



Australian Government
Department of Health and Ageing
Office of the Gene Technology Regulator

Licence for Dealings Involving an Intentional Release of GMOs into the Environment

Licence No.: DIR 047/2003

Licence holder: Department of Primary Industries, Victoria

**Title: Field evaluation of genetically modified white
clover resistant to infection by alfalfa mosaic virus**

Issued: 30 July 2004
Varied: 23 August 2004
Varied: 8 April 2005

More information about this licence is contained in the Risk Assessment and Risk Management Plan prepared in connection with this licence. This document can be obtained from the Office of the Gene Technology Regulator website at <http://www.ogtr.gov.au>, or by telephoning the Office on 1800 181 030.

The *Gene Technology Act 2000* (Cth) and corresponding state and territory legislation form a substantial part of a range of integrated regulatory measures relevant to controlling genetically modified organisms (GMOs) and their use.

The Gene Technology Regulator is required to consult with, and take into account advice from, a range of regulatory authorities on risks to human health and safety and the environment in assessing applications for dealings involving the intentional release of GMOs into the Australian environment.

Note in relation to Anti-viral Resistance Management

The *Gene Technology (Consequential Amendments) Act 2000* (Cth) requires the Australian Pesticides and Veterinary Medicines Authority (APVMA) to consult the Gene Technology Regulator for the purposes of making certain decisions regarding registration or issuing a permit for a chemical product that is or contains a genetically modified product.

The GMOs referred to in this licence falls under the *Agricultural and Veterinary Chemicals Code Act 1994* (Cth) definition of agricultural chemical product, due to the production of a viral coat protein which confers resistance to infection by Alfalfa mosaic virus, and is therefore subject to regulation by the APVMA. The APVMA assesses the hazard of development of anti-viral resistance as part of its evaluation process and would impose conditions to manage any risks. Therefore, the conditions of this licence do not relate to management of anti-viral resistance, and do not displace any conditions set by the APVMA. The licence holder must comply with any conditions imposed by the APVMA in relation to dealings with the GMOs covered by this licence.

Note regarding conditions applying to Howlong site

This licence imposes conditions in relation to ongoing monitoring obligations for the Howlong site. Note that:

Section 1 'Interpretation and Definitions' apply as relevant to the Howlong site.

Section 2 'General Conditions' apply as relevant to the Howlong site.

Section 3 'Specific Conditions' do not apply to the Howlong site.

Section 4 'Howlong Conditions' apply only to the Howlong site.

SECTION 1 INTERPRETATIONS AND DEFINITIONS

This licence does not authorise dealings with GMOs that are otherwise prohibited as a result of the operation of State legislation declaring areas to be GM, GM free, or both, for marketing purposes.

In this licence:

- (a) Words and phrases used in this licence have the same meaning as they do in the Act and the Regulations;
- (b) Words importing a gender include any other gender;
- (c) Words in the singular include the plural and words in the plural include the singular;
- (d) Words importing persons include a partnership and a body whether corporate or otherwise;
- (e) References to any statute or other legislation (whether primary or subordinate) are a reference to a statute or other legislation of the Commonwealth of Australia as amended or replaced from time to time and equivalent provisions, if any, in corresponding State law, unless the contrary intention appears;
- (f) Where any word or phrase is given a defined meaning, any other part of speech or other grammatical form in respect of that word has a corresponding meaning; and
- (g) Specific conditions prevail over standard conditions to the extent of any inconsistency.

In this licence:

‘Act’ means the *Gene Technology Act 2000* (Cth) and equivalent provisions in corresponding State law;

‘Annual Report’ means a written report provided to the Regulator within 90 days of each anniversary of this licence containing all the information required by this licence to be provided in the Annual Report;

‘Autumn’ means the period 1 March to 31 May;

‘Clean’ (or **‘Cleaned’**), as the case requires, means:

- (a) in relation to a Location or other area, the Destruction of the plants in that Location or area, to the reasonable satisfaction of the Regulator; or
- (b) in relation to Equipment, the removal and Destruction of plants or plant material from the Equipment, to the reasonable satisfaction of the Regulator;

‘Cultivate’ means plough to a depth of not more than 25mm;

‘Destroy’, (or **‘Destroyed’** or **‘Destruction’**) means, as the case requires, killed by one or more of the following methods:

- (a) stalk pulling; or
- (b) uprooting by ploughing; or
- (c) burning; or
- (d) treatment with herbicide; or
- (e) hand weeding;

Note: ‘As the case requires’ has the effect that, depending on the circumstances, one or more of these techniques may not be appropriate.

