Call for Industry Submissions on Pulse Standards 2020/21 Season

1. Background

This paper outlines a number of issues being considered by the Pulse Standards Committee (Committee) during the development of the 2020/21 pulse Standards.

The Committee seeks comment from industry on the topics as outlined in this paper and on any other issue relating to pulse Standards for potential adoption in 2020/21 or future seasons. All relevant comments from industry will be considered by the Committee and used to develop the pulse Standards for 2020/21, due for release as of 1 August 2020.

2. Timeline & Method of Submitting Comments

Please lodge your submissions by sending to Nick Goddard, Chief Executive Officer Pulse Australia, at nick@pulseaus.com.au and title your email – Pulse Standards Review 2020/21. Submissions are due by COB Thursday 9 April 2020.

For reference, the current 2019/20 pulse Standards can be downloaded from the Pulse Australia website at http://www.pulseaus.com.au/marketing/receival-trading-standards.

3. Agreed Changes for Adoption in the 2020/21 Season

The Committee intends to implement the following changes in the 2020/21 Standards.

3.1 Agreed Change: Updated Government & Industry Links – All pulse commodities

The current links in the Standards to various Australia Government and industry websites for use by industry in reference to a range of issues such as maximum residue limits for chemicals and market quarantine requirements will be updated.

3.2 Agreed Change: Visual Recognition Standards Guide – All pulse commodities in VRSG

- Existing sections for pulses (desi chickpeas, kabuli chickpeas, Angustifolius lupins, faba beans, field peas and red lentils) in the existing Visual Recognition Standards Guide (VRSG) located on the GTA website at http://www.graintrade.org.au/fact-sheets-publications will be reviewed and altered where required to improve clarity. This will include changes such as:
    - Revision of photos and adding new photos deemed necessary for clarity.
    - Revision to definitions for clarity.

Other changes are outlined below. Once developed, a revised draft version of the 2020/21 VRSG incorporating those changes will be made available to industry for review upon request.

Commodity	Standards Issue	Agreed Outcome
Faba Beans	Insect Damaged p26 and Fungal Affected p25	Changes to photos in the VRSG were made last year, specifically the removal of the photo depicting a kernel with a hole as a result of Fungal Affected. Given the Committee were advised of ongoing issues in interpretation of that grain versus insect damaged, it was agreed to re-add the prior photo and alter the wording in the definition to aid interpretation.
Faba Beans	Frost Damaged, Stained p28	Confusion on level of frost/staining only on seed coat before it is called PC, as PC doesn't address that. Add a note under all the photos to clarify that are images are defective. Clarify also that this defect is included in Poor Colour. Need to state this defect is included in PC.
Faba Beans	PSBMV p30	Clarify that this defect is included in Poor Colour.
Mung beans	n/a	The Australian Mungbean Association are currently revising visual guides for mungbeans to assist interpretation. It is not expected the revised photos for inclusion in the VRSG will be available for 2020/21.
Red Lentils	Contrasting Colours p36	Seek an update on the varieties depicted on the Contrasting Colours chart.
Red Lentils	Fungal Affected p37	Clarify that this defect is included in Poor Colour.

3.3 Agreed Change: Varietal Lists – All Commodities

As initially implemented in 2019, on an annual basis, the Committee will review the list of varieties by commodity on the Pulse Australia website to ensure it is up to date. A process has been developed to ensure all new pulse varieties by commodity are listed. This process will ensure that the previously introduced statement in all Standards of "Approved Varieties - Approved varieties as listed in these Standards or on the Pulse Australia website" does not cause any commercial trading issues.

In addition, the reference to Contrasting Colour and the visual guide for specific red lentil varieties in the VRSG will be updated if required based on the release of new varieties depicting this quality parameter.

3.4 Agreed Change: Defective Grain Sub-Categories & Tolerances – Faba Beans, Green Lentils, Red Lentils

The existing No.1 Farmer Dressed Receival Standards for the above commodities list a tolerance for the Total Defective category, including separate tolerances for various sub-categories such as "Poor Colour" and "All Other Defects".

