

June 23, 2022

GIAC Recommendations

FGIS/FDA MOU

The GIAC recommends that FGIS engage with the FDA to update the existing MOU to incorporate additional preapproved reconditioning plans/procedures in line with the attached "draft" document as generated by the GIAC subcommittee.

Janice Moved, Curt Seconded

14 In Favor

0 Opposed



GIAC Alternates

The GIAC recommends that in the event new committee appointments are not finalized prior to the next meeting, the committee members whose terms have just ended, shall extend until such appointments are made to maintain the work of the committee.

or

The GIAC recommends that the reauthorization of the US Grain Standards Act include the appointment of at least 3 alternate members to be added to the GIAC. These alternate members will serve staggered 3 year terms and ensure that work of the committee will continue, without delay, should membership levels fall below the required quorum minimum for any reason, until the appointment process restores the minimum quorum levels.

Curt Moved, John Seconded

14 In Favor

0 Not in Favor



Shuttle Train Timing Data

The GIAC recognizes that shuttle rail service performance has been in decline with many industry and government groups reporting and inquiring on the issues. One area that has not been highlighted is how the poor performance is contributing to staffing issues with Federal, State and private grain inspectors.

Inspecting grain at shuttle loading facilities is a challenging and demanding endeavor. Shuttle trains consisting of 110 railcars or more can take anywhere from 10 to 20 hours to load and inspection crews typically work the entire train as one shift. Grain Inspectors who work shuttle trains have work schedules that vary on a daily basis, frequently involve nights, weekends and holiday and are extremely unpredictable due to the lack of dependable rail service and associated schedules. This unpredictability make it very difficult for Official Grain Inspection Agencies to attract and retain inspection staff. As a direct example, during the last 12 months, the turnover rate for all Missouri Grain Inspector positions has averaged 41%. Retention rates for newly hired Inspectors are even worse, with roughly 2 out of 3 leaving the profession. It is known from exit interview data that unpredictable work schedules are the biggest reason people choose to leave the job.

Most inspection agencies would likely agree that hiring and retaining grain inspection staff has never been more difficult than it is right now. The U.S. unemployment rate is near historic lows, job openings are exceeding the number of available workers and "remote working" is becoming increasingly popular, both in the public and private sectors. In other words, today's employees have lots of options and fewer of them are willing to sign on for the unpredictable work schedules of a Grain Inspector. Much of this unpredictability could be eliminated, if grain handling facilities had reliable access to dependable rail schedules.

Using Missouri as an example again, there are currently three primary railroad companies providing service to eleven high speed shuttle loading facilities. Those railroads are as follows: BNSF, Union Pacific and Kansas City Southern. None of these rail companies provide their grain handling customers with the ability to track their trains in real time. Their only notice of arrival are daily schedule updates provided by the railroad that indicate a date and time, which change at almost each subsequent update provided. Since the railroads have both incentives and penalties which dictate

how quickly after arrival a train needs to be loaded, grain companies are forced to make best guesses on when to request grain inspection personnel to arrive on site for prompt service. These start times change frequently, resulting in inspection staff being placed "on call" for long hours at a time before they actually report to work. These delays result in financial costs to the grain elevator as well as the inspection agencies, which is separate from the indirect issues surrounding hard working inspection workers and the costs to the personal lives of all employees involved.

This problem is not specific to Missouri based examples and is a challenge across the nation. Just recently, both USDA and the National Grain and Feed Association (NGFA) publicly expressed concern over "significant rail disruptions" that are negatively impacting grain companies across the country. The lack of accurate and dependable information is creating similar disruptions in the ability to hire and retain official grain inspection staff who provide critical services to the world's food, feed and fuel supply. For that reason, USDA/FGIS has a vested interest in taking a further public position on this matter by engaging with the Surface Transportation Board (STB) to require greater transparency within the railroad industry.

The GIAC requests the Secretary engage the STB on these ancillary impacts and consider implementing the following changes to the railroads required operation to alleviate the issues outlined caused by their poor service performance:

- Implement shuttle train tracking with real time data to provide to grain elevators and other customers, allowing them a more accurate snapshot for predicting train arrivals (thus proper personnel scheduling). This should be in a common and easily recognizable format across all railroad operators.
- Provide complete power, staffing and movement plans for all shuttle movements into a facility. This should include expected daily movement by milestone including crew/power limitations, maintenance windows and congestion delays. This should already be occurring by the railroads in how they arrive at an expected arrival date/time to provide to customers but is kept internal to the railroad so any divergence from the plan is not known by the customer until the railroad provides an update, typically daily. This should be in a common and easily recognizable format across all railroad operators.
- Implement penalties against the railroad to the customer for shuttle arrival times varying by 6 hours or more in the final 24 hours of estimated arrival. These

penalties would incentivize the railroads to accurately predict and perform while also providing compensation to the grain companies and inherently their support service staff (ex. grain inspectors) for additional on call hours and relief workers.

- Implement automatic adjustments to the spot times for shuttles arriving to customers with a variance of 6 hours or more against the final 24 hours of estimated arrival. This will allow for grain companies and their support service staff (ex. Grain inspectors) to be released from on-call status and compensated as they await for a train's arrival while allowing a necessary rest period until a known time (next day/morning), without penalty or loss of incentive to the grain company for the delayed loading/release of the train.

Bob Moved, Janice Seconded

14 In Favor

0 Not in Favor

A handwritten signature in blue ink, appearing to be "M. Jones", written in a cursive style.

Recommendation to address importing government registration requirements for entities involved in exporting.

Due to the increasing number of importing countries that require an exporter and/or exporting facility registration, the GIAC recommends that the USDA Undersecretary for Marketing and Regulatory Programs and the USDA Undersecretary for Trade and Foreign Agricultural Affairs lead a US Government task group to provide for a trade facilitative and least trade distortive US approach and coordinate internationally in response to such registration requirements. To contribute to the consideration for the US approach to meeting these requirements FGIS should develop options for the task group to consider. One option FGIS should develop is providing a unique exporter and/or facility identifying number.

Ryan Moved, Curt Second

14 In Favor

0 Opposed



Recommendation for research on soybean functionality related to color.

The GIAC recommends FGIS solicit, initiate, and support independent research to determine if functionality is impacted by seed coat discoloration associated with currently commercially available genetically engineered seeds. Research should include impact of such seed coat discoloration on soybean processing as well as on the protein, oil/fat, and other intrinsic values of soybeans or their processed products/byproducts.

David Moved, Nick Second

14 In Favor

0 Opposed

