PROGRAMS

FROM: James L. Stone
USDA RESIDENT INSPECTOR

Frank D. Bolder
PLANT MANAGEMENT TEAM MEMBER

SUBJECT: RESPONSE TO SCIENCE DIVISION REVIEW DATED 12/14/99

Recommendation # 1 in the Laboratory Operation section reads:

Standards book/books are needed for record keeping, showing all work regarding reagent standardization, equipment checks, calibrations, repairs, etc.

Response: A standards book was started on the day of the review. The rpm of the centrifuge used for solubility index was determined and recorded.

Recommendation # 1 in the Laboratory Safety section reads:

Rubber or plastic mats should be placed in the sink and on the drain.

Response: Rubber mats were purchased on 12/28/07 for the sink in the bacteriology room and for the sink located on the north wall of the main lab room.

cc: Chief, Dairy Grading Branch
National Field Director
Dairy Grading Field Supervisor

88. NonFat Dry Milk Re-Grade Certificate

U.S. DEPARTMENT OF AGRICULTURE AGRICULTURAL MARKETING SERVICE NON FAT DRY MILK GRADING CERTIFICATE					CERTIFICATE NO. DM-500184081-1	
TO: APPLICANT <i>(Name and address)</i> USDA-FSA-KCCO KANSAS CITY, MO	SHIPPER OR SELLER <i>(Name and address)</i>		RECEIVER OR BUYER <i>(Name and address)</i>		DATE INSPECTED 04/08/07	NO. SAMPLES TAKEN 1
INSPECTED AT <i>(Name and address)</i> ABC TRADING CO. KANSAS CITY, KS	INSPECTED BY JOHN E. ROCK		CONDITION OF CONTAINERS Applicable U.S. Standards for condition of Food containers		SAMPLE CONTAINERS STAMPED WITH USDA LOT NO.	
MANUFACTURED BY <i>(Name and address)</i> DUSTY MILK CO. LEFSA, MN	ANNOUNCEMENT NO.	CONTRACT NO.	SEED NO.	SIZE AND KIND OF CONTAINERS 25 KG PEEL PAK BAGS	STORAGE LOT 1608002	SERVICE DATE 03/29/07

COMPOSITE % MOISTURE 3.7	COMPOSITE FLAVOR SATIS	U.S. GRADE **	IU/VIT A 100G
INSPECTION REQUEST NO.	KC-M-2277	DATE	1/12/2005
ORIGINAL CERTIFICATE	DM-50018408-0		

****NO U.S. GRADE ASSIGNED BECAUSE OF MOLD ON THE OUTSIDE OF THE BAG. THE PRODUCT MAY NOT BE USED FOR HUMAN CONSUMPTION. IT MAY BE USED FOR ANIMAL FEED IF TESTED NEGATIVE FOR AFLATOXIN**

U.S. GRADE	NO CONT.	WEIGHT	FEES	I CERTIFY that in compliance with the regulations governing the inspection and grading of dairy products issued pursuant to the Agricultural Marketing Act of 1946, as amended (7 U.S.C. 1621 et seq.), the product described above was inspected on the date shown and that the quality and/or condition of said product, on said date, were as stated above		
EXTRA STANDARD BELOW	2160	119,048	INSPECTION	102.00	SIGNATURE OF OFFICIAL GRADER <i>John E. Rock</i> SIGNED BY <i>Nat F. Director</i> JOHN E. ROCK 4/10/07	
			EXPENSE	63.00		
			LABORATORY	36.95		
			TOTAL	201.95		
		NET WEIGHT			LEFSA, MN	

DA-201 (03-01) Previous edition may be used. 1/ AS STATED BY APPLICANT

This certificate is receivable in all courts of the United States as prima facie evidence of the truth of the statements contained. It does not excuse the failure to comply with any applicable Federal law.

