



The Western Sugar Cooperative
(Grower Owned)

7555 E. Hampden Ave., Suite 600
Denver, Colorado 80231
Telephone: [Redacted] PII

March 17, 2011

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

FROM: The Western Sugar Cooperative (Responsible Entity)
7555 East Hampden Avenue, Suite 600
Denver, Colorado 80231

[Redacted] PII (Authorized Representative)

The Western Sugar Cooperative
7555 East Hampden Avenue, Suite 600
Denver, Colorado 80231

[Redacted] PII @westernsugar.com

[Redacted] PII

[Redacted] PII (Alternate Authorized Representative)

[Redacted] PII

The Western Sugar Cooperative
7555 East Hampden Avenue, Suite 600
Denver, Colorado 80231

[Redacted] PII @westernsugar.com

[Redacted] PII

[Redacted] PII

SUBJECT: Compliance Agreement Request - 2nd Submission

This letter serves as the formal request for The Western Sugar Cooperative (WSC) to be the responsible entity and enter into a compliance agreement with APHIS/BRS in advance of the shipment (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, [PII] am the authorized representative approved by The Western Sugar Cooperative, the responsible entity, and authorized to request, legally bind and obligate, and sign the compliance agreement on behalf of The Western Sugar Cooperative and its members, growers, contractors, etc.

The Western Sugar Cooperative wishes to move/plant H7-1 sugar beet (seeds and roots) associated with sugar beet root production activities. The required information is provided below. The Western Sugar Cooperative would like APHIS to fax the compliance agreement for review and signature. (WSC Fax number: [PII])

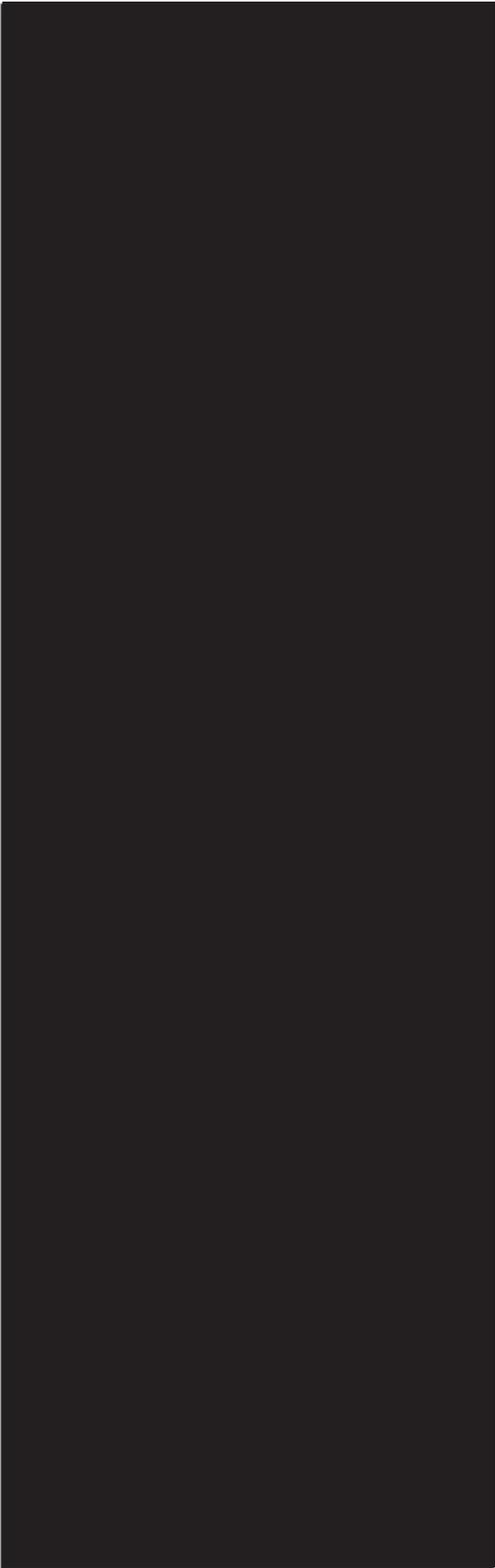
The Western Sugar Cooperative requests that [PII] be the alternate authorized representative for questions related to the compliance agreement and/or reporting instances of noncompliance. [PII] contact information is listed above.

Business Information:

The Western Sugar Cooperative, located at 7555 East Hampden Avenue, Suite 600, Denver, Colorado is the responsible entity and is a sugar beet cooperative. The Western Sugar Cooperative has 1,200 growers and operates in the States of Colorado, Montana, Nebraska and Wyoming where the activities under the compliance agreement will be conducted. The types of activities that will be conducted under the compliance agreement will be environmental release and movement.

