



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: John Giler, Acting Director
Field Management Division

SUBJECT: Samples for Informational Purposes

ORIGINATING OFFICE: Policies and Procedures Branch

1. PURPOSE

This memorandum provides guidelines for interpreting export load order service requests for supplemental testing of an official criteria factor (e.g., DON, protein, etc.).

2. BACKGROUND

An FGIS export office has asked for assistance from Policies and Procedures Branch in interpreting a request for supplemental testing on an official criteria factor from official subplot samples taken from an export lot. The applicant deemed the request as factor analysis **“for informational purposes only”**.

Specifically, an applicant presented a written load order document requesting official testing services on an official criteria factor, but requested that the results of the official test not be documented on the official work record, the ship (CuSum) inspection log. Additionally, the applicant requested a separate official sample lot inspection certificate on the official criteria factor.

3. POLICY

When testing of an official criteria factor is specifically requested on an officially sampled lot, inspection personnel must perform the testing according to the established testing protocol (e.g., DON testing on a wheat shipment on an individual subplot basis) and document the test results on the official work record. In the case of an export shiplot, the results are documented on the CuSum loading log.

The FGIS inspection log is the official work record for recording sampling information, inspection results, and significant or unusual events occurring during the loading of a ship, and serves as the source document for preparing official certificates and other reports that are used to document the loading of the lot.

Certification of the official criteria factor is permitted on the certificate for grade or on a separate certificate.

If an applicant for service does not want the test results on the inspection log, then the applicant may withdraw the request for service and request a submitted sample service for the official criteria factor. Official personnel should refer such requests to FGIS's Compliance Division for contract documentation review.

4. SUBMITTED SAMPLE ANALYSIS

As an option to the applicant for service, official personnel can offer to perform testing service on the official criteria factor as a submitted sample inspection service on the basis of subplot or composite samples taken from the lot. In this case, official criteria test results are recorded on the work record (sample pan ticket). If requested by the applicant, a submitted sample certificate is issued with the sample identification, as specified by the applicant, for each sample. When providing submitted sample inspection service on official criteria factors official personnel should follow these guidelines:

- a. Test samples at the frequency (e.g., subplot, composite), as designated by the applicant for service.
- b. Use the most cost effective method available for service. (e.g., grouping of mycotoxin test, additional man-power etc.).
- c. Document all submitted sample information on the sample pan ticket.
- d. At the applicant's request, certify the official criteria results on an FGIS Submitted Sample Inspection Certificate using the identification designated by the applicant.

5. FILING INSTRUCTIONS

File a copy of this memo with the Grain Inspection Handbook, Book III, Chapter 1 Inspection Procedures. Field office managers must ensure that a copy of this memo is provided to official agencies that use the CuSum loading plan for the inspection of shiplots, unit trains, and lash barges.

6. QUESTIONS

Direct any questions concerning any unusual service request to
AMS - FGIS Policies Procedures Market Analysis Branch.