
Joint Cotton Industry Bale Packaging Committee

October 24, 2022

To: U.S. Cotton Gins

From: Chris Berry, Chairman

Attention Required – PBI Management, Sampling and Packaging Performance

New educational material has been developed to reflect the best management practices of PBI tag placement and usage, as well as best sampling methods to prevent instances of mismatched tags.

The attached PBI Management document outlines the proper placement of PBI and safety tags on bales. These tags should be placed on the front and back of the rounded side of the bale between the first and third bale strap below the head closures. PBI tags should never be placed on the heads, feet or flat sides of the bale. Additionally, placing PBI or other tags under bale bagging and against the cotton in a bale is not acceptable, even when clear bagging is used. These practices can cause the tag to become lost or hinder the warehouse's ability to scan the barcodes.

Securing PBI or other tags to bale bags using fine wire or metal fasteners is strongly discouraged. These small wires, if not removed completely, can cause serious damage to mill equipment, pose a fire hazard, and contaminate the cotton. The JCIBPC's "[A Guide for Cotton Bale Standards](#)" is available to reference the differences between grade A, grade B, and unacceptable bales.

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, as seen in the attached letter.

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 when 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.

A Cotton Sampling Procedures poster was developed jointly by the USDA and NCC and was distributed to all U.S. gins earlier in the summer. This poster outlines the minimum standard for cotton sampling procedures. Gins wanting to use paper sleeves may do so if the submitted

sample meets the other requirements as outlined on the poster. A copy of this poster is attached for your reference.

A new online form is now available to report packaging material performance or incidents where packaging materials failed to meet gin, warehouse or mill expectations. This tool will electronically log any issues submitted and send this report directly to the NCC for review. It should take less than five minutes to complete the report and is available to all gins and warehouses. Please use the following link to open the [Bale Tie and Bag Incident Reporting Form](#).

Continued communication between gins and warehouses is extremely important in mitigating many of the issues outlined above. In addition, relating to fire safety, it is important to let your warehouse know if you have a fire or hot bale. That bale or group of bales should be set aside to ensure that they no longer pose a potential hazard. The warehouse should then be notified that these bales had been suspect and monitored.

If you have questions or need additional information, please contact Lauren Krogman from the National Cotton Council at lkrogman@cotton.org or 901-274-9030.

Attachments:

PBI Management Flyer

2022 Mismatch PBI Letter

Cotton Sampling Procedures Poster



P.O. Box 2995 • Cordova, TN 38088-2955
(901) 274-9030 • FAX (901) 725-0510
www.cotton.org

PRODUCERS • GINNERS • WAREHOUSEMEN • MERCHANTS • COTTONSEED • COOPERATIVES • MANUFACTURERS

May 18, 2022

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.

MANAGING PBI TAG PLACEMENT AND AMS SAMPLE COUPONS

PBI Tag Placement

PBI Tags are to be placed on the top of the rounded (crown) side of the bale between the first and third bale strap below the head closure. Only one PBI tag per bale is allowed. PBI tags should always be secured to bales with an adhesive backed tag, cotton cord, or nylon zip tie.

Safety Tag Placement

Properly placing PBI tags and safety tags is critically important. A numerically matching safety tag should be placed opposite the PBI tag on the back of the bale. Most warehouses encourage gins to include one or more safety tags on each bale. The above graphic demonstrates the position where most warehouses prefer placement of safety tags. Safety tags facilitate bale identification because storage and handling methods do not ensure that the same rounded sides of all bales are always displayed. However, if there is an identity question, the PBI tag takes precedence.



Unacceptable Practices

Do not place PBI tags on heads, feet or flat sides of bales (A). Additionally, placing PBI or other tags under bale bagging and against the cotton in a bale is not acceptable (B). Even when clear bagging is used (C), it is difficult to scan barcodes, particularly when warehouse crew members are attempting to maintain a safe working distance from stacked bales. In addition, some mills consider tags placed under bagging as a contaminant.

In 1994, the Joint Cotton Bale Packaging Committee “Eliminated use of hog rings, metal staples or other metal for securing or closing bale heads.” Securing PBI or other tags to bale bags or ties using fine wire or metal fasteners is an objectionable practice (A).

The JCIBPC’s “[A Guide for Cotton Bale Standards](#)” indicates that wrinkled and mutilated PBI tags on a bale result in “Grade B” bales (D). If the PBI tag cannot be scanned, a bale may be rejected at a mill.

Matching PBI and safety tags should be on opposite sides of bales, not next to each other.

Avoid Mismatched PBI Tag and AMS Coupon

All gins are encouraged to invest and utilize technologies and tag handling practices that catch mismatches before the bale and AMS sample leave the bagging area. When scanners and other practices are utilized, and all numbers are matched — mismatches at gins, warehouses and classing offices go away!



USDA Cotton Sampling Procedures

Step 1

USDA cotton samples must be 12”L x 6”W.



Step 2

The sample coupon should be placed between the two halves of the sample, wrapped or rolled up to ensure that they do not lose their identity.



Step 3

Compare the sample coupon with the bale tag to be sure the numbers match.



Step 4

Roll the sample and put into the USDA sack.



Step 5

Close the cotton sample sack.



Presented by the USDA-AMS and the National Cotton Council

