



United States Department of Agriculture

Agricultural
Marketing
Service

Federal Grain Inspection
Service

Field Management
Division

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TO: FGIS POLICY BULLETIN BOARD

FROM: Robert Lijewski, Acting Director
Field Management Division

SUBJECT: Transferring Sublots

ORIGINATING OFFICE: Policies, Procedures, and Market Analysis Branch

1. PURPOSE

This memorandum provides FGIS policy for transferring sublots from lot-to-lot on average quality shipments loaded under the CuSum loading plan.

2. BACKGROUND

The CuSum plan represents an online acceptance sampling plan providing continuous quality information with the goal of maintaining a consistent minimum quality throughout the lot. The applicant for inspection, based on the contract requirements, may specify factors and other criteria as minimum, maximum, or absolute limits (e.g., no subplot to exceed). Additionally, the applicant can specify average quality on some or all of the factors encompassing the grade determination.

Average grade applies to grade factors, moisture, and some official criteria factors. It does not apply to odor, condition, and aflatoxin test results exceeding the Food and Drug Administration's (FDA) action limit of 20 parts per billion (ppb).

Uniformity between sublots and within sublots (component results) is not applied and inspection plan tolerances (CuSum values) are not used when average quality is requested. All other parts of the Grain Inspection handbook, Book III, Chapter 1, apply to an average quality lot.

Material portions cannot occur on individual factors that are declared "average" in quality. However, material portions may still occur for odor, condition, sample grade criteria (e.g., stones), factors that have minimum/maximum or absolute limits, or aflatoxin that exceeds FDA action limits.

When average quality is specified for a particular factor(s) it is the responsibility of the shipper to maintain the overall quality of the lot. Self imposed limits (e.g, maximum 1.5% foreign material) that are not listed in the load order document do not qualify an individual subplot to be determined as a material portion because the self imposed limit was violated.

3. POLICY

Since material portions cannot occur on quality factors loaded under “average” criteria the shipper does not have an option of moving a subplot meeting “average” load order specifications to another lot with the same or different quality grain. Only sublots that are determined to be material portions (e.g., odor, sample grade factor(s)) may be transferred to another lot. This provision is only applicable when the load order for the destined lot allows the material portion factor found in the subplot analysis.

4. FILING INSTRUCTIONS

Retain a copy of this memo with the Grain Inspection Handbook, Book III, until the handbook is revised.

5. QUESTIONS

Direct any questions concerning this policy to [AMS - FGIS Policies Procedures Market Analysis Branch](#).