

August 2023 Recommendations

FGIS User Fees & Budget

The GIAC would like to thank FGIS for the in-depth report on the FGIS finances. Furthermore, the GIAC understands the gravity and urgency of the situation with respect to the depleted operating reserve and the shortfall of revenue versus obligations. It is imperative to maintain the integrity of the official system since industry along with domestic and international customers hold the US official system up as the gold standard. As such, the GIAC recommends that FGIS engage industry stakeholders to review the proposed adjustment resulting from the periodic fee review and continue to work with industry to identify short- and long-term solutions to address concerns over FGIS user fees and budget.

Key aspects to consider, but not limited to:

- Support streamlining of the budget process for FGIS
- Decoupling tonnage fees from the rest of the Schedule A Fees
- Evaluate the use of the AMS Standard Formula for calculating user fees
- Evaluate the current FGIS Operating Reserve target

GIAC recommends keeping the FGIS User Fees & Budget recommendation open for next GIAC meeting to discuss the gathered information.

Fumigation Policy Handbook – Attachment 5 Revision:

The GIAC recommends FGIS adopt the proposed revisions made by Dr. Walse with ARS to the Fumigation Policy Handbook Attachment 5. Prior to finalizing the changes FGIS should engage APHIS and grain handlers, to ensure there is agreement amongst stakeholders. The changes specifically to Table 3 within the Attachment will better facilitate the safe and effective fumigation of bulk vessels, which furthers the marketability of U.S. grains.

Current:

**Attachment 5: Fumigant Application
Methods and Mandatory Minimum Exposure Time**

The following mandatory procedures represented in Table 3 apply only when fumigation is required to do the following: (1) remove the special grade designation "infested" from the official inspection certificate when insect infestation is found during loading, or eliminate the "U.S. Sample Grade" designation, as applicable; or (2) when fumigation is required to satisfy phytosanitary inspection certification of the cargo; or (3) when official personnel are requested by contract to observe fumigation of a lot and certify that the fumigation was done according to official procedures.

TABLE 3

Application Method with Minimum Fumigant Dosage Rate and Exposure Time in Days by Cargo Hold Depth*				
Application Method and Minimum Dosage Rate Per 1,000 Cubic Feet of Storage Space	CARGO HOLD DEPTH IN METERS			
	< 6	6 – 12	>12 – 20	>20
FUMIGANT EXPOSURE TIME IN DAYS				
Surface Application 45 grams of metal phosphide per 1,000 cu. ft.	9	15	Not Acceptable	Not Acceptable
Subsurface / Trench-in Application 45 grams of metal phosphide per 1,000 cu. ft.	8	15	18	Not Acceptable
Recirculation Application Method A 33 grams of metal phosphide per 1,000 cu. ft.	4	7	9	9
Recirculation Application Method B 45 grams of aluminum phosphide pellets per 1,000 cu. ft. or 30 grams of magnesium phosphide per 1,000 cu. ft.	3.5	3.5	3.5	3.5

* Cargo Hold Depth is the length from the bottom of the hold to the top of the combing.
Note: It is recommended that fumigated holds remain closed during entire voyage even if the mandatory minimum exposure time is met or exceeded.

Fumigating Slack Holds and Slack Tanks of Vessels.

- When the grain or commodity is less than or equal to 12 meters in depth, the surface application may be used with the mandatory minimum dosage rate of 45 grams of metal phosphide per 1,000 cu. ft.
- When the grain or commodity is greater than 12 meters in depth, the application method (e.g., subsurface, recirculation) as specified in the chart above must be used.

Proposed:

**Attachment 5: Phosphine Application
Methods and Mandatory Minimum Exposure Time**

The following mandatory procedures represented in Table 3 apply only when fumigation is required to do the following: (1) remove the special grade designation "infested" from the official inspection certificate when insect infestation is found during loading, or eliminate the "U.S. Sample Grade" designation, as applicable; (2) when fumigation is required to satisfy phytosanitary inspection certification of the cargo; (3) when official personnel are requested by contract to observe fumigation of a lot and certify that the fumigation was done according to official procedures.

TABLE 3

Application Method with Phosphine Dosage and Minimum Exposure Time by Cargo Hold Depth*				
Application Method and Dosage Rate Per 1,000 Cubic Feet of Storage Space **	CARGO HOLD DEPTH IN METERS			
	< 6	6 – 12	12 – 20	>20
MINIMUM EXPOSURE TIME IN DAYS				
Surface or subsurface application 45 grams of phosphine per 1,000 cu. ft.	9	15	18	Not Acceptable
Surface or subsurface application with recirculation 33 grams of phosphine per 1,000 cu. ft.	4	7	9	9
Surface or subsurface application with recirculation ≥ 45 grams of phosphine per 1,000 cu. ft.	3.5	3.5	3.5	3.5

* Cargo Hold Depth is the length from the bottom of the hold to the top of the combing.
 ** Fumigant quantity is calculated by total volume of the empty cargo hold.

Note: It is recommended that fumigated holds remain closed during entire voyage even if the mandatory minimum exposure time is met or exceeded.

Note: When possible, recirculation methods are recommended.

Note: For dosage rates > 45 grams, dual fan recirculation is recommended.

Fumigating Slack Holds and Slack Tanks of Vessels.

Surface or subsurface applications may be used as specified in the chart above.

Data Standardization Initiative:

In concert with other Technology initiatives within FGIS, the GIAC recommends that the following subjects regarding standardization of data be further explored and findings reported to the Committee. The scope of data standardization in this recommendation includes communication protocols, data formats, units of measure, security protocols, and other criteria that facilitate the exchange of data between stakeholders.

- Evaluate and document the current status of previous data standardization initiatives that are unfinished, their anticipated benefit, and the required work to bring them to completion.
- Engage both internal and external stakeholders to aid in identifying potential data standardization projects and their perceived benefit.
- Develop a framework for prioritizing and managing data standardization projects to ensure progress is made on the appropriate projects and they are closed out in a timely manner.
- Assess/identify funding options available to facilitate the above recommendations.

GIAC recommends keeping the Data Standardization Initiative recommendation open for next GIAC meeting to discuss the gathered information to make an informed decision.

Inspection Lab Scale Requirements to e 0.01 grams

The GIAC recommends FGIS gather further information to help determine the proper path forward regarding the requirement of lab scale e-values at 0.01 grams. The following information is requested before the next GIAC meeting to aid in the committee's decisions surrounding a recommendation.

- Identify and report grains and grading factor/official criteria that could be statistically impacted using a laboratory scale for inspection purposes with a 0.1-gram e-value versus a 0.01-gram e-value.
 - For example, grading factors requiring calculations to the hundredth on a portion size less than 125 grams.
- Additional data surrounding how often that statistical impact of not requiring 0.01-gram e-value scales could have on factors that change grade determinations. It is thought FGIS could gather data through the Inspection Data Warehouse within FGISOnline for the above factors that are +/- 0.1 grams from a grade change.
- GIAC members will discuss the proposal details with industry sectors to determine financial impacts. These figures will be brought to the next meeting for discussion.

GIAC recommends keeping the inspection lab scale recommendation open for next GIAC meeting to discuss the gathered information to make an informed decision.

