

1 **Transportation and Insurance Committee**  
2 **Adopted at the 102<sup>nd</sup> Annual Convention**  
3 **June 23, 2026**

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5 The Transportation and Insurance Committee recommends that ACSA:

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7 **OCEAN TRANSPORTATION:**  
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- 9 1. Continue to work with like-minded export organizations to monitor, review, highlight and  
10 oppose national, state and/or local legislative and regulatory actions which would make U.S.  
11 cotton less competitive compared with foreign cotton growths;  
12
- 13 2. Work directly with other organizations to provide guidance to Congress on appropriate actions  
14 for merchants to ensure competitive capacity, timely execution from the ocean transportation  
15 industry, systemic alignment, and resilience from all the ocean container transportation  
16 industry segments to ensure adequate capacity and competitive pricing;  
17
- 18 3. Support local, state, and national efforts to review, prioritize and fast track port and intermodal  
19 infrastructure projects, including but not limited to terminals, roads, bridges, and other physical  
20 capacity to support interior and near port physical movement of U.S. cotton exporters;  
21
- 22 4. Support legislative, regulatory, and administrative initiatives to enhance visibility, review and  
23 drive improvements in port / terminal business processes, data alignment, and technology  
24 options to increase overall daily marine container handling terminal velocity and help ensure  
25 future port labor stability necessary to support U.S. cotton exports;  
26
- 27 5. Urge the administration and Congress to address the issue of Chinese dominance in  
28 shipbuilding and the manufacturing of critical intermodal equipment, including ship-to-shore  
29 cranes, containers, and chassis, in a manner that does not impose punitive measures on  
30 agricultural exporters; of note, the Ocean Shipping Reform Act of 2022 provides a framework  
31 for the Federal Maritime Commission (FMC) to set rules on reasonable fees and practices,  
32 which can be leveraged to ensure fair competition and support for U.S. exporters;  
33
- 34 6. In the context of supply chain challenges, urge:  
35
  - 36 a) All members of the cotton supply chain to maintain sufficient trained personnel to expedite  
37 and efficiently manage the physical logistics and documentation volumes and expand  
38 beyond the traditional Monday to Friday operating model in place for most segments today;  
39
  - 40 b) Ocean carriers to ensure their ports and terminals provide and release sufficient cargo  
41 worthy “wind and watertight” and clean containers to minimize merchants’ cargo risks and  
42 damage during transportation; additionally, Merchant members’ overseas buyers should  
43 not be charged for cleaning and / or cosmetic repairs on wear and tear damage that does  
44 not affect the “wind and water” standard;  
45
  - 46 c) Supply chain enhancements are created to incentivize the utility of assets for shipment,  
47 including ports, marine terminals, container yards (CYs), ocean containers, intermodal  
48 chassis, and trucks;

