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Comments in Opposition to S&T Items 320-1 and 360-3
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The weighing systems that are the focus of these proposed changes are part of the same seed treatment systems that were discussed last year. The two proposed changes actually describe the operation of automatic bulk weighing systems, except they don't require recording the no-load weight values or have the safeguards included in the Automatic Bulk Weighing Systems Code (ABWS) that promote accurate weighing in automatic operation. The presentation and the comments I presented last year still apply.

The scales weigh multiple drafts of the same commodity for subsequent treatment to generate the final product, which is a treated seed. The scale is not a batching system; it is an automatic bulk weighing system. Consequently, the proposed changes are to the wrong Code. The proposed changes are to permit the option for an ABWS to "force" the scale to return to the center of zero before allowing the automated weighing process to continue (instead of recording the load and no load reference weights for each draft). If the S&T Committee wishes to allow this option, then this change should be made to the ABWS Code. It should not be a change to the Scales Code.

If the change is considered for the Scales Code, then the operation of the weighing system should be limited to a single draft per a transaction, consistent with Scales Code paragraph S.1.1.2. If multiple drafts of the same commodity is to be weighed for a single transaction, then the weighing system is an automatic bulk weighing system and the ABWS Code applies.

If the option is allowed, then the scale should not have the feature of programming a tolerance on the return to zero that can be changed by the operator at any time during the normal operation of the weighing system. Furthermore, if the non-legal-for-trade feature of a tolerance on the return to zero is allowed in the software, then the activation and deactivation of this feature should be a sealable parameter, which is currently not the case based upon the videos the manufacturer has available on YouTube.

Batching scales weigh two or more different ingredients that comprise some or all of the components that go into the final product. The proposed definition would allow a single "raw material" to be weighed in multiple drafts as a "batching" process. This is incorrect. This definition would create confusion and not adequately distinguish between automatic bulk weighing systems and batching scales. The automatic weighing of a single "raw material" in multiple drafts is the operation of automatic bulk weighing systems and the ABWS Code applies to these systems. A better definition is needed.

1. Are these scales Class III or III L?
    a. Which raw materials are to be weighed? Is grain being weighed? Systems used to weigh grain are Class III. Also see ABWS Code, UR.3.1.
    b. For Class III scales, $n \geq 500$; if weighing grain, then $n \geq 2000$
    c. For Class III L scales, $n \geq 2000$
    d. For hopper (other than grain hopper) scales, $n \geq 1000$ (Scales Code)

2. Will AZT be prohibited? It should be prohibited, otherwise, the return to center of zero requirement is meaningless. AZT is prohibited on automatic bulk weighing systems. If AZT is allowed to operate, then the accumulated errors for multiple drafts for the same transaction may become large and exceed the accuracy tolerance for the scale.
3. For automated weighing systems, the safeguards required for automatic bulk weighing systems should be required for "batching systems." The proposed changes to the Scales Code would give the weighing systems in seed treatment systems an exemption from these safeguard requirements. If the change is proposed to the Scales Code, then the safeguards on automatic operation should be incorporated into the Scales Code for "batching scales."