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Date: August 27, 2010
To: Cotton GINNERS
From: Curtis Stewart, Chairman
Joint Cotton Industry Bale Packaging Committee
Subject: Approved Bale Packaging

Even though the 2010 ginning season has started for some of us, I want to take this opportunity to remind my fellow gINNERS of the importance of using bale packaging materials approved by the Joint Cotton Industry Bale Packaging Committee (JCIBPC) and USDA's Commodity Credit Corporation (CCC). The [Specifications for Cotton Bale Packaging Materials](#) are published by the National Cotton Council on its website and can be downloaded from that site. The USDA form CCC-809, "[Cooperating Ginner's Bagging and Bale Ties Certification and Agreement](#)," is a contract between gINNERS and CCC to use only materials that comply with the specifications published by the JCIBPC. Form CCC-809 can be downloaded from the eForms page of the USDA website. With the USDA CCC agreement in mind, gINNERS are encouraged to purchase packaging materials from reputable sources and to make sure their bale packaging systems function properly before their first bale is ginned.

We gINNERS should remember that **bales wrapped and tied with materials other than those meeting the JCIBPC specifications can cause producers to be ineligible for CCC market assistance loans and other farm program benefits.** Because of the loan eligibility requirement, you need to know that an amendment to the specifications added an ultraviolet ray (UV) inhibitor (light stabilizers) requirement for polyethylene (PE) film bags in 2010. That amendment requires all polyolefin (plastic) bale bag manufacturers to include UV inhibitor additives in their bags. When the change was made, the JCIBPC wanted to make it clear that outside storage was not the intent of the change and the committee made the following statement:

“With no endorsement of outside storage, the JCIBPC recommends that all polyolefin (polyethylene (PE) film and polypropylene (PP) fabric) bale bags contain the same ultraviolet (UV) ray inhibitors (stabilizers).”

The new UV inhibitor requirement applies only to bags that were manufactured after the specifications were approved by USDA and published by the NCC in June. You may use PE film bags carried over from 2009 in 2010 even if the bags do not contain UV stabilizers.

One way to make sure bale packaging materials conform to the committee's specifications is to ask for proof that the requirements have been met. That proof can be provided in the form of a certificate of analysis stating that the packaging material complies with the published specifications for that material. While a list of active bale packaging distributors is not published, the “JCIBPC Lists of Approved Manufacturers” can be viewed on the right hand side of the [NCC Bale Packaging](#) page by going to the Technical section on the NCC's homepage.

Some ginners may have the opportunity to use materials in JCIBPC experimental test programs this year. Because these materials may not meet current JCIBPC specifications, USDA CCC will grant a variance for the materials included in those approved test programs. If a firm states that a packaging material is in a JCIBPC experimental test program, the claim can be verified by reviewing the “Participating Gin Warehouse Form” link on the the NCC Bale Packaging page. Go to the link for “2010 Participating Gin Warehouse Forms” for either bagging or bale ties at the bottom of the page.

Gins or firms with materials in test programs may use these links to complete and submit online “Participating Gin Warehouse Forms” prior to placing the materials at gins. Firms also may email the information needed to complete the forms directly to NCC staff. Firms with test programs may ask ginners for email addresses, tag lists for the bales wrapped or tied with experimental materials, and information about where the bales will be warehoused. This information is needed to complete the forms.

Please direct your bale packaging and experimental test program questions to Dale Thompson at the National Cotton Council. His phone number is 901.274.9030 and email is dthompson@cotton.org.