- 1 d) Ocean carriers to work with intermodal equipment providers (IEPs) and respective chassis  
2 pool managers to:
- 3 i. Fully comply with the FMC Administrative Law Judge’s ruling on chassis choice for  
4 Merchant Haulage moves;
- 5 (1) Ocean carriers should not designate chassis provider for CYs bookings; and  
6 (2) Merchants and their truckers should be allowed to decide where to pick up  
7 chassis; and,  
8 (3) Ensure sufficient U.S. Department of Transportation Federal Motor Carrier  
9 Safety Administration (FMCSA) road worthy supply and efficient pick-up  
10 locations of the U.S. to meet peak shipping demand periods; further, when no  
11 good order chassis are available, the chassis provider shall perform chassis repair  
12 within a reasonable time frame for roadability / minor repairs;  
13
- 14 e) Ocean carriers’ designated CYs commit to:
- 15 i. Handle peak volumes and turn drivers quickly to ensure sufficient daily pickup  
16 velocity;
- 17 ii. Offer extended operating hours Monday through Friday;
- 18 iii. Offer Saturday gates;
- 19 iv. Mount chassis in one (1) hour or less; and,  
20 v. Communicate operational problems, including – container lift issues; and down  
21 systems, to the shipper and trucker communities quickly and consistently;  
22
- 23 f) Ocean carriers to ensure their intermodal rail facilities and CY providers have sufficient  
24 labor and equipment to manage the increase in “live” chassis swings at rail ramps and port  
25 terminals, based upon the ocean carrier industry’s movement away from own chassis fleets  
26 and shifting of chassis provisioning burden to Merchant members;  
27
- 28 g) Ocean carriers to ensure their designated rail providers’ appointment systems are aligned  
29 with ocean carriers’ Cargo Receiving Windows (CRWs), defined as the combination of  
30 Early Return Date (ERD), Documentation Cutoff, and Physical Cargo Cutoff; noting  
31 alignment is essential because truckers cannot rail bill containers or secure a ramp  
32 appointment until containers are fully loaded and the trucker is ready to proceed to the rail  
33 ramp; and noting further that failure to obtain a same day appointment after loading results  
34 in additional and unplanned member costs, including holds at trucker yards, unplanned  
35 container storage, incremental trucking expenses, and increased chassis and container  
36 usage costs (per diem);  
37
- 38 h) Ocean carriers and their designated international intermodal rail carriers to improve and  
39 then maintain the integrity of containers moving together from interior ramp of receipt to  
40 port of loading to reduce splits and rolls and to help ensure all containers make the interior  
41 intermodal cutoff and load their intended booked vessel with container seals intact;  
42
- 43 i) Ocean carriers, BNSF Railway, and Union Pacific to increase security efforts to reduce  
44 loss of original container seals from break-ins after merchants tender loaded and sealed  
45 containers from Texas and the Mid-South for marine terminals in Long Beach and Los  
46 Angeles;  
47
- 48 j) Ocean carriers to load shipments to booked vessels without splits or rolls when cargo  
49 received by port cutoffs and / or intermodal cutoffs; noting that in the event a split or roll  
50 is unavoidable, ocean carriers should offer merchants the option to combine bookings at

1 no additional charges – administrative, equipment, and terminal – to reduce collective  
2 rework, number of Original Bill of Ladings (OBLs), document sets, and Letter of Credit  
3 (LC) negotiation delays to improve overall shipper trade-to-cash cycle, with the objective  
4 of restoring performance to pre-pandemic service levels as defined throughout this  
5 committee’s policy;  
6

7 k) Urge ocean common carriers to include in their required annual FMC filed export strategies  
8 detailed information on services offered, markets served, pricing strategies, and equipment  
9 provisioning; further, urge inclusion of identified high risk trade corridors, assumptions  
10 related to war risk costs, deviation routing impacts, and operational measures taken to  
11 protect agricultural exports during periods of geopolitical disruptions; recognizing the need  
12 to improve service integrity, ocean common carriers should also include specific objectives  
13 to enhance on-time arrivals and reduce the frequency of split and rolled shipments in both  
14 local and intermodal applications, as this will improve transparency and accountability,  
15 aligning with the objectives of the Ocean Shipping Reform Act of 2022 and 46 U.S.C. §  
16 40101(2), which aims to ensure an efficient, competitive, and economical transportation  
17 system in the ocean commerce of the United States;  
18

19 l) CSX Corporation, Norfolk Southern Railway, Georgia Ports Authority, and South Carolina  
20 State Ports Authority to work together to provide a dedicated full export train service and  
21 capacity to and from Memphis at some set frequency each week compared to existing  
22 service design;  
23

24 m) Ocean carriers, whether operating alone or within the same alliance and at the same ports  
25 and rail ramps, to implement uniform and consistent standards on inland, vessel, and  
26 documentation cutoffs;  
27

