## **OTHER FACTORS**

1. Do broken <u>pieces</u> of animal filth function as a whole animal filth when determining count?

**ANSWER**. Distinguishable broken pieces of animal filth are considered as whole for count purposes.

2. What are the requirements for a cocklebur to function as cocklebur?

**ANSWER**. Common bur of thorn-like seeds appearing in grain (i.e., cocklebur, yellow star, thistle, starbur, sandbur, etc.) which are of any size and have at least one hard and sharp barb.

3. If anhydrous ammonia is applied to cool off grain when a hot spot is found, can the sample be downgraded?

**ANSWER**. If the sample has an obvious odor, make it COFO. If the grain is also affected by color and appearance, it can be made distinctly low quality (DLQ).

4. What do <u>pieces</u> of suspected fertilizer smaller in size than shown on VRI OF-31 or pulverized pellets of suspected fertilizer function as?

**ANSWER.** Distinguishable broken fertilizer pellets function as whole fertilized pellets for count purposes. (Discontinue use of or reference to OF-31).

5. What do Pelletized Chicken Manure pellets function as?

**ANSWER.** If it is known that the pellet(s) is comprised of chicken manure, it functions as Unknown Foreign Substance (FSUB).

6. When inspecting thresher-run or field-run pulses, is it required, under the FGIS-FDA Memorandum of Understanding, to report lots that contain animal excreta?

**ANSWER.** Thresher-run or field-run pulses are raw agricultural products that typically undergo further processing (cleaning). As such, it is generally not necessary to report such occurrences to the FDA. However, FDA would like to have extreme cases reported so they can handle them on a case-by-case basis. FDA has defined extreme as being severe enough, in the inspector's judgment, that normal processing procedures would not successfully remove the excreta.

{Updated 12/17/2008}