Testing Method Recommendations
for Short Weight in Frozen Seafood Products on IA 99-47

Date: 8-13-2024

**Please note, this recommendation is intended to provide supplemental general information to private laboratories on methods of analysis and test portion sizes when testing for short weight adulteration in frozen seafood products. This document does not outline all of the analytical methods or worksheet requirements for packages being submitted for FDA review. **
Please refer to the current FDA Laboratory Manual, Volume III, Section 7 for comprehensive information on private laboratory package requirements and the review process: https://www.fda.gov/media/73540/download

Analytical Protocol:

- Samples should consist of at least 48 subsamples (48 units) for official analysis. The relevant CPG is 562.300.
- The recommended method is AOAC 963.18 Net Contents of Frozen Seafoods Drained Weight: Procedure
- Percent short weight = [(absolute value of X – Y) / Y] x 100

  Where X = average weight (average of actual weights, i.e. weights determined by lab)
  Y = declared net weight (label statement of Net Quantity of Contents)

AOAC 963.18 is generally the preferred method. However, larger subsamples may present challenges. For larger subsamples, one option is to use 963.18 and analyze the subsamples in portions to obtain the total deglazed product weight; divide the shrimp, putting one portion at a time on the sieve. Note that the entire contents of the package should be deglazed (not a portion) for the testing. Another option is to utilize 35.1.08 AOAC Official Method 967.13 Drained Weight of Frozen Shrimp and Crabmeat. Regardless of the method used, 48 subsamples will need to be analyzed.

Regardless of method used, include the following in the lab report:
• number of subsamples analyzed
• name of method (e.g., AOAC Official Method 963.18 Net Contents of Frozen Seafoods, Drained Weight Procedure)
• net weight declared on label
• lab test result (drained weight determined) for each individual subsample
• average drained weight for all subsamples
• range of weights (minimum and maximum weights)
• average percentage under the declared weight (average short weight, across all subsamples), if applicable

Quality Assurance:
Laboratory must follow the methodology specified in its private laboratory analytical package submission. Any method modifications, or deviations to the cited method, must be explained and validation must be documented.

FDA does not endorse any private laboratory firms, nor requires specific methods to be used for Private Laboratory Analytical Packages (PLAPs). Information herein is provided as a courtesy, but private laboratories are not required to use them. The requirements state the method should be locally validated and should adequately identify and or quantitate the violative analyte(s). The information herein may also provide

supplementary sampling, method information and/or sample preparation information to assist private laboratories who are analyzing products being held under Detention Without Physical Examination (DWPE) as part of an Import Alert to assist private laboratories with submitting scientifically sounds PLAPS as testimony pursuant to FD&C Act section 801 and 21 CFR 1.94 or FD&C Act section 422(b) and 21 CFR 1.1107.