Third Party Inspector and Third Party Auditor Information: Following is a list of individuals for USDA-APHIS to consider for inspectors and/or auditors for releases and auditors for movement of seed only. Their individual resumes and credentials will follow this letter:







For the movement of seed starting March 18, 2011, ending July 31, 2011, The Western Sugar Cooperative is responsible for the interstate shipping of approximately 10,000 lbs of H7-1 seed to the following entities and locations:

Western Sugar Growers & [REDACTED] Agronomist located in the following counties and states:
(The counties and states listed below can be both the origin and destination of the shipping of seed)

- Yellowstone County, Montana
- Big Horn County, Montana
- Park County, Wyoming

Morgan County, Colorado
Phillips County, Colorado
Sedgwick County, Colorado
Washington County, Colorado
Weld County, Colorado
Yuma County, Colorado
Big Horn County, Montana
Carbon County, Montana
Custer County, Montana
Rosebud County, Montana
Stillwater County, Montana
Treasure County, Montana
Yellowstone County, Montana
Banner County, Nebraska
Box Butte County Nebraska
Chase County, Nebraska
Cheyenne County, Nebraska
Dawes County, Nebraska
Deuel County, Nebraska
Keith County, Nebraska
Kimball County, Nebraska
Lincoln County, Nebraska
Morrill County, Nebraska
Perkins County, Nebraska
Scotts Bluff County, Nebraska
Sheridan County, Nebraska
Sioux County, Nebraska
Big Horn County, Wyoming
Goshen County, Wyoming
Laramie County, Wyoming
Park County, Wyoming
Platte County, Wyoming
Washakie County, Wyoming

Destination:

Adams County, Colorado
Boulder County, Colorado
Kit Carson County, Colorado
Larimer County, Colorado
Logan County, Colorado
Morgan County, Colorado
Phillips County, Colorado

Sedgwick County, Colorado
Washington County, Colorado
Weld County, Colorado
Yuma County, Colorado
Big Horn County, Montana
Carbon County, Montana
Custer County, Montana
Rosebud County, Montana
Stillwater County, Montana
Treasure County, Montana
Yellowstone County, Montana
Banner County, Nebraska
Box Butte County Nebraska
Chase County, Nebraska
Cheyenne County, Nebraska
Dawes County, Nebraska
Deuel County, Nebraska
Keith County, Nebraska
Kimball County, Nebraska
Lincoln County, Nebraska
Morrill County, Nebraska
Perkins County, Nebraska
Scotts Bluff County, Nebraska
Sheridan County, Nebraska
Sioux County, Nebraska
Big Horn County, Wyoming
Goshen County, Wyoming
Laramie County, Wyoming
Park County, Wyoming
Platte County, Wyoming
Washakie County, Wyoming

For Environmental Release, The Western Sugar Cooperative is responsible for the release of approximately 135,000 acres in the following counties and states. All listed release sites have been under agricultural production for the past three (3) years:

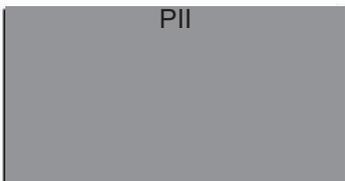
Adams County, Colorado
Boulder County, Colorado
Kit Carson County, Colorado
Larimer County, Colorado
Logan County, Colorado
Morgan County, Colorado
Phillips County, Colorado

Sedgwick County, Colorado
Washington County, Colorado
Weld County, Colorado
Yuma County, Colorado
Big Horn County, Montana
Carbon County, Montana
Custer County, Montana
Rosebud County, Montana
Stillwater County, Montana
Treasure County, Montana
Yellowstone County, Montana
Banner County, Nebraska
Box Butte County Nebraska
Chase County, Nebraska
Cheyenne County, Nebraska
Dawes County, Nebraska
Deuel County, Nebraska
Keith County, Nebraska
Kimball County, Nebraska
Lincoln County, Nebraska
Morrill County, Nebraska
Perkins County, Nebraska
Scotts Bluff County, Nebraska
Sheridan County, Nebraska
Sioux County, Nebraska
Big Horn County, Wyoming
Goshen County, Wyoming
Laramie County, Wyoming
Park County, Wyoming
Platte County, Wyoming
Washakie County, Wyoming

If you have any questions regarding the above information, do not hesitate to contact J. Kent Wimmer, WSC Alternate Authorized Representative.