‘Equipment’ includes machinery, harvesters, seeders, storage equipment, transport equipment (eg bags, containers, trucks), clothing and tools used in connection with this licence;

‘GM’ means genetically modified;

‘GMOs’ means the genetically modified organism or organisms authorised for release by this licence;

‘Howlong site’ means the site at Heritage Seeds Research Farm Howlong, NSW that was previously planted to GM white clover under PR-64 and which is defined by the following GPS coordinates:

GPS coordinates for the corners of the outermost fence:

North West corner: 35° 59.94S, 146° 39.23E
North East corner: 35° 59.98S, 146° 39.30E
South West corner: 36° 00.01S, 146° 18.23E
South East corner: 36° 00.04S, 146° 39.25E

GPS coordinates for the corners of the innermost fence:

North West corner: 35° 59.99S, 146° 39.22E
North East corner: 36° 00.00S, 146° 39.23E
South West corner: 36° 00.01S, 146° 39.21E
South East corner: 36° 00.01S, 146° 39.23E

‘Inner Fence’ as used in the **Specific Conditions** means the rabbit-proof fence surrounding the Location with the GPS corner coordinates set out at Attachment C;

‘Location’ means the area of land where the GMOs are planted and grown;

‘Material from the GMOs’ means genetically modified material, including parts of GMOs that are derived from or produced by the GMOs;

‘Natural Waterways’ means waterways other than irrigation channels, holding dams or storage ponds used to collect water runoff from irrigated areas;

‘OGTR’ means the Office of the Gene Technology Regulator;

‘Outer Fence’ as used in the Specific Conditions means the stock-proof fence around the Location with the GPS corner coordinates set out at Attachment C;

Regulator’ means the Gene Technology Regulator;

‘Sign-off’ means a notice in writing from the Regulator, in respect of a place, that inspection conditions no longer apply in respect of that place;

‘Spring’ means the period 1 September to 30 November;

‘Volunteer plants’ means progeny of the GMOs, GM or non-GM White Clover;

‘White Clover’ means *Trifolium repens* L.

SECTION 2 GENERAL CONDITIONS

Duration of Licence

1. This licence remains in force until it is suspended, cancelled or surrendered. No dealings with GMOs are authorised during any period of suspension.

Holder of Licence

2. The holder of this licence ('the licence holder') is the Victorian Government Department of Primary Industries.

Project Supervisor

3. The Project Supervisor in respect of this licence is identified at Attachment A.
4. The licence holder must immediately notify the Regulator in writing if any of the contact details of the Project Supervisor change.

No dealings with GMOs except as authorised by this licence

5. Persons covered by this licence must not deal with the GMOs except as expressly permitted by this licence.

GMOs covered by this licence

6. The GMOs covered by this licence are described at Attachment B.

Permitted dealings

7. The permitted dealings with the GMOs are to plant and grow 4 crops of the GMOs and to conduct experiments on the GMOs that are grown. The permitted dealings include the possession, storage, supply, use, transport and disposal of the GMOs for the purpose of any of the permitted dealings with the GMOs, or in the course of any of these dealings.

Persons covered by this GMO licence

8. The persons covered by this licence are the licence holder and employees, agents or contractors of the licence holder and other persons who are, or have been, engaged to undertake any activity in connection with GMOs grown in a Location pursuant to this Licence.

Informing people of their obligations

9. The licence holder must inform any person covered by this licence, to whom a particular condition of this licence applies, of the following:
 - (a) the particular condition (including any variations of it);
 - (b) the cancellation or suspension of the licence;

- (c) the surrender of the licence.
10. The licence holder must provide the Regulator, on the Regulator's written request, signed statements from persons covered by this licence that the licence holder has informed those people of the conditions of this licence that apply to them.

Licence holder to notify of circumstances that might affect suitability

11. The licence holder must immediately, by notice in writing, inform the Regulator of:
- (a) any relevant conviction of the licence holder occurring after the commencement of this licence;
 - (b) any revocation or suspension of a licence or permit held by the licence holder under a law of the Australian Government, a State or a foreign country, being a law relating to the health and safety of people or the environment;
 - (c) any event or circumstances occurring after the commencement of this licence that would affect the capacity of the holder of his licence to meet the conditions in it.