In contrast, the No.1 Farmer Dressed Export standards for each of these commodities do not specify an "All Other Defects" limit. A request has been made, as outlined in 2019, to remove the "All Other Defects" category.

It is recognised that damage to faba beans, green lentils and red lentils can occur in the storage and handling process. As a result, it is acknowledged there should be a difference in the defective tolerances between Farmer Dressed Receival Standards and Farmer Dressed Export Standards. However it is felt by some in industry (based on prior submissions to the Committee) that there must be reasonable balance between the two Standards.

The current difference is not considered reasonable given that if no Poor Colour is delivered by growers at receival, a restrictive limit is placed on "All Other Defects" such as splits and brokens. For example, if the level in the delivery is just over the limit for "All Other Defects" the delivery is graded No.2. The grain on outturn may still be able to be sold as No.1 given there is no category of "All Other Defects".

Implications of a change in Standards are several including:

- The impact on the quality received by the market, whether for whole or splitting purposes
- The market factoring in a potential price risk for high "defects such as splits and brokens"
- The impact on the storage and handling sector ability to receive and outturn according to contractual requirements
- Removal of the category "All Other Defects" may improve the accuracy of the application of Standards given current uncertainty of tolerances and categories that apply.

In light of the discussion, the Committee agreed to remove the category of "All Other Defects" for the 2020/21 season for the three commodities listed. For clarity the following is proposed, noting industry submissions on this proposed change will be considered when finalising the 2020/21 Standards:

Commodity Name	Faba Beans
Commodity Grade Number(s) & Name(s)	CSP – 5.2.1 FABA BEANS – NO.1 GRADE MINIMUM RECEIVAL STANDARD FARMER DRESSED
Current Definition / Tolerance	Total Defective: 6% Max by weight, includes - 3% Max by weight Poor Colour - 3% Max by weight total of All Other Defects except Mould
Proposed Change	
Quality Parameter	Total Defectives
Definition	6% Max by weight, includes - 3% Max by weight Poor Colour Note – no change to Mould is proposed

Commodity Name	Red Lentils
Commodity Grade Number(s) & Name(s)	CSP – 7.2.1 RED LENTIL BEANS – NO.1 GRADE MINIMUM RECEIVAL STANDARD FARMER DRESSED
Current Definition / Tolerance	Total Defective: 4% Max by weight, includes - 1% Max by weight Varietal Restriction - 1% Max by weight Poor Colour Seed Coat - 1% Max by weight Poor Colour Kernel - 3% Max by weight total of All Other Defects except Mould
Proposed Change	
Quality Parameter	Total Defectives
Definition	4% Max by weight, includes - 1% Max by weight Varietal Restriction - 1% Max by weight Poor Colour Seed Coat - 1% Max by weight Poor Colour Kernel Note – no change to Mould is proposed

Commodity Name	Green Lentils
Commodity Grade Number(s) & Name(s)	CSP – 7.1.1 GREEN LENTIL BEANS – NO.1 GRADE MINIMUM RECEIVAL STANDARD FARMER DRESSED
Current Definition / Tolerance	Total Defective: 4% Max by weight, includes - 1% Max by weight Varietal Restriction - 1% Max by weight Poor Colour Seed Coat - 1% Max by weight Poor Colour Kernel - 3% Max by weight total of All Other Defects except Mould
Proposed Change	
Quality Parameter	Total Defectives
Definition	4% Max by weight, includes - 1% Max by weight Varietal Restriction - 1% Max by weight Poor Colour Seed Coat - 1% Max by weight Poor Colour Kernel Note – no change to Mould is proposed

4. Industry Feedback Required

The Committee seeks industry advice on the following issues. Based on industry feedback, the following potential changes may occur for the 2020/21 season or future seasons.

