

U.S. DEPARTMENT OF AGRICULTURE

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GRAIN INSPECTION ADVISORY COMMITTEE MEETING

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WEDNESDAY
MAY 12, 2021

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The Committee Meeting met via
Video/teleconference at 11:00 a.m. EDT, Matthew
Kerrigan, GIAC Vice-Chair, presiding.

PRESENT:

DAVID AYERS, Champaign Danville Grain Inspection,
Inc.

JANICE COOPER, Wheat Marketing Center

CURTIS ENGEL, The Scoular Company

NICHOLAS FRIANT, Cargill Inc.

MATTHEW KERRIGAN, EGT, LLC

RYAN KUHL, Northern Plains Grain Inspection
Service

JOHN LINDGREN, United Grain Corporation

ROBERT SINNER, SB&B Foods, Inc.

ERROL BRENT TURNIPSEED, South Dakota State
University Seed Testing Lab

JIMMY WILLIAMS, Grain Inspection Services

Administrator

ALSO PRESENT:

LEE CAPPER, FGIS Chief Innovation Officer

ANTHONY GOODEMAN, Director, FGIS Field Management

Division

EDWARD JHEE, Director, FGIS Technology and

Science Division

KENDRA KLINE, FGIS Chief of Staff and the

Advisory Committee Specialist

JESS MCCLUER, NGFA Vice President of Safety and

Regulatory Affairs

ARTHUR NEAL, FGIS Deputy Administrator, DFO

DENISE RUGGLES, FGIS Executive Program Analyst

BRUCE SUMMERS, AMS Administrator

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P R O C E E D I N G S

(11:00 a.m.)

1
2
3 MR. KERRIGAN: All right. Well, good
4 morning, everybody. Appreciate everybody joining
5 on the Zoom call here this morning. I know
6 everybody. Hopefully this is all pat for
7 everybody at this point. I'm sure that we will
8 all have some technical difficulties going along
9 the way. But just a simple reminder to everybody
10 to try and keep muted if you're not speaking, it
11 does help with the echo and everything else. I
12 assume that as we get through this, Kendra has
13 already set up the agenda, it was attached to the
14 meeting invite. If you need it, let us know and
15 we can get that out to you again.

16 We've got several, or a few items
17 here, a lot of updates. I'm hoping that Arthur
18 is going to be giving everybody, given it's been
19 such a long time since we've all met, we've got a
20 lot of new members. You know, we've got the
21 officer elections. We've got a lot of good stuff
22 here, you know. So again, just want to thank

1 everybody before I turn it back over. And just
2 one housekeeping item, I did not get any
3 volunteers to as acting secretary for this
4 meeting. So depending on what the rules of order
5 are, Arthur, we may need to take care of that.

6 MR. NEAL: Yes, sir. And we will take
7 care of that after we get through the initial
8 components of the agenda. And we'll stop and
9 take a break and we'll find out if we could
10 revisit that particular situation. So thanks,
11 Matt. So without any further ado I'd like to, I
12 think I saw him earlier, we've got, there he is,
13 Bruce Summers our Administrator. He's going to
14 bring some greetings to us on behalf of AMS.
15 Bruce, I turn it over to you, thank you, sir.

16 MR. SUMMERS: Thank you, Arthur. And,
17 good morning, everybody. It's good to see you-
18 all today, virtually. I hope that you have all
19 done well through this period of unique
20 challenges caused by the pandemic. I think at
21 AMS, we understand that you-all had to modify
22 your operations to ensure the health and safety

1 of you workforce. And that you might be seeing
2 some increased demand right now, there have also
3 been a lot of challenges with respect to
4 transportation and staffing and all sorts of
5 hurdles that we've all had to navigate during
6 this time period.

7 Certainly, at AMS, we've had some of
8 the same hurdles that you-all probably have. I'm
9 happier, relieved, not sure which word is best to
10 use there to say, I think the leadership of our
11 Federal Grain Inspection Service, Arthur and his
12 team, have really done an admirable job of, you
13 know, steering the Committee to make sure our
14 employees were safe and healthy and at the same
15 time balance that out with continuing to provide
16 the services to all of our customers and help
17 keep grain moving through the supply chain.

18 So I want to give a little shout-out
19 to the AMS team for work they've done and also
20 acknowledge all that you-all have done to work
21 with us during this is difficult time period.
22 You know, hopefully, hopefully, hopefully, the

1 positive developments that we're seeing around
2 vaccines and declining case numbers. Our numbers
3 across the Agency have gone down to close to zero
4 which is a tremendous improvement from what we
5 were seeing, certainly last fall and even in
6 January. So hopefully this means the next time
7 we meet with this Committee, maybe we can do it
8 in-person.

9 But, you know, really, the virtual
10 meetings have been pretty successful. I've been
11 in hundreds of virtual meetings and maybe
12 thousands by now over the last year. And you
13 know, there is that advantage of not requiring
14 people to travel and, you know, foregoing the
15 expenses of traveling to participate in in-person
16 meetings. And so one of the things I've kind of
17 noticed, I think in some of these virtual
18 meetings, you know, we have more people
19 participating probably because that flexibility
20 and sometimes reduced costs.

21 And so I would expect when we meet or
22 we may be in-person, we may have a virtual

1 component too just to maintain that flexibility
2 for our folks and we can kind of keep everybody
3 who wants to be able to participate one way or
4 the other. So I feel like, you know, as we move
5 forward, and how we reopen, and how we staff our
6 offices, I think we're probably going to see a
7 lot of flexibility and I think kind of a hybrid
8 cross between in-person and virtual. But I am
9 looking forward to getting back out on the road
10 and seeing the real world again. I'm here in
11 Washington DC, which few people would call the
12 real world. I look forward to getting out on the
13 road soon, hopefully see some of you-all.

14 At AMS, you know, kind of give you a
15 little update on what's going on around here.
16 We're continuing to welcome new leadership. USDA
17 is, as the new administration continues to ramp
18 up, I mean January may feel like a long time ago.
19 But really it's still kind of infancy of a new
20 administration. You may be aware that Jenny
21 Lester Moffitt has been nominated to serve as the
22 Under Secretary of the Marketing Regulatory

1 Program missionary. Which is the missionary that
2 houses both AMS and APHIS. At this point she's
3 waiting for a vote in the senate to confirm her
4 to the position. I would expect and hope that as
5 soon as she's confirmed that we can maybe start
6 talking about having her attend, you know, maybe
7 the next next Advisory Committee Meeting for this
8 group. So kind of look forward to that.

9 Right now, and, you know, in addition
10 to working and maintaining the delivery of our
11 inspection programs like FGIS, the issue
12 marketing in these reports, and all that kind of
13 normal operations we work on every day at AMS, we
14 are also working really hard. Tremendous effort
15 across the Agency to implement a variety of
16 pandemic assistance related programs that have
17 been authorized by both the Consolidated
18 Appropriations Act, which you may recall, asked
19 right at the end of December last year, and the
20 American Rescue Plan which was put in place in
21 March.

22 So between those two programs, a lot

1 of pandemic assistance and a lot of Federal
2 dollars. You've heard about it in the news,
3 right? A lot of money being pumped into the
4 economy. And those were the two Acts, two new
5 laws that are really impacting agriculture. Much
6 of the work around that pandemic response space
7 for AMS is related to grant programs. Both
8 beefing up of existing grant programs and new
9 programs. New grant programs that all intended to
10 provide relief to ag businesses, ag producers or
11 hit hard by the pandemic.

12 So you may have seen, if you were
13 watching the trade press announcements recently
14 on things like transfer, especially crop sector
15 and local food sector. Those are existing
16 programs that are being added onto, and sometimes
17 more than doubling in size. And we have a series
18 of new grant programs that will be coming out in
19 the next few weeks. We continue to meet with the
20 Secretary and the new leadership on all of those
21 as we ramp up. There is one, it's not a grant
22 program, but there's one particular issue I

1 really would like to raise for this group. And
2 then we'll talk about that a little bit and then
3 maybe open it up for some conversation.

4 But I would like to put to this
5 Committee the possibility that you-all would
6 consider responding to a Federal Register Notice
7 that we put out a few weeks ago. It's related to
8 an Executive Order that was issued by President
9 Biden in February. And that Executive Order
10 directs federal agencies to secure and strengthen
11 America's supply chains. So to do that, AMS has
12 taken the lead for the entire Department on this.
13 And to do that, we're asking for public comments
14 from all across agriculture to provide us
15 feedback on what do you think the stimulus relief
16 programs should look like. How you think
17 spending related to food supply chain resilience
18 can help increase the variability within the US
19 food supply.

20 You know, we're asking for comments
21 that talk about how stimulus relief programs and
22 spending related to the food supply chain can

1 help with new market opportunities, facilitating
2 fair and competitive markets, advancing efforts
3 to transform the food system. If that's what
4 folks think needs to happen. Meeting the needs
5 of the agricultural workforce, supporting
6 nutrition security for consumers. So it's really
7 a wide open, broad discussion and we really do
8 need public comments as we work on this over the
9 course of the next year. We have actually one
10 year to provide a report to the White House on a
11 pretty big topic, right, the entire US
12 agriculture supply chain.

13 And so I'd like to kind of put it to
14 the Committee to consider whether the Committee
15 would want to provide comments. And even to you-
16 all individually, in your private sector role, to
17 provide comments on and your perspectives about
18 challenges to the US food supply chain we've seen
19 during the pandemic, but even broader than that,
20 just in general. So kind of put that charge in
21 front of you. Happy to talk about it some more
22 if you have any questions, but I'd kind of like

1 to stop there. Arthur only gave me ten minutes.
2 So I've got to be fast and I certainly want to
3 leave time for any questions, any feedback,
4 anything like that you have from me. So let me
5 pause there and, Arthur, let's take any questions
6 if there are some.

7 MR. NEAL: Are there any questions for
8 Bruce? Points of clarification.

9 MR. SUMMERS: I'm going to keep you-
10 all on track. I'm not going to go long.
11 Questions, comments, or feedback, if not, I would
12 just say, and I always say this either at the
13 beginning or at the end, you know, we know you-
14 all could be doing other things, right. We're
15 pulling away from your businesses, we're pulling
16 you away from your farms, to come serve on these
17 committees. You-all are representing grain
18 sector at large. We couldn't do this without
19 you. We really value the input that you-all give
20 to us in these meetings. And the next two days,
21 we now you're going to talk about a lot of
22 important stuff. You're going to make some

1 recommendations for us to consider.

2 We really appreciate, and respect to
3 the fact that you-all have taken this chore on
4 and we're glad you're here. We need you. So
5 thank you very much for being willing to help us
6 out. And if there's no questions, comments,
7 Arthur, I'll kick it back to you guys to stay on
8 track.

9 MR. NEAL: Thank you, Bruce. Are
10 there questions?

11 MR. FRIANT: Arthur, real quick, Nick
12 Friant with Cargill. And, Bruce, thanks for the
13 comments, appreciate you taking the time to, you
14 know, welcome us and share the update. And your
15 comments around the Federal Register Notice, I
16 guess just to comment back to you, just raise the
17 awareness. I do know that NGFA and NAEGA are
18 both drafting comments around the whole supply
19 chain issue. So just for your feedback to know
20 that some of the trade associations are aware of
21 it and are working on some comments back on that
22 Federal Register Notice.

1 MR. SUMMERS: Yes, I would certainly
2 hope that those major organizations would be
3 participating and I would be disappointed if they
4 weren't. So I'm glad you got the inside
5 knowledge on that. But again, you may have some
6 things specifically that you want to put forward
7 and we would love to hear your perspectives.
8 You-all have been in the forefront, front lines,
9 whatever you want to call it here for last year.
10 And from keeping workers healthy to finding a way
11 to ship product, right, and all kinds of
12 challenges this year, and we'd like to hear about
13 those. So thank you, Nick, I appreciate that
14 comment.

15 MR. NEAL: Any other comments or
16 questions?

17 MR. SUMMERS: I hope you guys have a
18 great meeting.

19 MR. NEAL: Thanks, Bruce, take care.
20 So I guess, Matt, I'll go from here. So I want
21 to say, good morning, everybody. It's good to
22 see your faces. And for those who are hiding

1 behind names and black boxes, you know, hopefully
2 we'll get a chance to see your face too today.
3 Ideally it would be great for us to be together.
4 The AAGIWA group met down in Nashville a couple
5 of weeks ago, I think. And, you know, they they
6 were bold and, you know, they had about 90 plus
7 people together. And I think they may have been
8 some of the first to get back to some normalcy.
9 And I was really hoping that I'd be able to get
10 down there, but, you know, we haven't gotten a
11 green light to travel yet.

12 But our goal is for hopefully our next
13 Grain Inspection Advisory Committee Meeting that
14 that will be in-person. Able to sit around the
15 table, you know, whatever protocols we need to
16 put in place we'll make every effort to do that.
17 But I want us to get together again so that we
18 can conduct business and feel like we're doing
19 things in a way that allows us to interact and
20 develop and enhance the relationships we already
21 have. So just good morning.

22 I do want to take a moment to

1 acknowledge and welcome some new members to the
2 Grain Inspection Advisory Committee. And because
3 we do have a little bit of time, I'm going to
4 share some of my time, not a lot though. So
5 everybody take about maybe 20 seconds to
6 introduce yourselves as I call your name. We've
7 got Mr. Curt Engel, who's a new members of the
8 Grain Inspection Advisory Committee. Curt, could
9 you introduce yourself to those may not have an
10 opportunity to have met you.

11 MR. ENGEL: Good morning. My name is
12 Curt Engel, I work for The Scoular Company in
13 Salina, Kansas. And, excuse me, my job
14 responsibilities all of the asset businesses that
15 are in the Grain Division of The Scoular Company.

16 MR. NEAL: Thank you, sir. I'd also
17 like welcome Mr. Nick Friant.

18 MR. FRIANT: Nick Friant with Cargill.
19 Sorry, my video feed is not working well this
20 morning, so you're going to see me in bits and
21 pieces, I think. Sorry about that, I don't know
22 what's going on. But as I mentioned, I'm with

1 Cargill. I'm now part of our North American
2 Regulatory Affairs Team. I also chair the NGFA
3 Grades and Weights Committee, as well as the
4 NAEGA Grades and Inspections Committee.

5 MR. NEAL: Thank you, Nick, Ms. Janice
6 Cooper.

7 MS. COOPER: Good morning. Janice
8 Cooper, I'm Managing Director of the Wheat
9 Marketing Center. We're a research and technical
10 training center and non-profit located Portland,
11 Oregon, upstairs from the FGIS office and across
12 the river from export loading facilities. So I
13 keep an eye on all the wheat that's moving out
14 through the Columbia River System. So happy to
15 be back on the Committee.

16 MR. NEAL: Morning. Thank you. Mr.
17 Robert Sinner.

18 MR. SINNER: Morning, everyone. I'm
19 President of a company called SB&B Foods in
20 eastern North Dakota. We are both a producer and
21 an exporter of IP Food Grade, especially soil
22 beans and specialty grains. I'm also current

1 Chair of the Specialty Soy and Grains Alliance, a
2 national organization of IP, food grade
3 commodities. Thanks, enjoying participating.

4 MR. NEAL: Thank you, sir. We've got
5 Mr. Jimmy Williams.

6 MR. WILLIAMS: Good morning. Can
7 everyone hear me okay? Awesome, all right. So
8 again, my name is Jimmy Williams. I work with the
9 Missouri Department of Agriculture. I served as
10 the Program Manager for the Grain Inspection
11 Program for approximately 11 years. I have also
12 been very active in AAGIWA. My role with the
13 Department recently changed back in January. I'm
14 now serving as the Division Director for Weights
15 and Measures, but I still am working closely with
16 a my peers in the Grain Inspection Program. So
17 look forward to meeting some of the new members,
18 getting acquainted.

19 MR. NEAL: Thank you, Jimmy. Thank
20 you-all. We want to, you know, really express my
21 gratitude for you-all expressing interest in
22 being nominated, and also being selected to serve

1 on this prestigious committee. We're looking
2 forward to leveraging the knowledge and skills
3 and all of your experiences. And I also want to
4 say good morning to our existing members that
5 have been on with us for a couple of years now.
6 We look forward to engaging in this over the next
7 couple of days. We've talked to some people over
8 the past few weeks, but not all of you and I just
9 want to give you a few updates.

10 You know, since the last time we got
11 together, and it's been a while, there's been a
12 lot going on in the world. We've all been
13 experiencing some highs and some lows, some
14 anxieties, and some joys in the midst of it all.
15 But I believe that when this COVID pandemic
16 initially hit, none of us knew what to expect.
17 Most of us were concerned about our health, the
18 health of our families, the health of our
19 employees and a lot of other things, the health
20 of our businesses. But I'm thankful to say that,
21 you know, we've made it thus far. We're still
22 here.

1 The industry's thriving. Grain is
2 moving at a rapid pace. We're moving 60 percent
3 more grain this year than we did last year.
4 We're moving more grain this year that we did our
5 record year back in 2016. And folks have been
6 working extremely hard to make that happen on all
7 ends. You know, I just want to say thank you to
8 all of those who are participating in this
9 meeting as a Grain Inspection Advisory Committee
10 member, as well as any industry participant.
11 Just want to say thank you for what you've been
12 doing to contribute to the successful marketing.
13 Not just successful marketing, but also the
14 marketing grain with integrity. Because of the
15 integrity of the official system and the quality
16 of US grain we have buyers, we have interest.
17 And we want to say thank you for the role that
18 you play in making that happen.

19 For FGIS, part of the challenge of
20 keeping pace with the demand for grain is keeping
21 a healthy trained, kind of competent workforce,
22 and committed workforce. And I can say that

1 through this COVID pandemic, our staff has been
2 extremely committed to servicing our customers.
3 We did not have many instances at all where our
4 employees said, you know, they didn't want to go
5 to work. Yes, at the initial stages, folks were
6 afraid what would happen in this COVID
7 environment. But no-one gave us any push-back to
8 meeting the charge to our fulfilling the
9 expectations of providing service. And they
10 worked extremely hard in doing so.

11 So I want to publicly thank our staff
12 for the work that they've done. And that staff
13 that, you know, whether they're on the quality
14 side, inspection, the weighing side, the
15 management side, I want to say thank you, to all
16 of you. Because they've given us the best that
17 they've had. And I want to say thank you for our
18 customers that they've serviced that have helped
19 our staff stay safe because some of our
20 customers, when they would clean their
21 facilities, they would also take time to clean
22 the lab space in which our staff was working. So

1 I want to publicly thank the industry for
2 supporting us that way so that we can keep our
3 staff safe.

4 Right now, from a staffing standpoint,
5 FGIS has roughly about 500 staff. We have a goal
6 to hire some more people because there's an
7 expectation that grain is still going to move at
8 record rates. So particularly in our Gulf area
9 where the grain is moving very rapidly, we need
10 to hire more people. But in part of hiring more
11 people, we also have to make sure we can train
12 them. We've had a lot of turnover and change
13 over the past few months, particularly in our New
14 Orleans Office and our League City Office. In
15 New Orleans, the Field Office Manager, Ken
16 DeWert, he has transitioned to a new job and he's
17 working for the Department of Navy. So we'll be
18 soon looking for a Field Office Manager our New
19 Orleans Field Office.

