

# 3

Animal Product  
Manual

## Reference

### *Bones and Related By-Products*

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#### Introduction

The *Bones and Related By-Products* section covers the following animal parts and their by-products, or cross-references to other categories within the *Reference* section:

- ◆ Antlers
- ◆ Bones
- ◆ Carcass, entire, with skin, hide, or feathers attached
- ◆ Chondroitin sulfate
- ◆ Gelatin
- ◆ Hoofs
- ◆ Horns
- ◆ Items made of bony material
- ◆ Skulls
- ◆ Teeth
- ◆ Tusks

Regulate an importation of bones as bone when it is a commercial importation. Also, consider a large quantity of unfinished bones as a commercial importation, and regulate it as bones rather than trophies.

**Not** covered in this section are the following animal products and by-products:

- ◆ Antlers or their products imported for medicinal use such as an aphrodisiac; regulate as Asian medicinal products under **Miscellaneous Products**
- ◆ Bone, hoof, and horn meal; regulate these products as rendered products under **Animal Waste and Related By-Products**
- ◆ Bones consigned to a museum
- ◆ Bones or skulls entering as trophies or souvenirs; regulate these importations under **Trophies**. Trophies and souvenirs would include:
  - ❖ One to two skulls or horns
  - ❖ Skulls or horns that have been lacquered or painted
  - ❖ Clean, dry ruminant skulls free from undried pieces of hide, flesh, and sinew imported for display
- ◆ Bones, horns, or hoofs imported for pet toys; regulate these importations under **Pet Food, and Livestock, Poultry, and Aquaculture Feed**
- ◆ Collagen of bones; regulate these products under **Animal Waste and Related By-Products**
- ◆ Gelatin capsules containing medication and in final, finished form ready for distribution; such capsules are **unrestricted**
- ◆ Gelatin-containing food products (such as candy, drinks with gelatin, film, gelatin desserts (Royal and Jello), jams, jellies, marshmallows, pudding, and sherbert)

When a VS permit authorizes entry of the bones or related by-product, match the following information on the shipping documents with that on the permit:

- ◆ Current date
- ◆ Description of the material
- ◆ Shipper
- ◆ Consignee
- ◆ Conditions spelled out on the permit

Follow **Table 3-4-1** as you match the permit with the shipping documents.

**TABLE 3-4-1 Validate Importation Authorized Entry by a VS Permit**

If the shipping documents:	And the:	Then:
Match the permit	—————▶	RELEASE or CONTROL as stated on the permit
<b>Do not</b> match the permit	Permit has expired	<ol style="list-style-type: none"> <li><b>DO NOT</b> RELEASE the HOLD</li> <li>HAVE the consignee contact VS, TTSPS (see <a href="#">page 2-4-26</a>)</li> <li>SAFEGUARD the importation until you hear from VS, TTSPS</li> </ol>
	Discrepancy is <b>other than</b> an expired permit	<ol style="list-style-type: none"> <li><b>DO NOT</b> RELEASE the HOLD</li> <li>CONTACT PPQ-VRS-AQI or PPQ-VRS-HQ personnel for further action (see <a href="#">Appendix H</a>)</li> </ol>

## Locator

When a VS permit **does not** authorize entry, use [Table 3-4-2](#) to determine the appropriate regulatory action to take.

**TABLE 3-4-2 Determine Where to Find the Regulatory Action on Bones and Related By-Products Not Authorized by a VS Permit**

If the bones or related by-products are:	And the importation is entering:	Then:
Bone ash, bone black, or bone char	—————▶	GO to <a href="#">Table 3-4-3</a>
Bones: horns, hoofs, antlers, skulls, teeth, tusks, dried bones, granulated bones, crushed bones	For manufacturing or as manufactured items such as pistol grips, knife handles, buttons, souvenirs	GO to <a href="#">Table 3-4-5</a>
	Hoofs except those for pet toys	GO to <a href="#">Table 3-4-9</a>
	For purposes <b>other than</b> described in the two cells above	GO to <a href="#">Table 3-4-12</a>
Chondroitin sulfate	—————▶	GO to <a href="#">Table 3-4-11</a>
Entire carcass with skin, hide, or feathers attached	—————▶	GO to <a href="#">Table 3-4-12</a>
Gelatin	—————▶	Go to <a href="#">Table 3-4-4</a>
Gelatin-containing foods	—————▶	Unrestricted

## Bone Ash, Bone Black, or Bone Char

**TABLE 3-4-3 Regulatory Action on Bone Ash, Bone Black, or Bone Char**

If the bone char is from:	And the bones originated from a region:	And were processed in:	And the importation:	Then:
A ruminant	Free from BSE	A region affected with BSE	Is accompanied by a VS Permit	RELEASE or CONTROL as stated on the permit
			Lacks a VS Permit	<ol style="list-style-type: none"> <li><b>DO NOT</b> RELEASE the HOLD</li> <li>ADVISE the importer that the material is being held because the importation requires a VS permit</li> <li>PROVIDE the importer with the appropriate options including apply for a VS permit (see <a href="#">page 2-4-26</a>)</li> </ol>
		Their region of origin or another region free from BSE	Is accompanied by the appropriate certification <sup>1</sup>	RELEASE
	Affected with BSE	—————→	Lacks the proper certification <sup>1</sup>	<ol style="list-style-type: none"> <li><b>DO NOT</b> RELEASE the HOLD</li> <li>PROVIDE the importer with the appropriate options (see <a href="#">page 2-2-11</a>)</li> </ol>
<b>Other than a ruminant</b>	—————→	—————→	—————→	RELEASE

1 A government certificate stating that (a) the product was derived from ruminant bones from a region (must state the region) **other than** those considered by the USDA to be affected with BSE, and (b) during processing, there was no commingling with any ruminant material from a region considered by the USDA to be affected with BSE.