28 n) Ocean carriers to recognize last-minute changes to coastal vessel schedules, berthing  
29 assignments, and first cargo receiving days directly and materially impact merchants and  
30 the trucking partners with whom they operate, resulting in increased equipment utilization,  
31 operational inefficiencies, and higher costs; further; ocean carriers and marine terminals to  
32 be responsible for minimizing these impacts by implementing structured, reliable, and  
33 timely notification processes for all scheduled-related changes; and, noting that CRW  
34 changes remain the single greatest impediment to shipping cargo on time and intact,  
35 resulting in significant delays and additional costs incurred by Merchant members, urge  
36 the following requirements to apply:

37 i. All three (3) CRW elements – ERD, Documentation Cutoff, and Physical Cargo  
38 Cutoff – be displayed on all booking confirmations and be make available on ocean  
39 carriers’ platforms including websites, portals, and/or application programming  
40 interfaces, which constitute a mandatory industry standard for all ocean carriers;

41 ii. Any change to a CRW be communicated within two (2) hours of the change to the  
42 booking party and their designated trucker, using systems and channels that ensure  
43 receipt and visibility;

44 iii. No CRW be modified within two (2) working days of the CRW dates stated on the  
45 most recent version of the booking confirmation;

46 iv. Ocean carriers and marine terminals honor the release of originally allocated empty  
47 equipment where ERD changes allow planned pickups to occur within two (2)  
48 working days of the original booking;

49 v. CRW to be fully aligned in real-time between ocean carriers and the marine

- 1 terminals; further shippers and their truckers to not be assessed demurrage or per  
2 diem charges resulting from misalignment, inconsistency, or data discrepancies  
3 between ocean carriers and marine terminal CRWs;
- 4 vi. Ocean carrier e-business platforms to continuously reflect the most current and  
5 accurate vessel schedule information, including all CRW-related data;
- 6 vii. Ocean carriers and marine terminals to adopt and enforce aligned data-accuracy  
7 standards governing vessel schedules, cargo operations, and CRW dates, times, and  
8 changes; and,
- 9 viii. Members to regularly review and formally address CRW compliance and  
10 performance with their ocean carriers, including escalation where systemic non-  
11 compliance persists;
- 12
- 13 7. Acknowledge merchants need consistent and competitive pricing due to global competitive  
14 pressure for cotton and the forward nature of how export sales are made relative to other  
15 agricultural exports based upon:
- 16
- 17 a) Annual agreement and rates;
- 18
- 19 b) All-inclusive ocean container freight rates; acknowledging that otherwise, there must be  
20 full transparency of all underlying cost components that impact a Merchant member's total  
21 landed costs to the foreign market, noting that full transparency means all applicable fees,  
22 charges, and surcharges are explicitly identified on per-container or per-shipment basis,  
23 including charges published in the ocean carrier's tariff as well as all so-called "Pass  
24 Through Costs"; clearly identified pass-through costs within the applicable tariff section  
25 and sufficiently detailed disclosure to permit Merchant members to understand, verify, and  
26 review the nature, applicability, and origin of each charge for future audit and compliance  
27 review; and,
- 28
- 29 c) Minimum ninety (90) days notification of planned increases in ocean rates, bunker charges,  
30 any applicable surcharges and / or the imposition of new surcharges, noting that annual or  
31 bi-annual negotiations remain preferred since merchants bear all supply chain risks;
- 32
- 33 d) Urging the Federal Maritime Commission (FMC) to review the reasonableness,  
34 transparency, and timing of conflict-related surcharges, including but not limited to war  
35 risk, security, congestion, deviation, and contingency surcharges, and ensuring such  
36 charges are not imposed in a matter that disproportionately disadvantages U.S. agricultural  
37 exporters; and,
- 38
- 39 e) Agreed service contract free time at destination that needs to be clear and honored  
40 consistently;
- 41
- 42 8. Work with the World Shipping Council (WSC), U.S. Coast Guard, who has International  
43 Maritime Organization (IMO) jurisdiction, and ocean carriers to ensure U.S. cotton's February  
44 1998 non-hazardous designation is fully understood and adhered to by all ocean carriers, noting  
45 that bookings are accepted without merchants' affirmation that U.S. cotton bales underwent  
46 gin universal compression, meeting non-hazardous specifications;
- 47
- 48 9. Work with Congress, the administration, the WSC, and other relevant organizations to create  
49 a permanent working group and subgroups comprised of ocean container shippers, ocean  
50 carriers, railroads, ports, truckers, chassis providers, terminal labor, and other essential groups;