Sincerely,

PII



Authorized Representative

P11





P11

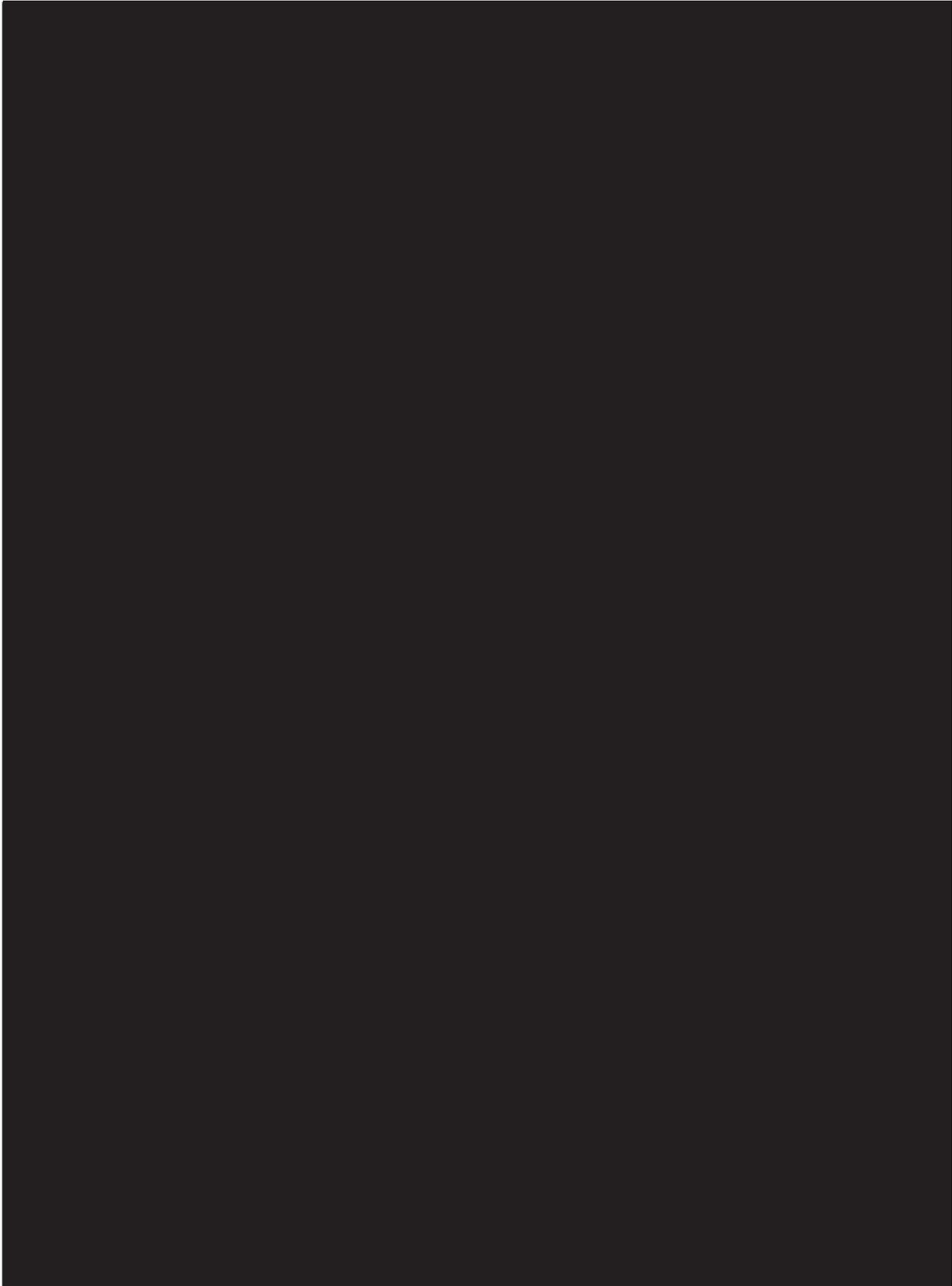


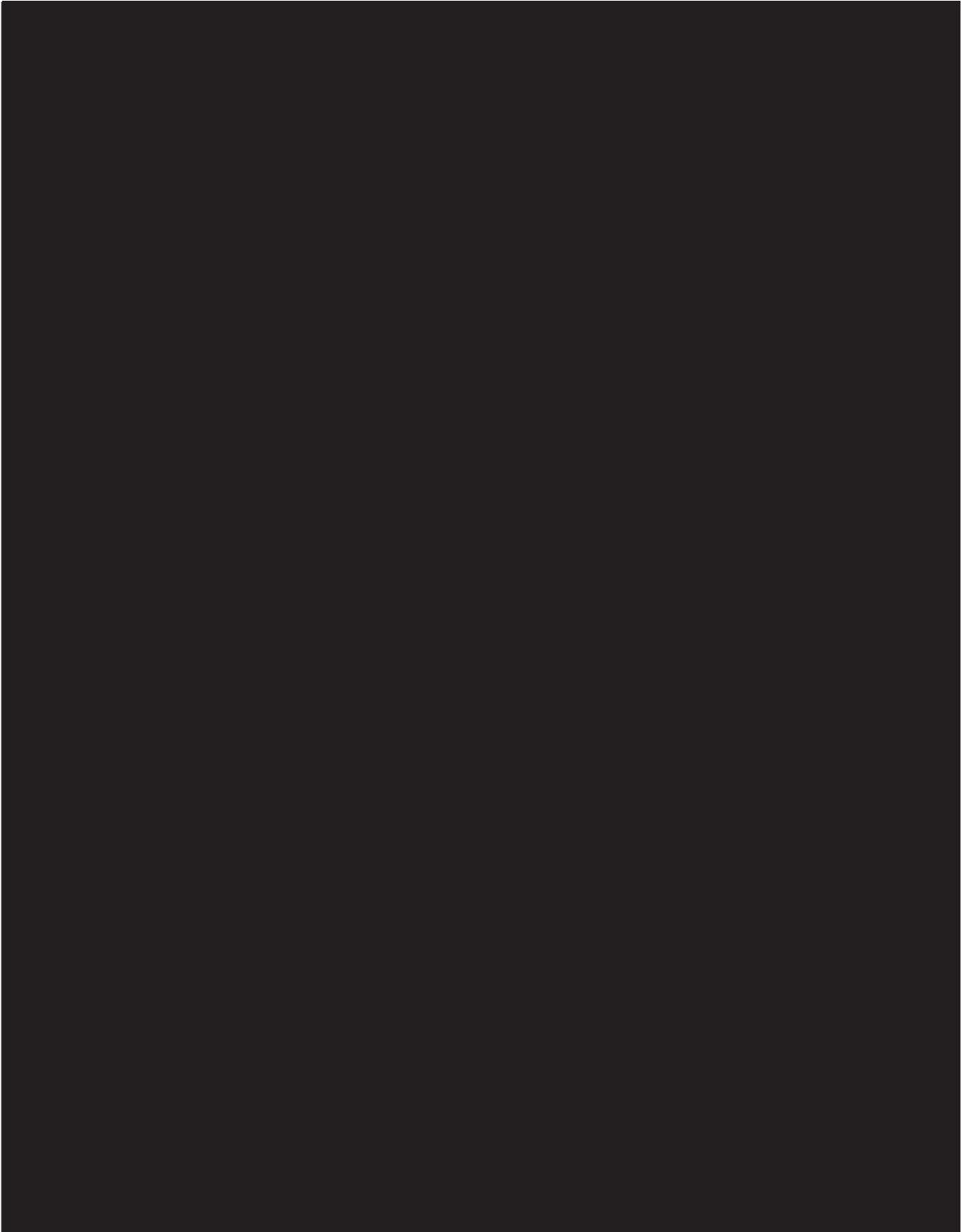
PII

P11



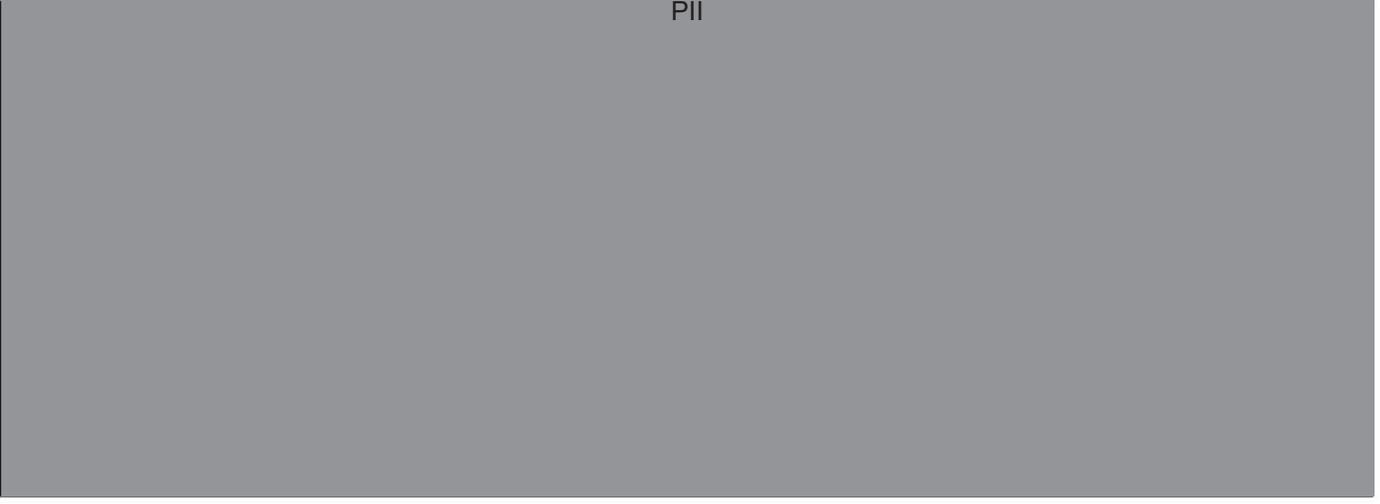
P11







PII





FOREWORD

Seed Certification in Wyoming is authorized by the Wyoming Seed Law, Chapter 12 (11-12-119). This law designated the College of Agriculture of the University of Wyoming as the official seed certifying agency for the state. Seed Certification is conducted under the direction the Agricultural Experiment Station and the University of Wyoming Cooperative Extension Service.

The Wyoming Crop Improvement Association (WCIA) serves as an advisory board to the Seed Certification Service. The WCIA is an organization of seed growers with a common interest in the Wyoming seed industry. The function of this organization is to advise the Seed Certification Service, distribute information concerning seed, promote certified seed and conduct any other business the members deem necessary for the betterment of the certified seed industry. The Association is governed by a board of directors elected by the membership and represents the various districts of the state. In addition, the Director of the Wyoming Agricultural Experiment Station; the Department Head for Plant Sciences and the Director of the University of Wyoming Cooperative Extension Service preside on the board as ex-officio directors.

Growers listed in this directory are members of WCIA, producing seed in accordance with the rules and regulations set forth by the Wyoming Seed Certification Service, which is a member of the Association of Official Seed Certifying Agencies (AOSCA). AOSCA is an organization composed of agencies responsible for seed certification in the U.S., Canada, and New Zealand.