Additional information to be given to the Regulator

12. It is a condition of a licence that the licence holder inform the Regulator if the licence holder:
- (a) becomes aware of additional information as to any risks to the health and safety of people, or to the environment, associated with the dealings authorised by the licence; or
 - (b) becomes aware of any contraventions of the licence by a person covered by the licence; or
 - (c) becomes aware of any unintended effects of the dealings authorised by the licence.

The licence holder must provide the information required by paragraphs (a) (b) and (c) of the immediately preceding condition to the Regulator as soon as practically and reasonably possible and must also include the information in the Annual Report.

Reporting

13. The licence holder must provide an annual report to the Regulator.

People dealing with GMOs must allow auditing and monitoring of the dealing

14. If a person is authorised by this licence to deal with GMOs and a particular condition of this licence applies to the dealing by that person, the person must allow the Regulator, or a person authorised by the Regulator, to enter premises where the dealing is being undertaken, for the purposes of auditing or monitoring the dealing.

Remaining an accredited organisation

15. The licence holder must, at all times, remain an accredited organisation in accordance with the Act and comply with its instrument of accreditation.

SECTION 3 SPECIFIC CONDITIONS (DO NOT APPLY TO THE HOWLONG SITE)

Permitted period during which dealings may be undertaken

1. The permitted dealings with the GMOs (other than disposal of the GMOs) may be only undertaken during the permitted period.
2. The permitted period commences on the date of issue of this licence and concludes on 30 April 2007.

One crop at a time to a maximum of 4 crops

3. Only 1 crop of the GMOs may be grown at a time. Not more than 4 crops of the GMOs may be grown during the permitted period.

Location and restrictions on the size of trial

4. The permitted dealings may be undertaken at a single Location on land at the Department of Primary Industries field station on Mount Napier Road, Hamilton, Victoria (Attachment C).
5. The Location must not be larger than 494 square metres (or 26m x 19m).
6. The Location must not be within 50m of a Natural Waterway.
7. The licence holder must be able to access and control a Location to the extent necessary to comply with this licence, for the duration of the life of the licence.

Notification of planting of the GMOs

8. The licence holder must provide a notice in writing to the Regulator each time a crop of the GMOs are planted at the Location.
9. The notice must set out:
 - (a) the date on which planting of the GMOs commenced;
 - (b) the period during which the licence holder considers the GMOs are likely to flower;
and
 - (c) the period during which the licence holder considers the Location will be Cleaned (after the GMOs have been grown there).
10. The notice must be provided to the Regulator within 14 days of the date on which planting of the GMOs commenced.

Notice of Cleaning of Location

11. The licence holder must provide a notice in writing to the Regulator when the Location is Cleaned pursuant to this licence.

12. The notice must be provided to the Regulator within 14 days of the date on which Cleaning the Location concluded.

Location must be within a bee cage while GMOs are flowering

13. Whenever there are flowers on the GMOs, the Location must be inside a bee-proof cage.
14. The bee-proof cage must be lockable and must be kept closed and locked at all times other than when there are people working inside it.
15. When people are working inside the bee-proof cage, the door on the cage must be kept closed.
16. Bees may be placed inside the bee-proof cage.
17. If there are live bees inside the bee-proof cage, reasonable steps must be taken to prevent the bees from escaping from the bee-proof cage.
18. The bee-proof cage cannot be moved, taken down or otherwise interfered with unless all the bees inside it have been killed.

Seed and GM material may be collected for research and stored for the purposes of this licence

19. Seed and Material from the GMOs may be collected from the Location for the purpose of conducting experiments on the seed and Material from the GMOs.
20. Seed and Material from the GMOs that is collected from the Location may only be transported off the Location to the extent necessary to transfer it to a facility certified by the Regulator to physical containment level PC2.
21. Seed and Material from the GMOs that is collected from the Location may be stored to the extent necessary to enable other permitted dealings contemplated by this licence to be undertaken. Where seed or Material from the GMOs is stored, it must be stored in a sealed container, within a locked facility that is signed so as to indicate that GM seed or Material from the GMOs is stored within the facility.