## Gelatin

**TABLE 3-4-4 Regulatory Action on Gelatin**

If the product was derived from a:	And the region of origin is known to be:	And the importation is:	Then:
Ruminant	Affected with BSE	→	<ol style="list-style-type: none"> <li><b>DO NOT</b> RELEASE the HOLD</li> <li>ADVISE the importer of the hold because the importation requires a VS permit authorizing its entry</li> <li>PROVIDE the importer with the appropriate options including apply for a VS permit (see <a href="#">page 2-4-26</a>)</li> </ol>
	Free from BSE	Accompanied by the proper certification <sup>1</sup>	RELEASE
		Lacks the certification described above	<ol style="list-style-type: none"> <li><b>DO NOT</b> RELEASE the HOLD</li> <li>GIVE the importer the opportunity to get the certification</li> <li>PROVIDE the importer with the appropriate options (see <a href="#">Table 2-2-11</a>)</li> </ol>
<ul style="list-style-type: none"> <li>◆ Equine (horse)</li> <li>◆ Swine</li> <li>◆ Fish</li> </ul>	→	Accompanied by the proper certification <sup>2</sup>	RELEASE
		Lacks the certification described above	<ol style="list-style-type: none"> <li><b>DO NOT</b> RELEASE the HOLD</li> <li>GIVE the importer the opportunity to get the certification</li> <li>PROVIDE the importer with the appropriate options (see <a href="#">Table 2-2-11</a>)</li> </ol>

- 1 A government certificate of origin stating that the gelatin is derived from ruminants in regions **other than** those considered by USDA to be affected with BSE.
- 2 A government certificate of origin stating the species (or kind) of animal from which the gelatin is derived (i.e., equine (horse), swine, or fish).

## Bones, Etc. for Manufacturing

Bones (horns, hoofs, antlers, skulls, teeth, tusks, dried bones, granulated bones, crushed bones) imported for manufacturing may still require some drilling, shaping, or grinding. If the bones require further processing, then they must be finished at an establishment that is approved to properly dispose of the residue (pieces, chips, or dust).

**TABLE 3-4-5 Regulatory Action on Bones for Manufacturing**

If the bones are:	And the bones are from:	Then:
Fully finished, ready to use such as: <ul style="list-style-type: none"> <li>◆ Pistol grips</li> <li>◆ Knife handles</li> <li>◆ Buttons</li> <li>◆ Souvenirs</li> </ul>		RELEASE
<b>Not</b> fully finished; still requiring some drilling, shaping, sanding, or grinding	Ruminant	GO to <a href="#">Table 3-4-7</a>
	<b>Other than</b> a ruminant	GO to <a href="#">Table 3-4-6</a>

**TABLE 3-4-6 Regulatory Action on Bones Not Fully Finished from Other Than Ruminants**

If the importation is:	Then:
Consigned to an approved establishment	AUTHORIZE shipment under seal with VS 16-78 (see <a href="#">Appendix K</a> to complete form)
<b>Not</b> consigned to an approved establishment	1. <b>DO NOT</b> RELEASE the HOLD 2. PROVIDE the importer with the appropriate options (see <a href="#">Table 2-2-11</a> )

**TABLE 3-4-7 Regulatory Action on Ruminant Bones Not Fully Finished**

If from a region known to be:	Then:
Affected with BSE	1. <b>DO NOT</b> RELEASE the HOLD 2. PROVIDE the importer with the appropriate options (see <a href="#">Table 2-2-11</a> )
Free from BSE	GO to <a href="#">Table 3-4-8</a>

**TABLE 3-4-8 Regulatory Action on Ruminant Bones Not Fully Finished from a Region Free from BSE**

If the importation is:	Then:
Consigned to an approved establishment	AUTHORIZE shipment under seal with VS 16-78 (see <a href="#">Appendix K</a> to complete form)
<b>Not</b> consigned to an approved establishment	1. <b>DO NOT</b> RELEASE the HOLD 2. PROVIDE the importer with the appropriate options (see <a href="#">Table 2-2-11</a> )

## Hoofs Except Those for Pet Toys

**TABLE 3-4-9 Regulatory Action on Hoofs Except Those for Pet Toys**

If the hoofs are from:	And from a region known to be:	Then:
Ruminant	Affected with BSE	1. <b>DO NOT</b> RELEASE the HOLD 2. PROVIDE the importer with the appropriate options (see <a href="#">Table 2-2-11</a> )
	Free from BSE	GO to <a href="#">Table 3-4-10</a>
Swine		
<b>Neither</b> ruminant <b>nor</b> swine		RELEASE