- 1 10. Support and advocate for National Shippers Advisory Committee (NSAC) recommendations  
2 that do not conflict with ACSA policy; further, urge the FMC to provide serious support and  
3 consideration to recommendations put forth by the NSAC;  
4
- 5 11. Urge merchants to review how to improve commitment visibility and forecasting with ocean  
6 carriers within the FMC service contract process to help support sufficient equipment, chassis,  
7 truck power and vessel space when needed, noting that ocean carriers should allow merchants  
8 to make bookings further forward than allowed today at least eight (8) weeks from current  
9 calendar week;  
10
- 11 12. Work with the U.S. Coast Guard and the FMC to ensure clarity, transparency, and to the extent  
12 allowed, create uniform fuel models at the alliance level for any new fuel mandates coming  
13 from the IMO or a similar organization;  
14
- 15 13. Work with the FMC to enforce the aims of the U.S. Shipping Act including to promote the  
16 growth and development of U.S. exports through competitive and efficient ocean  
17 transportation through market-based review of ocean carrier vessel sailing cancellations and  
18 prohibit discrimination of agricultural container exports for empty containers;  
19
- 20 14. Urge Congress to fund the dredging and maintenance of U.S. rivers and harbors from the  
21 general funds of the U.S. Treasury rather than user fees;  
22
- 23 15. Urge ocean carriers in the same alliance and operating on the same vessel service from the  
24 same port authority and marine terminal to implement more uniform and consistent standards  
25 for their interpretation of regulatory and statutory mandates for data and cargo cutoffs across  
26 their industry, specifically:  
27
  - 28 a) Timelines for “No Doc / No Load” should be noted in the initial booking confirmation  
29 from the ocean carrier;
  - 30
  - 31 b) Notifications of earlier deadlines should meet the rules and regulations of the European  
32 Union and other jurisdictions;  
33
  - 34 c) Required information should be clearly identified, and additional information that is  
35 extraneous should be eliminated by ocean carriers to create a uniform standard; and,  
36
  - 37 d) Country regulation changes should be documented and substantiated by the responsible  
38 agency and / or governmental body;  
39
- 40 16. Urge the digital interfaces for Shipping Instructions, Bill of Lading Proofs and Releases  
41 between shippers, industry portals and / or ocean carriers be utilized as intended, noting that:  
42
  - 43 a) The current shipment data interfaces and transmissions process is not working as intended  
44 for shippers and ocean carriers, resulting in an unacceptable amount of re-work for all  
45 parties - above fifty percent (50%) of all proof bill of lading releases;  
46
  - 47 b) The incomplete use of electronic shipment data causes delays in document turn times and  
48 unnecessary re-work;  
49
  - 50 c) Resulting amendment fees add unplanned costs to merchants and mask a broader industry

1 data integrity issues; and,  
2

- 3 d) The failure of ocean carriers and their industry portals to systematically communicate when  
4 Electronic Data Interchange mapping changes can affect data transmission integrity;  
5

6 17. Urge the continued support of on-going stakeholder efforts to improve existing documentation  
7 processes and performance, including by:  
8

- 9 a) Establishing a cotton industry standard with the ocean carrier industry for clean and  
10 expedited document release according to which eighty percent (80%) of total documents  
11 are produced and released within two (2) working days after vessel sailing and proofs are  
12 received at least two (2) working days after sending original shipping instructions, and with  
13 respect to which:

