

Grower Requirements and Conditions for Planting Roundup Ready Sugar Beets

- 1.** All acres must be entered in the WSC beet accounting system as contracted fields before seed can be issued from the dealer.
 - a. If a grower changes a field during planting that is not contracted, they must notify and contract that field with their agriculturist within 24 hours.

- 2.** Roundup Ready Sugar Beets are only allowed on fields that have been in agricultural production for at least three years prior to planting.

- 3.** Growers are required to either text, email, or call their agriculturist within 24 hours of a contract being planted with the:
 - a. Planting date
 - b. Contract number
 - c. Acres planted
 - d. Seed variety

- 4.** Beginning April 1st, growers shall survey each field every 3 to 4 weeks to identify and eliminate bolters.
 - a. Growers are responsible for training their employees if they are doing inspections and record keeping.
 - b. Grower inspections must be performed, recorded, and maintained regardless of the presence of bolters.
 - c. If bolters are found, growers must contact their agriculturist within 24 hours.
 - i. The Western Sugar Cooperative must report to APHIS within 48 hours.
 - ii. Growers must destroy bolters in the field.
 - 1.** Document and maintain records on this action

- 5.** APHIS approved third party inspectors will randomly select fields to inspect for bolters. If the third party inspector finds a bolter they will directly contact the grower and the bolter must be removed immediately.

- 6.** APHIS approved third party auditors will inspect grower records including;
 - a. Seed shipping records/receipt
 - b. Facilities
 - c. Fields
 - d. Transport vehicles
 - e. Planting date by field
 - f. Planted acres by field
 - g. Grower field inspections
 - iii. In season crop inspections records
 - iv. Biannual rotational crop inspection records

7. In your crop rotation, fields following beets must be monitored for volunteers during the growing season for next three crop years or until beets are grown again. **Growers will maintain records of inspections done twice per year** during the growing season. Volunteer beets must be destroyed.

Requirements/Conditions for Movement of the Seed for Root Crop Production:

1. Seed movement across state lines will require triple containment.
 - a. This means seed must be placed in a secondary and third container that is independently capable of preventing spillage or loss of seed during transport.
 - b. Each container shall clearly identify that the seed contents within shall only be used for the planting of sugar beet root crop.

Requirements/Conditions for Movement of the Root Crop for Processing:

1. The grower agrees that beet trucks will be loaded in a manner to restrict losses.
 - a. If accidental spillage occurs during transportation to receiving station all beets must be cleaned up and incident reported to your agriculturist.

Consequences for Non Compliance

1. Western Sugar can enforce 2.9 of the 2011 Shareholder and Non-Shareholder Agreement by terminating the right to deliver beets to the Cooperative for processing.

Western Sugar recommendations for Good Stewardship

1. That all sugarbeet seed boxes be burned or disposed of properly
2. Seed spilled in areas other than a sugarbeet fields must be cleaned and place into a sugarbeet field

**Western Sugar Cooperative
Shareholder & Non-Shareholder
Compliance Agreement
2011 Crop**

As a condition for the USDA-APHIS partial deregulation of the H7-1 root crop the Western Sugar Cooperative (WSC) has entered into a compliance agreement with the USDA which is legally binding and enforceable upon WSC and its Shareholders and Non-Shareholders for the utilization of roundup ready tolerant beet seed which contains the H7-1 gene.

This agreement authorizes root crop production activities and ensures that all persons involved in each step of the entire production cycle of the H7-1 beet root crop (from obtaining seed for planting to the transportation of the root crop to the processing facility) are knowledgeable about the requirements of this agreement and are in compliance with the requirements/conditions for the movement and/or the environmental release (planting) of the H7-1 root crop.

I, the below signed WSC grower (entity) confirm my understanding of the mandatory requirements/conditions set forth in the agreement and confirm that grower (entity) will comply with all the requirements of the agreement. The mandatory requirements/conditions for the H7-1 sugar beet root crop production under this agreement are outlined and attached Appendix A and incorporated into this agreement by reference and bound by paragraph 15.2 of the 2011 Shareholder and Non-Shareholder Agreements.

As per paragraph 2.9 of the 2011 Shareholder and Non-Shareholder Agreement, if the Board of Directors finds a Shareholder or a Non-Shareholder in breach of the agreement, the Board of Directors may impose on the Shareholder or Non-Shareholder one or more of the remedies of paragraph 2.9, but more specifically paragraph (c) the termination of this Agreement and the right to deliver beets to the Cooperative for processing.

I hereby attest that I have been trained and knowledgeable in the requirements and conditions of this Compliance Agreement and will comply with these requirements and conditions.

Signature

Date

Print Name of Grower (Entity)

Western Sugar Trainer