Certified seed may be sold bagged or in bulk. Bagged seed must be packaged in new containers and have an official certified tag attached to each bag. Certified seed sold in bulk must be accompanied by a bulk sales certificate completed and signed by the grower.

"Certification" of any seed lot by the University means only that the certified seed lot has been visually inspected and that random samples have been tested and have been found to be in compliance with applicable standards as set forth by the Wyoming Seed Certification Service. Certification of any lot is not a guaranty or warranty that the certified lot is free from defects such as disease, rot or noxious weeds.

(THE SELLER, THE INSPECTOR, UNIVERSITY OF WYOMING AND ANY OF ITS ENTITIES MAKE NO WARRANTY OF ANY KIND, EXPRESSED OR IMPLIED, CONCERNING SAID SEED, INCLUDING MERCHANTABILITY, FITNESS FOR PARTICULAR PURPOSE, QUALITY OR ABSENCE OF DISEASE).

UNIVERSITY OF WYOMING

College of Agriculture
Crop Improvement Association

Seed Certification Service

Cooperating with Wyoming
Department of Ag Experiment Station
P.O. Box 983 · Powell, WY 82435
Ph. (307) 754-9815 · Fax (307) 754-9820

DESCRIPTION OF OUR PROGRAM AND SERVICES

The Wyoming Seed Certification Service is a function of the Department of Ag Experiment Station of the University of Wyoming, College of Agriculture. The authority for seed certification comes from the Wyoming Seed Law. The standards for the Wyoming Seed Certification Service are developed by the Association of Official Seed Certifying Agencies (AOSCA) whose authority comes from the Federal Seed Law.

The function of the Wyoming Seed Certification Service is to inspect seed fields submitted for certification to determine if they meet the existing standards. The information from the field inspection, plus results from the State Seed Lab and the Plant Disease Lab are reviewed by Wyoming Seed Certification Service to determine if a lot of seed meets all standards. Seed lots meeting minimum standards are issued certified tags.

The mission of the Wyoming Seed Certification Service is to make available to the

seed growers of Wyoming, a quality seed certification program compatible with AOSCA and other state seed certification agencies and to respond to the educational, research and other service needs of the seed growers by coordinating the needed activities with members of Plant Sciences staff and faculty, other departments within the University of Wyoming and agencies outside the University.

The Wyoming Crop Improvement Association (WCIA) serves as an advisory board to the Wyoming Seed Certification Service. The WCIA is an organization of seed growers with a common interest in the Wyoming seed industry. The function of this organization is to advise the Wyoming Seed Certification Service, distribute information concerning seed, promote certified seed and conduct any other business the members deem necessary for the betterment of the certified seed industry.

REPORT OF CROP ACRES APPLIED FOR CERTIFICATION 2005-2010

<u>CROP</u>	<u>2005</u>	<u>2006</u>	<u>2007</u>	<u>2008</u>	<u>2009</u>	<u>2010</u>
Alfalfa	5,712	7,885	8,729	7,452	8,420	8,095
Red Clover	259	610	1,169	689	347	52
Barley	304	876	1,044	1,216	1,349	760
Grass	990	1,117	1,543	1,576	1,685	1,494
Millet	454	274	132	138	39	39
Beans	10,319	7,938	6,763	9,412	14,465	13,681
Oats	70	248	166	438	428	180
Radishes						36
Sainfoin	18	18	95	172	179	425
Native Forbs and Grasses		154	118	170	178	216
Spring Wheat	176	0	88	82	85	97
Winter Wheat	2,406	1,423	2,288	2,971	2,864	2,782
Milkvetch	34	34	24	24	14	14
Crownvetch	63	110	102	116	116	124
Sweetvetch	5	6	7	12	12	12
TOTAL ACREAGE	20,810	20,693	22,268	24,672	30,181	28,007
WCIA MEMBERS (Growers)	116	118	107	128	137	133
WCIA MEMBERS (Non-Growers)	39	37	37	37	44	40