89. Certification of Labor

WA-667 (09-18-84)	U. S. DEPARTMENT OF AGRICULTURE Agricultural Stabilization and Conservation Service CERTIFICATION OF LABOR <i>(Furnished by warehouseman for commodity inspection assistance)</i>	1. DATE 03/29/2007 2. INSPECTION REQUEST NO. (If applicable) KC-M-2277
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NOTE: Undue delays which result in excessive work hours of labor should be fully explained.

3. NAME AND ADDRESS OF WAREHOUSE

ABC Trading Co.

4. TOTAL NO. WORK HOURS	5. DATE(S)	6. NO. OF CONTAINERS	7. COMMODITY	8. NO. LOTS
42	2/27,28,3/1,2,3,4/2007	280	NDM	48

9. INCLUDES ALL LOTS LISTED ON KC-426

YES ☒

NO ☐

10. LOT NUMBERS INSPECTED (If only a portion of those listed on KC-426)

<u>2/27</u> 106431 107248 107251 107255 107256 107257 107258 107259 6Hrs	<u>3/2</u> 107122 107123 107124 107125 107126 107127 102128 102129 8 Hrs
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<u>2/28</u> 105332 106432 106435 102726 102727 102728 102735 102737 6Hrs	<u>3/3</u> 104550 104551 104552 104553 104554 104555 104556 104557 5 Hrs
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<u>3/1</u> 102842 102931 102932 102933 102934 102935 102936 102937 8 Hrs	<u>3/4</u> 108111 108112 108113 108114 108115 108116 108117 108118 9 Hrs
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CERTIFICATION

I certify that the approximate number of hours shown were for warehouse labor furnished me for commodity inspection. The labor shown herein does not include any labor involved in moving samples to and from the tempering and grading room.

11. BY COMMODITY INSPECTOR		12. BY WAREHOUSE EXAMINER	
SIGNATURE	DATE	SIGNATURE	DATE
<i>John E. Rock (001)</i>	03/29/2007		

90. Evaporated Milk Regrade Certificate

U.S. DEPARTMENT OF AGRICULTURE AGRICULTURAL MARKETING SERVICE EVAPORATED MILK GRADING CERTIFICATE					CERTIFICATE NO. DX-700129687-1		
TO: APPLICANT <i>(Name and address)</i> CCC WASHINGTON, DC		SHIPPER OR SELLER <i>(Name and address)</i> THICK MILK COMPANY FROSTBITE FALLS, MN		RECEIVER OR BUYER <i>(Name and address)</i>		DATE INSPECTED 12/06/07	NO. SAMPLES TAKEN
INSPECTED AT <i>(Name and address)</i> THICK MILK COMPANY FROSTBITE FALLS, MN		INSPECTED BY JOHN E. ROCK		CONDITION OF CONTAINERS Applicable U.S. Standards for condition of Food containers		SAMPLE CONTAINERS STAMPED WITH USDA LOT NO. 129687	
MANUFACTURED BY <i>(Name and address)</i> THICK MILK COMPANY FROSTBITE FALLS, MN		ANNOUNCEMENT NO. EVD-1	CONTRACT NO. VDOM-00243316	SEED NO.	SIZE AND KIND OF CONTAINERS 48-12 FL. OZ CANS/40# C/F CASE	STORAGE LOT	SERVICE DATE 12/06/07

REGRADE
THE EVAPORATED MILK COVERED BY ORIGINAL CERTIFICATE
DX-700129687 DATED 3/31/2007, WAS REINSPECTED THIS DATE
AND SAMPLES SELECTED SHOWED 5 OF 21 SAMPLES SELECTED
HAD FAT SEPARATION.

