

MICHIGAN SUGAR COMPANY

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: Responsible Entity – **Michigan Sugar Company**

Authorized Representative:

[REDACTED] PII
Michigan Sugar Company
2600 S. Euclid Ave.
Bay City, MI 48706
Phone: [REDACTED] PII
Cell Phone: [REDACTED] PII
Email: [REDACTED] PII [@michigansugar.com](mailto:[REDACTED]@michigansugar.com)

Authorized Alternate Representative:

[REDACTED] PII
Michigan Sugar Company
2600 S. Euclid Ave.
Bay City, MI 48706
Phone: [REDACTED] PII
Cell Phone: [REDACTED] PII
Email: [REDACTED] PII [@michigansugar.com](mailto:[REDACTED]@michigansugar.com)

SUBJECT: Compliance Agreement Request

This letter serves as the formal request for Michigan Sugar Company 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] PII am the authorized representative approved by Michigan Sugar Company, the responsible entity, and authorized to request, legally bind and obligate, and sign the compliance agreement on behalf of Michigan Sugar Company and its members, growers, contractors, etc.



CORPORATE OFFICES
2600 S. EUCLID AVENUE, BAY CITY, MICHIGAN 48706
TELEPHONE (989) 686-0161

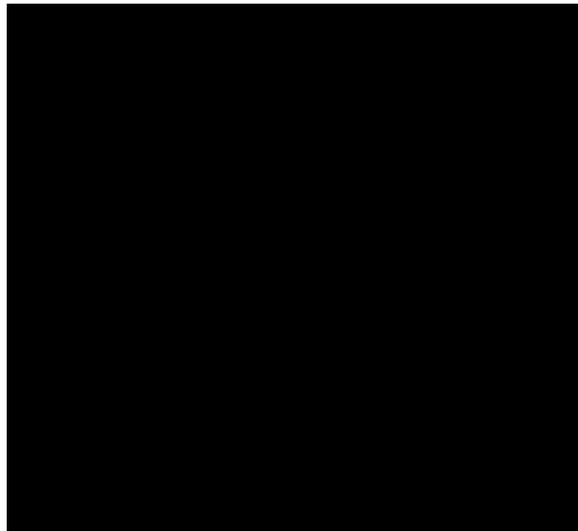


Michigan Sugar Company wishes to import, to move, and to plant H7-1 sugar beet (seeds and roots) associated with sugar beet root production activities. The required information is provided below. Michigan Sugar Company would like APHIS to contact us by fax at  PII

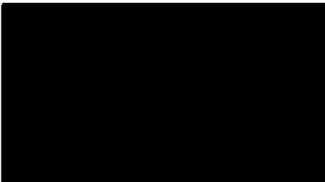
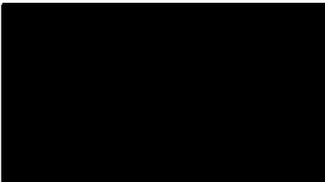
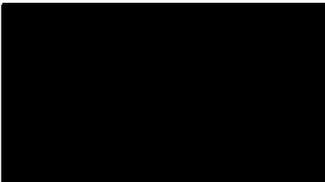
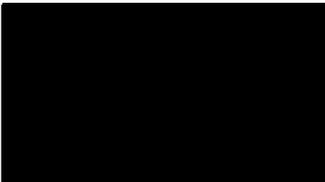
Business Information: Michigan Sugar Company is a cooperative owned by approximately 1,000 sugarbeet growers in the State of Michigan and Ontario, Canada. Michigan Sugar Company's corporate office is located at 2600 S. Euclid, Bay City, Michigan, and it has four factories in the State of Michigan (see names and addresses below) that process sugar from sugarbeets. Michigan Sugar Company growers will plant (environmental release) approximately 155,000 acres of RoundUp Ready sugarbeets and we will harvest and transport (movement and importation) the roots from these acres to our various receiving stations and factories in Michigan.

