



United States Department of Agriculture

Agricultural
Marketing
Service

Federal Grain Inspection
Service

Field Management
Division

1400 Independence Ave.
SW, Stop 3630
Washington, D.C. 20250

Voice (202) 720-0228
Fax (202) 690-3951

Hotline 1-800-998-3447

Reference #287

December 13, 2021

TO: FGIS POLICY BULLETIN BOARD

FROM: Anthony Goodeman, Director
Field Management Division

SUBJECT: Certifying Cultivated Buckwheat Count in Wheat

ORIGINATING OFFICE: Policies, Procedures, and Market Analysis Branch

1. PURPOSE

Exporters of wheat bound for Japan have requested that AMS-FGIS provide a means for showing the number of cultivated buckwheat kernels in wheat sublots encountered during official inspection. Currently if cultivated buckwheat is found, it is a component of foreign material and is reported on a percentage basis to the tenth percent, upon request of the applicant. Exporters are requesting the analysis be made on a 1000-gram portion of wheat before the removal of dockage. Japanese buyers of U.S. wheat are interested in limiting the amount of buckwheat in their purchases, due do buckwheat being considered by Japan to be an allergen (it is not a phytosanitary issue).

2. POLICY

Buckwheat is an official factor in wheat, per 7 C.F.R. 810.2202 (h). Upon request of the applicant for service, official service providers (OSP) will examine a 1000-gram portion of wheat before the removal of dockage for the presence of whole kernels of cultivated buckwheat, with broken kernels disregarded.

Seeds of "wild buckwheat" are not included in this instruction. Certification of wild buckwheat content is not available.

FGISonline has been updated to include count as a Unit of Measurement for the factor buckwheat in wheat. Users of 3rd party software should inform their software provider of this requirement.

3. PROCEDURES

The applicant may request factor-only analysis for cultivated buckwheat kernel count on a submitted sample or may request the analysis on subplot samples during ship loading.

- (1) Submitted sample: Factor-only analysis is allowed for a submitted sample
 - (a) provided by the applicant
 - (b) obtained during ship loading from the sample collection box on the elevator side, or
 - (c) upon applicant's load order request of a 1,000-gram cut of the official sample, subsequently submitted back to the OSP for factor-only analysis of buckwheat kernel count.

The OSP will analyze the sample for kernels of whole cultivated buckwheat kernels. The OSP will issue a submitted sample certificate with a Certificate Remark stating: "x kernels of cultivated buckwheat per 1000 grams prior to removal of dockage".

- (2) Sublot sample basis: Applicant may request buckwheat kernel count on sublots during ship loading. A column for whole buckwheat kernels must be on the inspection log. The OSP will examine the 1000-gram work portion for whole buckwheat kernels and enter the result into the inspection log.
 - (a) No numeric limit stated on the load order. The certificate for grade will show the average number of cultivated buckwheat kernels to the nearest whole number. The factor result will use "count" as the Unit of Measurement. The certificate will include a Certificate Remark stating "x cultivated buckwheat kernels per 1000 grams before the removal of dockage on average".
 - (b) Numeric limit is stated on the load order. The certificate for grade will show the average number of cultivated buckwheat kernels to the nearest whole number. The factor result will use "count" as the Unit of Measurement. The certificate will include a Certificate Remark: "No individual subplot result exceeds [applicant's numeric limit] cultivated buckwheat kernels per 1000 grams". At the applicant's request, a Certificate Remark stating "x cultivated buckwheat kernels per 1000 grams before the removal of dockage on average" may be added.

4. FILING INSTRUCTIONS

Field office managers must ensure that a copy of this memorandum is available to official service providers operating within their circuit.

5. QUESTIONS

Direct any questions regarding this procedure to the local field office or to [AMS - FGIS Policies Procedures and Market Analysis Branch.](#)