PII

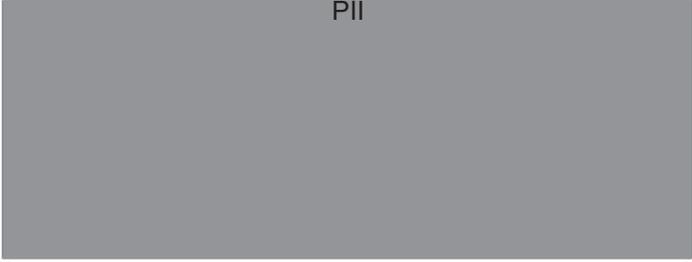


PII



P11

PII



PII

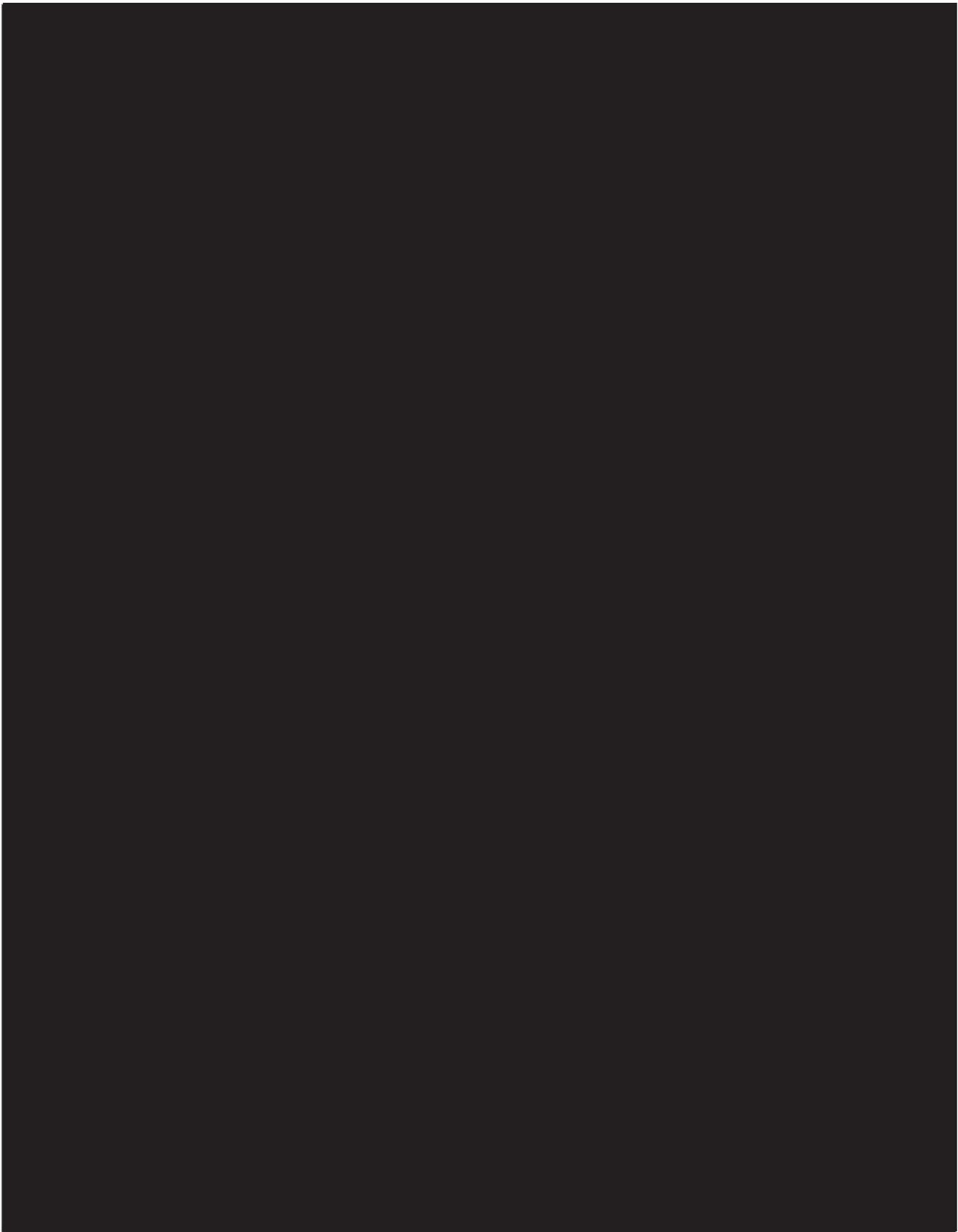




PII













PII



PII



PII



PII





PII

P11

