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To: U.S. Cotton Gins

From: Gary Adams, NCC President & CEO

Attention Required - Mismatched PBI Tags and AMS Sample Coupons

While there were significant improvements made during the 2021 crop, instances of mismatched PBI tags and sample coupons continue, despite extensive communications efforts conducted during the ginning season by the USDA Agricultural Marketing Service (AMS) Cotton and Tobacco Program, the National Cotton Council and others.

Mismatching incidents often involve PBI tags from one roll and sample coupons from a separate roll where all numbering series digits were not matched when one or both rolls were changed. Additionally, there have been instances where gins start the season with a PBI number that was used in the previous year, leading to duplicate number errors. In each of these cases, AMS has confirmed that the tag mismatches and duplications involved gins with automatic baggers. Even when gins rely on traditional PBI tags that have the AMS sample coupon attached to the bottom of the tag, mismatches may occur if proper sample handling/bale tagging procedures are not followed.

All gins are urged to remind their licensed samplers that they are responsible for the actions of the employees under their supervision. To protect their sampling license, it is imperative that all digits on the PBI tag are matched against the digits on the sample coupon. From the beginning of the season, the tags and coupons must match every time a bale is tagged and the AMS coupon for that bale's USDA sample is handled. When mismatches are discovered, no additional bales should be tagged or samples pulled until all mismatched bales and samples are identified. Before the ginning process is restarted, it is the licensed sampler's duty to ensure that procedures are in place to prevent future mismatches. In addition, if bales with mismatched samples have been sent to a warehouse, the gin must notify the warehouse and AMS of the incident and provide the PBI tag range to both entities.

Correcting AMS records associated with mismatches is time consuming and expensive. AMS is considering charging gins a fee for correcting mismatched bale classing records. If the record cannot be corrected, it may be necessary to draw a new sample from the bale which will result in additional costs and time delays. If these actions do not effectively address the situation, AMS may revoke a sampler's license, thus prohibiting that gin from drawing samples.

This is a serious issue and your attention to this matter is appreciated. If you have questions or need additional information on proper sampling/tagging procedures, contact your local AMS classing office representative.