20 Right now though, we are very grateful
21 and thankful Mr. Ron Bundy, who is the Field
22 Office Manager for our Domestic Inspection

1 Office, he's now acting down in New Orleans. And
2 so we're thankful for that. We've got a strong
3 team there, they're holding it together very
4 well. But we will be advertising for a Field
5 Office Manager in New Orleans. We also had a
6 retirement League City. The Field Office Manager
7 there, Mr. Alan Wadyko, who served FGIS I believe
8 43 years, he retired. I talked to him this
9 morning and he's golfing. He's enjoying
10 himself. But, you know, one of the things he
11 said when I talked to him, he said, you know, I
12 loved my work. And I feel that way about most
13 folks who work for FGIS and that they loved their
14 work.

15 But we advertised for that Field
16 Office position and that closed, I guess a couple
17 of weeks ago. And so we're waiting to hear back
18 on who are the candidates we can interview and
19 consider. So we're looking to fill that position
20 real soon. But with that type of transition, we
21 also want to make sure that we have the capacity
22 in all other areas to train folks accordingly.

1 And we've got new quality assurance specialists
2 in those Field Offices. And so we're we're
3 setting up engagements with them and the Board of
4 Appeals and Review. So we're just try to make
5 sure we can get all of our training components
6 tightened up before we start bringing on a whole
7 lot of new people as technicians and as graders.
8 But that's a small update here on some our Field
9 Officers.

10 We are expecting some additional
11 transitions later on this year. In Portland, we
12 may be seeing a transition from one of our Field
13 Office Managers. And, you know, hopefully we can
14 convince him to stay a little longer, but we'll
15 see. But there's talk that RA may be retiring.
16 So there's some potential change there. So
17 there's a lot of movement going on in the system,
18 but we will voice to take advantage of it. Not
19 only that, there's opportunity for those were
20 listening to become a part of FGIS with the right
21 experience.

22 And so additional change that we've

1 experience here at FGIS, as many of you know,
2 Karen Guagliardo, who was our Director for
3 Quality Assurance and Compliance, she retired
4 back in January. And Karen has spent close to 30
5 years with FGIS. We hired her replacement a
6 couple of weeks ago. A young lady by the name of
7 Ms. Karla Whalen. Karla, she's coming to us from
8 AMS's Transportation and Marketing Programs.
9 She's got about 28 years of experience in the
10 Federal Government. Over 20 of those being in
11 Compliance and Enforcement in the specialty crops
12 world and with US Commerce. So we hope to see
13 Karla soon. She'll be starting with us on the
14 24th of May. So that's an additional change here
15 of our staff.

16 We've also hired some new quality
17 assurance, not quality assurance. Yes, some
18 Compliance Officers in QACD. So for those who
19 are going through designations and delegation
20 reviews, you may have interactions with some new
21 Compliance Officers there. Cathy Brenner, is
22 another name that some of you may be familiar

1 with. Cathy ran our Inspection Branch in the
2 National Grain Center, our Instrumentation
3 Inspection Branch in the National Grain Center.
4 She retired last year as well. And Mr. Jeff
5 Vanfossan has taken her role there. And I think
6 that's it for some of our more senior positions
7 in FGIS where we've experienced some change.

8 We've got a lot of questions about
9 when are we going to open up for business. And
10 when can folks get back into the National Grain
11 Center, meet with some of the staff. I want to
12 get you the National Grain Center and meeting
13 some of the staff. But we haven't opened it back
14 up yet because things are still a little tenuous
15 and we still have cases here and there. So until
16 we get guidance from the White House that Federal
17 Buildings can be opened up for re-engagement with
18 public, we're just kind of holding tight. Our
19 staff they're reporting to work in the National
20 Grain Center. A lot of them are rotating in on
21 schedules so just be mindful there.

22 And it looks like I'm talking too

1 much. I'm overtime already. There are other
2 things that we can talk about. What I'll try to
3 do is cover some of those things in our updates
4 on recommendations. So I will pause there and I
5 will turn it back over to Matt.

6 MR. KERRIGAN: Thanks Arthur. Does
7 anybody have any, I guess, quick questions for
8 Arthur? I'd hate to move on if there's something
9 that's on the top of somebody's mind here. And
10 he got off it easy that time. All right, well,
11 we will keep pressing on here. Denise, if you'd
12 like to talk about the financials.

13 MS. RUGGLES: Let me see if I can
14 figure out how to share my screen here. Can
15 everybody see my screen?

16 MR. KERRIGAN: Yes.

17 MS. RUGGLES: Great, thank you. Okay.
18 So I'm going to go over the financials for FGIS
19 and talk about our rules that we have out and
20 also what we've published on our finances
21 publicly on our website. So we have posted on
22 the website, the public website, the financial

1 data up through second quarter for FY21. I'm
2 also going to go over the user fee review and
3 obligations by each account with the April
4 numbers that we have from our status of funds
5 plans. And then the fee reviews and the
6 financial registers that we've had so far.

7 So for second quarter for fiscal year
8 2021, you can see that the Inspection Weighing
9 Program has about \$22.6 million of obligations so
10 far and revenue of 20.2. Our operating reserve
11 is around about 7.6 million. And then our
12 official Agency Program, the obligations are at
13 889,0000 and then the revenues only at 474. So
14 to bring up about that is because the fee was
15 suspended through December 31st, of 2020. So it
16 was just reinstated in January. And I'm going to
17 go on and talk about the proposed rule that was
18 out and the final rule where it's at.

19 And then the Rice Program just
20 touching briefly, I know this is the Grain
21 Committee, but the Rice Program for AMA where we
22 are, it's about 2.9 of obligations and we brought

1 in about 1.4 in revenue. And the Commodity
2 Program is about half a million and then we've
3 brought in about 1.1 million in revenue. And I'm
4 going to talk about the little notes about the
5 CARES Act funding briefly when I get to those
6 individual programs.

7 For a second quarter for the
8 Inspection and Weighing Program, we break down
9 how we're bringing our expenses or how we're
10 accumulating our expenses by the different fees
11 and the revenue that's brought in for those. So
12 like the national costs is our overhead costs,
13 and the revenues brought in from that national
14 tonnage fee, the portion of the fee that we
15 collect. And then the local tonnage fees for the
16 Field Offices, and then their operating expenses
17 for those local tonnage fees.

18 And then down below you'll see the
19 section about our export hourly and Inspection
20 Unit fees, and the costs and revenue for that, as
21 well as the non-export hourly and inspection
22 fees. And that covers such as the Domestic Field

1 Office, Appeals, Scale Testing Program, the
2 Expert Registration Program, and the Technology
3 and Science Division, the work they do on grain.
4 Board Appeals primarily is one of the items.

5 So historically, here's a picture of
6 the Inspection and Weighing Account. The purple
7 line is our export tonnage, metric tons. With
8 the right-hand side with the tonnage figures.
9 We're estimating that the tonnage this year will
10 be at about 140 million. And then what the costs
11 as of April are about 42.1 million with revenue
12 only bringing in about 3.4 million. So to give
13 you an -- to talk about that FY20 our four-and-a-
14 half months of operating reserve this program was
15 to have, was 13.4 million. When we closed the
16 FY20, the operating reserve was only 10 million.
17 So this did trigger a 5 percent fee increase,
18 which is the limitation we have in the rule for
19 increasing fees, it's like at a 5 percent maximum
20 increase or decrease.

21 The goal for 2021, end-of-year four-
22 and-a-half months is \$15.8 million due to the

1 increased costs for the busier season we're
2 having this year. The reserve balance is
3 estimated at the end of this fiscal year at \$7.3
4 million. So it's only going to have about two
5 months of reserve. We have used some CARES Act
6 funding to offset some costs that were caused due
7 to the pandemic. Items such as travel costs that
8 have been incurred to keep coverage and supplies
9 for masks and hand sanitizers and things like
10 that.

11 The Supervision Account, the tonnage
12 fee is estimated to be about the same. Some of
13 the tonnage is being shifted from the domestic
14 market, of course, to the export market. And
15 it's a little trickier to estimate those tons at
16 this time. The reserve goal for '20 for the
17 Supervision Account was \$903,000 for six months
18 of reserve. This year, the estimated amount
19 needed is \$824,000 with the estimated balance of
20 the reserve going to be around \$2 million or 14
21 months of reserve.

22 There is a rule, proposed rule that

1 was put out in clearance and we are working on --
2 in clearance is the final rule for that
3 formulation to make adjustments annually to bring
4 the reserve down to mirror the costs. So we are
5 working on the getting that rule out so we can
6 adjust those fees.

7 And then briefly on the Rice Account,
8 six months of reserve for the Rice Account was
9 2.9 million, at the end of FY20 was the goal.
10 And the goal for this year is up again, \$2.9
11 million of operating reserve. And the estimated
12 balance of the reserve is going to be 4.6 million
13 or approximately nine months of reserve. We have
14 done our fee analysis and it's already been
15 published and I'll talk about that, it's coming
16 up in another slide. But the new fees have
17 already been projected, are already announced for
18 starting in October 1, of 2021. And that does
19 take into consideration adjusting those fees to
20 reduce the operating reserve.

21 And then the Commodity Account.
22 Here's the Inspection and Commodity Account and

1 he's about \$1.2 million for a six months reserve
2 and that's what it was for '20 and '21. At this
3 time, based on information we have I and the
4 CARES Act funding that we have used for this
5 account, we are estimating we're going to have
6 about 169,000 or only one month of operating
7 reserve at the end of this year.

8 On the fee reviews, so the Grain
9 Inspection Fees were announced. Annually they're
10 announced with the effective date of January 1st
11 of each year. January 8th, we made the
12 announcement in the Federal Register 86, Federal
13 Register 1475, and we did publish a 5 percent fee
14 increase. If you can remember back to that
15 graph, I know it was really quick, as you can
16 see, we're not going to maintain our reserve that
17 we need for this program.

18 So we will have to have a conversation
19 about what we call rightsizing the fees where we
20 need to periodically review the fees that have
21 adjusted and determine what the correct fee for
22 those type of services. To give an example,

1 would be maybe Aflatoxin Services where the fees
2 maybe are not even covering the cost of the
3 service as well as, like, the test kit for
4 performing that service.

5 The Grain Inspection fees, the
6 proposed rule was announced in March 2nd, in
7 Federal Register 86, Federal Register 12119. And
8 that had the proposed rule to implement a
9 standard formula to announce the fees each year
10 with a January 1st, effective date. That final
11 rule is in clearance at this time. We were
12 hoping to have it published this month that we
13 could have it effective this summer.

14 The Rice Fees, of course, as I just
15 noted, we had our last Federal Register that had
16 the fees that are currently published for this
17 year. We had two consecutive 20 percent
18 reductions for each year for the portion of FY20
19 and then all of '21, we had a reduction. We have
20 announced in the Federal Register for the '22
21 fees was in Federal Register 86, Federal Register
22 20476. That does have the new fees that will go

1 into effect October 1st. And that uses the new
2 formula for determining what the reserve is at,
3 adjusting the fees based on that reserve need,
4 and also the hourly rates. Now we have a regular
5 rate, an overtime rate, and a holiday rate to
6 mirror the other AMS programs, as well as
7 contract and non-contract.

8 And then a Commodity Program, we are
9 drafting a new work-plan to adjust that commodity
10 fees to cover the costs. And we are continuing
11 to implement cost-saving measures where possible.
12 We're also going to review the Co-operator
13 Agreements that we have in place to assure that
14 oversight fee we collect from the co-operators is
15 appropriate for those services.

16 That was a lot to go over. But is
17 there any questions for me about the
18 presentation?

19 MR. AYERS: Denise, David Ayers,
20 Champaign. Is it possible to get a file copy
21 sent to the the Committee so we can print it off
22 and have it?

1 MS. RUGGLES: Yes, I believe Kendra --
2 Kendra, you are sharing that, correct, after the
3 meeting?

4 MS. KLINE: Yes, and it gets made
5 public. So it'll be on the public website.

6 MS. RUGGLES: Yes.

7 MR. AYERS: Thank you.

8 MS. RUGGLES: You're welcome. Is
9 there any other questions for me?

10 MR. KERRIGAN: Have there been any
11 initial discussions when you talk about the right
12 sizing, I mean, obviously we all see the numbers.
13 Costs is always a very touchy subject when it
14 comes to be it costs of services as it trickled
15 down and such. You know, on a percentage basis,
16 has there been anything floated, I guess, as to
17 what you guys would like to see knowing that 5
18 percent increase just went into maintain your
19 guys comfort cushion and the reserves?

20 MS. RUGGLES: We have not done a
21 detailed breakdown yet of the fees and what fees
22 would need to be adjusted yet, we have not done

1 that, no.

2 MR. KERRIGAN: Okay.

3 MR. NEAL: I think that was Matt, I'm
4 not sure.

5 MR. KERRIGAN: Yes.

6 MR. NEAL: Yes. But one of the things
7 people will have to keep in mind is that over the
8 past, I guess four, five years, there have been
9 constant, you know, continuous discounts to fees.
10 So the fees have been discounted so low now, we
11 got to re-adjust to account for just regular
12 costs period. Because the whole intent was to
13 use the reserves up. So it's not so much that
14 FGIS's costs are increasing, They are increasing
15 that's because we're moving a heck of a lot more
16 product. But the revenue isn't where it should
17 be because we've been discounting fees year over
18 year over year. And so a five percent discount
19 for, you know, to account for, I can't recall the
20 total for sending discounts that we'd given the
21 five percent discount. It doesn't bring fees
22 nearly as close to what they need to be to

1 account for current operations.

2 MR. KERRIGAN: And then a little bit
3 different, I guess for, like, out here in the PW,
4 Portland Field Office, how much oversight does
5 FGIS have in, like, for instance all in all in
6 WSDA fees and how those are are rippled through
7 the industry. Because, you know, obviously on
8 our certificates there is a dual fee for the WSDA
9 services, but then also for the FGIS certificates
10 and such. Is that just part of the general
11 program overview or is it very interactive, I
12 guess, between FGIS and WSDA, for example?

13 MS. RUGGLES: Well, Compliance
14 Division does review their fee schedule that they
15 publish. It is reviewed by Compliance Division.
16 And, Arthur, I'm not sure if Compliance could
17 talk on how they do that analysis of those fees,
18 but it does include our fees and their fees.

19 MR. KERRIGAN: Okay. And my question,
20 just for clarity, does stem from, there's a lot
21 of the same discussions going on with WSDA
22 regarding fee structure because of the previous

1 couple of years of, you know, extremely low
2 volumes due to, you know, multiple factors and
3 things of that nature, and just trying to get
4 those operating reserves back up.

5 MR. NEAL: Yes, and I think part of
6 the requirements that in the review of the fees
7 we have to ensure that those fees are reasonable.
8 And I understand the position that WSDA's
9 probably in since like we are as we've been
10 trying to extend down reserves. We want to be in
11 a position where, you know, if we have a
12 situation where we're shutdown or we've got a
13 significant pandemic like we've had this year.
14 But we didn't have to tap into reserves per se to
15 stay in operation, but if we needed to, we would
16 be able to sustain service long enough for that
17 pandemic, whatever, to pass through.

18 We also want to make sure that we're
19 covering our costs such that we have the size of
20 workforce that we need to respond, nimbly to
21 demand. As, you know, sometimes the demand isn't
22 planned. It just it comes and it comes swiftly

1 and the request for service it comes swiftly.
2 And we want to make sure that, you know, we've
3 got the resources in place to ensure we've got
4 the staff ready to go. So I understand where
5 WSDA is with the low demand seasons and then you
6 have a high demand season where you didn't
7 necessarily predict, particularly through a
8 pandemic.

9 A lot of other industries, they're not
10 necessarily Ag, but in some cases, their demand
11 went down, particularly for food, the demand
12 increased. You know, so that's a good thing for
13 us. And I'm sure everybody who was in a service-
14 oriented business will be re-evaluating and
15 looking at, you know, the cost for things. Look
16 at what we're doing with gasoline now, that's
17 unfortunate. But just the cost for services, we
18 want to make sure that we are recovering the cost
19 to provide the service that we're offering. So
20 that's that.

21 MS. RUGGLES: And on that, it will
22 take a Federal Register proposal to be able to

1 implement those rightsizing of fees. That's not

2 --

3 MR. NEAL: And --

4 MS. RUGGLES: -- announcement.

5 MR. NEAL: -- nothing's going to be
6 done rapidly, it'll be done in collaboration, and
7 transparency with the industry. Any other
8 questions for Denise? Okay. So I apologize, I
9 got crossed up looking at the agenda and time. I
10 wrapped up my comments sooner than I had to. So
11 Denise leaves me with a little bit more time and
12 I will share some more what's going on in the
13 life of FGIS. We were talking about Field
14 Offices. At one point, there was some
15 significant work being done by Tony and his team
16 in the Field Management Division particularly.
17 Well, also PPMAB, Pat McCluskey and his team as
18 well in partnership with the Ag Research Service.

19 The wheat industry had been looking at
20 trying to ship more wheat out of the Gulf and
21 that's to China. And one of the tests that's
22 required, the TCK test, those tests typically

1 take place out of the Pacific Northwest by the
2 Wheat Marketing Center. I'm pleased to say that
3 we have staff now trained out of our League City
4 Field Office to perform that test for the wheat
5 industry. So that if wheat does need to move out
6 of the Gulf, we can take some of that burden out
7 of the Pacific Northwest and allow it to move so
8 through the Gulf. So we're thankful for that.
9 That was a huge team effort between FGIS, the
10 wheat industry and Agricultural Research Service.
11 So tanks, Tony, for your leadership in that.

12 I also want to say regarding
13 information technology and modernization, I know
14 before I came on board, there was a lot of
15 emphasis on, what's it called, Epic. And FGIS
16 modernizing its ability to facilitate grading and
17 inspection in a more streamline way using
18 technology. A lot of things have changed, I
19 think, since that time period. Particularly here
20 at USDA, there's been a huge shift in its
21 information technology staff and its structure
22 where a lot of its now consolidated and

1 centralized. And it also impacts our ability to
2 do some of the things that we need to do to
3 continue with that type of project, that type of
4 effort. Not only that, we want to make sure that
5 where we are, we don't invest in areas that won't
6 yield significant returns.

7 We want to make sure that whatever is
8 invested, the industry, the staff, the program,
9 the Agency, everyone can experience an impact or
10 a return on that investment. And so right now we
11 made a decision to ensure that what we have in
12 place currently, we spend time maintaining it so
13 that it operates well. And we'll be having more
14 conversations internally and externally with you,
15 our partners, around how we proceed moving
16 forward. And there are a number of conversations
17 that we know we need to have around forms and
18 data collection and things like that. And so
19 we'll be planning conversations with industry in
20 the days of head around how we proceed
21 collectively.

22 We did have an informal conversation

1 with the Grain Inspection Advisory Committee
2 around technology. Not just FGIS Technology from
3 the standpoint of its enterprise system, but also
4 the type of grading and inspection equipment
5 that's out in the world today. And having
6 conversations amongst industry members about what
7 they've seen, what they need. So we're making
8 sure that we're in touch with those type of
9 needs. And we're also taken them into
10 consideration when we're having conversations
11 with the Grain Inspection Advisory Committee as
12 well our staff. And Dr. Jhee will have some
13 updates around equipment.

14 A couple of the other updates I have
15 will come later, but one update I do want to
16 share with you is that there's some standards
17 development work that's been going on out of our
18 Field Management Division around we've opened up
19 the standards for wheat. And so for those
20 individuals who had interest in the wheat
21 standards, make sure that you have an opportunity
22 to review that call for input. We have some

1 other standards development work going on. Some
2 of it's related to some of the GIAC
3 recommendations, as a matter of fact, I might as
4 well just go into those now.

5 One of the recommendations from the
6 Grain Inspection Advisory Committee, oh, Kendra,
7 can you pull up the recommendations for us, so
8 everybody can follow along.