- 14 i. Merchant members should work with available data portals and ocean carriers  
15 supporting the cotton industry to identify and seek final and permanent remedies for  
16 specific high frequency documentation errors that prevent the timely release of  
17 original bills of lading; and,  
18 ii. ACSA members should endeavor to ensure ocean carriers satisfy commitments to  
19 work through identified issues to resolve with their Documentation and IT teams;  
20

- 21 b) Engaging Agriculture Transportation Coalition's continued focus on the issue of ocean  
22 carrier industry documentation performance as part of its Ocean Carrier Performance  
23 Survey;  
24

25 18. Recognizing that geopolitical volatility, including disruptions in the Red Sea, Suez Canal,  
26 Black Sea, and other global chokepoints, has transitioned from episodic to structural, urge  
27 ocean common carriers and marine terminal operators to maintain, publish, and communicate  
28 contingency service plans addressing vessel rerouting, transit time impacts, equipment  
29 positioning, and conflict-related surcharge structures affecting U.S. cotton exports;  
30

## 31 **MEXICO**

### 32 **EXPORTS/TRANSPORTATION**

- 33  
34  
35 1. Continue to support the goals of the United States-Mexico-Canada Agreement (USMCA),  
36 urging the free flow of goods between all of the signatory nations, and the elimination of  
37 trucking restrictions that impede flow or reduce industry capacity and support investments in  
38 International Bridges infrastructure;  
39  
40 2. Engage with all appropriate parties within Mexico and continue to increase the relationship  
41 with CANAINTEX to identify ways to implement a lasting enhanced security agreement to  
42 improve shipment reliability for mill deliveries at their facilities including extended receiving  
43 hours, secure drop yards and local security personnel; and,  
44  
45 3. Urge members to work with Mexico mill buyers and implement an industry agreed letter of  
46 understanding with compromises to provide longer receiving hours in recognition of changing  
47 traffic conditions between the border crossings and delivery locations, urging further that mill  
48 contact information include alternative secure parking for carriers arriving during and outside  
49 of receiving times;

1 **DOMESTIC TRANSPORTATION**

2  
3 **TRUCKING**

- 4
- 5 1. Recognize the importance of the trucking industry across all lines of business;
- 6
- 7 2. Recognizing trucking capacity is entering a period of renewed structural tightening driven by  
8 driver availability, rising fuel costs, equipment expense, and regulatory pressures, urge federal  
9 and state policymakers to avoid additional regulatory mandates that would further constrain  
10 port drayage capacity or reduce the availability of owner-operators serving agricultural  
11 exporters;
- 12
- 13 3. Urge members to continue to vigorously oppose any proposed legislation or regulatory rule  
14 changes that would effectively ban owner-operators at U.S. ports and establish a unionized  
15 port trucking regime, recognizing owner-operators remain critical to agricultural export  
16 flexibility during peak shipping periods;
- 17
- 18 4. Work with affiliated organizations to monitor the on-going impacts of regulatory changes for  
19 the trucking industry that will affect trucking capacity and cost, including:
- 20
- 21 a) Hours of Service rules and electronic logging effect on service and capacity effective  
22 January 2018; and,
- 23
- 24 b) Federal Motor Carrier Safety Administration (FMCSA) proposed rules against truck driver  
25 “coercion”;
- 26
- 27 5. Noting the importance of timely pickup and delivery to meet customer commitments, and  
28 further noting that truck transportation is a key part of the process, and that timely pick up  
29 remains essential for ACSA members to ensure consistent service performance to meet port  
30 and/or intermodal cutoffs for exports, mill delivery appointments for domestic customers and  
31 to reduce late warehouse pick up charges, expect truckers to:
- 32
- 33 a) Adhere to scheduled load dates and mill delivery dates;
- 34
- 35 b) Confirm ready date with warehouse operators via electronic portals, warehouse website  
36 and/or other digital methods at least forty-eight (48) hours in advance of scheduled pick up  
37 date;
- 38
- 39 c) Participate in the newly developed ACSA / Cotton Warehouse Association of America  
40 shipping tool to improve visibility between supply chain participants;
- 41
- 42 d) Notify the shipper or warehouse of schedule changes within forty-eight (48) hours that  
43 impact planned pick up at the warehouse, and the recovery plan;
- 44
- 45 e) Provide equipment that is clean, free of contaminants and leakage; and,
- 46
- 47 f) Provide and maintain their own equipment, particularly if they are asset-based, noting that  
48 proper maintenance of equipment ensures safety and reliability, which are paramount in  
49 the transportation industry; additionally, the FMCSA mandates all commercial motor  
50 vehicles be maintained in a condition that ensures safe operation;

