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TO: United States Department of Agriculture
Animal and Plant Health Inspection Service
Biotechnology Regulatory Services
Attn: [redacted]
4700 River Road Unit 91
Riverdale, MD 20737

Date: March 9, 2011

FROM: **Responsible Entity** (Syngenta Seeds, Inc.)
Authorized Representative [redacted] 1020 Sugarmill Rd, Longmont, CO, 80501; [redacted] @syngenta.com; [redacted]
Alternate Authorized Representative [redacted] @syngenta.com; [redacted]

SUBJECT: Compliance Agreement Request

This letter serves as the formal request for Syngenta Seeds, Inc. to be the responsible entity and enter into a compliance agreement with APHIS/BRS in advance of the shipment (import/movement) and/or planting (environmental release) of H7-1 sugar beets (seeds and roots) associated with the H7-1 sugar beet root crop production activities. I [redacted] am the authorized representative approved by Syngenta Seeds, Inc., the responsible entity, and authorized to request, legally bind and obligate, and sign the compliance agreement on behalf of Syngenta Seeds, Inc. and its growers, contractors, etc.

Syngenta Seeds, Inc. wishes to move and plant H7-1 sugar beet (seeds and roots) associated with sugar beet root production activities. The required information is provided below.

Business Information:

Responsible Entity: Syngenta Seeds, Inc., 120 Sugarmill Rd, Longmont, CO 80501

Nature of the Responsible Entity: Seed Producer

Number and Type of Members: Not Applicable

States Where Activities Under Agreement Will be Conducted: CO, ID, MI, MN, MT, ND, NE, OR, WA, WY

Preferred Method of Compliance Agreement Receipt: e-mail

Third Party Inspector and Third Party Auditor Information:

Attached are the resumes of two individuals [redacted] who are qualified to inspect and/or audit Syngenta RRSB activities conducted under compliance agreement. Both individuals have extensive applicable

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experience and Syngenta has used both individuals routinely to inspect and/or audit Syngenta regulated activities.

For Movement:

See attached list of origins and destinations (Syngenta RRSB Compliance Agreement Activities)

For Environmental Release:

See attached list of environmental release locations (Syngenta RRSB Compliance Agreement Activities). All of the release sites have been under agricultural production the past three years.

Some of the information contained in this compliance agreement request relates to the commercial or financial activities of Syngenta Seeds, Inc. and has been designated as confidential business information (CBI). That information is exempt from disclosure to the public under Exemption 4 of the Freedom of Information Act (FOIA), 5 U.S.C. 552(b)(4). This designation has been reserved for information that Syngenta Seeds, Inc. has not previously divulged to the public. We have determined that the release of such information to the public at this time would provide our competitors and others with important data on our research and development activities and/or distribution network, trends and directions, and could jeopardize protection of intellectual property rights. Therefore, access to this information by our competitors and others would cause Syngenta Seeds, Inc. competitive harm. Use of the CBI designation herein protects the substantial research and business investments made by Syngenta Seeds, Inc. It is sometimes necessary to protect sensitive location information relating to research and development and/or distribution activities. When such information is designated as CBI, Syngenta believes that the disclosure of the specific address may cause a threat of vandalism to persons or property, and/or loss of investment by the Company.

If you have any questions regarding the above information, do not hesitate to contact me.

Sincerely,

PII

Authorized Representative