9 MS. KLINE: Just give me a second.

10 MR. NEAL: Yes, take a minute.

11 MS. KLINE: You guys see it okay?

12 MR. NEAL: It'll come in a second
13 probably. Not yet. Here it comes. So one of
14 the recommendations, the GIAC made was that it
15 wanted FGIS to take steps to reconcile and
16 consolidate instructions to ensure clear, easy to
17 access guidance that would be basically helpful
18 to the official system and provide more accurate,
19 consistent autonomy service. We took this
20 recommendation and we worked very closely with
21 Pat McCluskey and his team, Tony, to update a
22 number of the Grain Inspection Handbooks. So in

1 fiscal year 2020, we updated the Rice Handbook,
2 Fumigation Handbook, Grain Inspection Book 1,
3 Grain Inspection Book 2, Grain Inspection Book 3,
4 and the Sanitation Handbook.

5 Those were three Inspection handbooks
6 that we updated in 2020. They've been posted on
7 the website and are available for use. We're
8 continuing that process in 2021. We're going to
9 be, I think they're working on some of the
10 certification handbooks and a number of other
11 items. And so Tony, if there's anything about
12 that, in other words just an update process for
13 2021, you can feel free to jump in a to add any
14 more information there.

15 MR. GOODEMAN: I think you covered, I
16 think we've got, I think seven handbooks and
17 directives last year, some or a number coming up
18 this year. It's a continuing effort and
19 recognize the interest in getting updated
20 guidance out there that's easy to access.
21 Continues to be a major priority for us. I think
22 Arthur mentioned, the Certification Handbook.

1 We've got the Pea and Lentil Handbook, the Bean
2 Handbook coming out. We've got the NRT handbook
3 in the works. Certification being a major one,
4 I've said that bout three times now. But, yes,
5 still a major focus and we're receptive to
6 feedback. We try and plan these out a couple of
7 years in advance to try and get them on a
8 schedule. So if there's anything that you'd like
9 us to focus on or look at most closely we would
10 receive that feedback.

11 MR. NEAL: Okay. Thanks, Tony. Part
12 of that whole process to updating handbooks we're
13 also taking a look at the website to see how we
14 can cut down on some of the redundancy, organize
15 it a little bit better. And it's tough because
16 we're operating in a structure that was given to
17 us from the last administration. All of the
18 Agencies had to put their information into a
19 certain structure and it was done corporately.
20 So they just took the information from the old
21 websites and they put it into an existing kind of
22 container. And so we're trying to sort through

1 it to reorganize it to make it more useful to our
2 users and our stakeholders. So we're working on
3 it too and Kendra, and Shane, and Ruth, and
4 others are kind of leading that team up along
5 with Lee and and some of the folks in Policy
6 Branch with Pat. So I thank them for that
7 effort. Hopefully you'll be able to see some
8 improvements soon.

9 The next recommendation talks about
10 budget. The Advisory Committee recommended that
11 Office of Management in budget eliminate the
12 limitation on Inspection and Weighing Service
13 expenses. And if it's not possible, the
14 Committee recommended that \$55 million limitation
15 only apply to grain export activities under the
16 provisions of the USGSA. This is ongoing
17 activity for us. We did have a number of
18 meetings internal to USDA with our Office of
19 Budget and Program Analysis to begin educating
20 our leadership regarding the \$55 million cap.

21 And for those who are not aware of
22 what that means, through the appropriations

1 process, there's a \$55 million cap that's being
2 applied to FGIS across all of its user-fee
3 activities. And what that means is that we
4 cannot spend more than \$55 million on all grain
5 inspection and weighing services. The reality
6 that we believe is that the \$55 million cap, the
7 intent was for that \$55 million cap to be placed
8 on grain inspection and weighing activities. But
9 it's also capturing our activities under Rice and
10 Pulses. Which sometimes puts, you know, it
11 causes to be very, very -- we should always be
12 very careful, deliberate, and targeted in our
13 spending.

14 But sometimes it can create an
15 unnecessary ceiling for us when we're trying to
16 do more for Grain Inspection. So what we're
17 trying to do is educate our leaders internally to
18 see whether or not if we can only have that cap
19 apply to our grain inspection and weighing
20 activities, not are Rice and our Commodities
21 activities under our 580 accounts. That process
22 is ongoing. We did have some conversation with

1 the Hill about it. But the process by which, you
2 know, they'd have to go to probably change this
3 would be extremely involved. So we're trying to
4 see if we can handle it administratively inside
5 of USDA versus opening up Pandora's box. So
6 we'll continue to provide updates on that.

7 The next recommendation is regarding
8 a systems approach or the Committee recommended
9 that FGIS execution of support for the USDA
10 soybeans systems approach should not compel a
11 change in US Grading Standards nor require FGIS
12 financial resources. To date, APHIS has
13 basically paid for FGIS's involvement in this
14 systems approach. They've been reimbursing FGIS
15 through a reimbursable agreement for any of our
16 staff time to work on this project. I think they
17 work until it's carried out for a third year.
18 And if there any other updates on that, I'll kind
19 of kick it to Tony because he will have the
20 latest on.

21 MR. GOODEMAN: This was a three-year
22 project along with it's the overall systems

1 approach. One component of that was a study of
2 weed seeds a farm-gate survey that was
3 implemented by APHIS at the state level. And
4 FGIS had been assisting in that project by
5 evaluating that and also by sending samples to
6 the AMS Seed Lab in Gastonia, North Carolina. We
7 are entering the third year of that study, the
8 third and final year. And the actual analysis
9 has not started yet, but the samples are all in
10 waiting. We are not using any FGIS money for
11 that project that is funded exclusively from
12 APHIS. And we do have an inter-agency agreement
13 with them to fund our portion of that study. So
14 that's, I think that's the big update there,
15 Arthur.

16 MR. NEAL: Thanks, Tony. Another
17 recommendation from the Committee dealt with
18 lengthening the terms of service for GIAC
19 members. The recommendation stated that the GIAC
20 recommends at the 2020, Reauthorization US Grain
21 Standards Act establishes a five-year term of
22 service for GIAC members with the utilization of

1 shorter terms and standard appointments. This
2 process of appointing members serves to
3 strengthen commitments, service established
4 continuity, forms a collaboration, and encourage
5 cohesiveness on the Committee. Members are
6 eligible to serve multiple but not successive
7 terms of the reauthorization of the 2020 USGSA
8 extended terms service for GIAC members, the
9 Committee recommends that the Secretary extend
10 current GIAC members terms according to this
11 policy.

12 So unfortunately, the USGSA did not
13 get reauthorized until December 2020. By that
14 time, we had already lost, when I say lost, some
15 members their terms had already expired from the
16 GIAC. However, the reauthorization did include
17 an authorization for members to serve consecutive
18 terms. Now, those consecutive terms are not
19 automatic. Those members would still have to go
20 through the nomination process for that second
21 term. But the reauthorization does not prevent
22 that member from serving a consecutive term

1 should the Secretary re-appointment them.

2 So their recommendation was made known
3 to Congress as they were considering the
4 reauthorization of USGSA, and they did accept it.
5 So you should feel good about that. Another
6 recommendation dealt with the review of
7 geographic boundaries. And it's stated that the
8 GIAC Committee recommends a comprehensive survey
9 of the market and scope of service fees in its
10 boundary for Official Grain Inspection Services
11 and the number of the official agencies.

12 Since FGIS was created in 1976, there
13 have been significant changes in the number and
14 operations of grain handling facilities and
15 official designated inspection agencies the
16 amount of grain and oil seeds handled and
17 processed within each geographic boundary and the
18 number of quality attributes and other quality
19 tests conducted by these agencies. The Advisory
20 Committee believes these changes in the domestic
21 marketplace necessitated that FGIS
22 comprehensively update information and data upon

1 which the geographic boundaries are placed.

2 The Reauthorization of the Grain
3 Standards Act took this issue into account as
4 well. And it does contain a requirement that
5 after 18 months of the authorization, the
6 approval of the USGSA, that we have to complete a
7 geographic boundaries review. We've begun that
8 review and hope that or we plan to have that
9 review completed by, you know, early spring or
10 mid-spring 2022. That's our goal and so we have
11 started that process.

12 The next recommendation dealt with
13 vessel storage exams and the Advisory Committee
14 commended FGIS on its efforts to incorporate
15 innovative technology by delivering services to
16 her stakeholders while protecting the safety of
17 personnel. The Committee strongly encouraged the
18 approval and implementation of the pilot program
19 for Barge Stowage Examinations via camera system.
20 The Committee also recommends FGIS continuous
21 studying its technological innovative programs
22 for cost-saving, efficiency and operational

1 safety concerns as it relates to vessel storage
2 examinations. That is UAV with our technology
3 and/or camera when applicable. And I'm going to
4 kick this with Tony for an update on that.

5 MR. GOODEMAN: Yes, so on that first
6 about the Barge Stowage Exam with cameras, we did
7 implement this. This was put in place via a
8 program notice in the fall, I guess it would have
9 been August of 2019, so that's available now.
10 Implementation has been fairly slow, but we did
11 also start the pandemic shortly after that. This
12 involves a camera system. It's a it's a site-by-
13 site approval. There's an approval process and
14 anybody's welcome to use this. We are definitely
15 encouraging this for Barge Stowage Exams.

16 If you are a person on top of barges,
17 could also result in lower rates long-term
18 because it may reduce the insurance premiums paid
19 by some of the official agencies for having more
20 people working on barges. It is expensive. The
21 cameras are very sophisticated. They're high-end
22 security cameras that are needed for seeing this

1 far into the Barge and several thousand dollars,
2 but not tens of thousands of dollars. So that's
3 existing now and we're looking to continue to
4 promote that program.

5 Secondly, we've got an FMD Field
6 Management Division Project this year to look at
7 just more of an exploratory project for Vessel
8 Stowage Exams using cameras. And we're in the
9 early stages of that, but we're really trying to
10 benchmark and see what other efforts have already
11 been conducted. What kind of regulatory
12 restrictions there are for using drones or other
13 cameras in the environments where we have vessel
14 exams. We're also looking at our own workplace
15 injuries and the cost to justify and to examine
16 that expense, just from a safety standpoint.

17 So it's really early on and I would
18 say that if anybody's got any good points to
19 contact on this front, or anybody that really has
20 tried this in earnest, drones or otherwise, we'd
21 be interested in speaking with them to, again,
22 try and get as much information as possible as we

1 evaluate what might be out there.

2 MR. NEAL: Thanks, Tony. Before we
3 move onto the next set of updates, I want to
4 pause here and ask the Committee if you have any
5 questions on what we shared thus far?

6 MS. COOPER: I have a quick question
7 to Tony on that last report. Did you say how
8 long the pilot program for the Barge Stowage Exam
9 is going to go on, and then, you know, what --

10 MR. GOODEMAN: Oh, yes.

11 MS. COOPER: -- evaluation process be?

12 MR. GOODEMAN: Great question. We ran
13 the pilot program for, I think it was about 18 or
14 24 months, had great experience with it. And so
15 we ended the pilot and implemented it full-scale.
16 So the pilot is concluded and that procedure is
17 now available to anyone that's on river barges we
18 do allow cameras and there's an approval process.
19 And that has been posted on our site and is
20 publicly available.

21 MR. KERRIGAN: Is that both river
22 systems, Tony, or is it only been tested on the

1 Ohio and Mississippi River?

2 MR. GOODEMAN: Just just on those
3 river barges that are the flat bottom. We
4 haven't looked at it for the self-unloaders out
5 west . It's feasible. It's feasible.

6 MR. AYERS: Tony, David Ayers. How
7 many cameras are in use currently?

8 MR. GOODEMAN: It's only a handful.
9 I don't have the exact number, but it's a small
10 number. I think it's less than ten still. We
11 did start out with rail-car cameras that same way
12 and now we have hundreds. So I mean, almost
13 every rail-car loader is probably slow to start
14 and then it gets momentum. And so I'm hoping
15 that this one is similar.

16 MR. FRIANT: This is this is Nick
17 Friant. I'm not sure if this is a question for
18 you, Arthur, or Tony, or someone else on the
19 team. But on the systems approach, does FGIS
20 have any sort of insight into who's got access to
21 those, all the results of the analysis that's
22 being performed? My understanding is a lot of

1 those samples are coming from port facilities.
2 So are any of those sample results being shared
3 back to the elevators that they come from or, you
4 know, any information on how those sample results
5 are being shared or not.

6 MR. GOODEMAN: That's a good question
7 on sharing back. I know APHIS is the point of
8 contact for that whole study.

9 MR. NEAL: Yes, Nick, I think APHIS
10 is, they're keeping that data on house. So it's
11 definitely not being shared wildly. So there
12 they have a PLC for the study. So probably have
13 to get in touch with him for that.

14 MR. FRIANT: Okay. Thanks.

15 MR. TURNIPSEED: This is Brent. I
16 have a question from the educational side of the
17 things with the website you're redoing that.
18 When they redo the e-learning part and maybe
19 they've already somehow have it where you can
20 download those grading tutorials where you don't
21 have to have an internet connection to go through
22 them. Could they make sure that that's possible

1 again? Years ago you could do that and you
2 actually gave out the CD-ROMs of them.

3 MR. NEAL: Yes, Brent, I can't tell
4 you the last time I saw a CD, man.

5 MR. TURNIPSEED: I don't want the CD,
6 but I want to be able to download the tutorials.

7 MR. NEAL: Yes, I think the only
8 challenge, we'll look into it. I think the
9 challenge is I think it's almost impossible to
10 download anything without having to have a
11 internet connection.

12 MR. TURNIPSEED: Well, you have to
13 have an internet connection to download it, but
14 then to be able to use it without the internet
15 connection.

16 MR. NEAL: Okay.

17 MR. TURNIPSEED: Maybe they've got
18 that solved but --

19 MR. NEAL: I see what you're saying
20 now.

21 MR. TURNIPSEED: Our classrooms have
22 always had a good, strong internet connection.

1 MR. NEAL: Okay, We'll see, we'll take
2 that into consideration.

3 MR. TURNIPSEED: So I always download
4 other things all the time.

5 MR. NEAL: Got you. Any other
6 questions or comments based on what we shared
7 thus far? All right. Thank you for those that
8 you did ask and we're going to move onto the next
9 set of recommendation updates and we'll turn it
10 to Dr. Ed. Jhee.

11 DR. JHEE: Good morning, good
12 afternoon, folks. I appreciate this opportunity
13 to provide some updates. This one, as far as
14 HVAC, the Advisory Committee commends FGIS for
15 researching an improved method for HVAC
16 classification in durum wheat. The Committee
17 recommends FGIS continues to research and develop
18 a bleaching method to quantifying separate HVAC
19 kernels from soft kernels of durum wheat to
20 facilitate sub-class determinations. The
21 Committee encourages FGIS to further investigate
22 whether the same or similar methods can be used

1 to determine DHV kernels versus non-vitreous
2 kernels in the hard red spring wheat class.

3 The update to this, the bar
4 investigated the viability of the bleach DHV HVAC
5 project for about two years. During this time,
6 it was determined that a consensus among
7 inspectors could not be made on kernels that
8 contain high amounts of fissures or cracks.
9 These fissures can create an appearance in a
10 kernel that make it appear soft when it's
11 actually hard. And they're formed on hard and
12 semi-hard kernels due to handling. After several
13 attempts to gain consensus among the inspectors,
14 the bar decided to suspend the project and focus
15 its resources on the possibility of supporting
16 imaging technology for DHV HVAC. Kendra, you
17 want to go to the next one.

18 Mycotoxin test kits. The Advisory
19 Committee urges FGIS to continue to identify
20 causes of variation in mycotoxin testing and to
21 develop a comprehensive plan to address these
22 causes. The Committee requests FGIS to

1 investigate, certifying and reporting at lower
2 levels than the current limit of quantitation and
3 report back to the Committee. What I'll provide
4 an update on is the mycotoxin test kit Federal
5 Register Notice. We published this Federal
6 Register Notice on some proposed changes to the
7 test kit criteria back in December of 2020 with a
8 30-day comment period. We did extend the comment
9 period in February of this year, which concluded
10 around the end of March.

11 We're currently analyzing the comments
12 and we'll begin formulating responses this month.
13 Our next steps will include internal deliberation
14 of the responses to the comments, as well as
15 internal discussions on what our plans will be to
16 move forward. With regards to improving accuracy
17 among test kit users, the Technology and Science
18 Division, we will have discussions with Field
19 Management Division on enhancement, enhancements,
20 excuse me, to internal quality control and
21 training and licensing improvements.

22 Next topic, new devices. The Advisory

1 Committee appreciates FGIS's recognition of the
2 importance of encouraging competition in the
3 official device system. The Committee urges FGIS
4 to develop a comprehensive and proactive approach
5 to identifying new technology priorities that may
6 bring improved test results, greater efficiency,
7 and/or lower costs. The Committee recognizes
8 that any new devices must add value to the
9 testing system and compliant with current
10 guidelines. We, FGIS is in the process of
11 developing a comprehensive process for evaluating
12 new inspection technology.

13 The process will include approvals for
14 technology for the official grain inspection
15 system. As of now, this evaluation process does
16 not apply towards research and development
17 efforts that are necessary before the technology
18 is deemed fit for posts. Here are some of our
19 initial thoughts. That the process includes an
20 initial evaluation to determine if the
21 manufacturer's proposal meets requirements,
22 demonstrating clear benefits for official grain

1 inspection. Furthermore, we have several
2 unanswered questions so far, and we would like to
3 engage the GIAC on input on this process. We
4 anticipate having a draft of the documented
5 process for GIAC input and discussion towards the
6 end of this summer.

7 Next LED. The Advisory Committee
8 recommends FGIS continue research in the most
9 appropriate LED lighting solution that may
10 include overhead or task lights. TSD and FGIS
11 collaborated with official agencies, they have
12 Field Management divisions, DIO, Domestic
13 Inspection Office, as well as the bar, to develop
14 a test plan for the possible use of LED bulbs in
15 the inspection system. We established MOUs with
16 ten different official agencies who volunteered
17 to participate in the study. We had 16 grain
18 inspectors at these different official agencies
19 provide services for us.

20 The selected grain samples were sent
21 to each participating location, as well as LED
22 lamps. There were circulated to each location as

1 well. The inspectors graded samples under the
2 LED lamps as well as the currently approved
3 fluorescent bulbs. Once the official agencies
4 completed grading of the samples, all of the
5 samples were sent back to the bar for final
6 evaluation. They've all recently completed their
7 evaluation. And some of our next steps include
8 statistical analysis of the data and then a
9 decision based on the results of the data
10 analysis on whether LED bulbs produce equivalent
11 results to the currently approved fluorescent
12 bulbs.

13 Okay. Next one, Kendra, mycotoxin
14 test kits.

15 MS. KLINE: That's all of them.

16 DR. JHEE: Okay. Got you. With that,
17 I'd be happy to answer any questions.

18 MR. KERRIGAN: Dr. Jhee, regarding the
19 LED lighting and technology and the assessment,
20 you know, one of the big issues with the
21 fluorescent bulbs has been acquiring them.
22 Especially looking to the future, I'm assuming

1 that that is a discussion point because if I
2 remember right, during our last in-person
3 meeting, there was a lot of discussions regarding
4 the lights that were being evaluated. We still
5 had very, very limited supply, suppliers, and
6 with some of the different supply chain issues
7 we're seeing just around the globe. Has there,
8 I'm assuming that the bulbs that were analyzed
9 were still the ones that were kind of presented
10 to us at the last meeting or has there been the
11 addition of potentially some other bulbs that
12 that could have a better supply, I guess
13 availability

14 DR. JHEE: My understanding is that
15 the bulbs that we considered to use in this pilot
16 study or this project were actually custom-made
17 based off the specifications that we needed in
18 order to align both colored temperature and then
19 the same type of -- in order to produce the same
20 type of range as the fluorescent bulbs. So I do
21 understand that that may end up becoming an
22 additional cost, especially for unique production

1 of these bulbs. But I think right now we have
2 one producer in California that supplied these
3 bulbs for us that were of reasonable cost. I do
4 know that our preference is to probably purchased
5 from US manufacturers. We do know that there's
6 some overseas bulbs as well. But that'll be, I
7 think, part of the decision-making process as
8 well.

