



IDAHO - EASTERN OREGON SEED ASSOCIATION

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July 25, 2015

TO: Jared Stuart, Idaho State Department of Agriculture

FR: Roger Batt, Executive Director

A handwritten signature in blue ink, appearing to be 'RB', is written over the name 'Roger Batt'.

RE: Support of Bean Rules – IDAPA

This letter is to inform you that the Idaho Eastern-Oregon Seed Association representing 135 members within the Idaho Seed Industry is in full support of IDAPA 02.06.25 Rules Governing the Planting of Beans, Other than *Phaseolus* Species in Idaho.

To recap our Association's involvement in this issue, we were provided information during the 2014 Annual Winter Convention by one of our members. The concerns presented at that time were testing requirements in a prior approved and adopted set of Rules that would include all plantings regardless of the size of the seed lot and include non-*Phaseolus* Idaho-grown seed. These unforeseen consequences in the prior adopted set of Rules meant that a company could be forced to spend thousands of dollars on testing requirements for small trial grounds (often with less than 1 pound of seed for each trial.)

The IEOSA discussed these concerns with our Board of Directors and presented the information to the Membership during the Annual Business Meeting. It was agreed by both the Board and our Members that we work with the ISDA to provide an exemption from the testing requirements for those planting Trial Grounds. We were certain that Negotiated Rulemaking was going to result due to these discussions. This set of Rules accomplishes the goals and objectives set forth by the Industry that was also discussed with the ISDA.

Thank you for your time and attention to this notice.