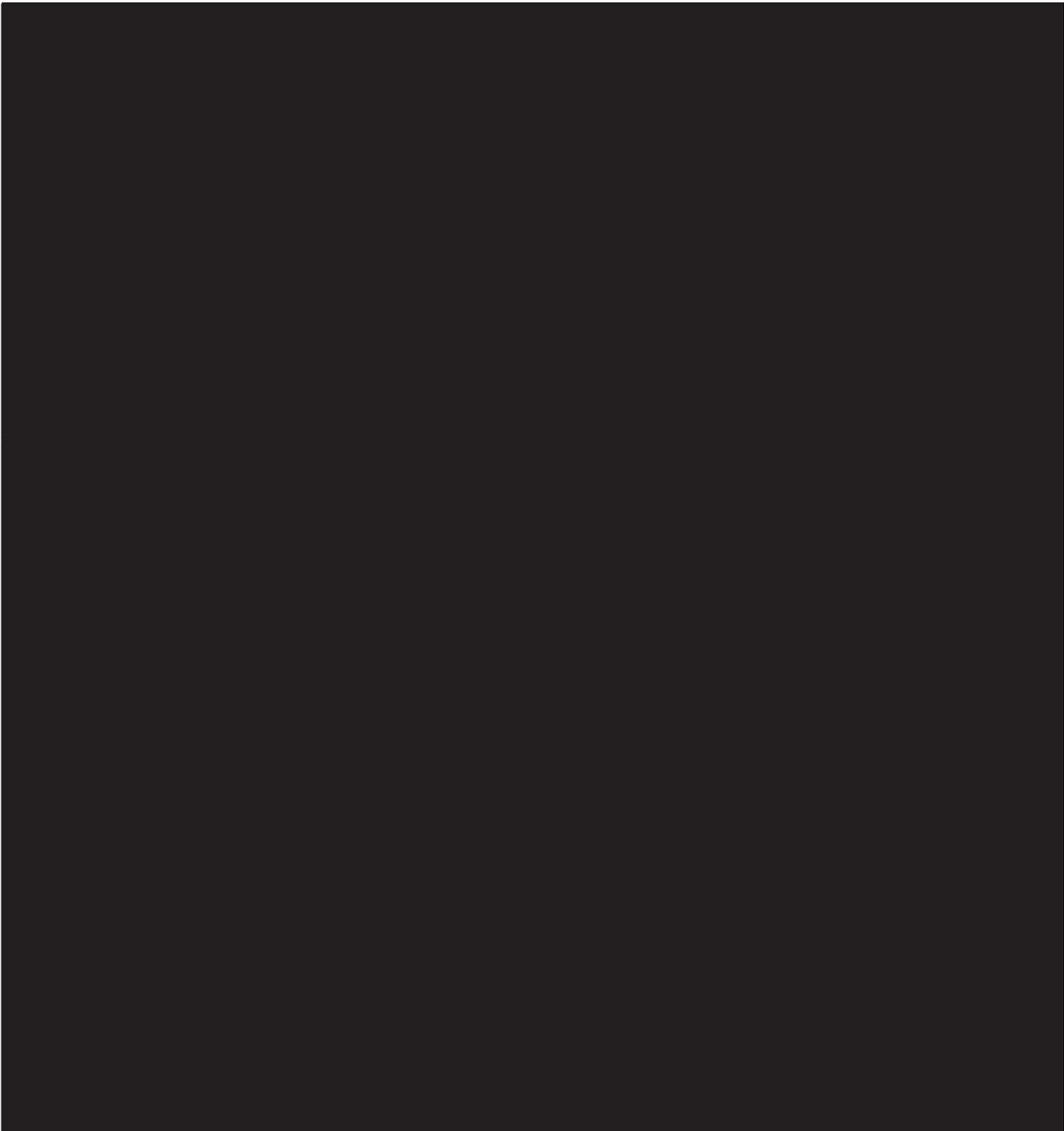


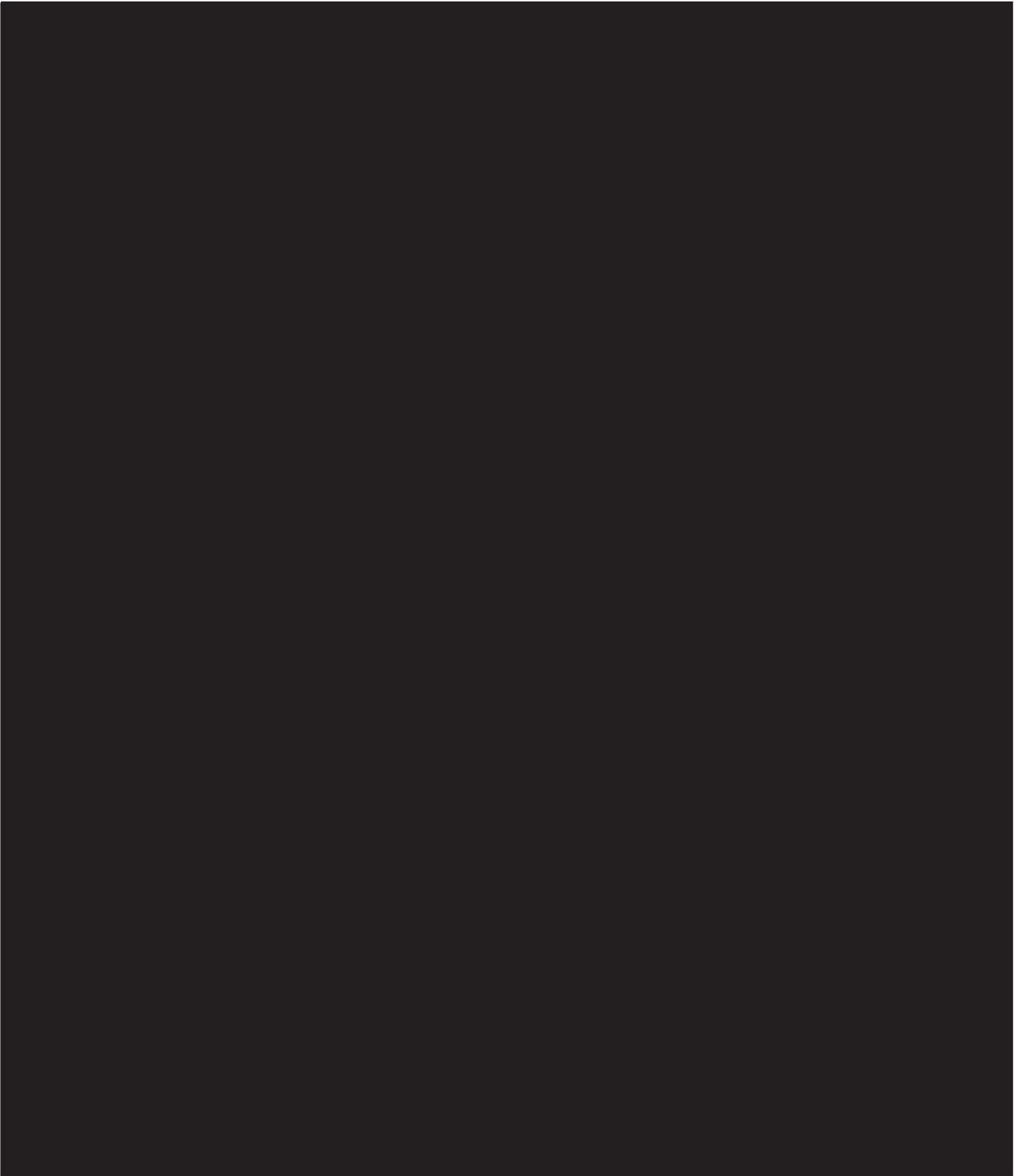
PII



Qualifications for third-party inspection and auditing services for:

**United States Department of Agriculture
Animal and