9 MR. KERRIGAN: Thank you.

10 DR. JHEE: Sure.

11 MS. COOPER: Ed, I have a question.
12 Good morning. Back to the HVAC report that you
13 gave, and the decision not to move forward with
14 the bleaching project. Could you give us a
15 little bit more information about the timeline of
16 the imaging technology and how that will roll-
17 out, what that will encompass?

18 DR. JHEE: Sure. So imaging
19 technology, we are actually currently exploring a
20 pilot project to determine the feasibility of
21 imaging technology for both rice brokens as well
22 as DHV, HVAC in wheat. Right now, internally,

1 we're considering what the scope of work would be
2 for this type of pilot project. And our current
3 thought process is to solicit participation in
4 the pilot via the Federal Register. All of this
5 is preliminary if you consider the scope of these
6 types of projects. And our current thoughts are
7 to consider what would be the performance
8 criteria for evaluating imaging technology.

9 We need to kind of really have a good
10 idea of what we we're looking for. Lastly, we
11 have been engaged with USDA's Agricultural
12 Research Service, who has been working on a
13 project to determine vitreousness in wheat using
14 imaging technology. However, it's our
15 understanding of this project it's still in its
16 infancy. So there's additional discussions that
17 we hope to have with ARS. Anything else, if not,
18 Arthur, back to you.

19 MR. NEAL: Thanks Ed. A number months
20 ago, last year actually, we published in the
21 Federal Register a proposed rules. I mean,
22 Advanced Notice of proposed rule-making for

1 criteria around granting the exceptions to
2 geographic boundaries. Can you-all hear me okay,
3 or is it pretty light? I see my microphone bar
4 is moving small, I'm trying to figure it all out.
5 But we appreciate those who commented. An update
6 on that rule-making is that we have a proposed
7 rule but we got feedback from our Office of
8 General Counsel to make some adjustments to it.

9 You know, part of the recommendation
10 you-all made to us regarding geographic
11 boundaries and the review of it, that ended up
12 getting to include it in the Reauthorization of
13 the Grain Standards Act. You know, we really
14 started asking the questions, you know, what is
15 this, you know, what's the impetus behind it, you
16 know, what are we really trying to achieve. And
17 I really believe that we may be getting at the
18 root of geographic boundary situation in the
19 proposed rule on exceptions to geographic
20 boundaries. A lot of it dealt with customer
21 service issues and how to get those resolved if
22 one does not believe they're getting timely

1 serviced.

2 And so we're looking at those issues
3 and we'll be addressing that in the proposed
4 rule. That proposed rule has been put back into
5 the USDA currents process. And so we hope to see
6 it move swiftly through that process. We'll keep
7 you updated on its whereabouts. But we hope to
8 see it come out sometime this summer so that we
9 can make continued progress on exceptions to
10 geographic boundaries issue. So that that is an
11 update that I think I failed to mention earlier.
12 That is still related to the recommendation for
13 FGIS to conduct this assessment or review on
14 geographic boundaries.

15 So I think team, if I have forgotten
16 to mention anything else, you know, we've got a
17 little bit more time left. Yes, we've got a lot
18 more time left. I will open it up for anything
19 that you-all have to share that you think I've
20 forgotten and for additional questions from the
21 Committee.

22 MR. KERRIGAN: Anybody have any

1 questions for Arthur? Or any other member of the
2 FGIS staff that may be present? Arthur, either
3 everybody's forgotten to take themselves off mute
4 or I think you guys have a clearance pass here.

5 MR. NEAL: Well, we'll keep pressing
6 ahead, that's for certain. And, you know, if
7 questions arise, please let us know. But since
8 we do have time, Matt, I would like to pause and
9 address that initial question that you asked
10 regarding the Secretary. And so I want to make
11 sure that the Committee knows when we get into
12 the discussion component of the agenda, we really
13 need to have someone responsible for capturing
14 those critical areas of discussion and also
15 helping to summarize the recommendations that
16 will flow from the Committee.

17 Getting those recommendation crafted
18 properly is critical. From the last meeting,
19 there were two recommendations. I think one was
20 the exceptions recommendation, and the other was
21 the consecutive term recommendation for the
22 Committee. Getting that language right, took a

1 while. And without having that Secretary to help
2 us think through that process and get it all
3 documented right so that we can share it with the
4 Secretary, was significant.

5 So ask that, you know, as we have a
6 few moments that we reconsider that. And, Matt
7 will have to pose that question again and ask for
8 volunteers without a Secretary volunteering, you
9 know, I guess we can take it, but if we do it,
10 it's really not, you know, and it's not right,
11 kind of not our fault either because we're not
12 the Committee, you know.

13 MR. KERRIGAN: Yes, you know, you
14 know, the biggest thing here, especially for the
15 large amount of new members on here, is that
16 really the Secretary is just trying to document
17 it. And especially on the Zoom, you know, it
18 would likely be a sharing of screen of what's
19 been typed up within comments to revise it from
20 the whole group. It's not not solely relying on
21 on the Secretary to craft it by themselves, for
22 instance. So, you know, I don't want anybody

1 scared off by that. You know, what we're looking
2 for is somebody kind of volunteer here for the
3 next 24-hour period, I guess. And then you can
4 kind of, I guess, decided if you'd like to put
5 your name in the hat for the next round.

6 You know, we do have a lot of examples
7 from the last meeting of the previous
8 recommendations to go off of. I will say that,
9 you know, those are a big help to see how that
10 wording is because again, these are
11 recommendations to the Secretary. These are not
12 recommendations or telling Arthur what to do, you
13 know, for instance. You know, but because these
14 are our topics, and this is really how this
15 group, I guess, creates value for FGIS, you know,
16 it's through these formal recommendations.

17 So given that we're kind of at that
18 mark in the agenda, Arthur, I guess maybe even
19 though we're about 45 minutes from lunch, what do
20 you think about maybe taking, like, a 15-minute
21 break here. We want everybody kind of think
22 about if they'd like to assist here. And we'll

1 come back, because we really, it's going to be
2 hard to move forward if we don't have one and
3 we'll start off with that in about 15-minutes.

4 MR. NEAL: Sounds like a plan.

5 MR. KERRIGAN: Okay. So me back here,
6 I guess it would be 9:45 my time, which is about
7 what, 12:45 Eastern Time.

8 MR. NEAL: Yes.

9 MR. KERRIGAN: We will come back and
10 try and resolve that.

11 MR. NEAL: All right.

12 MR. KERRIGAN: Thank you.

13 (Whereupon, the above-entitled matter
14 went off the record at 12:30 p.m. and resumed at
15 12:49 p.m.)

16 MR. KERRIGAN: Okay. So kind of just
17 getting us started back off here to the GIAC
18 members, would anybody like to raise their hand
19 as Acting Secretary here for the discussion here
20 for the rest of this time and then for tomorrow?

21 MR. TURNIPSEED: There's nobody else.

22 MR. KERRIGAN: Okay. Brent sent me a

1 note that he would attempt to assist as Acting
2 Secretary. So if that's okay with the group, I
3 don't know, Arthur, Kendra, do we need to
4 actually take a vote for an Acting Secretary or
5 can we take it as self-nomination?

6 MR. NEAL: You can take a self-
7 nomination.

8 MR. KERRIGAN: Okay. Brent, thank you
9 very, very much. We're all here to kind of help.
10 Like I said, you know, you were a part of the
11 last one. So we'll -- hopefully the intent here
12 with the rest of our time, we can get through the
13 majority of our discussion today. So that way we
14 can definitely take the time offline and such to
15 review the wording from the previous one so we
16 can come in tomorrow's meeting with hopefully a
17 draft to start off with so okay. Arthur, do you
18 have anything you want to start off with, or do
19 you want to just get right into some of these
20 topics?

21 MR. NEAL: So it's up to you. You
22 might as well go ahead and get right into it.

1 MR. KERRIGAN: Okay. Nick, do you
2 have good enough internet connection to talk
3 about the corn borer items since that now has
4 your name on it?

5 MR. FRIANT: Yes, I think so. I
6 understand from Kendra that my voice is coming
7 through fine. I don't know why my video isn't.
8 It's probably this Zoom gov connection giving me
9 fits, probably should pay more taxes or
10 something. But yes, for sure. And if my voice
11 does not come through very well, somebody please
12 just stop me. So I guess Matt, just a question
13 from a process perspective, how do we want to
14 handle this, just an overview of the topic and --

15 MR. KERRIGAN: Yes, Kendra, do you
16 have the summary write-up that you could
17 potentially share the screen on and put up for
18 everybody. And then maybe we'll have Nick give a
19 brief overview to the entire group. And then
20 with kind of, I guess if, you know, kind of where
21 where the group is at and maybe if there's any
22 FGIS feedback, you know, on concerns with this, I

1 guess.

2 MS. KLINE: Sure, just give me one
3 second and I'll get it pulled up.

4 MR. FRIANT: I think, Matt, if it's
5 okay with you, while Kendra's pulling that up I
6 can start in on the overview. So the issue at
7 hand here is hearings on Corn Borer
8 Certification. And if folks aren't familiar with
9 it for grain that originates east of the Rocky
10 Mountains, corn, I should say specifically hey,
11 that originates east of the Rocky Mountains
12 heading west of the Rocky Mountains, particularly
13 Arizona, California, Idaho, Nevada, New Mexico,
14 Oregon, Texas, Utah, Washington, the grain has to
15 be screened or scalped to over a certain size
16 mesh to remove any cob, cobs or stalk joints that
17 could harbor European Corn Borer. Because
18 there's allegedly no corn borer west of the
19 Rockies.

20 And what happened, and now this is
21 getting to be a little bit of an older issue,
22 back in 2018, as you can see here on the screen,

1 in about the second or third paragraph down
2 there. Minnesota Department of Agriculture, had
3 identified some grain elevators in Minnesota that
4 we're shipping those receiving States. And the
5 screening wasn't occurring as required. Either
6 it wasn't being done or not through the
7 appropriate screen sizes. And so it raised a
8 bunch of questions around what, well, in short,
9 what can be done to address it and were there
10 some different options to help manage it and for
11 the facilities, right.

12 So part of the part of the question at
13 hand is, look, if I'm operating facility and I
14 need to put in a screen or a scalper, to manage
15 this, it could be a fairly expensive costs,
16 right. And you can see down there in the, I
17 think that's not the fourth paragraph right
18 before the next steps. It talks about, you know,
19 just the equipment itself could be upwards of
20 \$200,000 and this was, that \$175,000 number was
21 about three years ago. So could be even more
22 than that today plus any of the, that's just the

1 cleaner, scalper equipment that doesn't include
2 any of the additional belting or drags or
3 facility modifications that would be needed to
4 actually run that piece of equipment. So you can
5 be talking several millions of dollars
6 potentially.

7 And so the point of this was to say,
8 well, what are some options that could happen
9 here and what role could FGIS play in supporting
10 this. And you can see in the short-term options,
11 there was some discussion initially around, you
12 know, was there some sort of possibility for FGIS
13 to provide some sort of official certification
14 where if the grain was officially sampled and
15 inspected, now FGIS or, you know, potentially the
16 official agencies could issue a certificate
17 saying that no live European Corn Borers. No,
18 pieces of cob or stalk joints that could harbor
19 European Corn Borer were found in the sample,
20 something along those lines.

21 And then another piece, and this is
22 probably a little bit more specific to

1 facilities. Maybe not necessarily an FGIS
2 opportunity, but allowing facilities instead of
3 purchasing a brand new scalper or screener for
4 their facility, could appropriately assign mesh
5 screens put over the dump pit to screen the
6 incoming loads while it was happening. So again
7 that shorter term option probably not as
8 applicable to this group. The question really at
9 hand here was because of some option to work with
10 FGIS at some sort of certification procedure or
11 process for a short-term solution.

12 And then longer-term, which I think
13 some questions in my mind, what role FGIS and the
14 Advisory Committee has to play in this longer
15 term option. But eliminating the quarantine
16 program for those States west of the Rockies.
17 Again, not sure how the Agency might be part of
18 those discussions, but that is one of the longer
19 term solutions from a grain handler's
20 perspective, there's interest in exploring. So
21 that's the Overview. You can read the full
22 details there and I think it's also posted on the

1 Advisory Committee website, if I remember
2 correctly, too.

3 The one other piece I wanted to share
4 with the group on this particular issue is this,
5 as I mentioned earlier, this topic got a whole
6 lot of attention in 2018 when Minnesota
7 Department of Ag found these facilities that
8 didn't have the proper equipment or weren't
9 properly scalping the corn. I would add just
10 from an industry perspective, since that time,
11 and since somebody's initial discussions occurred
12 a couple of years ago, the issue has not been a
13 major topic for the grain industry. We haven't
14 heard a lot of concerns either from handlers in
15 Minnesota, North South Dakota, Iowa, Nebraska,
16 any states that are are heading with corn west of
17 the Rockies.

18 There hasn't been a lot of attention
19 this particular subject, so not sure, you know,
20 how that might or might not play into any of our
21 Advisory Committee discussions. But I did want
22 to make sure that this group could hear that

1 update from grain handlers/industry perspective.
2 I think with that, Matt, I think I can open it up
3 to any questions that folks have about it or, or
4 comments.

5 MR. KERRIGAN: So I will say as an
6 exporter I should probably know this question,
7 but since it actually predates my time in the
8 industry and I've always known it to be an item.
9 This quarantine program is this a state-by-state,
10 is this something that was rolled out from one of
11 the Government Certifying Agencies? Was this due
12 to export on the west coast? Does anybody, I
13 guess, anybody shed some light, I guess, into how
14 this, I guess, originally started as far as, you
15 know, for us to kind of look at it from the, you
16 know, from how we get past it if it's not an
17 issue anymore?

18 MR. FRIANT: So I can certainly give
19 some of that answer, Matt, and absolutely welcome
20 others to jump in as well. Part of, you know,
21 part of it is, yes, it is a state-by-state
22 requirement. And so I know I've spent some time

1 along with Jess McCluer at NGFA, having some
2 conversations with some of the various State
3 Grain Feed Associations and looking at the actual
4 regulations. And, yes, basically, each state has
5 their own European Corn Borer quarantine
6 requirements. And so it is a very, you know,
7 state-by-state specific how they may or may not
8 change their rules.

9 The other piece that you, I kind of
10 thought you were going to include as well based
11 on your questioning, was this balance between
12 domestic and export. And I don't know how every
13 state specifically manages it. I have some
14 experience with Washington, Oregon, and
15 California, where generally speaking, and I don't
16 mean all the time, but consignments destined for
17 export don't necessarily have to have this what's
18 referred to as a Corn Borer Cert.

19 So movements that are just in transit
20 and are going from the train through the facility
21 to the vessel, oftentimes, it's not required
22 and/or facilities are not getting the Corn Borer

1 Cert for those shipments. So that's I guess my
2 high-level understanding of it. If anybody else
3 wants to jumping in that conversation?

4 MR. SINNER: Nick, this is Bob Sinner.
5 That was a question that I had as well is if
6 you're bridging these states for export, it
7 wouldn't apply. But the question I have is on
8 the certification program. Who's doing the
9 certification? I'm assuming that FGIS is not
10 involved in that. Is that all through the
11 Department of Ag of each state. And then,
12 because it would seem to me that if the group
13 wanted to endorse the idea that FGIS be
14 responsible for some sort of a certification on
15 that particular shipment that one or the other
16 could apply.

17 MR. FRIANT: Yes, so your first
18 question is a really good one. And based on my
19 understanding of it, it's usually the State
20 Department of Ag, yes. There's various, my
21 experience is there's kind of some various
22 different ways, right. So the Minnesota

1 Department of Ag example, they had the particular
2 branch and I don't remember the particular branch
3 off the top of my mind. But they had some stuff
4 changed in their Department where they started
5 sending a number of people, inspectors out, to
6 check these scalpers or screening systems that
7 locations had.

8 I know some other states like
9 Nebraska, it's more of a, it's almost like a
10 survey that they send out. And then the
11 facilities have to have someone inspect their
12 screens. So it is a little bit of a patchwork in
13 the origin states on how it's managed and who
14 certifies it, and who issues the Corn Borer
15 Certificates. I know, I think if my memory
16 serves correctly, in some states it might be and
17 I don't know, Matt can, if or Arthur, can we
18 leverage some members of the public that are on
19 the call and in my case, particularly if if
20 possible, I'd like to leverage Jess McCluer with
21 NGFA since he's helped with this, if he's back
22 on.

1 Or I think some of the States, it
2 might be the official agencies that provide some
3 sort of a certificate that they know the grain
4 was scalped during loading. So I guess I say all
5 that to say the origin states is as much of a
6 patchwork of regulations and process as the
7 destination states are.

8 MR. WILLIAMS: Hey, Nick, this is
9 Jimmy Williams. You know, I can only speak for
10 Missouri, but I know working for the Missouri
11 Department of Ag that our State Entomologist is
12 the key person who is responsible for making sure
13 facilities in the State of Missouri are
14 certified. And that certification process, I
15 mean, from what I understand, they will send an
16 inspector to that facility once a year and
17 they'll look at the screens and, you know, I
18 don't know, do whatever they do. And one time a
19 year and then they get a piece of paper saying
20 that, you know, that they're certified.

21 So, you know, that's how it's done in
22 the state of Missouri. But it seems to me that

1 the folks that definitely ought to be involved in
2 this conversation would be the folks at APHIS.
3 Because if you've got a patchwork of rules and
4 regulations, you know, with the western states,
5 you know, it seems to me that the entity that can
6 bring all of them together would be APHIS. You
7 know, if this is no longer a problem, I would
8 think APHIS could play a huge role in helping
9 make this go away.

10 MR. KERRIGAN: I don't know. Tony
11 Goodeman, are you able to comment at all on on
12 what the Field Ops in those various states are
13 doing or not doing, I guess, from the FGIS
14 perspective.

15 MR. GOODEMAN: Yes, I remember when
16 this first came up back in 2018, it was
17 summertime and I was in Ohio, on leave, great
18 State of Ohio. And a message came in, and I said
19 corn borer, like, of all the things, like, you
20 know, we don't deal really with corn borer,
21 hadn't heard about it, maybe except in passing.
22 And I guess I had some extended family around

1 that were corn farmers, I said, do you guys deal
2 with the corn borer still. And they said, no, I
3 thought that was gone years ago with Bt Corn,
4 that was a thing of the past.

5 And so yes, looked into it more and it
6 is a state-specific program. This is the western
7 states that require, that have the quarantine
8 unless there's that certification. So we aren't
9 really involved in it, no. It is definitely a
10 fiber sanitary type issue. There is, I do want
11 to offer and be upfront, that there is, like, we
12 can measure things pretty easily. We can look
13 for, you know, insects pretty easily if they're
14 identifiable, you know, if we don't need to send
15 them off to to an expert.

