



February 19, 2021

Dear Colleague,

The Japan Feed Trade Association and the North American Export Grain Association are working jointly to address challenges and opportunities to advance our common interest to provide for reliable, predictable, competitive, and uninterrupted exports of grain from the United States. The circumstances we are experiencing related the global COVID 19 Pandemic have brought us together to discuss and encourage contingency plans to achieve continuity of U.S. grain exports in the case the U.S. export supply chain is adversely impacted in these unique times.

We would like to relay measures we support in the event U.S. Department of Agriculture (USDA) Official Weighing and Grading services are restricted or prevented.

It is our desire to maintain service and try to avoid a national, regional, state or port specific blanket declaration of a waiver in accordance with USDA Federal Grain Inspection Service (FGIS) authority as would be implemented under Directive 9020.1. To do so we encourage FGIS to have plans in place and to inform as soon as possible buyers and sellers of those plans and how they might be implemented in order to maintain the availability of FGIS official services 24 hours per day every day.

We recognize, support, and appreciate the current effective actions FGIS has taken to provide continuity of services.

We also call for additional measures be defined and notified that may be needed to reduce demands on the FGIS system. Additional contingency measures needed to be in place so they may be deployed in a timely and well notified manner include:

1. Suspending non-mandatory services offerings from FGIS if they are already available from internationally recognized inspection companies that are not mandated by U.S law. Mandated FGIS inspections are for vessel hold, USDA official grades and weights (which includes monitoring vessel loading), phytosanitary inspection and Aflatoxin. The optional / not mandated services that FGIS would eliminate include protein, oil and assessments for mycotoxins like Zearalenone, Vomitoxin and DON. To make this possible we expect to work with FGIS, importers and exporters to clearly define which services might be suspended.
2. Making available internationally accredited and recognized inspection company personnel under the direction control of FGIS to:
 - a. Firstly, to assist FGIS in inspections (including phyto-sanitary) and weighing throughout the FGIS service territories except at export.
 - b. Secondly, to assist in FGIS in inspections and weighing (including phyto-sanitary) at export locations.

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personnel from companies like Russel Marine and SGS stand ready to contract with FGIS. FGIS should develop and implement necessary protocols and agreements to provide for deployment of this standby capacity when needed. A list of qualified companies or personnel who might be deployed in this regard should immediately be notified to users of FGIS services.

3. Issuing additional guidance to for time or location limited waiver of mandatory services. The current waiver application needs to be amended to provide for applications submitted jointly by buyers and sellers for specific contracts or groups of contracts in advance of vessel presentation and acceptance at load ports.

Finally, we also believe contingency plans must be put in place and notified to provide for the possibility that a national, regional, state or port specific blanket declaration of a waiver in accordance with Directive 9020.1 be deployed. We note that if FGIS declares the waiver in accordance with Directive 9020.1 buyers and sellers will need to turn to qualified private third parties to provide for services to provide for reliable, predictable, competitive and uninterrupted exports of grain from the United States. FGIS should develop and implement necessary protocols and agreements, including the provision of reports to FGIS, with accredited companies that sellers might contract to secure capacity. A list of these FGIS qualified companies needs to be in place and made available immediately.

Your advice and comment in this regard is most welcome. We look forward to any opportunity to discuss these and other opportunities to advance the provision of reliable, predictable, competitive, and uninterrupted exports of grain from the United States. Please do not hesitate to contact us at your convenience.

Signed By



Gary C. Martin
President and CEO, NAEGA



Toshikazu Mitoma
Executive Director, Japan Feed Trade Association

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