Plant Health Inspection Service (APHIS)
Biotechnology Regulatory Services (BRS) - H7-1 Sugar Beet Root Crops**





P11

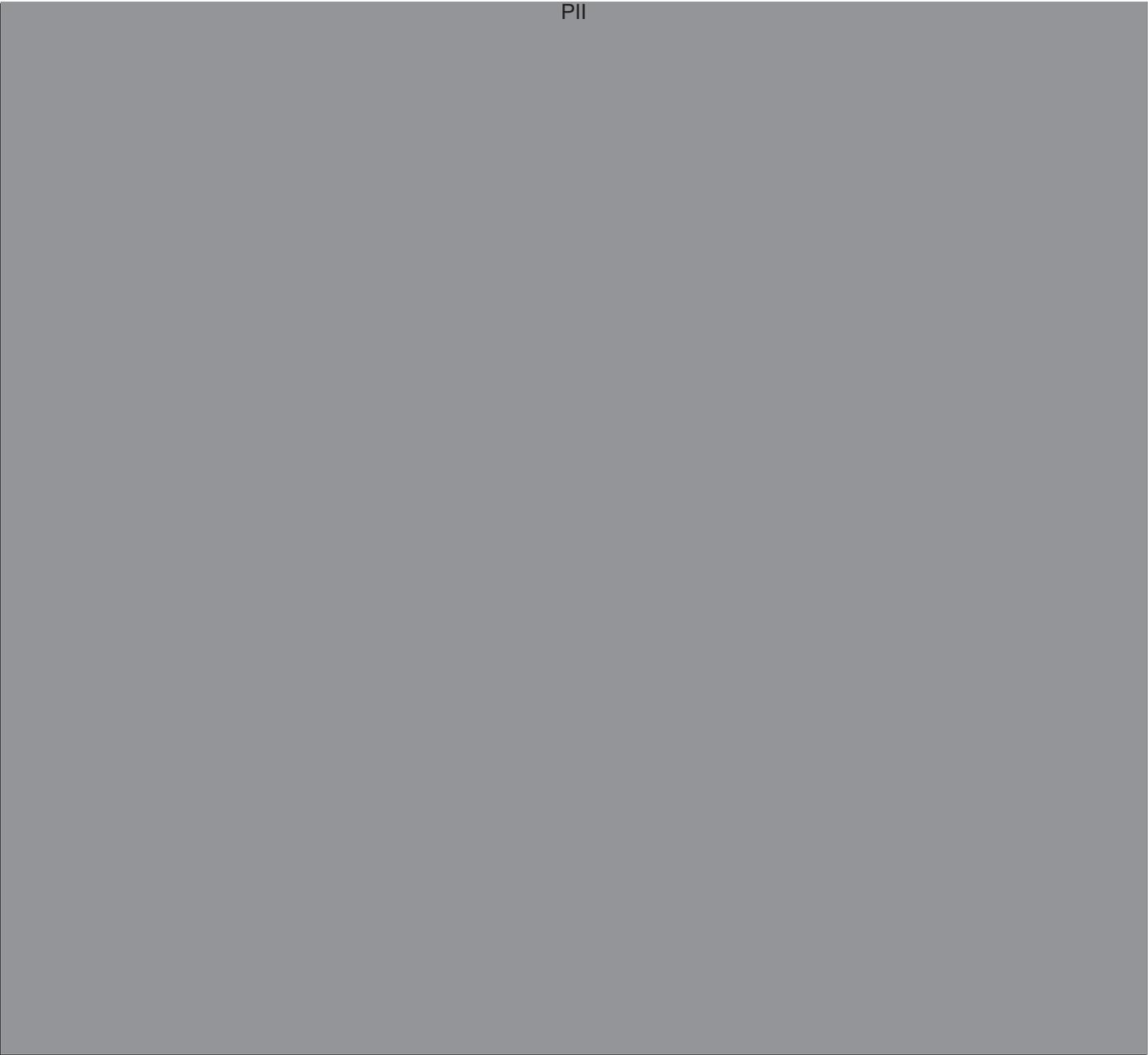




PII



PII



Page 1 of 1

PII