16 So if somebody needed to know if there
17 was pieces of corn cobs or stalk that were of a
18 certain measurement, it's feasible that we could
19 set up something like that, you know, with the
20 statement to either put on a letterhead or or
21 something to talk about any findings of cobs or
22 stalks, but we don't want to go down that road.

1 And one of the reasons that we're looking for the
2 Committee is feedback. If it doesn't mean
3 anything to the receiving state, you know, it
4 might be all well and good to have this.

5 But if it's not going to be acceptable
6 by those western states, then it's kind of all
7 for -- or if it's not used or acceptable by the
8 the origin states for those programs to issue
9 that certificate. So I do want to throw that out
10 there. We can measure things as long as it's
11 pretty prescriptive and easy to do. We could
12 look for live insects if they were easily
13 identifiable. But that's as far as her
14 involvement, right now.

15 MR. KERRIGAN: And --

16 MR. ENGEL: This --

17 MR. KERRIGAN: I'm sorry.

18 MR. ENGEL: This is Curt.

19 MR. KERRIGAN: Okay. Go ahead. Go
20 ahead, Curt.

21 MR. ENGEL: Well, this is Curt. As
22 someone who's been doing this for a really,

1 really long time, you know, this is a quarantine
2 issue, not an inspection issue. And I believe
3 the background to all of this quarantine activity
4 over time is this goes back to when corn was
5 shelled by shellers. And the cobs were broken up
6 in very large chunks and the stalks and that kind
7 of thing. And all of that ended up being
8 shipped. Quite frankly, I believe in boxcars.
9 And there was active corn borer. There were corn
10 borer activity that did end up making it to the
11 feeders and consumers of corn on the west coast
12 and the mountain states.

13 You know, the physicality of scalping
14 all of this product particularly is very large
15 train loading installations. I mean these
16 scalpers are enormous, and they're incredibly
17 expensive. And to be able to go at speed, you
18 know, if you're loading a train at 50, 60, 70,000
19 bushels an hour, this equipment is incredibly
20 large and it's hard to get it in the grain
21 mainstream without, you know, doubling, well Nick
22 was trying to refer to earlier, double and triple

1 elevating all of the product. You know, there
2 was some comments about putting screen over the
3 dump pits that would be sufficient to do the
4 scalping exercise.

5 Well, as I understand it, its half-
6 inch square screen is the standard for knocking
7 out the cobs and stalks that would be harborages
8 for European Corn Borer. You know, I've never
9 seen one and I've been in and around loading a
10 lot of corn trains. So I think the quarantine
11 piece could be, I don't know how to say this
12 correctly, but I think this Advisory group could
13 recommend some kind of action to end this
14 quarantine corn situation in the states where
15 this corn's being shipped.

16 But I couldn't begin to think of how
17 FGIS could influence whether or not the corn
18 scalping activity was being done or not being
19 done, and have a validity to a statement of that
20 mixture without being included in the
21 accountability for that. And one other comment,
22 everywhere I've ever been involved in this, it

1 was the State Boards of Agriculture, in one
2 manner or another, who were the certifying agents
3 for all of this scalping capacity. And I'll be
4 quiet now.

5 MR. MCCLUER: Chairman Kerrigan, this
6 is Jess McCluer. I just was going to, I mean, I
7 know there may be others that may have comments,
8 but I'd be happy to, you know, add to what Nick
9 was saying earlier if no one else has anything
10 else to add.

11 MR. KERRIGAN: Any other GIAC members
12 have any comments or current questions before let
13 other members speak from the public?

14 MS. COOPER: Yes, this is Janice.
15 Just a couple of thoughts. It sounds like if the
16 issue is not related to exports, then that might
17 indicate maybe it's not a primary role or
18 inappropriate role for FGIS. And someone
19 mentioned that APHIS would be a more appropriate
20 entity to get involved. It also sounds like this
21 is a state issue. So I would hesitate to put the
22 Committee on record on this particular issue

1 unless somebody showed that there was an
2 appropriate role.

3 I know that our Charter is to advise
4 the Secretary. But I think it's really focused
5 on FGIS activities. So that would just, that's
6 based, I don't know a lot about it, but it's
7 based on the discussions so far, that would be my
8 reaction. But Jess, you may be able to educate
9 us as to why it is a concern for this Committee.
10 So I'll drop off.

11 MR. FRIANT: Well, and this is Nick.
12 I'll add part of the reason because I was
13 involved in this when it came up originally in
14 2018. Outside the Advisory Committee, part of
15 the reasoning behind potential thoughts for FGIS
16 was an alternative to get a certificate rather
17 than having to install the equipment and some of
18 the stuff that we heard from handlers was, you
19 know, if we can have some sort of official
20 certificate that would be accepted that might
21 eliminate this need for the equipment. But Tony,
22 you raised a phenomenal point that no guarantee

1 that the destination states would even be
2 accepting of an FGIS certificate certifying, you
3 know, no live insect and no FM above a certain
4 size. So that's where I think there could be
5 some potential FGIS involvement. But I think
6 you're raising a good point, Janice, that is this
7 really the right forum or not. And I think
8 that's why we should be having -- that's the
9 exact discussion we should be having here because
10 it may not be the right forum anymore.

11 MR. MCCLUER: And Nick, is there
12 anyone else, Matt, that, or --

13 MR. KERRIGAN: Go ahead, Jess.

14 MR. MCCLUER: Okay. So for those
15 don't know me, my name is Jess McCluer, I'm with
16 the National Grain and Feed Association. I know
17 many of you that are on the call. But Nick had
18 referenced me and the Association. We had
19 obviously been very involved in this with the
20 Minnesota Grain and Feed Association. And just a
21 little background on this, I can tell you that it
22 has primarily been the State of Minnesota and the

1 Minnesota Department of Ag that has been very
2 involved and really pushing this issue. And when
3 we had discussions with our other NGFA State
4 affiliates in California, Texas, Washington
5 State, Nick, correct me if I'm wrong, but it was
6 difficult finding staff at those levels within
7 those Department of Ags that were very familiar
8 with this. It was not a priority issue.

9 Okay. And I think from the Minnesota
10 Department of Ag standpoint, there was some other
11 issues, I think, leading to them pushing this.
12 And some of you may remember there was an issue
13 of several years ago that came up in Minnesota
14 with a general manager of a co-op that had been
15 embezzling some funds. And it was a very
16 controversial issue and I think that led to a lot
17 of the increased inspection and enforcement of
18 this based on what happened there.

19 So as Nick was saying, this issue
20 initially came up, we had discussions with FGIS
21 about this. We had a joint NGFA NAEGA Committee
22 Meeting and Austin right before the lockdown when

1 this issue came up and these proposals that Nick
2 was mentioning. And then of course, with the
3 lockdown, everything was tabled. And thought
4 this would be an opportunity to raise it with the
5 Advisory Committee. But in the meantime, since
6 this discussion began, it has been very quiet.
7 There has been really no activity. No, I would
8 say this issue is not been raised by a member or
9 by the Minnesota Department of Ag.

10 And so in that sense, along what
11 Janice said, you know, it might be, you know,
12 obviously it's the Advisory Committee's decision,
13 but, you know, something to consider would be
14 maybe this might want to table this for now until
15 there is any further development that may need
16 input or advice by the Committee on this. And
17 obviously, if there is any new development that's
18 something that Nick, or other members might
19 provide input. The only other thing I would just
20 add to that, it's something that might be very
21 helpful in line was what I believe Curt had said,
22 is that, you know, something to consider as far

1 as this, you know, obviously this corn borer
2 issue is still out there.

3 I mean, these rules are still
4 required, but maybe something to help, I would
5 say that would strengthen the case in repealing
6 these requirements might be a study to show that
7 the corn borer issue, and a study by a
8 university, or a study by an agency having the
9 data to show that this is no longer the issue
10 that it was 20 years ago. And I think having
11 that type of data available might further
12 strengthen the push to maybe eliminate the
13 requirements. So that's just further background
14 information on the issue. So Nick, I don't know
15 if there's any anything else to add to that or
16 hopefully I was on track.

17 MR. FRIANT: Yes, no, nothing else
18 from my perspective.

19 MR. KERRIGAN: Okay. Just a quick
20 question for you just because you mentioned
21 obviously, that NGFA, they get involved back in
22 2018, to a certain degree and obviously has, I

1 don't want to say a loose or affiliation but a
2 ability to work with the various State agencies
3 and such, you know, where we're in this
4 discussion about FGIS. Is it NGFA's current
5 position that it's kind of let sleeping dogs lie
6 since it hasn't come up again or are you guys
7 actively thinking about pursuing that, I guess
8 from the Trade Association standpoint?

9 MR. MCCLUER: From the Trade
10 Association standpoint, this is, I would say, we
11 are on the let sleeping dogs lie standpoint. We
12 have reached out to our State affiliate, the
13 Minnesota Grain and Feed Association, and we
14 haven't really heard anything back from them
15 about this. They were the ones that initially
16 raised the issue. They made a presentation to
17 our Grain Grades and Weights Committee about this
18 issue. We started working with them on putting
19 together this material, reaching out to FGIS.
20 And it has been very quiet since. And so since
21 it's been quiet, in light of everything else that
22 we're dealing with, this does not seem to be a

1 priority. So we would just let it -- from an
2 Association standpoint, we're going to let it sit
3 until there's any further development.

4 MR. KERRIGAN: Okay.

5 MR. MCCLUER: Okay. Is that correct
6 Nick, you're the Chairman of the Committee, I
7 want to make sure.

8 MR. FRIANT: Yes. No, I would agree
9 with that position from the Association. So I
10 guess Matt, my question back to the Committee is,
11 what is do we have a procedural steps that we say
12 that we're just going to table it or we just --
13 how do we handle it from this current
14 perspective?

15 MR. KERRIGAN: Well, so from a
16 procedural standpoint, I mean, it's a discussion
17 item, you know. And out of that discussion and
18 we can put it back on the agenda for future
19 meeting. We can try and come to a an agreement
20 to make a recommendation to the Secretary. Or,
21 we can have the discussion and we can move on is
22 kind of the three options. You know, there's

1 nothing that says that we have to have a
2 recommendation. You know, this was a requested
3 topic to discuss. You know, we don't have to, if
4 the entire Committee, you know, feels that the
5 correct approach is to let it be, then that's the
6 the Committee's decision.

7 I did want to follow up here, I guess
8 one of the benefits of Zoom, while there's not
9 that many of them, is I was able to reach out to
10 one of our head traders and he has confirmed that
11 the co bo certificates are only needed for
12 domestic markets from their perspective. While
13 we get all of them from an export standpoint,
14 because we don't always differentiate or IP
15 what's going to domestic or export, it's not
16 currently a requirement for export in general.
17 So just to confirm that I realized that, you
18 know, that's one exporting company on the west
19 coast and not trying to speak for everybody by
20 any means, but that has been our experience so
21 far.

22 So I guess for the Committee, my only

1 kind of question is, you know, it could be an
2 APHIS, it could be a Department of Ag, for the
3 individual states, you know, what does the
4 Committee think about, you know, while -- all
5 right, Arthur, you have your hand up. I just
6 happen to see your hand, Arthur, do you have
7 something to add to this?

8 Maybe, maybe not. Okay. You know, as
9 far as the Committee's concerned, you know, while
10 there are obviously, you know, a lot of various
11 government agencies that, you know, if we wanted
12 to, I guess make a recommendation that the
13 recommendation for FGIS is likely not to take
14 direct action, but it could always be to interact
15 with the other agencies. Again, it is also with
16 the Secretary to potentially reach out, you know,
17 again for that APHIS group as well. Or if it's
18 the individual states, again, I agree with the
19 group that from my standpoint, I don't know that
20 that's a whole lot of, you know, of action from
21 recommendation. It looks like we have a couple
22 of questions out there. I apologize how I've got

1 my screen, I'm not seeing all of them. Brent, do
2 you have a question?

3 MR. TURNIPSEED: Well, one thing I
4 just want to mention, I work at a university and
5 I hear the talk about the corn borers and
6 everything from our entomologist. The issue will
7 go away for a while, but it's going to come back
8 probably because I hear from farmers, they don't
9 want to buy the Bt Corn now, pay that extra
10 because it's so expensive. Because they don't
11 have any problems with the borers. So some of
12 them are going back to planting non Bt corn until
13 the problem increases again. And then they'll
14 swap back. So this is not going to go away. So
15 I don't think, I hate to see us, I think it's
16 more of an APHIS issue as well, as along with
17 Janice there. That's just my two cents on it.

18 MR. KERRIGAN: No, that's a great
19 feedback there, Brent, on that, from a different
20 perspective. Any other comments or questions or
21 discussion on this?

22 MR. NEAL: Hey, Matt, this is Arthur.

1 Sorry, I faked you-all out with the raised hand,
2 my connection dropped. I just want to provide
3 some clarity to on today's agenda talking about
4 discussing these issues. You-all don't have to
5 take them up for recommendation today because
6 that's on the agenda for tomorrow. And so you
7 can decide tomorrow whether or not you want to
8 table them.

9 MR. KERRIGAN: Okay. Arthur, can you
10 maybe shed a little bit of light, I guess for
11 discussion purposes regarding, and really kind of
12 thinking about the intent of the group, you know,
13 to the Secretary while obviously our primary
14 liaison, you know, it's with yourself and the
15 FGIS, you know, group and such. And it actually,
16 it looks like Jimmy Williams actually just kind
17 of posted up everybody regarding your guys
18 interaction with APHIS. Can you describe kind of
19 how that is or if there was to be a question to
20 reach out to APHIS. So what that could look like
21 or how that interaction could happen?

22 MR. NEAL: Yes, I mean, jimmy Williams

1 hit it. You-all could make that recommendation
2 that, you know, FGIS reach out to APHIS to help
3 facilitate conversation with industry around this
4 issue to see, you know, what steps would be taken
5 to address the patchwork effect that could work.
6 I mean it's going to the Secretary and so we can
7 definitely convey that message Aphis and FGIS or
8 AMS, we're under the same umbrella Marketing
9 Regulatory Programs. We have the same Under
10 Secretary, Deputy Under Secretary. And so we can
11 definitely convey that recommendation to the
12 Secretary and to our Under Secretary. So it's
13 not in vein.

14 MR. KERRIGAN: Understood. Thank you.

15 MR. NEAL: Yes.

16 MR. KERRIGAN: Any other discussion
17 from the group while we're actually in the middle
18 of discussions here. Okay. I just happened to
19 notice, looking at the time here, and I apologize
20 because I am on a three-hour different time zone
21 than everybody else. It looks like it appears to
22 be 1:25 Eastern Time and we have scheduled lunch

1 for 1:15. If there's no other discussion on corn
2 borer, it could be my recommendation here that we
3 would take a break for lunch and then come back
4 to hit the other topics. Again, that's assuming
5 that that are current corn borer discussion has
6 been exhausted. Is there anybody else from the
7 GIAC that has anything that they'd like to share
8 or add to this discussion? Okay. Arthur, I'm
9 not hearing anything so I'm going to recommend
10 that we take a one-hour, we're a little bit ahead
11 given that the corn borer is discussion appears
12 to be at through. So let's come back at, you
13 want to say 2:25. Okay. We'll see everybody in
14 an hour. Thank you.

15 (Whereupon, the above-entitled matter
16 went off the record at 1:26 p.m. and resumed at
17 2:26 p.m.)

18 MR. KERRIGAN: All right, I'm seeing
19 58 people. We definitely had some some that have
20 dropped off that joined back again. Given that
21 I'm not seen a lot of videos. A few more people
22 popping in. It is 12:25 Eastern Time or 12:27

1 Eastern Time. And I feel like my grandma right
2 now, I'm trying to figure out what time it is for
3 everybody, but I don't know. Does anybody have
4 any comments on anything that we've discussed
5 this morning, whether it be any of the FGIS, you
6 know, item or updates, the previous GIAC topics
7 that had been talked about, you know,
8 recommendations in the past that we've got an
9 update on or the corn borer topic?

10 MR. NEAL: Hey, Matt, this is Arthur.
11 I did seek some clarity on the corn borer topic
12 and I'm corrected in that the GIAC should not
13 take a formal action on it as it does not pertain
14 to issues that fall under the scope of the USGSA.
15 However, you know, a letter can be submitted to
16 FGIS asking us to help facilitate a meeting, you
17 know, by the industry, you know, with APHIS.

18 MR. KERRIGAN: Okay. That is very
19 good information to know, I appreciate that
20 Arthur.

21 MS. COOPER: I have a question about
22 some of the recommendations from the last meeting

1 in 2019. I see there was a hemp rule-making
2 item. Were you going to report on that?

3 MR. NEAL: Was not taken up as a
4 formal, it was a recommendation, but we're not,
5 because it does not fall under USGSA, we don't
6 have anything to report out on it. It was us
7 bringing AMS to the table to update the GIAC on
8 AMS's rule-making activities pertaining to hemp.

9 MS. COOPER: Thank you.

10 MR. KERRIGAN: Anything else from the
11 group? Okay. Hearing nothing, if we can, let's
12 keep moving on, on the agenda items for the
13 discussion. Next one I see there is, Average
14 Inspection Flexibilities. If Kendra is able to
15 put that write-up up on screen, that'd be great.
16 If not, everybody should have received a copy of
17 it already. I'm going to take the lead on this
18 one as it was submitted by me. I've had
19 discussions with with a couple of the GIAC
20 members and hopefully everybody has had a time to
21 take a look at this.

22 But essentially we'd run into a

1 situation where our export customers, usually and
2 most typically on the wheat, are asking for very
3 specific tolerances and grade factors that not
4 all of them are, I guess, are being governed,
5 governs not the proper word there, but not being
6 watched by FGIS. And so in the example, the
7 second one there is a customer will ask for a
8 protein average of 14.0 or more. But there will
9 also be a requirement that each subplot has to be
10 a minimum of 13.8. Again, every, you know,
11 different grade factor here has different reasons
12 why the FGIS is only looking at one factor or the
13 other.

14 But that 13.8 minimum per subplot is in
15 the elevator, the loading facility's
16 responsibility under a, quote unquote, elevator
17 instruction on the load order. Which then, you
18 know, requires the shipper to provide that
19 documentation, as well as self-manage, you know,
20 should we still fall within the actual 14.0
21 average at the end of the lot, with a subplot fall
22 below 13.7, the actual grade certificate issued

1 by FGIS, you know, will show that it met all the
2 requirements. You know, however, if there was
3 one that fell below 13.8, the loading elevator
4 would have to EER it. There's no ability for re-
5 inspections or anything of that nature.

6 Again, this is giving the example,
7 just asking for, as this kind of request, because
8 these are all factors that are currently being
9 graded by FGIS. And it's more in the application
10 of how that grade is issued. And so, you know,
11 my I guess, request and proposal is kind of a
12 discussion regarding the utilization of the of
13 the elevator instruction piece, you know, versus
14 if those can be incorporated to the actual FGIS
15 certificate and graded. John, I believed you had
16 her hand up?

17 MR. LINDGREN: Yes, Matt, my
18 understanding was the 13.8 for each subplot is
19 required by WSDA to follow. So you couldn't put
20 a 13.7 on board, it would be a material portion.
21 The average is what we show as what is the
22 responsibility of the loading elevator. Anything

1 the average is our responsibility, but that
2 minimum, 13.8 per subplot, we've been instructed
3 that WSDA will lower that.

4 MR. KERRIGAN: So they will do it
5 either way. You can either state on the load
6 order that you want an average of 14.0, and then
7 the elevator instruction is the minimum of 13.8,
8 or they will look at the 13.8 and then it's our
9 responsibility to do the 14.0 at the end. The
10 key piece here is that there's no meshing of a
11 min-max in an average on the same load order
12 peaks.

