



STATE OF WASHINGTON
DEPARTMENT OF AGRICULTURE
P.O. Box 42560 • Olympia, Washington 98504-2560 • (360) 902-1800

September 23, 2016

Brandon Willis
Administrator, Risk Management Agency
United States Department of Agriculture
Room 6092-South, 1400 Independence Avenue Southwest
Washington, D.C. 20250

RE: Falling Number Crop Insurance Waiver Consideration

Dear Administrator Willis:

The Washington State Department of Agriculture (WSDA) was one of several signees on the letter you received from the Washington Association of Wheat Growers (WAWG) dated September 22, 2016. WAWG's letter urges the Risk Management Agency (RMA) to consider waiving the procedure regarding falling numbers impacting an insured's future actual production history. The letter also urges RMA to allow farmers not filing a crop insurance claim to exclude discounts and report actual production yield.

The percentage of wheat yields affected by low falling numbers (below 300) quoted in WAWG's letter is of great concern. The purpose of this letter is to provide further data to underscore the severity of the falling number crisis plaguing wheat growers in Washington State.

As of September 13, 2016, WSDA grain inspection staff located throughout Eastern Washington performed falling number analysis on more than 13,400 soft white wheat samples. Soft white is the predominant class of wheat grown in Washington. Of the 13,400 plus samples analyzed, more than 5,600 samples had a falling number result below 300. This means that 42 percent of the predominant class of wheat grown in Washington is subject to elevator discounts resulting in growers receiving a lower price per bushel and the RMA's production reporting requirements. In addition to soft white wheat samples, WSDA analyzed 1,101 hard red spring samples, 106 had results below 300; 818 hard red winter wheat samples, 163 had results below 300 and 1,836 club wheat, 794 had results below 300.

As stated in WAWG's letter, particular areas in Eastern Washington have been impacted more than others. The fact of the matter is, growers all across Eastern Washington are being adversely affected by low falling number wheat yields and the associated elevator discounts.

Administrator Willis
September 23, 2016
Page 2

Wheat growers in Washington are not only looking to the RMA for assistance during these extremely difficult times, they're also looking to identify long-term solutions. The wheat industry in Washington is partnering with the United States Department of Agriculture, Agricultural Research Service located at Washington State University to conduct trial studies on the milling qualities and end use performance of below 300 falling number wheat. The wheat industry is also engaged in efforts to make advancements in the technology and protocols used to determine falling number, as well as the on-going variety research trials to develop more robust and resistant wheat varieties.

Unfortunately, the 2016 wheat crop is not an exception, the 2015 crop was subject to extreme weather (drought) resulting in lower quality yields. Given the continuing challenges growers are facing, I strongly urge you to support the Washington Association of Wheat Grower's request to waive the RMA procedure regarding falling numbers impacting an insured's future actual production history.

Thank you for your consideration of this very important matter facing the growers in Washington State. If you have further questions, please contact me or Jason Ferrante, Assistant Director, Commodity Inspection Division at jferrante@agr.wa.gov.

Sincerely,



Derek I. Sandison
Director