Conditions in relation to the Cleaning of Location after each crop of GMOs is grown

22. After each crop of the GMOs is grown, the Location must be Cleaned.

General conditions in relation to the Cleaning of all other places and Equipment used in connection with this licence

23. If:
 - (a) an area or place other than the Location is used in connection with this licence; or
 - (b) Equipment is used in connection with the GMOs or Material from the GMOs;then that area, place or Equipment must also be Cleaned.

24. Cleaning must occur immediately or as soon as practicable after the use and before it is used for any other purpose.
25. If Equipment is Cleaned, the area in which the Equipment is Cleaned must also be Cleaned. (It is not necessary for Equipment to be Cleaned only at a Location.)
26. On the request of the Regulator, the Regulator must be provided with written documentation of the procedures in place to ensure continuing compliance with these Cleaning conditions.

Inspections that must take place while a bee proof cage is over the location

27. Commencing on the day that a bee proof cage is placed over the Location, the following places must be inspected for the existence of Volunteer plants:
 - (a) the area between the Inner Fence and the Outer Fence;
 - (b) irrigation channels and drains through which water flows to and from the Location;
 - (c) any areas used to Clean Equipment.
28. Whenever a bee proof cage is in place over the Location, the structural integrity of the cage must be inspected weekly. Any damage to the cage that could result in the escape of bees from the cage must be immediately:
 - (a) repaired; and
 - (b) reported to the Regulator in writing.

Inspections that must take place while there is no bee-proof cage in place over the Location

29. The following places must be inspected for the existence of Volunteer plants during the permitted period unless there is a bee-proof cage in place over the Location:
 - (a) the Location;
 - (b) the area between the Inner Fence and the Outer Fence;
 - (c) irrigation channels and drains through which water flows to and from the Location;
 - (d) any areas used to Clean Equipment.

Inspections that must take place after fourth crop of GMOs is Cleaned

30. Following Cleaning of fourth crop of the GMOs at the Location, the following places must be inspected for the existence of Volunteer plants:
 - (a) the Location;
 - (b) the area between the Inner Fence and the Outer Fence;
 - (c) irrigation channels and drains through which water flows to and from the Location;

(d) any areas used to Clean Equipment.

31. If:

(a) inspections in respect of a place have been routinely completed for a period of at least 5 years; and

(b) inspection records for that place show that no Volunteers have been observed in the most recent 12 month inspection period;

then the licence holder may make written application to the Regulator that these inspection conditions no longer apply in respect of that place.

General conditions that apply wherever inspections must be undertaken for the existence of Volunteer plants

32. The following conditions apply wherever this licence requires inspections to be undertaken in connection with the possible existence of Volunteer plants.

33. Inspection must be performed by a person who is able to recognise Volunteer plants.

34. The results of inspection activities must be recorded in a logbook. The logbook must be available on request for examination or photocopying by the OGTR. The findings of the inspections as recorded in the logbook must be included in the licence holder's annual report to the Regulator. The logbook must contain at least the following:

(a) details of the areas inspected;

(b) details of the date of inspection;

(c) the names of the person or persons who undertook the monitoring and details of the experience, training or qualification that enabled them to recognise Volunteer plants;

(d) the number of Volunteer plants observed, if any;

(e) details of the development stages reached by the Volunteer plants, if any; and

(f) details of methods used to Destroy Volunteer plants, if any.

35. Any Volunteer plant identified must be Destroyed prior to the plant flowering.

36. Unless this licence provides otherwise, a place must be inspected at least once every month, either until this licence expressly provides that inspections are no longer required, or until the Regulator has issued a sign-off.

37. Inspection conditions do not apply in respect of a place if the Regulator has issued a sign-off in respect of that place.

Restrictions in relation to areas and plants while GMOs are being grown

38. From the date of commencement of this licence until the day the last crop of the GMOs is Cleaned:

- (a) no plants other than White Clover may be planted in the Location;
 - (b) no plants may be grown between the Inner Fence and the Outer Fence unless the licence holder has received prior written approval from the Regulator to grow the plants; and
 - (c) plants, or parts of plants, from the Location or from between the Inner and the Outer Fence (including Material from the GMOs), must not be used as animal feed and must not enter the human food supply.
39. Without limiting condition 38(c) above, honey from bees that have had access to the GMOs must not be fed to animals or humans.