## Hoofs of Swine or of Ruminant from a Country of Origin Known to Be Free from BSE

**TABLE 3-4-10 Regulatory Action on Hoofs of a Ruminant from a Country of Origin Known to Be Free from BSE or Hoofs of Swine**

If the hoofs are:	And:	Then:
Accompanied by a government of origin certificate stating that the hoofs were processed by an approved method <sup>1</sup>		RELEASE
<b>Lacking</b> the required certification stating an approved method of processing <sup>1</sup>	Consigned to an approved establishment	AUTHORIZE shipment under seal with VS 16-78 (see <a href="#">Appendix K</a> to complete form)
	<b>Not</b> consigned to an approved establishment	1. <b>DO NOT</b> RELEASE the HOLD 2. PROVIDE the importer with the appropriate options (see <a href="#">Table 2-2-11</a> )

- 1 One of the following approved methods for processing must appear on the certificate:
  - ◆ Dry heat at 180°F (82.2°C) for 30 minutes
  - ◆ Soaking in boiling water for 20 minutes
  - ◆ Soaking for 2 hours in a 0.1 percent solution of chlorine bleach
  - ◆ Soaking for 2 hours in a 5 percent solution of acetic acid
  - ◆ Soaking for 2 hours in a 5 percent solution of hydrogen peroxide

## Chondroitin Sulfate

**TABLE 3-4-11 Regulatory Action on Chondroitin Sulfate**

If from:	And originated from a region:	And was processed in:	And the importation:	Then:
Ruminant (bovine, caprine, or ovine)	Affected with BSE		→	1. REFUSE ENTRY 2. PROVIDE the importer with the appropriate options (see <a href="#">Table 2-2-11</a> )
	Free from BSE	A region affected with BSE	Is accompanied by a VS Permit	RELEASE or CONTROL as stated on the permit
			Lacks a VS Permit <sup>1</sup>	1. <b>DO NOT</b> RELEASE the HOLD 2. PROVIDE the importer with the appropriate options (see <a href="#">Table 2-2-11</a> )
		Their region of origin or another region free from BSE	Is accompanied by a VS Permit	RELEASE or CONTROL as stated on the permit
		Lacks a VS Permit <sup>1</sup>	1. <b>DO NOT</b> RELEASE the HOLD 2. PROVIDE the importer with the appropriate options (see <a href="#">Table 2-2-11</a> )	
Livestock <b>other than</b> a ruminant (avian or porcine for example)	→		Lacks a VS Permit <sup>1</sup>	1. <b>DO NOT</b> RELEASE the HOLD 2. PROVIDE the importer with the appropriate options (see <a href="#">Table 2-2-11</a> )
	→		Is accompanied by a VS Permit <sup>1</sup>	RELEASE or CONTROL as stated on the permit
Marine species (usually shark)	→		Is accompanied by the appropriate certification <sup>2</sup>	RELEASE or CONTROL as stated on the permit
	→		Lacks the appropriate certification <sup>2</sup>	1. <b>DO NOT</b> RELEASE the HOLD 2. CONTACT PPQ-VRS-AQI or PPQ-VRS-HQ personnel for further action (see <a href="#">Appendix H</a> )

<sup>1</sup> Let the importer know that the material is being held because the importation requires a VS Permit. If asked, let the importer know how to apply for a VS Permit (see [page 2-4-26](#)).

- 2 A Government of Origin Certificate stating that the chondroitin sulfate was derived only from marine species (for example, shark), and the processing facility **does not** process any ruminant material from a region considered by the USDA to be affected with BSE.

## Bones and Related By-Products Not Specifically Mentioned Elsewhere

Use **Table 3-4-12** when the importation is bones (horns, hoofs, antlers, skulls, teeth, tusks, dried bones, granulated bones, crushed bones) or entire carcasses with skin, hide, or feathers attached that are being imported for purposes **other than** what is covered in this section.

**TABLE 3-4-12 Regulatory Action on Bones and Related By-Products Not Specifically Mentioned Elsewhere**

If the bones are from:	And from a region known to be:	And the importation is:	Then:
Ruminant	Affected with BSE	→	1. <b>DO NOT</b> RELEASE the HOLD 2. PROVIDE the importer with the appropriate options (see <a href="#">Table 2-2-11</a> )
	Free from BSE	Consigned to an approved establishment	AUTHORIZE shipment under seal with VS 16-78 (see <a href="#">Appendix K</a> to complete form)
Not consigned to an approved establishment		1. <b>DO NOT</b> RELEASE the HOLD 2. PROVIDE the importer with the appropriate options (see <a href="#">Table 2-2-11</a> )	
Other than ruminant	→	Consigned to an approved establishment	AUTHORIZE shipment under seal with VS 16-78 (see <a href="#">Appendix K</a> to complete form)
		Not consigned to an approved establishment	1. <b>DO NOT</b> RELEASE the HOLD 2. PROVIDE the importer with the appropriate options (see <a href="#">Table 2-2-11</a> )