4.1 Proposed Change: Bleached Grains – Kabuli Chickpeas

An issue was raised during 2019 on the classification of "bleached grains" in Kabuli Chickpea Standards. Following a review it was determined that industry was applying different a interpretation to this defect:

- Seed Coats appeared "bright white/bleached" and some in industry classifying these grains as Weather Damaged. As such, grains were being classified as Poor Colour or under the Total Defective category.
- Seed Coats may or may not appear loose, resulting in seed coats falling off during grain movement and grains then falling under the definition of "Broken, Chipped, Loose Seed Coat and Split".
- In some instances a varietal difference may lead to grains appearing to as "bleached".
- These "bleached grains" may or may not be able to be clearly distinguished from other grains in the sample.

The Committee discussed the issue and determined that the current Standards definitions were not clear on the interpretation of this defect. It was agreed:

- There is a need for clarity and consistent interpretation both within the Australian pulse industry and in overseas markets. Definitions in the Standards and VRSG should include this defect.
- Visual photos should be included in the VRSG for 2020/21 as a priority.

Based on the discussion, while the defect of "bleached grains" may lead to other defective grain parameters, it was agreed that these grains should be included in the category of Poor Colour for the 2020/21 season.

4.2 Proposed Change: Mechanical Damage & Sample Size – Broad Beans

A submission was received from industry covering two issues related to the Broad Bean Standards.

a) Mechanical Damage

The current Standards include a definition and tolerance for Mechanical Damage that does not apply to any other pulse including faba beans. In summary, any damage to the seed coat is classified as Mechanical Damage. The request was made to delete any reference to Mechanical Damage and apply the definition of "Broken, Chipped, Loose Seed Coat and Split".

During discussion, a number of factors were discussed including:

- The variation in classification between faba beans and broad beans is significant when applying the differing standards definitions.
- Feedback from overseas customers is they aren't concerned with the small fracture in the bean seed coat that would be classified as Mechanical Damage under current Standards. Reasoning being that many customers treat broad beans as "faba beans" in terms of Standards. In addition a major use of broad beans requires frying during which the seed coat is partially/wholly removed.
- Removal of the Mechanical Damage quality parameter would greatly speed up classification.

b) Sample Size for Assessment

The Standards currently require a 400 gram sample of broad beans to be assessed. As broad beans are large grains, the number of grains in a 400 gram sample for assessment is "relatively low" and industry considers that the sample may not be representative given this low number of grains.

Given the major defect tends to fall under the existing category of Mechanical Damage, there is a risk of inaccurate assessment of the load based on this low number of grains. A request was made to increase the sample size. The increased sample size and thus time for assessment would potentially be offset by the reduction in time for assessment of Mechanical Damage.

The Committee agreed with the industry submission and agreed to alter the Broad Bean Standards for 2020/21 as follows:

- Increase the sample size for assessment to 600 grams (reflective of grain size compared to faba beans).
- Delete all reference to Mechanical Damage in all broad bean Standards.
- Apply the current definition of Broken, Chipped, Loose Seed Coat and Split to broad beans, with these grains being included under the tolerance of Total Defective.

While these proposed changes may have an impact on forward contracts, it was agreed this change should apply in the 2020/21 Standards.

4.3 Proposed Change: Insect Eggs on Grain – All Pulses

During 2019 a number of instances arose where insect eggs were present on the Seed Coat of grains. There was no clear definition in the Standards and varying interpretations by industry were being made. The Committee considered this issue and a number of factors were discussed:

- While mainly on desi chickpeas, other commodities were/may also be affected.
- Eggs were mainly as a consequence of the Cowpea Bruchid, but other species could also be present.
- Eggs relate to Stored Product Insects (not Field Insects) where a nil tolerance for live insects apply.
- It is difficult if not impossible to identify if the eggs are alive at the time of classification.
- Adult insects may or may not be present in the kernel.
- Eggs may be controlled (killed if alive) via fumigation, however may remain on the surface of the grain and be visually unappealing.
- In general eggs were not present on the grain at delivery during harvest, but appeared during the storage period (i.e., were present within the grain).
- Different end-uses of grain impact on the interpretation of this quality parameter. For example, the splitting market removes the seed coat hence eggs only on the Seed Coat are not a significant issue from a quality issue (but may be visually unappealing and a food security/hygiene issue). The whole seed market may reject these grains due to their appearance.