INSPECTION REQUEST NO. KC-M-15443

U.S. GRADE	NO CONT.	WEIGHT	FEE	I CERTIFY that in compliance with the regulations governing the inspection and grading of dairy products issued pursuant to the Agricultural Marketing Act of 1946, as amended (7 U.S.C. 1621 et seq.), the product described above was inspected on the date shown and that the quality and/or condition of said product, on said date, were as stated above	
			INSPECTION	136.00	SIGNATURE OF OFFICIAL GRADER <i>John E. Rock</i> SIGNED BY <i>SUPERVISOR</i> JOHN E. ROCK 12/06/06
			EXPENSE	268.00	
			LABORATORY		
			TOTAL	404.00	ADDRESS LEFSA, MN

DA-201 (03-01) Previous edition may be used.

1/ AS STATED BY APPLICANT

This certificate is receivable in all courts of the United States as prima facie evidence of the truth of the statements contained. It does not excuse the failure to comply with any applicable Federal law.

[illegible]

92. Butter Certificate, Commodity Credit Corporation

U.S. DEPARTMENT OF AGRICULTURE AGRICULTURAL MARKETING SERVICE BUTTER GRADING CERTIFICATE					CERTIFICATE NO. DB-100163657-0		
TO: APPLICANT (Name and address) BIG BUTTER FACTORY BLUE RIVER, WI		SHIPPER OR SELLER (Name and address)		RECEIVER OR BUYER (Name and address) COMMODITY CREDIT CORPORATION WASHINGTON, DC		DATE INSPECTED 01/19/2009	NO. SAMPLES TAKEN 4
INSPECTED AT (Name and address) JOE'S BIG BOX WAREHOUSE STORAWAY, KS		INSPECTED BY JOHN E. ROCK		CONDITION OF CONTAINERS Applicable U.S. Standards for condition of Food containers		SAMPLE CONTAINERS STAMPED WITH USDA LOT NO. 163657	
MANUFACTURED BY (Name and address) BIG BUTTER FACTORY BLUE RIVER, WI		ANNOUNCEMENT NO. DAIRY 6	CONTRACT NO.	SEED NO. .125634	SIZE AND KIND OF CONTAINERS 25 KG C/F BOXES	STORAGE LOT	SERVICE DATE 01/16/2009

[-----MANUFACTURER DATA (1)-----]

CHURN NUMBER	NO. CONT	DATE MFG	TEST SHORT	CLASSIFICATION FLAVOR	COLOR	SALT	DEFECT RATING BODY	COLOR	SALT	TOTAL	U.S. GRADE	COMMENTS (S-SLIGHT, D-DEFINITE P-PRONOUNCED)	%SALT	%MOIST	%FAT
006-1-A	192	01/06/09		AA	VL	M					AA		1.8		80.2
006-1-B	192	01/06/09	0.1	AA	VL	M					AA				
006-1-C	192	01/06/09		AA	VL	M					AA				80.1
006-1-D	192	01/06/09		AA	VL	M					AA				

MARKED WT: 42,328.32

SHORTAGE: 1.92

GRADING TEMP 49°F

LAB RESULTS: CHURNING 006-1-A COLI <10 YEAST AND MOLD 8

KEEPING QUALITY TESTS TO BE COMPLETED: 01/23/09

U.S. GRADE	NO CONT.	WEIGHT	FEES	I CERTIFY that in compliance with the regulations governing the inspection and grading of dairy products issued pursuant to the Agricultural Marketing Act of 1946, as amended (7 U.S.C. 1621 et seq.), the product described above was inspected on the date shown and that the quality and/or condition of said product, on said date, were as stated above		
AA	768	42326	INSPECTION 136.00	SIGNATURE OF OFFICIAL GRADER <i>John E. Rock</i> JOHN E. ROCK 01/19/09		
A			EXPENSE 98.00			
B			LABORATORY 352.00			
BELOW			TOTAL 586.00			
		MARKED WEIGHT		ADDRESS LEFSA, MN		

DA-201 (03-01) Previous edition may be used.

1/ AS STATED BY APPLICANT

This certificate is receivable in all courts of the United States as prima facie evidence of the truth of the statements contained. It does not excuse the failure to comply with any applicable Federal law.