

## Testing Method Recommendations for Filth Analysis of Garlic Bulbs on IA 99-46

Date: 9-25-2024

\*\*Please note, this recommendation is intended to provide supplemental general information to private laboratories on methods of analysis and test portion sizes of garlic products. This document does not outline all the analytical method 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>

### Product Information:

Import Alert 99-46 (Detention Without Physical Examination of Imported Human Foods Due to Filth) includes garlic bulbs.

### Product Code:

25 J - - 21 Garlic Bulb (Root & Tuber Vegetable)

### Sample Collection:

Fresh Garlic Bulbs. – The sample will consist of 6 subsamples, and each subsample will consist of at least 2 lb. Also note that each subsample should consist of at least 20 intact garlic bulbs.

Other Garlic Products – Collect 6 subsamples. Each subsample will consist of at least 1lb of product or intact retail units containing greater than or equal to 1lb.

### Analytical Protocol:

MPM V-11.L *Method for Garlic Bulbs* (V-117)

**Count all filth elements** and report findings according to AOAC 970.66. Note that other extraneous materials (e.g., fibers, paint chips, etc.) need to be described and reported by type and appropriate quantitative figure.

### Quality Assurance:

Laboratory must follow the methodology specified in the private laboratory 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 sound 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.