A range of interpretations were suggested including:

- In the absence of proof the eggs were dead, classification as live and thus falls under the definition of Objectionable Material with a nil tolerance applying.
- Seeking a Commodity Vendor Declaration from the grain provider the eggs were dead.
- Classification as Foreign Material.
- Classification as Insect Damaged.

Following discussion, the Committee agreed to seek industry views on the proposal to interpret eggs on the surface of all pulses as Insect Damaged, thus falling under the tolerance for Total Defective for the 2020/21 season.

4.4 Future Review: Nil Tolerance Parameters – All Pulses

The Committee has previously advised industry of research being undertaken by Grain Trade Australia (GTA) on the applicability of a nil tolerance in Standards. In conjunction with GTA the Committee will review various aspects related to this topic including:

- The definition of Nil.
- The applicability of a Nil tolerance to apply for each quality parameter in a bulk grain load.
- Regulatory impacts of any potential change away from Nil.
- Suitable tolerances by quality parameter and commodity to apply.
- The consistency of the definitions and tolerances across commodities.
- The method of assessment, including sample size.

The review by GTA has commenced and the Committee will consider any implications and possible changes in pulse Standards once the project findings have been made available.

4.5 Future Review: Truck Sampling – All Pulses

In prior seasons the Committee has been made aware of variations in procedures used by industry for sampling of static loads of pulses tendered for delivery. On various occasions the Committee has reviewed the current sampling procedures (as also applied to a range of cereal and oilseed commodities) and determined that if applied correctly, those procedures are suitable for obtaining a representative sample from each load tendered for delivery for the purposes of assessment against pulse Standards.

In 2018 the Committee was advised of planning for a potential research project to review the practicalities of using the documented sampling procedures for all commodities including pulses, and the implications of varying those procedures. The research would include other aspects of sampling such as the suitability of the probes and reduction in the sample to the size required for assessment as per the Standards.

As required, the Committee will participate in planning and implementation of that research project to ensure outcomes for pulses are adequately considered. At this point in time the project has not commenced however industry will be advised if the project proceeds.

5. Rejected Changes

The Committee reviewed its draft decisions developed during 2019 and industry feedback received following release of the 2019/20 Standards. As outlined below this change was not approved for the 2020/21 Standards.

5.1 Rejected Change: Poor Colour - All Pulses

The Committee was advised of a proposal to alter the definition and thus tolerance of all small Poor Colour pulses that fall below the screen. The proposal was that these grains not be included as Poor Colour but are classified under Total Defectives.

The Committee is aware that there may be differences in interpretation of these grains, with some calling these grains Poor Colour and others as Total Defective (given they are pulse material that fall below the screen).

A number of factors were discussed on this issue including:

- Small grains (below the screen) may or may not be removed prior to processing.
- A large number of Poor Colour grains may be visually unappealing in a sample.
- If small Poor Colour grains are present in a sample there may be other defects present causing this quality parameter.
- Small Poor Colour grains may be a relatively frequent issue for some commodities but not others.

- There is a desire for consistency in interpretation across all pulse commodities, to assist accurate classification.
- If small Poor Colour grains falling below the screen were not to be classified as Poor Colour, the time taken for classification may be reduced.

Following discussion it was agreed that no change be made to the Standards for any pulse. If necessary, clarification would be made in the Standards to assist interpretation that any small Poor Colour grains falling below the screen following shaking are to be assessed as Poor Colour.