1 6. Urge ACSA members to:

- 2
- 3 a) Request ready dates to be the same day as the earliest return date to the marine terminal for
- 4 port bookings, sufficiently prior to intermodal cutoffs;
- 5
- 6 b) Provide complete and accurate information regarding truckers' loads, including detailed
- 7 marks and weights for each shipment; according to the FMCSA, maintaining accurate
- 8 records and providing consistent information is not just a matter of operational efficiency
- 9 but also a legal requirement; additionally, inaccurate or misleading information can lead to
- 10 severe penalties, including fines and shutdown orders;
- 11
- 12 c) Understand that extra movements (split pickups, holding trailers, containers, chassis splits,
- 13 etc.) reduce driver utilization and effective available capacity in a given location and time
- 14 period to meet member needs;
- 15
- 16 d) Recognize the overall supply of drivers in the United States continues to decline and
- 17 therefore, driver recruitment and retention are key issues for trucking companies today that
- 18 directly affect their ability to serve member needs; and,
- 19
- 20 e) Recognize and be aware of pending regional legislation that may hold importers and
- 21 exporters liable for monetary damages when using trucking companies that are
- 22 misclassifying drivers as independents/owner operators' rather than employees;
- 23

24 7. Recommend warehouse operators and domestic mills review and adjust their operating hours

25 to accommodate trucking community service changes and impacts coming from the FMCSA's

26 electronic driver log regulation/requirements;

27

28 8. Recommend all cotton warehouses purchase high security seals; apply to container(s) and

29 report container(s) and seal(s) information to merchant members at a reasonable cost;

30

31 9. Work with other like-minded organizations to oppose ocean carrier implementation of import

32 container "street turn" fees for members and their truckers, noting that such proposed charges

33 create increased costs despite cost and effectiveness benefits for the ocean carriers and overall

34 export supply chain velocity; and,

35

36 10. Noting that fuel is a concern for both shippers and truckers, advise that current weekly

37 notification changes are sufficient;

38

39 **RAIL (CARLOAD)**

40

41 1. Urge the Surface Transportation Board to evaluate the impacts of ongoing Class I rail network

42 restructuring, service redesign, and consolidation on agricultural exporters, particularly with

43 respect to interior cotton origins, port connectivity, service reliability, and routing optionality;

44

45 2. In light of the challenges within the trucking industry, urge merchant members to actively

46 solicit railroads to strengthen ties with warehouses who maintain open rail sidings, to help

47 preserve rail as a viable and competitive means of transportation;

48

49 3. For rail served warehouse locations, recognize that merchants need the railroads to provide the

1 following:

2  
3 a) Service design for the location;

4  
5 b) Switch plan;

6  
7 c) Equipment availability and lead time;

8  
9 d) Acceptable equipment dwell time; and,

10  
11 e) Assistance in preventing railcar “bunching” on delivery to the destination warehouse or  
12 mill;

13  
14 4. Urge merchant members to take a more direct and active role with their railroad service  
15 representatives to manage agreed service commitments, identify problems and jointly work  
16 toward problem resolution;

