

Alabama / Florida State Unit

Issues Update Fall 2017



Labor

- Immigration Reform
 - Little progress
 - Goodlatte has a framework
 - Nothing moving yet
 - Comprehensive not likely



Labor

- Mandatory E-Verify
 - Highly Likely to be included in ANY immigration bill
- The Wall
 - ?????????
 - Winter is coming





Labor

- I-9
 - New I-9 issued 7/17/2017
 - Must be used by 9/18/2017
 - Paper or Electronic then printed
 - Electronic version Adobe ONLY print and sign.
 - Some companies offer online I-9 Storage.



Labor

- I-9 instructions (Separate File now)
- M-274 New and Revised
- www.uscis.gov/i9
- www.uscis.gov/i-9-central



OSHA

- Higher Fines are HERE
 - One gin with relatively minor violations fined >\$6000
 - Fines would have been < \$3000 last year.







OSHA

- Form 300A Electronic Submission
 - Original Rule had Submission by July 1
 Page wasn't even up by July 1
 - Request for Additional Comments May 17, 2017
 - New Deadline December 1, 2017
 - Website was open in Mid August but pulled down



OSHA

- Form 300A Electronic Submission
 - DHS found security holes
 - OSHA pulled site for a couple weeks
 - Put site back up on Aug 25.
 - Our advice:
 - DON'T SUBMIT EARLY!
 - Real possibility rule will get pulled or changed.



OSHA

- New OSHA Manual on Safety and Health Programs
 - www.osha.gov/shpguidelines





Transportation

- ELD's Beginning Phase 2 this year
- AOBRDS and ELD's allowed for required haulers only (no paper logs)
- Dec 2019 FULL ELD Required
- Exemptions for logging still in place
 - No requirement for logging if 150 air mile
 - No hours of service if hauling ag to or from field.



Transportation

- ELD's could affect your warehouse
 - Truckers may be more reluctant to wait to load.
 - Could cause logistics issues
 - Not aware of any right now but be aware of issue

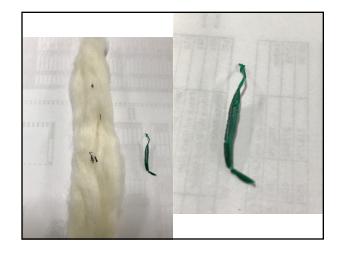


Contamination

- Still Getting Claims
 - Both Foreign and Domestic Mills
 - One large US mill:
 - "... regularly walk the laydowns and have the bale openers walk laydowns with keen eyes for this type of foreign material. It is imperative that bale marking is correct so we can track down the bale bag and bale id ticket and rule out that this isn't coming consistently from one gin."









Contamination

- Deere Round Modules
- Working on "marking" the cut zone.
- Tape between tacky and non-tacky sheets
- Visible through the wrap
- Testing in S. Texas earlier this year
- Early testing only Nothing set in stone







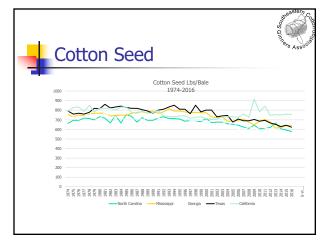
Deere Data

- EWR and Deere collaborating on bringing harvest data and gin data together.
- EWR and CI working on apps for smart phones to better manage logistics of modules.
- Some gins working on Module ID as only ID and stand alone.



FSMA

- New Administration= New Attitude
- They have "heard our issues and those of industries like us"
- They are "working on a solution"
- Will likely come to a gin during this season.
- Will NOT eliminate needs of consumers of cotton seed







Cotton Seed

- Seed per bale lowest in 40 yrs
- Soy prices and milk prices weighing on the market
- Market share is Crucial
- Raise milk and/or soy prices without market share and we don't rise with them.
- CI has put an additional \$100K into Cotton Seed Marketing

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Questions?