- Bay City Factory, 2600 S. Euclid Ave., Bay City, MI 48706
- Caro Factory, 819 Peninsular, Caro, MI 48723
- Croswell Factory, 159 S. Howard, Croswell, MI 48422
- Sebawaing Factory, 947 Pine, Sebawaing, MI 48759

Third Party Inspector and Third Party Auditor Information: Below are two companies which we submit for your approval to provide inspection and audit services.



For Importation and Movement: The following transportation companies will be utilized by Michigan Sugar Company to move the root crop from our receiving stations to our four factories. Note that Michigan Sugar Company does not import or distribute sugarbeet seed.

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Michigan Sugar Company will receive the entire root crop in the following Michigan counties:

- Arenac, Clinton, Gratiot, Huron, Ionia, Midland, Montcalm, Saginaw, Sanilac, Tuscola

Michigan Sugar Company will also import RoundUp Ready sugarbeets from Ontario, Canada (approximately 350,000 tons).

Michigan Sugar Company will begin receiving the root crop beginning approximately August 20, 2011, movement and importation will be completed by approximately March 20, 2012. Michigan Sugar Company will move and import approximately 2.5 million tons (our total crop is expected to be 4.5 million tons, with 2 million tons delivered directly to our factories from our growers).

For Environmental Release: Approximately 155,000 acres in the following counties in the State of Michigan: Arenac, Bay, Clare, Clinton, Genesee, Gladwin, Gratiot, Huron, Ionia, Iosco, Isabella, Lapeer, Mecosta, Midland, Montcalm, Ogemaw, Saginaw, Sanilac, Shiawassee, St. Clair, Tuscola.

The acreage in these counties has been used for agricultural purposes for the past three years.

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

Sincerely,

PII



Michigan Crop Improvement Association Mission Statement

The Michigan Crop Improvement Association (MCIA) ensures the integrity and consistency of Michigan Certified Seed through the production of high quality Foundation class seed and the seed certification process as mandated by the State of Michigan.

The Michigan Crop Improvement Association (MCIA) is dedicated to improving the productivity, profitability and competitive position of MCIA members and customers by providing services and seed products to producers, conditioners and distributors of plant products allowing them to provide high quality products throughout Michigan and the world.

Michigan Crop Improvement Association Quality Policy

Michigan Crop Improvement Association recognizes that a commitment to quality is central to the achievement of our mission. We are committed to providing our members and others engaged in the seed industry with quality inspection, certification and testing services, so that they may enjoy the benefits of a formal quality assurance system.

To accomplish this goal, we will as an association:

- Provide our members with services, which meet or exceed, agreed to specifications.
- Allow only qualified staff to provide services through member feedback.
- Continually improve our own services through member feedback.
- Consistently provide our members with cost-effective, on-time services.

MCIA is committed to the principles of seed certification and quality assurance. We recognize the benefits which quality agricultural seed stock provides to our members and their customers.

Our commitment to quality is fully endorsed by top management, and our success will be measured by the satisfaction of our members.

Services Provided By Michigan Crop Improvement Association

MCIA provides services to members through Seed Certification, Quality Assurance inspections, Identity Preserved inspections, disease inspections, auditing records, record keeping, royalty collections, laboratory testing, field rouging, providing Foundation seed product, specialty product conditioning, and conditioning of organic product.

In addition to certifying over 87,000 acres of field crops in 2010, MCIA also has performed field services inspections on an additional 38,000 acres. The MCIA seed lab offers a variety of tests including; seed purity, standard germination, cold tests, AA vigor tests, TZ tests, seed counts, and both a seed soak method and ELISA strip test method of testing seed for herbicide resistance.

Michigan Crop Improvement Association is a member of the Association of Official Seed certifying Agencies (AOSCA), a national organization promoting seed certification and other member services. In cooperation with AOSCA, MCIA has been involved in performing IRM

compliance audits for Monsanto, Syngenta Seed, and Dow AgroSciences. These audits verify that corn producers comply with the refuge requirements for producing BT corn hybrids. In 2010 MCIA performed 94 of these audits.