17  
18 **INSURANCE**

19  
20 1. Urge merchant members and ginning associates to maintain sufficient general liability  
21 insurance, including products liability and recall coverage;

22  
23 2. Notes cotton warehousemen are responsible to issue electronic warehouse receipts (EWRs) on  
24 receipt of clean and merchantable cotton and this duty extends to maintaining and shipping in  
25 merchantable condition regardless of storage location, further noting that:

26  
27 a) Merchant members should clearly understand their responsibility for country damage  
28 under International Cotton Association rules regarding insurance and review their  
29 insurance coverage annually; and,

30  
31 b) Shippers should work more closely with mill buyers in all markets, to facilitate the claims  
32 process for damaged cotton and include photographic evidence from a neutral third party;

33  
34 3. In view of price volatility, urge state governments, the USDA, and merchant members review  
35 internal and transit warehouse tariffs and / or obtain evidence of coverage demonstrating policy  
36 limits aligned with projected bale capacity and on minimum insuring conditions covering the  
37 perils of fire and lightning; additionally, urge that warehouse tariffs should reflect the actual  
38 coverage in place for goods stored in that facility; and finally, urge ICE to continue to ensure  
39 the amount of insurance coverage provided by approved and/or licensed warehouses will fully  
40 cover the interests of the holders of EWRs and extend property coverage to “all risks”;

41  
42 4. Urge ACSA members to carefully review warehouse tariffs and practices for compliance with  
43 these duties with special attention on the time limitation for the presentation of damage claims,  
44 noting that unreasonably short periods, although stated, may be legally unenforceable and  
45 further that if damage is suspected, ACSA members should give immediate notice;

46  
47 5. Urge now more than ever Merchant members require proof of full cargo and liability coverage  
48 from the truckers hauling their cotton and cotton samples and further require that all policy  
49 exclusions and deductibles be identified by the motor carriers’ insurance provider;

- 1 6. Urge members using third party warehouses at U.S. port transit facilities and/or in foreign  
2 countries fully review, verify, and maintain a copy of the consignment warehouse's insurance  
3 policy and title documentation;  
4
- 5 7. Urge Merchant members to be aware of the financial health of their ocean carrier partners and  
6 the threats of bankruptcy on Merchant marine coverage;  
7
- 8 8. Recommend members be aware of the potential problems with bandless bales and in particular  
9 the responsibility and/or liability in the event of mishandling or opening and further  
10 recommend that further study be done with respect to these bales;  
11
- 12 9. Urge all members to be aware of the underlying insuring conditions provided by all transit  
13 facilities, which are not licensed by the USDA nor ICE, especially those on the Gulf Coast and  
14 Eastern seaboard, specifically if coverage is offered for the perils of flood and windstorm;  
15 further, urge all warehouses to advise depositors if their facilities are located in a Federal  
16 Emergency Management Agency-designated flood area and to provide written disclosure of  
17 flood, windstorm, and named storm sublimits, deductibles, and any application exclusions;  
18
- 19 10. Urge all members to take heed of promulgated exclusionary zones for War Risk Insurance,  
20 namely Russia, Ukraine, Belarus, as well as areas of the Red Sea, Gulf of Aden, Persian Gulf  
21 and Indian Ocean, noting members should confer with their ocean cargo insurers prior to  
22 freight bookings through or around these areas and address coverages and responsibilities with  
23 their counterparties; further recognizing war risk premiums, exclusions, and conditions are  
24 increasingly corridor-specific and dynamic, urge members to obtain voyage-specific  
25 confirmations of coverage and not rely solely on annual open cargo policies; and,  
26
- 27 11. Urge members to address safety and operational risks of shipping bales within seventy-two  
28 (72) hours of ginning through cross-functional coordination and adoption of National Cotton  
29 Council of America's reasonable post-gin bale handling and transportation practices,  
30 recognizing that risk management extends beyond insurance.