13 MR. LINDGREN: Okay.

14 MR. KERRIGAN: So yes, and so that
15 seed damage, that's protein. Those were the two
16 examples that come up, I feel like, quite a bit
17 for us. There's also the typical one on Western
18 and club pits because of how some of those
19 requests one a specific level of club which is
20 either above or below but before the opposing
21 into a different classification. So kind of the
22 question is, is really from the FGIS a handbook

1 side, I guess, you know, is there or what are the
2 limitations regarding mixing some of these to
3 kind of help us watch and market this, you know,
4 these load orders and grain that we're selling
5 for our customers. What does that mean from that
6 application standpoint, from the FGIS standpoint.
7 And, you know, one of the thoughts are, as far
8 as, you know, could we get some mixture of it to
9 help manage that. John, do you have something
10 else there too?

11 MR. LINDGREN: No, I just think I just
12 haven't put my hand down.

13 MR. KERRIGAN: Okay. So I don't know
14 if Tony or even on the standards standpoint, I
15 believe it was that Pat, Arthur, from your side
16 that may be able to speak? I don't know if you
17 guys have have taken a chance to kind of consider
18 this, think about it, or maybe educate me a
19 little bit.

20 MR. GOODEMAN: I'm happy to speak to
21 it. This is average quality right after lunch,
22 get your popcorn ready. This is inspection

1 plans, this is tolerances. So this is exciting
2 stuff here.

3 MR. KERRIGAN: Hey man, it's day in,
4 day out, for us.

5 MR. GOODEMAN: Right, oh, I know. I
6 said it halfway in jest, but really, it is really
7 the bread and butter of exporters trying to meet
8 requirements. Okay. So just for an overview.
9 Generally, we have a couple of inspection options
10 when you're loading a vessel. In one hand I'll
11 certify it as one lot, you can do CUSUM which is
12 the traditional loading plan and that's intended
13 to achieve a set minimum, at a minimum quality
14 throughout that lot. And there's a lot of
15 restrictions on that. You can go a little bit
16 over on certain factors, but in general, there's
17 not much leeway there. We have average quality,
18 which is become more and more popular, especially
19 in corn and soybeans. I don't know if we put out
20 exactly what percentage of lots go to, I don't
21 think that's sort of public, but its popular.
22 And then we've also got no subplot to exceed.

1 Now, what we typically will come
2 across is applicants that want the best of both
3 worlds. They want to say average quality, so
4 they've got full leeway to load almost anything.
5 And as long as the average works out at the end,
6 they're in good shape. I know Arthur's
7 entertained, and I'm glad I'm entertaining
8 Arthur, get the hand motions going. So average
9 quality is very, generally speaking, very
10 shipper-friendly. Now I guess the buyer might
11 get a better price on that, so maybe it's, it's
12 friendly for everybody. But generally, if you
13 want, if you get a loader for US number 2, about
14 our yellow soybeans, you can have FM anywhere
15 from zero up to several percent, as long as the
16 average works out in the end, lot of flexibility.

17 Now what shippers will sometimes ask
18 for and try to get the best of both worlds, they
19 want the ability to blend wherever they want, but
20 they also want a re-inspection on the stuff that
21 goes over, from things that are -- and we have,
22 as our policy, if it's average quality, if it

1 meets, if it's good according to the inspection
2 plan which for average quality, almost everything
3 is, then it's not eligible for a re-inspection.
4 And so that's one angle that we work in our
5 instructions to try and address. That's why we
6 say, that if you've got average quality, if it's
7 accepted by the plan, you're not eligible for re-
8 inspection. If you want to have some kind of a
9 self-imposed limit, that's fine. But the
10 elevator responsible for maintaining that.

11 We're happy to maintain it as like a
12 no subplot to exceed or some type of a set value
13 with use intolerances. But if you want the
14 benefit of the average you can have those peaks
15 and valleys, then you can maintain any of the
16 self-imposed limits. Now, the items on this
17 sheet here are actually more restrictive than
18 some of these sort of things. It's actually not,
19 I think when his first came across, we're
20 expecting, you know, something that we see, you
21 know, a lot of times. This is actually more
22 restrictive --

1 MR. KERRIGAN: Correct.

2 MR. GOODEMAN: -- so I do think there
3 might be some options here for the heat damage.
4 You know, the heat damage is more complicated one
5 because I think that I think the grade limit for
6 number, we just went over this yesterday in
7 preparation and the bullets are escaping me, I
8 don't want to misquote the standard, the grade
9 chart. But you could ask for a maximum per
10 subplot, you know, no subplot to exceed and then
11 it's on you to maintain that average. Kind of
12 like what John was saying one or the other.

13 The protein average is interesting.
14 I'm wondering if there's something we couldn't do
15 within the CUSUM to tighten the tolerance of what
16 would, you know, exceed a break point. Because
17 again, if you asked for you, if you just asked
18 for a 14.0 on CUSUM, I think you'd have, or
19 looking yesterday, about five tens to play with.
20 You can have a subplot that was 13.5 as long as
21 you brought it back and the average worked out at
22 the end, you could potentially have that.

1 I'm trying to think if there might be
2 some options to reduce our CUSUM tolerances if
3 the applicant requested something like that. And
4 then with the white club, that's an interesting
5 going to it is correct that we do not allow kind
6 of grain or class or subclass except where it's a
7 specific reading factor to be averaged. The
8 reason being we didn't want to have corn going
9 into soybeans in the last, you know, subplot or
10 having all the, you know, the white club, you
11 know, being put or or subtracted in various
12 points. We do have some parameters in place
13 trying to, you know, maintain the integrity of
14 the shipments to a degree. But the --

15 MR. KERRIGAN: So for clarity on this,
16 these are specific trade terms that our customers
17 have versus from us. So yes, I 100 percent agree
18 that these are more restrictive. And so from a
19 shipper standpoint, we're not trying to get
20 additional flexibility. We're just trying to get
21 the assistance --

22 MR. GOODEMAN: Right.

1 MR. KERRIGAN: -- in keeping with what
2 we sold, I guess.

3 MR. GOODEMAN: Yes, and one thing I
4 think is maybe stated here, maybe we had it in
5 conversations previously, was just some
6 assistance in flagging sublots that don't meet
7 these criteria. From our standpoint, our primary
8 concern is if its eligible for a re-inspection or
9 not. If it's not eligible for re-inspection, you
10 just want us to have it show up red on the log so
11 that somebody hasn't loaded aboard by mistake.
12 There might be some options there, might require
13 some development work. I don't know. Our expert
14 on that, Lee Capper might be able to share how
15 cumbersome that would be. But in general, like
16 for us to have it wide, you know, more as a
17 safeguard might be possible. Again, so long as
18 it's not eligible for a re-inspection because
19 that make sure --

20 MR. KERRIGAN: So how this initially
21 started, was about 18 months ago, I guess, when
22 we first started talking about this. You know,

1 it was really I thought this was going to be a
2 technology piece in the flagging. Yes, but my
3 request is not so much focused on the re-
4 inspection piece. It's more about having
5 assistance because of how most exporters, you
6 know, have a duplicate screen available, you
7 know, with each subplot coming up with the grades
8 and everything's green or gray or red, right.
9 And if, you know, as we're doing various lots and
10 and again, moving the tonnage per hour we are, if
11 we're, you know, those operators they're seeing
12 green --

13 MR. GOODEMAN: Green means go.

14 MR. KERRIGAN: Green means go, but
15 then also from, you know, from, in our case WSDA
16 standpoint, it releases the interlocks to allow
17 us to load it.

18 MR. GOODEMAN: Okay.

19 MR. KERRIGAN: And so then if there's
20 a mistake made and everything's loaded and we
21 show it to the buyer and he says, hey, you missed
22 this, then there's usually one or two options.

1 One of them, which is, is a monetary compensation
2 to the buyer.

3 MR. GOODEMAN: Right.

4 MR. KERRIGAN: But depending on the
5 buyer, it could mean unloading that entire lot of
6 that vessel and starting over again. So that's
7 really our concern is, at least, you know, from
8 my perspective, is the flagging portion of it to
9 help watch it because we've gotten caught or some
10 of us had been caught or very close to being
11 caught of not watching it because we're seeing
12 all those greens and we're so used to the system
13 and how it works.

14 MR. GOODEMAN: Right.

15 MR. KERRIGAN: And that when we put it
16 in the elevator instruction, it's you know, it is
17 solely on us. And we understand that. I think
18 what I'm asking for is just can we get some
19 assistance because we're relying on your guys
20 grade and program to help moderate this?

21 MR. GOODEMAN: Yes, that's a great
22 question. And then with the white club, the not

1 less than 25 percent average. There are some
2 options there, but probably would likely include
3 putting that on the CUSUM for 25 percent then it
4 kind of limits the flexibility you'd have to go
5 really low. Like you wouldn't be able to put on
6 I think you'd have several percent to work with,
7 but probably couldn't put on, you know, even
8 something that met western white, you'd need to
9 put on a subplot of 10 percent probably be so far
10 below that 25 percent on the CUSUM, that would
11 probably kick it out.

12 MR. KERRIGAN: And so with at grading
13 of obviously CUSUM to average, you know, I
14 understand it's about trying to find that piece
15 in there, but it's really it's those trigger
16 points that are customers are looking for in a
17 phrasing. Well, yes, it would be nice to if, you
18 know, if everything handled like corn and beans,
19 let's face at right. But they do tend to get
20 very, very specific. And especially again, I use
21 wheat as an example because there are just so
22 many grade factors that are traded on, you know,

1 instead of just a number one, two, or three,
2 right?

3 MR. GOODEMAN: Right.

4 MR. KERRIGAN: Does anybody else from
5 the GIAC, I guess, have any comments on this?
6 Either from, John, if you have any more comments
7 that maybe I have misrepresented or maybe
8 haven't. Any examples that you're aware of that
9 this could be beneficial, that we want to get out
10 there?

11 MR. LINDGREN: Well, I think in the
12 end, what this average comes down to versus the
13 things that are allowed in the CUSUM plan or the
14 no subplot to exceed or below, it does come down
15 to, like, Tony's mentioning, whether it's an
16 ability to do a re-inspection or not. Because
17 the example you just used with club, you only get
18 5 percent on club. So you were to put a minimum,
19 you know, if you'd use a CUSUM plan on a 25
20 percent, you can put anything but 20 on board.

21 MR. KERRIGAN: Right.

22 MR. LINDGREN: And then it's some of

1 those that are so subjective, that's where the
2 challenge lies. And getting DHV picks or club
3 picks, which are the ones that we're talking
4 about on class where you can't average, you know,
5 below a class and things like that that are the
6 challenge. But I don't know, there seems to be a
7 lot of discrepancy on how the load orders need to
8 be written to meet what our customers are asking
9 for and what FGIS can issue load orders as. The
10 difference between the average and minimum or
11 maximum, you know, soon as they see the word
12 average, you throw out anything with min-max and
13 it becomes the elevators responsibility.

14 To your point, we, as well, you have
15 been right on that cusp of whether or not you put
16 something aboard that's not in a, like grade, you
17 know, when we're trying to track it. And the
18 responsibility is solely on the elevator. So if
19 there is a system that can flag instead of the
20 green to go, or allowing it to go, make sure that
21 the communication is there of where you're at
22 with your average, that's self-imposed. CUSUM, I

1 think is pretty straightforward or the no min or
2 max, you know, per subplot. But it's when you get
3 into these averages that the challenge is there.

4 Even as Tony, I'm sure you're aware,
5 and Matt, you can even have the CUSUM plan. And
6 with some of these lots that we do, you're within
7 the CUSUM plan, but it's not a material portion.
8 And it doesn't make grade and there's no reports
9 for the elevator to even do a re-inspection
10 because it's not a material portion. I think one
11 thing somehow to, and I know this was clear back
12 to long time ago when I first started, material
13 portions used to be anything that was in that
14 CUSUM plan you you could re-inspect the subplot.
15 Didn't necessarily have to be the one that kicked
16 it over. It could've been anything that's
17 involved in that subplot or in that material
18 portion range.

19 That's being said, I think from the
20 export standpoint, I know they would like to have
21 more flexibility on possibly re-inspecting things
22 that are subjective, the club picks, when it's an

1 average and you get below a certain point. I
2 don't know. I don't know that we can get there
3 because that's basically it's the plan that FGIS
4 has. And just that it's becoming more and more
5 difficult to meet the customers' needs on what
6 they want and to try to line it up with what FGIS
7 load orders need to read. So all this being
8 said, I don't know that there's a great solution
9 because what's currently there. I think we
10 understand but we were just looking for some help
11 to avoid a disaster. But I know it's our
12 responsibility to do so.

13 And I don't know if we can only ask
14 for, in our case, you know, Matt and mine, WSDA
15 and other locations that have FGIS, their aid in
16 making sure that we know where we're at, ten
17 minutes accurate. We at United Grain actually
18 don't have a slave monitor that has that green to
19 go. We are relying on communication in a
20 different fashion from that. I don't know, Tony,
21 whatever, you know, we're just looking for a
22 little more guidance on what we can do to help

1 facilitate the loading of these crazy load orders
2 that we get all the time and they, they're
3 becoming more and more challenging.

4 MR. GOODEMAN: Right.

5 MR. LINDGREN: I mean, a customer
6 that's going, well, I need this, this, this,
7 this, and we can't even meet some of that so --

8 MR. GOODEMAN: I'd be curious what
9 options we have internally with our own software
10 that we use, the Inspection Testing and Weighing
11 Application in FGIS for any kind of flags and
12 what that might look like for us, I don't know if
13 that's easy or hard. From a policy standpoint,
14 we talk about, you know, some of the subjective
15 factors, or even some of the other tests. I
16 imagine from the shipper's standpoint, you'd want
17 to re-check the ones that you thought might be
18 too high or too low but without those set
19 criteria.

20 You know, like for example, what would
21 the buyer want to be re-checking again, you know,
22 ones that might have been really high or really

1 low, you know, and their viewpoint. So if you've
2 got to average, you're cherry picking the ones
3 that you want to have checked again and then
4 including those all on the average and not re-
5 inspecting everything else. A little bit
6 debatable there without, you know, the confines
7 of a set loading claim like the CUSUM plan.

8 I would also add that, you know,
9 certificates don't look any different. We do
10 CUSUM, we do average quality. The certificate is
11 the same and I think that's something, you know,
12 whenever we're looking at, whenever a policy
13 group whenever we look with the Field Office, we
14 want to make sure that certificate tells an
15 accurate story. And if we further water down
16 what that average quality could be, and then
17 allow further options for re-inspections of ones
18 that are selected by the shipper only, I think it
19 would dilute, I've concerns about diluting, you
20 know, what, that certificate says, just in
21 general with an average quality.

22 MR. KERRIGAN: I know that the grade

1 log gets sent on many, if not all of the
2 shipments to our customers --

3 MR. GOODEMAN: Sure.

4 MR. KERRIGAN: -- and that they're
5 probably looking at that more from their
6 standpoint where the certificate is more for the
7 financial side, frankly, of who's getting paid
8 and banking and such.

9 MR. GOODEMAN: Yes, that's noted.

10 MR. KERRIGAN: So, you know, without
11 trying to make this, you know, overly
12 complicated, given that the original intent was
13 some sort of flag in the system --

14 MR. GOODEMAN: Yes.

15 MR. KERRIGAN: -- what, in your eyes,
16 you know, what can we ask you to do. Obviously,
17 you've got some background work, you know, what
18 do you think is even feasible, I guess, from the
19 flagging side or maybe because, you know, what I
20 don't want to do is, is say that we need to open
21 up every handbook.

22 MR. GOODEMAN: Right.

1 MR. KERRIGAN: And change this because
2 the the items in red, I believe were sent back to
3 me from WSDA when I passed this along to them and
4 that was their response and reasoning for why
5 they weren't. And so that's my concern, is is it
6 a handbook issue or do we think that it's a
7 technology issue in that program, or possibly
8 both, I guess.

9 MR. GOODEMAN: Yes, I would say I
10 would say just, you know, my initial response
11 will be both. That because typically when we
12 flag something, it's either in-process, it's
13 green, which means that it met the loading plan
14 or its red like is rejected and you have some
15 options to either re-inspect it or reject it.
16 You know, it's pretty confined. So it's, I'm not
17 committing or promising anything, but it is
18 feasible. I mean, it sounds, you know
19 reasonable. This request sounds reasonable to
20 look at.

21 Policy options just for some kind of
22 a flag just so everybody, you know, so it doesn't

1 get loaded. But not allowing the re-inspection
2 necessarily. But then of course, that would
3 require some type of an update. And that is the
4 part that I'm not sure if that's really easy to
5 do or really complex. You know, if some people
6 spend a couple of days working on it or this is
7 like a big, big, big overhaul.

8 MR. KERRIGAN: Well, nothing simple
9 and in the systems, right. You know, but that's
10 kind of the point of it to, John's comment is
11 these requests aren't getting fewer and fewer.
12 And we all know this. But they all seem to be
13 around trying to tighten these windows around
14 average, you know, the CUSUM and things of that
15 nature. I think everybody understands it's kind
16 of that combination of them being able to tighten
17 up the actual average. Not that that helps or
18 hurts, you know, and this is getting into the
19 weeds a little bit but, you know, we have a green
20 and red and maybe there just needs to be a
21 yellow, right.

22 You know, like I say, to your comment,

1 you know, we understand that that if it's not
2 allowed to have a re-inspect without some major
3 changes. And there's obviously a lot of rule-
4 making that goes into that to make sure that the
5 integrity isn't compromised. And we fully
6 understand that, you know, but but just, you
7 know, to flag either for WC, FGIS side for
8 communication, would that be from the monitor or
9 just, you know, how are the communications done
10 today?

11 MR. GOODEMAN: I would say if you're
12 looking for it, like what would be the most
13 easily digestible for us to receive some
14 information like that, I would say consideration
15 of an option to flag those self-imposed limits.
16 Not necessarily with a re-inspection option, but
17 just to flag them in some manner. I would also
18 consider like if these criteria, this load order
19 criteria, contract criteria are tighter and even
20 what are CUSUM would allow. Maybe ask us to
21 explore options there to set up a loader with
22 tighter specs than what the CUSUM would give you.

1 Like for the protein example, there is a good
2 example.

3 MR. KERRIGAN: You're killing me.

4 MR. GOODEMAN: I'm sorry, I'm trying
5 to give you what you want here. Just say, yes.

6 MR. KERRIGAN: Yes, I mean, I think
7 everybody understands CUSUM. It's very tough on
8 a mathematical side to get it honed in, right.
9 And it's all about the homogeneous product. And
10 so CUSUM could be an option. I don't know that
11 I'd like to raise my hand and say that sounds
12 like a great option because CUSUM tends to be a
13 little bit of a bad word on the exporter side.
14 Because of, you know, how restrictive it is, how
15 confusing it is for everybody as far as what that
16 next, you know, item, you know, or subplot needs
17 to be.

