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Date: June 11, 2025  
To: Cotton Ginner's

From: Chris Berry, Chairman  
Joint Cotton Industry Bale Packaging Committee

Subject: Reminder – USDA Commodity Credit Corporation Form CCC-809, Cooperating Ginner's Bagging and Bale Ties Certification and Agreement, PBI Tag Requirements, and Bale Weights

As the season begins, I am reminding my fellow ginner's that several years ago USDA changed renewal rules for form CCC-809, the "Cooperating Ginner's Bagging and Bale Ties Certification and Agreement". Annual renewals are no longer required. Instead, once a form CCC-809 is signed and returned to the Commodity Credit Corporation (CCC), it remains in force until terminated in writing by the ginner or CCC. The form is available at <http://forms.sc.egov.usda.gov/efcommon/eFileServices/eForms/CCC809.PDF>. Current, executed CCC-809 forms should be on file at Farm Service Agency (FSA) county offices, if there are any questions about the status of a gin's certification.

Form CCC-809 states that "...CCC and the cotton industry desire that ginner's assist producers in maintaining the eligibility of their cotton for CCC loans by using bagging and bale ties that meet the Specifications for Cotton Bale Packaging Materials ("the specifications") approved and published by the Joint Cotton Industry Bale Packaging Committee ("JCIBPC"), and incorporated by reference in the Cotton Loan Program Regulations (7 CFR Part 1427) issued by CCC." In a separate paragraph, the form states that "...the ginner may purchase and use on cotton at such gins (a) non-specification bagging and/or ties properly identified with the testing program of the Experimental Bale Packaging Program sponsored by the JCIBPC ..." to protect their producers CCC loan eligibility.

Specifications for Cotton Bale Packaging Materials are published electronically by the National Cotton Council (NCC) on the organization's Bale Packaging webpage and can be viewed at <http://www.cotton.org/tech/bale/specs/index.cfm>. The "JCIBPC Lists of Approved Manufacturers" referenced in the CCC-809 can be located on the right hand side of the NCC Bale Packaging page's navigation pane at <http://www.cotton.org/tech/bale/index.cfm>.

Gins are encouraged to work with their strapping and bagging manufacturers to make sure that there is scheduled servicing and preventative maintenance plans in place before the season begins. Keeping communication open with packaging companies on any issues that arise will help to prevent contamination with our bale packaging products.

The JCIBPC mission to "Preserve the quality of U.S. cotton fiber for mill consumption through the development of standards for cotton bales, including safe and environmentally friendly materials, methods and systems for packaging, handling and tagging" relies on ginner participation in test programs and evaluation of the tested material's performance. To determine if a packaging material is in a JCIBPC sanctioned test program, check out the "Test Program Review" section of the current specifications at <http://www.cotton.org/tech/bale/specs/test-program-review.cfm>.

I would also remind our ginner's about the removal of paper PBI hang tags from the Bale Packaging Specifications going into the 2025 season. All tags will need to be adhered to the bales, and it is highly recommended that a safety tag with a matching PBI number be placed on the opposite side of the bale from the PBI.

Please remember that producing a marketable cotton bale involves more than pressing, tying, and bagging cotton lint. Bales of uniform size and weight are essential of the U.S. cotton industry is going to successfully compete in the global arena. To reduce the incidences of lightweight and heavyweight bales, the gins should strive to produce 500lb bales. The Bale Weight Management flyer can be found at <https://www.cotton.org/tech/bale/upload/Bale-Weight-Mgt-2010.pdf>.

Please direct your bale packaging and experimental test program questions to Lauren Krogman at the NCC at 901.274.9030 or [lkrogman@cotton.org](mailto:lkrogman@cotton.org).