



Packaging and Packing

I. Purpose

This document defines policies and procedures for examining products for condition and container requirements.

II. Policy

It is the responsibility of the applicant to ensure products presented for certification meet the condition of container requirements before offering to USDA graders for certification.

III. Procedures

A. Requirements

All packages and packaging materials must be clean and in new condition, must not impart objectionable odors or flavors to the commodity, must be safe (cannot adulterate product or be injurious to health) for use in contact with food products and must be tamper-evident. Tamper-evident is defined as packaging or packing materials with one or more barriers of entry, which, when breached or missing, can reasonably be expected to provide visible evidence that tampering has occurred.

Exception – commodities packed in shipping containers with openings for hand holes for carrying or combo bins/tanks which will be closed with commercially accepted methods and materials.

Packaging and packing examinations must be performed online during production, per lot grading at time of shipment, or in conjunction with the 72-hour freezing verification check.

Packaging (primary container, bags, box liners, tray pack, saddle pack, etc.) will be examined for cuts, tears, holes, improper closure, excess moisture, and dirty, smeared, or stained areas affecting the usability of the container. Packing (shipping containers, combo bins, etc.) will be examined for condition, labeling, and markings. The examinations will be according to the criteria listed in the [United States Standards for Condition of Food Containers](#). Graders will use the sampling levels listed and report the examination results on [QAD 617A: Packaging and Packing Defects Worksheet](#). Refer to [QAD 616: Stamps and Shields](#) on how to officially mark the shipping containers.

For red meat products, unless otherwise specified in contractual documents, containers must be marked, strapped (closed) and sealed in accordance with the [Institutional Meat Purchase Specifications \(IMPS\) General Requirements](#).

B. Defects Classification

1. Critical Defects

Any defect that seriously affects or is likely to seriously affect the usability of the container for its intended purpose. Examples include presence of mold, foreign material, or insect infestation; when



product has exuded through any cut, tear, or hole; any opening in packaging that contains liquid or that uses vacuum or modified atmosphere packaging.

2. Major Defects

Any defect that materially affects or is likely to materially affect the usability of the container for its intended purpose. Examples include improper closure exposing product that may permit product dehydration; openings in the packaging where the product is otherwise still contained; dirty, stained or smeared areas that affect or are likely to affect container usability due to extraneous material being transferred to the packaged product when it is removed from the container.

3. Minor Defects

Any defect that materially affects the appearance of the container but is not likely to affect the usability of the container for its intended purpose. Examples include dirty, stained, or smeared areas that materially affect the appearance of the container but are not likely to transfer to the packed product when it is removed from the container; more than occasional small areas showing a thin layer of clear or pinkish colored ice (except for product where this is naturally occurring such as whole bagged birds packed without a drip pad).

4. Insignificant Defects

Any flaw in the container that does not materially affect the appearance and usability of the container for its intended purpose. When performing examinations, insignificant defects will not be recorded. Examples include stains or smears that are light in intensity and not of sufficient size or number to detract from the generally clean appearance of the container.

C. Online Sampling

Online sampling should occur as shipping containers are packed and labeled whether products are chilled/frozen in an inline system or packed to be sent to an offsite freezer. For products frozen at an offsite freezer, the product must also be visually scanned for major or critical defects at time of 0°F in 72-hour frozen product examination. This verification provides assurance that the condition of the containers is maintained through transport prior to distribution to the recipient. Procedures and controls for processors utilizing this method must be reviewed and approved by the supervisor.

Five shipping containers and five primary (one from each case) containers will be examined during online sampling for each sampling interval in accordance with the defect classifications above. Separate sample grids on the reverse side of LP-232-L2 must be completed for packaging and packing.



Documentation of each defect class will be as follows:

Critical defects = C

Major defects = M

Minor defects = √

Record multiple defects on a primary container as one defective unit regardless of the total number observed. The most serious defect observed will be recorded. For critical and major defects, enter the letter “C” three times and “M” twice, respectively, for each defect. This weighted tolerance will allow a major defective unit only when there is no carryover. Management should be notified when defects are encountered.

When the number of defect units exceeds the upper limit, the product the sample represents will be retained. There is no tolerance for critical defects. Product represented by any sample containing a critical defective unit must be retained. When a rejection occurs, the product must be reworked prior to resampling. Upon reworking, all retained containers must be re-examined according to the lot sampling method in section D.

The following example shows the correct way to record data:

PACKAGING DEFECTS

SAMPLE NO. ►	1	2	3	4	5	6	7	8	9
TIME ►	8:00	8:45	9:30	10:30	11:20	11:55	12:40	1:15	2:00
ITEM: 3 / 10 lb. poly bags Chicken Nuggets							M		
	√				M	√	M		
DATE: MM/DD/YY		X	√	√	M	X	X	X	Ø

PACKING DEFECTS

SAMPLE NO. ►	1	2	3	4	5	6	7	8	9
TIME ►	8:00	8:45	9:30	10:30	11:20	11:55	12:40	1:15	2:00
ITEM: 30 lb. case Chicken Nuggets									
	Ø	M				√			C
DATE: MM/DD/YY		M	X	Ø	√	√	X	Ø	C



D. Lot Sampling

For products not subjected to online sampling, samples may be randomly selected at time of shipment or the samples used for checking compliance with the 72-hour freezing requirement may be used for the packaging and packing examination. Graders must use QAD 617A: *Packaging and Packing Defects Worksheet*. If done in conjunction with the 72-hour freezing check, additional required samples must be selected as necessary.