18 Especially, and that typically comes
19 frankly on the commercial side with a premium,
20 you know, because of how the blending is, because
21 of how the high-speed is, you know, as we're
22 actually doing this loading. So, you know, it

1 absolutely could be an option, but, yes,
2 definitely --

3 MR. GOODEMAN: I understand.

4 MR. KERRIGAN: I would rather see a
5 flagging system than --

6 MR. GOODEMAN: I got you.

7 MR. KERRIGAN: -- you know, these
8 average with min and max to a CUSUM.

9 MR. GOODEMAN: Because you're right,
10 I mean, even if you put, even if we tightened up
11 the CUSUM tolerance on the protein to be, you
12 know, in specific situation on the applicant's
13 request to be 13.8 instead of a 13.5, you still
14 couldn't have a bunch of 13.8s in a row. You'd
15 probably only be allowed to have one 13.8 and you
16 have to make sure the next one is 14 or 14.1, you
17 know, bring it back so --

18 MR. KERRIGAN: And all year that
19 protein is high and there's not a lot of value
20 to, I mean, some if these vessels do go out over
21 a broad for instance.

22 MR. GOODEMAN: Yes.

1 MR. KERRIGAN: You know, to where you
2 would be able to put, you know, 15s on. I mean,
3 most of the time the customer would love it,
4 right. You know, but if you have that tolerance
5 because you still have that upper range as well.

6 MR. GOODEMAN: Got you.

7 MR. KERRIGAN: Does anybody else from
8 the GIAC have any comments or questions? I know
9 this is tends to be very specific on the exporter
10 load order standpoint. Like I say, I have spoken
11 to a few of you, you know, but as far as
12 questions on, kind of what we're looking at here,
13 or maybe if there's any concerns or applicability
14 or similarities, I guess elsewhere throughout the
15 system?

16 MR. FRIANT: This is Nick Friant. Oh,
17 go ahead, Janice.

18 MS. COOPER: Oh, thank you. Just
19 really a comment, Matt, this is, I mean, wheat is
20 so complicated from the time you're growing it to
21 the time you're selling it and and loading it on
22 the ship. So I just wondered if you had checked

1 with US Wheat Associates on these issues because
2 they're the ones that deal with the customers and
3 try and educate them on how to contract more
4 effectively for what they're looking to buy.
5 Just wondered if you had had a chance to consult
6 with with any of the US Wheat folks?

7 MR. KERRIGAN: I actually have not.
8 That's not a bad idea. You know, from my -- it's
9 probably a good discussion to have, but, you
10 know, what I will say is that, you know, the
11 commercial side and all the buyers and the
12 countries, that tends to get to be a bit of a can
13 of worms when we start talking about changing
14 grades. Because then it seems like we don't want
15 to supply what they feel is in their head. But I
16 can definitely, because obviously, you know, here
17 in Portland such would be open to kind of
18 discussing this to see if maybe some of the
19 culprits or primary culprits, you know, would
20 look for some of these other options. That's a
21 great idea. Nick, did you have something as
22 well?

1 MR. FRIANT: Yes, actually, I have two
2 things now. Thanks, Janice, for bringing up the
3 the US perspective. I would tag on too, Matt,
4 that this might be an opportunity to bring this
5 to the NAEGA Grades and Inspections Committee,
6 because I think it'd be something, you know,
7 we've heard comments from John as well. I think
8 it'd be something that a number of NAEGA
9 membership would be interested in having some
10 chance to talk about and maybe provide additional
11 input and support. Just I think that's commented
12 like to make from that direction.

13 And the other one is when I was
14 reading through the one-page summary and thinking
15 about it, and it's kind of been brought up here
16 in a couple of different comments, kind of this
17 question about when it says average grades or
18 average not to exceed or not less than a certain
19 number depending on the factor. I know that one
20 also creates a lot of confusion in this space.
21 And I think, you know, to your point, that some
22 of these customers, the requests that they're

1 making and the industry interpretation of it
2 versus the FGIS rules.

3 Around like John alluded to, you know,
4 if it says average, and then a max or a min, you
5 know, the way FGIS automatically looks at that
6 and disregards or includes it, you know, it
7 depends on the situation. I think that might be
8 part of this discussion as well, that, you know,
9 whether it's clarity in rules or a change in
10 rules of this direction, that we would happen to
11 go. I think that's another piece that to me fits
12 in this discussion, and, you know, folks can
13 disagree with that for sure, but I think that
14 would be a part of this one as well.

15 MR. CAPPER: This is Lee Capper with
16 FGIS. And Nick, if I can add to that, I think
17 part of what's here is we don't currently have a
18 specific Load Order Form that is common across
19 the all the shippers. And so some of these
20 questions could be more clearly answered by
21 having, you know, specific options that are
22 available in, you know, a great deal of

1 description about what that option means. So
2 there would be clarity around what's being
3 requested for grading versus, you know,
4 potentially these other flagging scenarios.

5 So we may want to consider a
6 recommendation around it. You know, more fully
7 exploring what does flagging means as well. You
8 know, is it subplot based, is it overall load
9 basis, you know, and just understanding more
10 nuances that will be requested there as well.

11 MR. KERRIGAN: Those are all very good
12 comments.

13 MR. NEAL: Let me, this is Arthur,
14 asking a point of clarification as well. If
15 customers can submit load order requests or make
16 all different types of request with no parameters
17 around it, that will make it pretty difficult for
18 us to kind of standardize things across the
19 system, right. So piggybacking a little bit off
20 of Lee's comment, would it make sense for us it
21 think about standardizing, as best we can, load
22 order requests? I don't know so that we got a

1 little bit more certainty and control over how
2 these requests come in, such so that we're not
3 doing acrobatics every time we get one. That's
4 just a thought.

5 MR. KERRIGAN: Well, we kind of have
6 that now with probably more informal unofficial
7 what we're told we can put on a load order and
8 what we can't. You know, which is, you know,
9 then how we either self-impose it or to be
10 honest, we bring in an independent
11 surveyor/grading agency to provide their
12 certificate to do that. And, you know,
13 unfortunately, you know, that's a little bit
14 counter to the mission, you know, of facilitating
15 trade. Because if, you know, which I understand
16 that this could get really broad, you know, but
17 there are some very specific items here that are
18 already being graded by FGIS, which is, like, if
19 we're already looking at them versus maybe items
20 that aren't being looked at on a regular basis.
21 You know, if there is a way to monitor that as
22 well is is where I was going with that.

1 MR. CAPPER: This is Lee again. Yes,
2 I mean, I think certainly everything's within the
3 realm of possibility from a technology
4 perspective. But again, given how nuanced we all
5 know, ship loading is, especially in wheat, we
6 would want to be, you know, very, very clear
7 about what it is we want to have offered and not
8 offered.

9 MR. KERRIGAN: So and this is a little
10 bit in to tomorrow's, I guess, session, but kind
11 of with that, given that I just gave a couple of
12 examples here. And this a little bit of the
13 policy or the kind of meat and potatoes of how
14 the GIAC works, Arthur. But would this group be
15 able to almost like with what's going to come up
16 with the FDA MOU, kind of maybe take a step back
17 to kind of, you know, try and gather these
18 specific items while maybe FGIS is taking a look
19 at the system and handbook kind of concurrently
20 without necessarily a recommendation to the
21 Secretary. Is that a potential for this group as
22 an end result, I guess, as I think about this?

1 MR. NEAL: Yes, I mean, it's still may
2 be open for, you know, as a business item, agenda
3 item. Homework can still be conducted on it on
4 both ends. And you revisit it to see what kind
5 of progress we make and whatnot a recommendation
6 needs to be made down the road. Or, we may come
7 to some kind of resolution in the meantime, and
8 then you can close it off, close the agenda item
9 out at the next meeting or the meeting.

10 MR. KERRIGAN: Okay. Yes, because the
11 last thing that I would not want to do is we get
12 very specific on two or three items. But then as
13 soon as that's done, right, there's another two
14 items that we hadn't seen for a while or forgot
15 about or didn't get an accurate poll of the
16 industry or something of that nature to where it
17 was very limited and, you know, requires extra
18 work on everybody, I guess.

19 MR. NEAL: Yes, and I mean, it sounds
20 like this one's pretty involved, it will require
21 some extra digging, and it makes perfect sense
22 though.

1 MR. KERRIGAN: No further questions or
2 comments? This is a great discussion on this,
3 appreciate it.

4 MR. GOODEMAN: I did get a note, and
5 I appreciate Dave in Portland for pointing this
6 out too. Sometimes it looks like in our CUSUM
7 log for things that are set up as CUSUM factors
8 like subclass, then perhaps the running average
9 isn't shown in the column next to that result
10 like it is for average factors. So that could be
11 an enhancement potentially. So I think it just
12 shows how far you are into the CUSUM which is
13 critically important, but it may not show again
14 the running average. So again, just the, I guess
15 the awareness everybody knows where they stand, I
16 think is really important too, from industry
17 standpoint.

18 MR. CAPPER: So Tony, to follow-up on
19 that, I do believe the running average is shown
20 at the bottom on the view side at the bottom. So
21 it's not shown to the inspector, but it is
22 available to the customer if they're viewing it

1 or the elevator.

2 MR. GOODEMAN: Okay. Thank you.

3 MR. KERRIGAN: Any further discussion
4 from GIAC, FGIS or members of the public? Okay.
5 I'd like to move onto the next agenda topic,
6 which is falling number. I believe John
7 Lindgren, I believe you are taking the lead on
8 that one?

9 MR. LINDGREN: Yes. Good afternoon
10 again, everybody. Welcome back from lunch, it's
11 just about lunchtime out here. I've had some
12 conversations over the past 18-months with
13 several different people when falling numbers was
14 first kind of at our last actual meeting. And
15 there's been a lot done, I think to already get
16 the recommendation. The biggest concerns that I
17 had back in the day was the inconsistencies, at
18 least the proceed inconsistencies on how the test
19 was run, whether it was everybody was running it
20 on that 14 percent moisture basis.

21 And I know the shake-o-matic has come
22 into play where everybody's doing that. I think

1 all of this has helped align things, it is
2 better, the last year-and-a-half than it was a
3 year-and-a-half ago. As far as origin grades,
4 meeting what destination expects, there's still
5 some inadequacies, I believe. And obviously when
6 there's good falling numbers like there has been
7 lately, the concern isn't as high, they seem to
8 repeat at the higher level. So until we get back
9 down into the struggles with white wheat at below
10 300 and the spraying winter wheats, not much
11 winter wheats, but the spring wheats that get
12 down in that 300 range as well. I think we're
13 just looking for consistency on how the test is
14 run at origin.

15 In my recommendation, I think part of
16 the biggest problem was not everyone was doing 14
17 percent moisture basis. And that will change the
18 falling number quickly if you're not running it
19 that way. The two tube method, and somebody can
20 correct me if I'm wrong as I'm going to here, but
21 from an expert standpoint, you have to run the
22 two tube method. Domestically I don't think

1 that's a requirement. And understand that
2 running two tubes instead of one, cuts your
3 production in-house because everybody likes to
4 run two tests at the same time if they can get
5 away with it. Which makes complete sense to me.

6 If you're doing a 115 car unit train,
7 and if you'd have to run 115 tests as opposed to,
8 you know, 65, that's a big difference in timing.
9 So I don't know what the best solution is on the
10 one tube, versus two tube. But in the end it's
11 basically tests need to be run the same at origin
12 as they are at destination to give yourself a
13 chance for repeatability. We all know that
14 falling numbers is enough of a challenge without
15 tests being run differently. So it's about
16 accurate information. Hopefully testing is done
17 better.

18 I had a conversation with Mr.
19 McCluskey and Mr. Easy, I'm not sure if that's
20 how Greg pronounces his last name for sure, a
21 couple of months ago. And I think FGIS has made
22 great headway in helping solving the issues that

1 were there. So it's open for more discussion.

2 MR. KERRIGAN: And to clarify, John,
3 the biggest thing here is making sure that there
4 are accurate results between origin to
5 destination to the actual results that are
6 actually there versus getting a grade from origin
7 then having it turned around and maybe put that
8 product directly on the vessel for destination
9 and we get something completely different,
10 correct?

11 MR. LINDGREN: Yes, it's mostly about
12 you have an idea of what you've got coming at
13 you, and you're thinking it's going to make grade
14 and when it gets here, there's a, you know, a 50
15 to 60 point difference which as you know, is
16 impossible to make grade at times depending on
17 the quality.

18 MS. COOPER: I wonder if if someone
19 could clarify the requirement for the double tube
20 method where it's required and where it's not and
21 what the reasons are. Can someone, Tony, maybe
22 you can discuss that or someone?

1 MR. GOODEMAN: Yes, so the falling
2 number test, let me back up a little bit. In
3 general, when official agencies are licensed or
4 when they're authorized to perform tests, if
5 they're designated for those services, they can
6 only do it the official way. If they're going to
7 grade corn damage, if they're going to do
8 soybean, they can only do it by our instructions.
9 So that's one thing. There is, I'm not going to
10 call an exception, but that's under anything done
11 under the US Grain Standards Act. We say that
12 they can only do it officially.

13 The falling number test, however, is
14 run under the authority of the Agriculture
15 Marketing Act because it was originally developed
16 for flour. We don't really run on flour anymore,
17 but that's how it was developed and we've set up
18 all of our instructions and rules under the
19 framework of the Ag Marketing Act, which does not
20 contain that restriction. So when you doing
21 things under the AMA, you can do, if you're an
22 official agency or a co-operative, you can do

1 things officially if you want to and put it on a
2 FGIS Certificate. Or you can do it unofficially
3 and put it on Tony's grain Inspection
4 certificate, whatever that is.

5 So if you run it unofficially, you
6 can, it's very, very loose, you can do it with
7 one tube. You don't have to do the barometric
8 pressure correction. And it's very, very much,
9 you don't have to use a shake-o-matic, it's very
10 loose. And that is something we definitely are
11 considering to make sure there is greater clarity
12 in lining this under the US Grain Standards Act
13 to say that, okay, if you're an official agency,
14 a co-op, or wherever you are, if you're North
15 Dakota Grain Inspection Champaign, Danville,
16 State of Missouri, whatever it is, you've got to
17 follow these official procedures if you want to
18 run this on this test.

19 There's concerns there because it's a
20 huge advantage to just do one tube both for the
21 producers that are paying for the service and for
22 the agency in providing timely service. So we

1 would maybe consider using official commercial
2 inspection services, which we can use some
3 modifications under a different certificate,
4 under a different protocol to maintain the one
5 tube, but require other the other procedural
6 conformities. But that's a long answer to a
7 short question. So yes, anybody running the
8 falling number tests can do so unofficially under
9 their own company name, letterhead, whatever.
10 But if they do it officially under an FGIS
11 certificate, it's got to be run with two tubes
12 and with all the barometric pressure correction,
13 everything else. All the other exact word-for-
14 word procedures, you know, or instruction.

15 MR. NEAL: And, Tony, the two tube
16 method along with the barometric pressure
17 adjustment is to ensure greater accuracy.

18 MR. GOODEMAN: Absolutely, yes. If
19 the barometric pressure correction was a change
20 in what was that early 2019, to a type where
21 greater uniformity because we talked about this
22 before, but there can be even at 500 foot,

1 elevation changes, there can be differences in
2 the falling number results. And so our previous
3 instruction only implemented a correction
4 starting at 2000 feet, when in reality you can
5 see variation much lower increments than that.
6 Kansas City, I think, is at 1000 feet, versus,
7 you know, a lot of those locations at sea level
8 and the PMW locations and higher country in
9 Montana. So I don't know if that answered the
10 question, Ms. Cooper?

11 MS. COOPER: It answered, but also
12 opened the door to many more. It's a complicated
13 topic. So is there some consideration being
14 given, I wasn't quite sure, and what would the
15 process be to move that particular test from the
16 AMA to the Grain Standards Act cover?

17 MR. GOODEMAN: You know what, this
18 topic is really (Audio interference.) got it.
19 You know, now that we made that change in 2019,
20 we saw and probably what this topic is speaking
21 to in the fall of '19, we saw some differences
22 that I think are attributable to that moisture

1 basis. If somebody wants to be really creative
2 or if they have the leeway in their contractual
3 terms, you can get some bonus points by lowering
4 the moisture basis. So just in general, thanks
5 to Greg for pulling this up real quick, the
6 standard moisture basis for falling number is 14
7 percent. And it's talking about pat, it seems
8 like the standard for flour testing in general.
9 So 14 percent.

10 If you were to do, if you had a sample
11 that was 292 seconds at 14 moisture basis, if you
12 said, hey, I want the certified at dry matter
13 basis, so all the way down to zero moisture, the
14 falling number is going to be 340 seconds. If
15 your moisture was around 10 percent or so and you
16 need it as is, so instead of being 14, and be
17 reported at the as-is moisture of whatever the
18 result was, a 10.2 percent it would be 305
19 seconds. So you can have a lot of manipulation
20 just in reporting the moisture basis differently.
21 And we don't obviously like that in wheat
22 protein. That standard moisture basis is 12

1 percent.

2 And for any other alternative moisture
3 basis, you have to report the 12 percent first.
4 And then you can report if somebody wants to know
5 what the dry matter or as-is basis is or
6 alternative, we can show that as well. So we're
7 looking at several policy options to continue
8 that greater alignment in the falling number
9 test. I think that we made some good strides in
10 2019. TSD and ARS did a lot of great work with
11 the barometric pressure correction and shake-o-
12 matic requirements. But I think there's probably
13 more to be done just so the certificate is clear,
14 kind of like we talked about earlier, making sure
15 the certificate tells the accurate story.

16 Not that it's inaccurate because it
17 says what the moisture basis is, but if you're
18 not going to catch it, if you've got somebody
19 involved that, you know, or if it ends up on a
20 spreadsheet somewhere, you know, it sort of get
21 says, okay, you know, during the 20 that, you
22 know, 320, you know, and then it shows up at

1 export and it, you know, doesn't having trouble
2 making grade. So we're looking at policy options
3 to clarify that. What would be needed, it's
4 definitely going to be public process in some
5 manner. But I think this is one of the first
6 steps and that is engaging you-all.

7 And the report in the moisture
8 reporting doesn't necessarily need a move to
9 USGSA. We could do that, I think through an
10 instruction. I think when we moved the wheat
11 protein to be a standard 12 percent and mandating
12 that standard moisture basis on the certificate.
13 I think that was actually done through the
14 Federal Register, but that was decades ago. I
15 think it was sometime in the 90s. I'm not sure
16 if we have to go through that or not.

17 MR. KERRIGAN: So if I'm hearing you
18 correctly, Tony, that the ability for agencies to
19 report it, I guess unofficially, is because what
20 the falling number testing requirements under ANA
21 versus is USGSA, right?

22 MR. GOODEMAN: That's correct.

1 MR. KERRIGAN: So, you know, to try
2 and get apples to apples to reflect all of the
3 hard work that you guys have done to try and get
4 this as accurate as possible, you know, it's
5 really that that movement piece because it then
6 incorporates all these changes, all these
7 updates, all these trials that you're doing
8 because it hones that in, right, from your
9 perspective of how that reporting is, correct?

10 MR. GOODEMAN: It would, yes, but
11 perhaps with some other side effects,
12 consequences, you know, as far as efficiency,
13 price, price to test, if we were require them to
14 use the two tubes, that's correct.

15 MR. KERRIGAN: John, with you being
16 the champion of this, and obviously, we all
17 understand the time and money involved with this
18 testing, especially on the origin side, what's
19 your feeling or thoughts on that movement to
20 fully official versus having a flexibility? Is
21 it is it a reporting issue of somebody being
22 clear or is it just that, you know, that FGIS has

1 done a lot of work to try and make this better,
2 but there's no requirement for the unofficial to
3 actually follow-up?

4 MR. LINDGREN: Well, I think in the
5 end what it is, and that was actually a topic
6 that Pat McCluskey and Greg and I spoke about
7 too, was the movement over to USGSA. And it
8 would require the origin to run at the same way
9 as we do on export. So that would help get
10 things tighter in my opinion. To Tony's point, I
11 don't know how difficult it is to move that over
12 to USGSA. The impact that it has, it makes sense
13 to be under USGSA. Because that's what we all
14 use it as and I think that's what the
15 expectations are.

