



United States Department of Agriculture

Grain Inspection,  
Packers and Stockyards  
Administration

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Service

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Division

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July 8, 2016

TO: FGIS POLICY BULLETIN BOARD

FROM: Anthony Goodeman, Deputy Director  
Field Management Division

SUBJECT: Fungicidal Additives Applied to Grain

ORIGINATING OFFICE: Policies, Procedures, and Market Analysis Branch

**1. PURPOSE**

This memorandum establishes instructions addressing situations when fungicidal additives are applied to grain.

**2. BACKGROUND**

A private company approached the Federal Grain Inspection Service (FGIS) requesting approval for the application of fungi control additives containing propionic acid to export grain cargoes. The regulations under the United States Grain Standards Act (USGSA) allow the use of additives for fungi control during loading in Sections 800.61, 800.88, and 800.96. The application of EPA and FDA compliant fungicidal additives to grain after the grain has been officially weighed and inspected is not prohibited under the USGSA.

However, fungicidal additives may contain propionic (or other) organic acids and are known to impart a vinegar-like odor to grain. When detected during official inspection, such an odor requires the inspector to make a determination of Commercially Objectionable Foreign Odor (COFO). This policy is established to alleviate uncertainty on what action to take when a fungi control additive is applied or when the odor is detected.

**3. POLICY**

- a. If a vinegar-like odor is detected during an official inspection, official personnel must:

- (1) Immediately notify the applicant of odor
- (2) Allow the sample to aerate in an open container for up to 4 hours to see if suspected COFO will dissipate
- (3) If COFO is still detected, certify accordingly

**NOTE: According for Directive 9060.2, Implementation of the FGIS-FDA Memorandum of Understanding, lots of grain, rice, and pulses having COFO odor are considered actionable. Report to FDA as instructed.**

- b. If a fungicidal additive is applied after inspection per buyer and seller contractual agreement, official personnel must provide a statement in the remarks section of the certificate:

“Applicant states fungicidal additive was applied to grain after sampling for the purpose of fungi control”.

#### **4. FILING INSTRUCTIONS**

File a copy of this memo with the Grain Inspection Handbook Book II, until the handbook is revised to include this change. Field Office Managers must ensure that a copy of this memorandum is provided to official agencies operating within their circuit.

#### **5. QUESTIONS**

Direct any questions regarding this procedure to Robert Dorman, Policies, Procedures, and Market Analysis Branch, at (816) 659-8411, or email at [Robert.J.Dorman@usda.gov](mailto:Robert.J.Dorman@usda.gov).