MCIA has a Memorandum of Understanding agreement with USDA-AMS to administer the OECD program in Michigan. MCIA will provide field inspections, lab testing, and tag printing for some customers, while providing auditing and control testing for accredited customers. MCIA is also responsible to do the required OECD post control testing.

The success of an organization is greatly affected by the quality of its employees. MCIA is very fortunate to have a skilled and professional staff that is committed to serving our membership. Our permanent staff currently consists of 7 full time employees, and 1 part-time seed lab employee. MCIA also hires part-time summer staff including 25 part-time field inspectors. The average years of experience for MCIA field inspectors are 10 years.

Michigan Crop Improvement Association Customer List

A partial list of MCIA customers include; Ag Reliant Genetics, Bayer Crop Science, Dow ArgoScience, Pioneer Hi-bred Int'l, Monsanto, Syngenta Seeds, Britton Elevator Company, Cooperative Elevator Company, DF Seeds, Harrington Seeds, Irrer Seed Farm, Mendon Seed Growers, Moore Seed Farm, Northern Star Integrated, Organic Bean & Grain, Remington Hybrids, Star of the West Milling Co., and Witt Seed Farm. Additional customers and contact information can be found on the MCIA web site, www.michcrop.com.

STAFF CURRICULAM VITA

Name & Contact Information

Randy Judd

MCIA Current Job Title:

Manager

Summary of Qualifications:

27 Years experience in seed certification in Michigan.

Education:

- B.S. in Crop & Soil Science, 1978, Michigan State University
- M.S. in Seed Technology, 1980, University of Kentucky

Professional Experience:

- Fifteen years as manager of Michigan Crop Improvement Association
- Twelve years as assistant manager of Michigan Crop Improvement Association
- Twenty-seven years of field inspection experience

Additional Professional Activities:

- ISO 9000 Internal Auditor Training by Pioneer Hi-Bred International
- Roundup Ready Soybeans Quality Seminar Training by the Monsanto Company
- AOSCA ISO/Auditor Training Seminar by Monsanto ISO Management Rep.
- USDA/AOSCA ISO 65 Quality Management Seminar by MCIA Reps.

Accreditations:

Registered Seed Technologist 1992

Staff Curriculum Vita

Version 1/11

2011 Michigan Crop Improvement Association

Critereon Company, LLC

•Provides authenticity management products and services to agri-food companies

- Implementation services – audits and inspections
- Consulting, training, system design
- Software for Quality, Compliance, and IP systems

•Background:

- Founded in 1991
- is a business unit of Critereon
- Agriculture and food industry expertise in development and management of quality systems

Experience

•Crops

- Biotech regulatory compliance & stewardship
- Production to quality specifications
- Export production and channeling

•Livestock

- Develop and administer certified quality programs

•Processing

- Assist in achieving quality standards - e.g., HACCP, et al

Regulatory Compliance Implementation Services

- Compliance Manual Assessment
- Training of Field Staff
- Pre-flower Field Audits
- Planting & Harvest Audits
- Volunteer Monitoring Audits
- In-depth Site Assessments
- Excellence Through Stewardship™ (ETS), APHIS Biotech Quality Management System (BQMS), and other QMS (ISO, et al) Assessments

Regulatory Compliance Implementation Services

- Geography
 - USA, Canada, Mexico, Argentina, Brazil, Chile, India, several EU countries
- Crops
 - Corn, Soybeans, Cotton, Canola/Rapeseed, Rice, Potatoes, Wheat, Flax, Vegetable crops

Critereon Software for Regulatory Compliance

- Web-based application: **Authentix™**
- Web-based, customizable software to manage and report regulatory compliance data
- Data collection: **Xpaper™**
- Digital pen-and-paper that transforms hand-written forms into PDF's for reporting, filing, emailing (www.myxpaper.com)

Regulatory Compliance Summary

- 2nd and 3rd party audits to specifications
- Process & Quality Control consulting
- Proprietary technology for collecting, managing, and reporting compliance activities
- Wide range of crop and geographical experiences

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Contact Information:

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