16 But as far as, and I don't know,
17 running one tube or two tubes, I've looked back
18 on several shipments. We get a copy of the
19 falling number log that shows how many times when
20 you're running the two tube method, if you go
21 outside 5 percent, the test has to be re-run. So
22 I went back and looked at several shipments on

1 how many times two tubes actually go outside 5
2 percent. And it's probably less than 5 percent
3 of the time. So would one tube be as accurate?
4 No. Will it be close enough from a speed
5 standpoint to allow that? And I don't I don't
6 know if you could have the choices of running one
7 tube or two tube.

8 The one piece in my recommendation
9 where I said, where possible run the two tube
10 method, we all know that that means, okay, I have
11 an out to run just one tube. I think it will
12 make it, it's definitely going to be more
13 accurate if everybody is, for lack of better
14 word, to run two tubes. But that is going to
15 impact how quickly you can get results. So from,
16 I think, the exporter standpoint, the accuracy is
17 important, but I don't know what the cost
18 actually ends up being that will be put back on
19 them if they need it run on two tubes.

20 And another piece that Tony mentioned,
21 if it can at least be on a certificate on how it
22 was run. I mean, sure, it says 14 percent

1 moisture basis, but does anybody really look at
2 that or do they just see the result? And then
3 the same thing, was it run on two tubes or, you
4 know, on the certificate can say that it was?
5 And I don't even know if that's an option that
6 FGIS would think about is giving you the option
7 to run one or two. Right now, if it's under the
8 official standard, it's two tubes.

9 MR. KERRIGAN: Yes, just as far --

10 MR. LINDGREN: So to play with those
11 options, I'm not entirely sure the best route to
12 go.

13 MR. NEAL: And this is Arthur. And I
14 think also to take into consideration is still
15 ponder on the challenge, the impact it has on
16 exports if customers receive wheat run off of one
17 tube, and it doesn't meet that expectations. And
18 then we end up dealing with complainants. So we
19 have to take that into consideration too that
20 we've done everything within our power to try to
21 ensure that the official system yielded the type
22 of results that customers expect.

1 MR. KERRIGAN: Well, it's complaints,
2 but then, you know, I'll be honest with you, I
3 don't know that I've actually checked our certs
4 to know when we've had issues, whether it's been
5 an official falling number cer or an unofficial
6 you know, cer when all of a sudden it comes in
7 because it's complaints, but it's also monetary
8 on what was purchased or what was expected,
9 right.

10 MR. KUHL: This is Ryan Kuhl, from
11 Northern Plains Grain Inspection in Grand Forks,
12 North Dakota. We run quite a few falling numbers
13 with the spring wheat in our area. And we do
14 official falling numbers the two tube method, as
15 well as the unofficial method with the one tube.
16 We do use the barometric pressure calibration or
17 the formula. What we see when we're loading the
18 shuttle trains is the time. We all know that it
19 takes time, but you run into probably eight to
20 ten minutes a test by preparing your sample. And
21 then letting it come down, or come out.

22 I don't see a probably an issue on the

1 argument side if we can get those results to the
2 loader quick enough to know what to put in the
3 next car or the next car. So I would say, for us
4 to give that information in a timely manner, the
5 one tube method is still important. I cannot
6 argue, I guess agree, that the two tube method is
7 better and more consistent, it's just the time it
8 takes.

9 MR. NEAL: So this is just me just
10 talking again. What I hear, I hear an efficiency
11 concern. I also hear an accuracy, concern.
12 Trying to meet the expectation of the loader and
13 also trying to meet expectation of exporter who's
14 trying to meet the expectation of the customer.
15 And I think as we think this through, you've got
16 to factor all of those in along with the process
17 so that we get to a place of reasonability as
18 well. That's a lot of expectation.

19 MR. CAPPER: This is Lee again. And
20 if I just piggyback, you know, one of the things
21 as an analysis over the last several years
22 describing that method of performing it, the

1 specific tests as part of the certification, you
2 know, I think is something that potentially we do
3 need to consider. There are multiple factors.
4 What we have is some varying methods where if we
5 do it, and the sort of certificate just states
6 the actual result without disclosing either on
7 the log, inspection log itself, or on the
8 certificate, you know, what was the method.

9 MR. KERRIGAN: So if I'm hearing
10 you're right, Lee, that, you know, as kind of
11 balance is it's maybe not so much a change in the
12 process, but a sharing of the information to what
13 exactly was done, so that way everybody
14 understands potentially.

15 MR. CAPPER: Correct.

16 MR. KERRIGAN: With that residing
17 under AMA so if that was a case that the
18 unofficial certificate needed to show that
19 information would it be an unofficial, is there a
20 way to, you know, a way to govern now or is that
21 just a requirement that would have to be on the
22 buyer to request that or to require that?

1 MR. CAPPER: In the current system?

2 MR. KERRIGAN: Correct.

3 MR. CAPPER: Yes, whoever's involved
4 in that transaction would, if you mandated that
5 the test had to be run officially and you want it
6 on a, you know, an FGIS certificate and they have
7 to follow all the protocols which would right now
8 would be two tubes. For mesh pressure
9 correction, shake-o-matic, everything like that.

10 MR. KERRIGAN: Because the other of
11 that, that is the unofficial method, there's
12 really no way to govern them requiring to state
13 what they're doing if they're doing it on
14 unofficially; is that correct?

15 MR. CAPPER: Exactly, I mean, if you
16 can think of unofficial, it just be like, you
17 know, like, an NQI, an SGS, Russell Marine, it's
18 companies like that don't have to, aren't
19 authorized by us, don't follow our rules.
20 Basically an official agency, we allow them to
21 wear that hat under the AMA so that they can
22 issue something on their own letterhead, their

1 own company name, their own company certificate.
2 It can't be FGIS, but it would be kind of along
3 the same line as one of those other unofficial
4 companies. And it's just really within their own
5 rules or however they design that certificate, if
6 they even report a moisture basis if they, you
7 know, would do one tube or two or whatever
8 procedures they follow.

9 MR. KUHL: I have spoke with, this
10 Ryan Kuhl, and I have spoke with a number of
11 agencies around us, North Dakota, South Dakota.
12 And, yes, we all do the official method as well
13 as be allowed unofficial method. And I would say
14 probably compared to NQI which we don't know,
15 official agencies are basically doing the
16 personal metric with the shake-o-matic. We have
17 all the equipment, so we use the shake-o-matic
18 wheat grind, what is it, 250 grams. We're just
19 cutting back to the one tube to save time. Now,
20 like you mentioned, Tony, NQI, SGS what they're
21 doing, we don't know.

22 MR. GOODEMAN: Right.

1 MR. KUHL: So maybe, and is this even
2 something that we can discuss with it being on
3 AMA side, or is it something that would be easier
4 to get on the GSA side first and prepare it that
5 way?

6 MR. GOODEMAN: Yes, I mean, you right
7 in reality, the official agencies that currently
8 offer this test unofficially are using the same
9 people, same equipment, same machines. But they
10 don't have to. They don't have to be licensed.
11 You don't have to use, you know, the right
12 procedures. And I think that there's probably an
13 option, you know, in some way to further restrict
14 tests provided under the AMA like that. But
15 really, I think the most obvious and everything
16 else we do really just move under USGSA and
17 therefore falls in line with all the other
18 structure where you've got to be licensed.
19 You've got to use the proper equipment, the
20 equipment has to be checked. You've got to
21 follow procedures which includes everything we
22 talked about today. Is that what you getting at

1 there, Ryan?

2 MR. KUHL: Yes. Yes, I probably could
3 consider moving it to the GSA side.

4 MR. GOODEMAN: Yes.

5 MR. KUHL: And obviously if we didn't
6 walk that trail carefully, because I know that if
7 the one tube option is not going to be available
8 these loaders that can load these 110 cars in
9 eight to ten hours, they're going to be waiting a
10 long time to know what to put in the next car, or
11 the following car.

12 MR. GOODEMAN: Right.

13 MR. KUHL: Or not doing it at all, and
14 then it gets to the PMW or wherever it's going,
15 and going just were its hoping.

16 MR. GOODEMAN: Right. And I mean,
17 it's definitely we don't want to, we like to
18 bring more things into the official system.
19 Don't want to drive somebody away from using it.
20 That's the whole reason we have what we call
21 OCIS, Official Commercial Inspection Service
22 setup is to do these quick checks. You know,

1 ideally, I think it was designed to do like a
2 truck inspection really high volume, really fast.
3 And you can set up an OCIS agreement with a
4 customer and you can frankly, take shortcuts.
5 Its authorized shortcuts in different parts of
6 the procedure, like for corn damage.

7 There was a concern, this is probably
8 taking place for a long time. of customers
9 wanting to say, hey, you guys take way too long
10 to pick 250 grams for damage, you know, I can do
11 house grader or I can use some other company and
12 they'll only pick a little handful. And so you
13 can modify procedures, just do 225 grams for
14 example. Because on an OCIS cert, everybody
15 knows what that is. And so there are some
16 options there that I think we'd look at for some
17 types of domestic shipments to look at the one
18 tube if there was a lot of interest in that under
19 OCIS.

20 MR. KUHL: Did visit with Pat
21 McCluskey about this, I think it was last week
22 and he mentioned the OCIS agreement with me. And

1 I guess, the only, and that would be up for
2 probably a different discussion, but the only
3 thing that came about that is here and all North
4 Dakota, does all about the same methods is
5 sometimes before an elevator will get ready to
6 load a train, you know, they'll submit in, you
7 know, 100 falling numbers, 20 falling numbers.
8 They may also have a bigger producer that will
9 bring in very long falling numbers that are going
10 to that certain elevator. Well, how many OCIS
11 contracts would I need in one day for one train?

12 MR. GOODEMAN: The way that our
13 current OCIS setup is for the applicant. So that
14 does make it more complex perhaps. I do
15 recognize that, you know, if you're taking a lot
16 of submitted samples and yes, so we do require
17 the setup OCIS agreement with the applicant.
18 Applicant specific, because they've got to agree
19 to it, they've got to know that they're not
20 getting the full procedure, they're getting a
21 different procure.

22 MR. KERRIGAN: Hey, Ryan, I'm sorry,

1 Tony, can you finish please.

2 MR. GOODEMAN: Go ahead.

3 MR. KERRIGAN: Ryan, a question for
4 you, given that you do the kind official
5 methodology with the official equipment, but only
6 one tube, in your opinion, is there a significant
7 time difference between the rest of the
8 methodology with the barometric pressure
9 adjustment, with the shake-o-matic versus other
10 methodologies other than just the one tube versus
11 two tubes, in your opinion?

12 MR. KUHL: Not really. No, after we
13 started doing quite a few more official falling
14 number since the 2019, crop year, there's not
15 FGIS, as Easy Farm, and actually some of the
16 certificate programs will have that in as your
17 typing the certificate, it will do the
18 calculation for you. So no, there isn't much
19 time and that's when we all kind of discussed and
20 we all just said well, the shake-o-matic, I think
21 that runs for is it even ten seconds. So I guess
22 you could save ten seconds skipping that method

1 but it also does it for you. So no, there's not
2 other than you can get two samples done out of
3 one run rather than different --

4 MR. KERRIGAN: Okay. Anybody that
5 hasn't been called on that has some commentary
6 questions on this topic? There are a lot of
7 crickets out there. Definitely spent about five,
8 six years out in the PMW, and I'm fairly certain
9 that falling number was one of the first topics
10 in the PMW Regional and Washington State
11 Department of Agriculture meetings and it has not
12 disappointed that it's come up and every single
13 meeting ever since. So we're going to get
14 opportunity tomorrow to kind of, after we've
15 thought about this and probably discuss a little
16 bit more as far as what the Committee would like
17 to do if anything. So yes, just throw it out
18 back to the GIAC if there's any other information
19 that we want to try and glean here before we move
20 on for the day.

21 MR. CAPPER: This is Lee again. Just
22 one final comment. If we look to try and have

1 standards and enforce agreement with various
2 things, this is the only test that can go on a
3 USGSA certificate, that is not a USGSA based
4 test. And so it causes a lot of extra hoops to
5 jump through from validating. All their tests
6 are aligned under USGSA and, you know, are
7 validated that way. So it will bring some
8 efficiencies to some of our information
9 management if we pursue moving it under USGSA.

10 MR. KERRIGAN: And then as a follow-up
11 kind of summary, Tony, to to one of your original
12 points regarding, I apologize, I don't know your
13 exact words, but it was something to the effect
14 that you were looking from a policy standpoint at
15 this item. Is this something that you feel that
16 FGIS or, you know, whichever group I guess needs
17 to spearhead it, will be looking at, I guess, on
18 your own moving forward or where would you say
19 that you guys are at I guess with that, given
20 that you're looking at or considering it?

21 MR. GOODEMAN: I think the point of
22 our internal project now is to evaluate, you

1 know, what's going on in the market. What are
2 options are. If we did make a move, what that
3 would entail? Is this going to be your follow-
4 up? But if the Advisory Committee, if a
5 recommendation would be helpful and I definitely
6 think it would, if that's something that you-all
7 wanted to do, it certainly help us, you know,
8 knowing what kind of big other groups are, you
9 know, where they stand on something like this.

10 MR. KUHL: Thank you.

11 MR. SINNER: Matt, I got just one
12 question and just to help clarify. What is the,
13 on the destination side, what is the method most
14 commonly used for running falling numbers?

15 MR. KERRIGAN: We're all getting
16 official certs on the destination side. We're
17 not using -- or sorry, we may have some customers
18 that request an independent lab cer. But as far
19 as the loading goes, from the export standpoint,
20 we're using WSDA which is using the official,
21 cer. We do have some customers that are are
22 requesting a private double-checks. John, do you

1 know on the double-checks, I'm assuming that's
2 using the official method or do you know if
3 that's otherwise?

4 MR. LINDGREN: What has been told to me
5 is that it's the official message, but it's done
6 by unofficial. So you have to assume that they're
7 telling you the truth when they say that yes, we
8 use the shake-o-matic, yes, we use two tubes.

9 MR. SINNER: Okay. All right, thanks.

10 MR. KERRIGAN: Okay. I believe I'm
11 hearing no more commentary on this one. We're a
12 little bit past our break time here, a little bit
13 off. But we did get through, I believe, all the
14 the agenda industry issues. My recommendation
15 here was that we'd take a 17-minute break. That
16 would take us to 4:00 and then we can open up
17 into public comments, any other agenda items at
18 that point in time, if that's okay. So be back
19 in about 17 minutes. So that's 1:00 Pacific,
20 4:00 Eastern Time. Thank you.

21 (Whereupon, the above-entitled matter
22 went off the record at 3:43 p.m. and resumed at

1 4:01 p.m.)

2 MR. KERRIGAN: Welcome back everybody.
3 The next topic on our agenda is actually
4 regarding public comments. And I believe,
5 Kendra, you said that we have not received any
6 public comments; is that correct? Okay. Good
7 deal. So I guess the question to the group or
8 or, Arthur, is we are currently sitting about an
9 hour earlier than scheduled for the day. Do we
10 want to forge ahead, just kind of begin
11 discussions on the FDA MOU or would you like to
12 adjourn early and give that time back to
13 everybody?

14 MR. NEAL: Yes, because we have the
15 agenda published for that topic to be considered
16 for tomorrow, we have to wait until tomorrow.

17 MR. KERRIGAN: Okay. That's fine.
18 Does anybody have any questions or additional
19 comments on what we have discussed today up until
20 this point?

21 MR. FRIANT: Hey, Matt, this is Nick.
22 Just a question of order because this is a little

1 bit different process than the last time I served
2 on the Committee. So we brought three industry
3 issues for discussion today with a lot of good
4 discussion, you know, presentation, good
5 discussion of them. Like, from a process
6 perspective, what's the intent, are, you know,
7 the next steps for that? Are these topics that
8 we are aiming to have resolutions on or are they
9 just general discussion topics and we'll have
10 some time as an Advisory Committee to talk more
11 about it tomorrow or just help me a little bit
12 from a process perspective.

13 MR. KERRIGAN: Yes, so on the agenda
14 tomorrow, we've got about another roughly two
15 hours set aside tomorrow to come back to those
16 items that we discussed today. And, you know,
17 basically discussed them to see what our next
18 steps are. If there is a next step.

19 MR. FRIANT: Okay.

20 MR. KERRIGAN: And so that's kind of
21 the order of of how it's set aside to make sure
22 that there isn't any more information or that

1 everybody has a time to kind of chew on it a
2 little bit. That's why during some of the
3 topics, you know, I was trying to kind of lead
4 into what those next steps could look like
5 depending on where we land tomorrow.

6 MR. FRIANT: Okay. Thanks.

7 MS. COOPER: So a further question on
8 process, again, coming from our prior experience
9 we usually put together the recommendations while
10 we were in Kansas City as a result of the
11 discussion of the first day then we came up with,
12 you know, as you know, sometimes 20 or more
13 recommendations. So is that no longer allowed
14 even if we're there in-person. And so are we
15 just basically talking about three things?

16 MR. KERRIGAN: The three items that
17 were on the agenda are that were published in the
18 Federal Register that were recommended given that
19 we haven't received any other items previous to
20 the meeting to put on there, are the three items
21 that we are talking about for moving forward.

22 MS. COOPER: Wow. Okay. That is a

1 shorter discussion then, isn't it?

2 MR. KERRIGAN: A little bit, yes. You
3 know, my first meeting, and that was kind of one
4 of the big things, you know, with Arthur coming
5 on board is to really try and get it into a less
6 of an ad-hoc committee and more of a, you know,
7 very appointed, directed, good conversation, and
8 well-thought out versus just blasting the
9 Secretary with thoughts and comments, you know.
10 And to make sure that especially a lot of the
11 items that FGIS, you know, could answer without
12 recommendations and things of that nature, and
13 have an opportunity to respond to. Arthur, if I
14 misstated that, you're more than happy to chime
15 in.

16 MR. NEAL: No, I think you've done a
17 good job summarizing it. We're trying to bring
18 the Grain Inspection Advisory Committee in
19 alignment with most other committees USDA
20 facilitates. Looking at the past, it seemed like
21 it was more of a scattered approach is that folks
22 would come to the meeting, not necessarily having

1 a clear agenda, and figure out on the fly,
2 whereas most other committees to the meeting with
3 an agenda with structured dialogue to bring some
4 constructive recommendations that can be
5 considered and possibly implemented. And it also
6 gave the committee members an opportunity to be
7 prepared when they came. That's why we have
8 discussion around the topics in advance before we
9 move them.

10 MR. KERRIGAN: Okay. Any anything
11 else after that? Anymore discussion, like I say,
12 we still have an hour still slated? If there's
13 anything else on those topics or public comment
14 we need to talk about, otherwise, we will adjourn
15 for the day. A lot of blank stares and silence.
16 So we'll adjourn for the day and we will join
17 back here again at 11:00 a.m. Eastern Time, 8:00
18 a.m. for those of us on the west coast and we'll
19 be ready to get started again. So have a good
20 evening, everybody. Thank you.

21 (Whereupon, above-entitled matter went
22 off the record at 4:07 p.m.)

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C E R T I F I C A T E

This is to certify that the foregoing transcript

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Before: USDA

Date: 05-12-21

Place: teleconference

was duly recorded and accurately transcribed under my direction; further, that said transcript is a true and accurate record of the proceedings.

Neal R Gross

Court Reporter

NEAL R. GROSS

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