

EXHIBIT I

UNITED STATES DISTRICT COURT

FOR THE

DISTRICT OF VERMONT

GROCERY MANUFACTURERS)
ASSOCIATION, SNACK FOOD)
ASSOCIATION, INTERNATIONAL)
DAIRY FOODS ASSOCIATION, and)
NATIONAL ASSOCIATION OF)
MANUFACTURERS,)

Plaintiffs,)

v.)

Case No. 5:14-cv-117

WILLIAM H. SORRELL, in his official)
capacity as the Attorney General of Vermont;)
PETER E. SHUMLIN, in his official capacity)
as Governor of Vermont; TRACY DOLAN,)
in her official capacity as Commissioner of the)
Vermont Department of Health; and JAMES B.)
REARDON, in his official capacity as)
Commissioner of the Vermont Department)
of Finance and Management,)

Defendants.)

DECLARATION OF REED GLIDDEN

I, Reed Glidden, make this declaration pursuant to Federal Rule of Evidence 702, in opposition to Plaintiffs’ request for a preliminary injunction.

1. I am the President and founder of Beanfields Snacks. Beanfields is a manufacturer of bean and rice tortilla chips in a variety of seven flavors, all of which are non-GMO verified, vegan, and certified gluten free. Our primary goal when we founded Beanfields was to help improve the global food supply by creating delicious, plant based, non-GMO snacks,

with beans as the primary ingredient. Beanfields supports Act 120, which requires labeling of products in Vermont that are produced through genetic engineering (GE foods).

GE Foods Are Not Natural

2. In 1989, before founding Beanfields, I began work at a small natural foods brokerage firm in Chicago, Illinois. At that time, the natural foods industry was a small industry, and no one had heard of a natural food brokerage. Within five months, I owned the company. Within two years I had five employees selling into an eleven-state area the size of Europe. Ten years later my food brokerage firm, Choice Marketing, had 80 employees operating in 38 states.

3. Just as my company grew, there is a huge and growing demand from the public for natural foods. We constantly hear from our consumers via our website, email and phone calls that consumers appreciate the non-GE products that we sell and are asking us to do more. We also hear from our retail partners that this issue of non-GMO is more important to them as they are getting increasing customer demand for non-GE products.

4. In my opinion, as a person with hands-on knowledge of the natural food business, there has been a steady slippage in what natural means as companies are taking advantage of the trend and demand from consumers for healthier products. In my opinion, based upon my experience in the natural foods industry, if a company sold a GE food and marketed it as “natural” it would be misleading to consumers.

Time Required to Label Products and the Cost to Label

5. As the President of Beanfields, I am intimately involved with the design of the packaging for our products. I write everything that appears on the package and I am involved in approving of all final decisions regarding packaging. Once we have designed the art work, we

send the art to a printer and request the packaging be made to our specifications. We then have the chips inserted in the package.

6. Because Beanfields only produces non-GE Foods, Beanfields will not be required to re-label to comply with Act 120. If it did have to re-label, however, Beanfields would be able to do so in a relatively inexpensive way that could be accomplished well before the effective date of the law.

7. Beanfields orders labels from the printer approximately every 3 months. Although we usually re-order the same labels, it is common for us to make a label change to a product for marketing reasons. In fact, we have averaged around one label change or more per year over the last few years. Changing labels is simply part of the business.

8. If a company could time its re-labeling for Vermont's law with its regular re-labeling for marketing purposes, it would not cost the company anything to comply with Vermont's law.

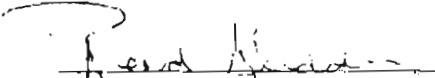
9. Similarly, if a company could time its re-labeling for Vermont's law with the re-labeling that all food manufacturers will need to do when the FDA finalizes its rule on updating the Nutrition Facts panel, it would not cost the company anything additional to comply with Vermont's law.

10. If a re-labeling was done solely to comply with Vermont's law, it would only cost \$300 to \$400 per color for the plate change necessary to make the disclosure. Assuming Beanfields chose to place the disclosure on the back of the product (where the Nutrition Facts are) and label in one color, as allowed by the draft rules issued by the Attorney General's Office, the cost would be limited to this \$300 or \$400 figure per label change.

11. In my estimation, based upon previous label changes, while a longer lead time is always preferable, Beanfields could easily make the changes necessary to comply with the labeling requirements in 3 to 4 months.

12. Given Beanfields' experience with labeling, I disagree with any suggestion by the Plaintiffs that Act 120 will force companies to go out of business. Overall, the cost of compliance is low, and can easily be absorbed by most companies or passed on to consumers. This is true even for small companies like Beanfields.

I swear under penalty of perjury that the foregoing statements are true and correct to the best of my knowledge.


Reed Glidden

Dated: November 11, 2014