



DuPont Agriculture & Nutrition
Pioneer Emerson Building
7250 N.W. 62nd Ave.
P.O. Box 552
Johnston, IA 50131-0552
(515) 270 3202 Tel

August 29, 2007

Henry S. Jennings
Acting Director
Maine Board of Pesticides Control
28 State House Station
Augusta, ME 04333-0028

Dear Mr. Jennings,

Pioneer Hi-Bred International, Inc. and Dow AgroSciences both appreciate the opportunity to respond to the Maine Board of Pesticide Control's registration process for Bt corn. We also would like to thank the MEBPC for your continued transparency and hard work. It is our understanding that, along with the approval to sell, the following two conditions were proposed for selling Herculex® Bt products in Maine.

1. Registrants shall provide the Maine Board of Pesticide Control annually with Bt sales records.
2. Registrants shall actively participate/support grower training on stewardship principles.

In response to the first registration requirement, we anticipate no issues with our respective companies annually providing the total number of Bt corn units sold in Maine to the Board of Pesticides Control, once we have approved a mechanism in place to keep the individual company numbers confidential and not subject to FOIA requests. The individual company numbers can then be totaled and provided to the public board and interested parties on a non-confidential basis. This will allow the amount and percentage of Bt corn grown in Maine each year to be tracked. As an alternative, we would be supportive of providing sales numbers to a 3rd party not subject to FOIA requests (such as Stan Abramson at Arent & Fox, an attorney that seed companies currently use for similar EPA situations).

Due to several concerns, including competitive business information, consumer privacy rights and potential grower exposure to bioterrorism, we are willing to provide sales data at the company level. We cannot provide or share names of individual grower or their sales records.

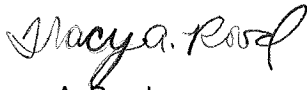
Regarding the second requirement, third party market research has shown that growers expect to receive most of their Insect Resistance Management (IRM) training and education from seed companies and their seed dealers. These surveys have also shown that seed companies and seed dealers have done an excellent job of providing that information and equipping growers with sufficient IRM knowledge prior to planting. Based on our current training models, we would like to continue this record of success in Maine by allowing our individual companies and employees to be the main source of grower education. Similar to our EPA-mandated requirements, a packet of education and training materials could be provided to the Board for their approval upon registration. To supplement our efforts we would participate by supplying materials to grower

groups, academics, extension and other interested parties to provide additional grower information and training as the Board deems necessary.

In addition to IRM, given Maine's agricultural landscape, we are willing to incorporate training materials and education on pollen movement to our Bt corn customers. Because we believe protecting identity preserved crops is best handled at the grower level, we will also incorporate information encouraging Bt growers to communicate their planting plans with neighbors who choose to preserve the identity of their crops for certain markets. Due to the small number of corn acres in Maine and the low number of organic growers who neighbor potential Bt corn growers, we believe rule making is not necessary to facilitate good communication.

Please feel free to contact me at 515-270-4036 or tracy.rood@pioneer.com if you require additional information.

Sincerely,

A handwritten signature in cursive script that reads "Tracy A. Rood".

Tracy A. Rood
Registration Manager

cc: Derek Hines, Pioneer Sales Representative
Penny Hunst, Dow AgroSciences