The initial sample size must be 9 or 18 shipping containers depending on the production lot size. The samples required for the packaging defects examination will be obtained from the sample containers taken for the packing defects examination. All primary containers will be examined in each shipping container until the appropriate sample size is satisfied.

Example: Lot size is 600 shipping containers with 4 primary containers in each shipping container. Eighteen samples are required for packaging & packing inspection. All eighteen shipping containers will be evaluated for packing defects. All primary containers in samples 1 through 4, and 2 primary containers in sample 5 will be evaluated for packaging defects. Product will either be accepted (Ac), retained (Re), or require a second sample based on the number of containers, sample size, and criteria as follows:

Production lots $\leq$ 500 shipping containers:

CODE _____	NUMBER OF SAMPLE UNITS	CRITICAL		MAJOR		TOTAL (minor, critical, and major)	
		Ac	Re	Ac	Re	Ac	Re
FIRST SAMPLE	9	0	1	0	2	0	2
SECOND SAMPLE	9						
TOTAL SAMPLE	18	0	1	1	2	2	3

Production lots $>$ 500 shipping containers:

CODE _____	NUMBER OF SAMPLE UNITS	CRITICAL		MAJOR		TOTAL (minor, critical, and major)	
		Ac	Re	Ac	Re	Ac	Re
FIRST SAMPLE	18	0	2	0	2	1	4
SECOND SAMPLE	18						
TOTAL SAMPLE	36	1	2	1	2	5	6

The criteria listed on the QAD 617A: *Packaging and Packing Defects Worksheet* must be used in checking the primary and shipping containers for the applicable defects. Both sides of the worksheet must be used to complete a packaging and packing lot examination. The front of the worksheet is for recording packaging defects and the reverse is for recording packing defects. A tally mark is made in the 1st Sample column in the corresponding defect category for each defect found in the sample for



packaging or packing. The total of critical, major, and minor defects is determined once the 1st sample is complete and recorded in the 1st sample total section.

If the defect totals are less than or equal to the total in the Ac column for Critical, Major, and Total the product is acceptable. Both packaging and packing must meet the acceptance criteria separately for the lot to be accepted. If the product exceeds the Re total for any category on either the packaging or the packing examination, the product must be retained. If the defect totals fall between the Ac and Re totals for any category, a 2nd sample is required using additional samples. The totals from the 1st and 2nd sample are then combined to determine if the defects meet or exceed the Ac and Re tolerances for the total sample. Retained product is only eligible for re-evaluation after being reworked.

With regard to packing only, each lot will undergo a visual scanning inspection at time of shipment to identify obviously damaged containers that may have occurred subsequent to the initial examination. When damaged containers are encountered, the lot must be retained until the containers have been removed and/or replaced. As necessary, the grader may take additional samples at time of shipment to ensure no further damage has occurred.

In accordance with Federal civil rights law and U.S. Department of Agriculture (USDA) civil rights regulations and policies, the USDA, its Agencies, offices, and employees, and institutions participating in or administering USDA programs are prohibited from discriminating based on race, color, national origin, religion, sex, disability, age, marital status, family/parental status, income derived from a public assistance program, political beliefs, or reprisal or retaliation for prior civil rights activity, in any program or activity conducted or funded by USDA (not all bases apply to all programs). Remedies and complaint filing deadlines vary by program or incident.

Persons with disabilities who require alternative means of communication for program information (e.g., Braille, large print, audiotape, American Sign Language, etc.) should contact the responsible Agency or USDA's TARGET Center at (202) 720-2600 (voice and TTY) or contact USDA through the Federal Relay Service at (800) 877-8339. Additionally, program information may be made available in languages other than English.

To file a program discrimination complaint, complete the USDA Program Discrimination Complaint Form, AD-3027, found online at [How to File a Program Discrimination Complaint](#) and at any USDA office or write a letter addressed to USDA and provide in the letter all of the information requested in the form. To request a copy of the complaint form, call (866) 632-9992. Submit your completed form or letter to USDA by: (1) mail: U.S. Department of Agriculture, Office of the Assistant Secretary for Civil Rights, 1400 Independence Avenue, SW, Washington, D.C. 20250-9410; (2) fax: (202) 690-7442; or (3) email: program.intake@usda.gov.

USDA is an equal opportunity provider, employer, and lender.



**United States
Department of
Agriculture**

Agricultural
Marketing
Service

Quality Assessment Division
1400 Independence Avenue SW, Stop 0249
Washington, DC 20250

QAD 617 Procedure
October 3, 2024
Page 6 of 6