Restrictions in relation to areas and plants after the fourth crop of GMOs is grown

40. Subject to the requirements in this licence for shallow cultivation of certain areas once the fourth crop of the GMOs has been grown, from the day the last crop of the GMOs is Cleaned until the licence holder has received a sign-off:
- (a) no plants of any kind may be planted in the Location ;
 - (b) no plants may be grown between the Inner Fence and the Outer Fence unless the licence holder has received prior written approval from the Regulator to grow the plants; and
 - (c) plants, or parts of plants, from the Location or from within the Outer Fence (including Material from the GMOs), must not be used as stockfeed and must not enter the human food supply.

Requirement to manage White Clover seed bank by shallow Cultivation and irrigation in Spring and Autumn

41. Commencing 1 September 2007, the licence holder must Cultivate the Location each Spring and each Autumn until such time as the licence holder has received a Sign-off in connection with the Location. In the 14 days following Cultivation of the Location, the Location must receive either 25mm of rain or an equivalent level of combined irrigation and rainfall.

Transportation of the GMOs and Material from GMOs

42. Subject to the condition immediately below in respect of transportation, the GMOs and Material from the GMOs must be transported in accordance with the OGTR Guidelines for the Transport of GMOs (June 2001) issued by the Regulator.
43. Every container used to transport the GMOs or Material from the GMOs must be labelled:
- (a) to indicate that it contains GM White Clover; and
 - (b) with telephone contact numbers for the licence holder and instructions to contact the licence holder in the event that the container is broken or misdirected.

Contingency Plans

44. Within 30 days of the date of the commencement of this licence, a written Contingency Plan must be submitted to the Regulator detailing measures to be taken in the event of the unintended presence of the GMOs or Material from the GMOs outside an area that must be inspected.
45. The Contingency Plan must include details of procedures to:
 - (a) ensure the Regulator is notified immediately if the licence holder becomes aware of the event;
 - (b) destroy any of the GMOs or Material from the GMOs; and
 - (c) inspect and Destroy any Volunteer plants that may exist as a result of the event.
46. The Contingency Plan must be implemented in the event that the unintended presence of the GMOs or Material from the GMOs is discovered outside an area that must be inspected.

Compliance Management Plan

47. Prior to growing the GMOs, a written Compliance Management Plan must be provided to the Regulator. The Compliance Management Plan must describe in detail how the licence holder intends to ensure compliance with these conditions and document that compliance.

Research requirements

49. The licence holder must, in consultation with the OGTR, develop an agreed research program to collect information regarding:
 - (a) expression levels of the proteins of the introduced Alfalfa mosaic virus coat protein (*AMV CP*) and neomycin phosphotransferase type II (*nptII*) genes in different parts of the plants under Australian field conditions;
 - (b) agronomic characteristics of the GMOs, with a view to seeking to determine the potential weediness of the GMOs under Australian field conditions;
 - (c) the disease status of the GMOs during the course of this licence, with a view to seeking to determine whether novel viruses emerge.
50. The progress and results of the research program must be provided in the Annual Report.

Testing methodology

51. The licence holder must provide a written instrument to the Regulator describing an experimental method that is capable of reliably detecting the presence of the GMOs and the presence of the genetic modifications described in this licence (at Attachment B) in a recipient organism. The instrument must be provided within 12 months of the issuing of this licence.

SECTION 4 HOWLONG SITE CONDITIONS

Note: Nothing in the General or Specific conditions permits the planting or growing of GMOs at the Howlong site. The following conditions are in respect of ongoing inspection for White Clover at the Howlong site

52. The following places must be inspected for the existence of White Clover:

- (a) the total area within the outermost fence on the Howlong site,
- (b) any areas, whether on the Howlong site or not, used to clean equipment used in connection with PR-64,
- (c) irrigation channels and drains through which water flows to and from the Howlong site.

53. Inspection must be performed by a person who is able to recognise White Clover plants.

54. Any White Clover plant found must be Destroyed on site prior to the plant flowering.

55. A place referred to in condition 52 must be inspected at least once every month until the Regulator has issued a Sign-off.

56. If:

- (a) inspections in respect of a place have been routinely completed for a period of at least 5 years from June 2003; and
- (b) inspection records for that place show that no Volunteers have been observed in the most recent 12 month inspection period;

then the licence holder may make written application to the Regulator that these inspection conditions no longer apply in respect of that place.

57. Inspection conditions do not apply in respect of a place if the Regulator has issued a Sign-off in respect of that place.

