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Comments on S&T Item 3200-1, Which Includes a Definition for Batching Scale

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Position: I am **opposed** to this item, particularly the proposed definition, and encourage a vote **against** the proposed changes.

Explanation:

The proposed definition incorrectly and inappropriately defines a batching scale in terms of how the weighed commodity is processed subsequent to the weighing operation. Handbook 44 categorizes scales based upon a combination of factors, including the design of the scale (e.g., hopper scale and monorail scale), use (e.g., as a grain hopper scale and animal or livestock scale), method of operation (e.g., static weighing or in-motion weighing) and commodity weighed (e.g., grain or aggregate). How a commodity is processed after the weighing operation is completed is irrelevant to the categorization of the scale.

The objective of the submitter is to get automatic bulk-weighing systems used in seed treatment systems classified as batching scales so that these scales do not have to comply with the Automatic Bulk Weighing Systems Code. All scales that automatically weigh individual commodities in multiple successive drafts of predetermined amounts should be required to comply with the Automatic Bulk Weighing Systems Code.

The proposed definition describes a batching scale as "Any scale which … lends itself to use in proportioning ingredients by weight." What is meant by "use in proportioning ingredients"?

The submitter wants to call scales that automatically weigh a single commodity in multiple drafts a "batching scale." For an individual customer order, these scales weigh a single commodity (one of various seed grains used for different customer orders), which is then delivered into a mixer, into which other seed treatment ingredients are added and mixed. The critical aspect of the weighing operation is the automatic weighing a single commodity in multiple drafts; not by how the grain is processed after weighing.

For example, is a hopper scale that weighs wheat that is subsequently milled and made into pasta called a pasta scale? Is a hopper scale that weighs corn that is subsequently milled, mixed with other ingredients and made into tortillas called a tortilla scale? Are these batching scales? Of course not!

Furthermore, the proposed definition refers to a scale that is designed for use in "proportioning" ingredients. However, for each automatic weighing operation consisting of multiple drafts, the scale is weighing a single commodity. There is no proportioning taking place *during the weighing operation*. Adding other ingredients later in a production process after weighing is irrelevant to categorizing the scale under Handbook 44.

I guess one could say that weighing 100% of a single commodity is a proportion, i.e., a proportion of 100:0, but that is not meaningful or helpful in this case.