

Written Testimony on
A Review of the U.S. Grain Standards Act

Before the
Subcommittee on General Farm Commodities, Risk Management, and Credit of the
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Chairman Scott, Ranking Member Davids, and members of the Subcommittee, thank you for the opportunity to testify today. I am Dr. Kevin Donnelly, Emeritus Professor of Agronomy at Kansas State University. My experiences related to the U.S. Grain Standards Act (USGSA) are through my university teaching career, so I offer a bit different perspective than the other witnesses, since I am not directly involved with grain handling, merchandizing or processing. I am most familiar with application of the Official US Standards for Grain and the FGIS inspection process, as that is the focus of what I have taught in my grain grading course, the crops team contests that I have trained students for, and the workshops that I direct for the International Grains Program at Kansas State. I also own a farm in central Kansas, so I also know how important reliable and consistent grain quality standards are for our producers.

I have long been interested in grain quality, probably stemming from my 4-H and FFA days when my projects involved crop production, and I started exhibiting grain samples at the county fair. As a college professor, I have integrated crop quality topics into several of my courses. We offer three unique degree programs in Grain Science at Kansas State (Milling Science and Management, Feed and Pet Food Science, and Bakery Science and Management). These programs produce graduates that typically enter industries with a vested interest in quality characteristics as end users of grain and oilseeds. Agronomy students who enter farming or consulting jobs need to understand how environmental and management practices impact the quality of grains produced and delivered to market, which may impact the grade and price received. Although most of our students do not take specific courses on the subject, nor become grain inspectors, we strive to incorporate at least some knowledge of the federal grain standards into our curricula at Kansas State, especially in these majors.

The United States Grain Standards Act originally passed in 1916, and as amended since, authorizes the Federal Grain Inspection Service to establish uniform standards for grain and oilseed quality, regulate grain handling practices, and manage a network of Federal, State, and private laboratories that provide impartial official inspection and

weighing services. For over a century, the USGCA has provided the foundation for quality assessment of grains and oilseeds.

In 1976, to address some issues with export inspections, FGIS was established, and increased the role and oversight provided by federal inspectors. Today, the system is often called the “gold standard” for grain quality assessment that assures uniform and consistent standards are applied for the benefit of producers, handlers, merchandisers, processors, exporters, importers, and end-users of grain. It also determines the manner in which grain is segregated, stored, handled and transported along the supply chain.

As I have interacted with foreign visitors from across the globe enrolled in short courses with our International Grains Program at Kansas State, I have found them eager to understand how our integrated system of impartial, third-party inspection functions. A visit to the National Grain Center in Kansas City is generally included in these courses to showcase FGIS quality assurance and science and technology activities and give them more confidence in the integrity of the system. The USGSA is critically important to maintain the integrity of our export markets, especially with ongoing international trade negotiations.

The USGSA requires that all exported grains and oilseeds be officially weighed and inspected. Domestically marketed grain and oilseeds are often officially inspected, but are not required to be. Export inspections must be completed only by FGIS inspectors or FGIS supervised state inspection agencies, called delegated official inspection agencies. Domestic official inspections are predominately done by FGIS supervised state agencies or private companies, called designated official inspection agencies.

FGIS standards describe physical characteristics (such as test weight, damaged kernels, foreign material, broken kernels, defects, etc.), market class, special grades and dockage as appropriate. Grade-determining factors and factor limits differ for each crop, and reflect levels of soundness and purity consistent with typical end-use of the crop. Under the USGSA, FGIS establishes and maintains official standards for barley, canola, corn, flaxseed, oats, rye, sorghum, soybeans, sunflower seed, triticale, wheat, and mixed grain. This system provides a basis for contract marketing by allowing sellers and buyers a reliable and consistent measure of quality to value commodities, and the FGIS official inspection certificate provides validation of the actual quality and weight of the grain loaded for domestic delivery or export.

Although not required for the official grade, FGIS also provides many other quality assessments upon request, including sanitary factors such as mycotoxins or chemical residues and composition factors such as oil, protein or starch that impact nutritional value and end use functionality. These factors are often very critical in domestic or international marketing. In addition, numerous other agricultural and food commodities not covered by the USGSA are assigned to FGIS for standardization, classing, inspection, grading, sampling, or testing.

Official inspection and weighing services are provided based on user fees. Per recent amendments to the USGSA, federally collected fees can only be used for activities directly related to the performance of inspection and weighing services. Costs for activities such as developing grain standards and or new procedures for measuring quality must use federal appropriations.

Most of the USGSA is permanently authorized, including mandatory inspection and weighing of exported grain, as well as authority to amend the grain standards. However, several provisions expire in September of 2025, including a number that were added during the past two reauthorizations in 2015 and 2020. Those include the authority for USDA to collect fees to fund official inspections, a cap on administrative and supervisory costs, and continued authorization of the Grain Inspection Advisory Committee. It is critical that we maintain the ability of FGIS to continue performing its functions and not allow a lapse in authorization that could disrupt the grain inspection and weighing program, and grain exports so critical to our trade balance.

Your witnesses representing organizations more directly involved with the industry and inspection operations have provided recommendations to consider as you develop legislation for reauthorization, for which I encourage your careful consideration. One area that I might emphasize involves advancing the use of technology driven solutions in for the grain inspection process to reduce costs and improve efficiency. The Grain Inspection Advisory Committee has been discussing this topic also. Examples include use of imaging technology and equipment that is more automated or combines separate measurements into one apparatus (ie. moisture and test weight).

Official personnel pass rigorous tests and undergo extensive and continuous training to ensure inspection accuracy. I know from personal experience in training my K-State Crops Team students for competitions using FGIS standards that it is very challenging, and tedious. System-wide quality control requirements ensure that official personnel consistently provide high-quality, accurate services and information. Although visual inspection has served the system very well for many years, we should think ahead. I would encourage continued evaluation of advancements in imaging technology, which may provide potential for equal or even more consistent inspection results, and could also be a key to meeting limited workforce challenges in the future. Incorporation of more advanced technology would likely make careers in the grain inspection profession more attractive to young people.

I strongly encourage you to move forward promptly with reauthorization of the US Grain Standards Act to avoid a lapse. The 2020 bill included a number of improvements, and we hope that the next reauthorization bill will consider additional provisions that further enhance the Act.

Thank you for the opportunity to testify.