58. Until the licence holder has received a Sign-off:

- (a) no plants of any kind may be planted within the innermost fence on the Howlong site,
- (b) sexually incompatible legume pasture species may be grown between the innermost fence and the outermost fence on the Howlong site,
- (c) plants, or parts of plants, from within the outermost fence of the Howlong site must not be used as stockfeed and must not enter the human food supply.

59. The licence holder must Cultivate the Howlong site each Spring and each Autumn at a time when germination of white clover is reasonably likely to ensue until such time as the licence holder has received a Sign-off in connection with the Location.

60. In the 14 days following Cultivation of the Howlong site under the previous condition, the Howlong site must receive either 25mm of rain or an equivalent level of combined irrigation and rainfall.
61. The results of inspection activities must be recorded in a logbook. The logbook must be available on request for examination or photocopying by the OGTR. The findings of the inspections as recorded in the logbook must be included in the Annual Report and contain at least the following:
- (a) details of the areas inspected;
 - (b) details of the date of inspection;
 - (c) the names of the person or persons who undertook the monitoring and details of the experience, training or qualification that enabled them to recognise White Clover plants;
 - (d) the number of White Clover plants observed, if any;
 - (e) details of the development stages reached by the White Clover plants, if any; and
 - (f) details of methods used to Destroy White Clover plants, if any.

DIR No: 047/2003

***Full Title:** Field evaluation of genetically modified white clover resistant to infection by Alfalfa mosaic virus

Organisation Details

Postal address: Department of Primary Industries, Victoria
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Phone No: (03) 9658 4601

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Project Supervisor Details

Surname: [Personal Information redacted]

First Name: [Personal Information redacted]

Title: [Personal Information redacted]

Phone No: [Personal Information redacted]

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Email Address: [Personal Information redacted]

Position: [Personal Information redacted]

Organisation: Department of Primary Industries, Victoria

Postal Address: Plant Biotechnology Centre
La Trobe University, Bundoora VIC 3086

IBC Details

IBC Name: Department of Primary Industries, Victoria

* Information that must be included in the Record of GM Products and GMOs Dealings.

GMOs Description

***Parent Organism(s) Common Name:** White clover

***Parent Organism(s) Scientific Name:** *Trifolium repens* L.

Modified Trait(s):

***Category:** Viral resistance and antibiotic resistance

***Description:** White clover plants have been genetically modified, using the *Agrobacterium* mediated transformation technique and conventional breeding, so as to express the Alfalfa mosaic virus coat protein and so as to be resistant to the antibiotic kanamycin.

***Gene Responsible for Conferring the Modified Trait(s):**

Alfalfa mosaic virus coat protein gene from Alfalfa mosaic virus (viral resistance)

Neomycin phosphotransferase type II gene from *Escherichia coli* (antibiotic resistance)

Details

The GMOs covered by this licence are all conventionally bred progeny of genetically modified white clover plants produced from the transformation event H6 containing a single copy of both the Alfalfa mosaic virus coat protein gene from Alfalfa mosaic virus and the neomycin phosphotransferase type II gene from *Escherichia coli*.

Transformation event H6 is the licence holder's description of an experiment, undertaken by the licence holder, in which genetically modified white clover was created. In the experiment, white clover plants were genetically modified, using the *Agrobacterium* mediated transformation technique, by the insertion of single copies of both the Alfalfa mosaic virus coat protein gene from Alfalfa mosaic virus and the neomycin phosphotransferase type II gene from *Escherichia coli* into the white clover genome.

Purpose of the Dealing with the GMOs:

To evaluate the performance of white clover resistant to infection by Alfalfa mosaic virus under field conditions and to produce GM white clover seed.

* Information that must be included in the Record of GM Products and GMOs Dealings.

ATTACHMENT C

GPS coordinates for site at Department of Primary Industries field station on Mount Napier Road, Hamilton, Victoria

GPS coordinates for the corners of the Inner Fence:

S 37° 49.993' E 142° 04.318'

S 37° 49.996' E 142° 04.299'

S 37° 49.978' E 142° 04.300'

S 37° 49.976' E 142° 04.311'

GPS coordinates for the corners of the Outer Fence:

S 37° 50.001' E 142° 04.376'

S 37° 50.026' E 142° 04.266'

S 37° 49.963' E 142° 04.248'

S 37° 49.944' E 142° 04.349'