

LICENCE NO: DIR066

LICENCE HOLDER: Monsanto Australia Limited

ACCREDITATION NO: ACCR 034/2002

SUBMISSION: 2013 Annual Report for Commercial release of GM

herbicide tolerant and/or insect resistant cotton lines

REPORTING PERIOD: 1 June 2012 – 1 June 2013

(covering 2012/13 cotton growing season)

DATE: 3 July, 2013

PREPARED BY:

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SECTION 1. LICENCE HOLDER DETAILS

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Accreditation

Number: ACCR 034/2002

SCOPE OF THE REPORT

This report addresses the annual reporting condition of the DIR066 commercial licence covering Roundup Ready® Cotton, Roundup Ready Flex® Cotton and the Bollgard II® trait issues to Monsanto Australia Limited by the Office of the Gene Technology Regulator.

This report details compliance with general and specific conditions of Sections 2 to 6 of the DIR066 licence as issued to Monsanto Australia Limited on 26 October 2006, and as varied 22 December 2006, 6 December 2007, 15 April 2009 and 20 June, 2013.

This report covers the period of time from 1 June 2012 to 1 June 2013, including the 2012/13 cotton planting season.



SECTION 2. LICENCE CONDITIONS

Condition 1. Duration of Licence

DIR066 has not been suspended, cancelled or surrendered.

Condition 2. Holder of Licence

Monsanto Australia Limited (Monsanto) remains the holder of the licence.

Conditions 3 and 4. Project Supervisor

is the project supervisor as per attachment A of the licence. This licence was varied 15 April 2009 to reflect the change of contact details.

Condition 5. No dealings with GMOs except as authorized by this Licence

Persons covered by the licence did not deal with GMOs except as expressly permitted by the licence.

Conditions 6 and 7. Location

The licence allows for dealings with GMOs to be conducted anywhere in Australia. This licence supersedes any previous licences regarding location.

Conditions 8 and 9. Persons covered by this GMO Licence

Monsanto acknowledges that the persons covered by the 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.

Conditions 10 and 11. Informing people of their obligations

DIR066 was issued in October 2006, permitting dealings with the GMOs to be undertaken during the cotton growing seasons.

Monsanto Australia Limited informed all persons covered by the DIR066 licence of the obligations imposed on them as a result of the conditions of the licence. This was primarily achieved through the Monsanto accreditation program, which includes information on regulatory obligations as well as management of the crop.



Accreditation programs require all persons having management responsibility for Roundup Ready (no longer sold commercially), Roundup Ready Flex and Bollgard II cotton crops to undergo training.

Condition 12. Applicant to notify of circumstances that might affect suitability

During the reporting period, Monsanto Australia Ltd did not receive a relevant conviction occurring after the commencement of this licence; nor was there any revocation or suspension of a licence or permit held by Monsanto Australia Ltd under a law of the Australian Government, a State or foreign country, being a law relating to the health and safety of people or the environment; or any event or circumstance occurring after the commencement of this licence that would affect the capacity of Monsanto to meet the conditions of the DIR066 licence.

Condition 13. Licence holder must provide information on matters related to suitability

Monsanto acknowledges that it must provide information related to its ongoing suitability to hold a licence when requested to do so in writing by the Regulator and must provide information within a time period stipulated by the Regulator.

Condition 14. People dealing with the GMOs must allow auditing and monitoring if the dealing

Monsanto acknowledges that if a person authorized 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 authorized by the Regulator, to enter the premises where the dealing is being undertaken, for the purposes of auditing or monitoring the dealing.

Condition 15. Remaining an Accredited organization

At all times, Monsanto remained an accredited organization and complied with conditions of accreditation as set out in the OGTR Guidelines for Accreditation of Organisations.

Conditions 16 - 19 Additional information must be given to the Regulator

During the reporting period, Monsanto did not become aware of any additional information as to any risks to the health and safety of people, or to the environment, associated with the dealings authorized by this licence; or of any unintended effects of the dealings authorized by this licence.

Condition 20. Compliance Management Plan

A Compliance Management Plan was provided to the Regulator on issuance of the DIR066 licence. A copy of the current Resistance Management Plans showing compliance metrics is in Appendix A and B.



SECTION 3. GROWING THE GMOS

3.1 GMOs covered by this licence

The only dealings with GMOs under this licence were those with the GMOs described in DIR066 Licence.

3.2 Permitted dealings

Sales and planting of the Roundup Ready Flex (RRF), Bollgard II (BGII) and Bollgard II were undertaken under a Technology User Agreement, which sets out the conditions for planting and growing a cotton crop containing RRF and BGII technology. Roundup Ready Cotton is no longer sold in Australia. In order to be eligible to sign such an agreement, a grower was required to attend an accreditation program and pass a test based on the material covered in the accreditation program.

3.3 Commercial Crop Locations and Volumes

Valley	BGII ha	RR ha	RRF ha	BGII w RR	BGII w RRF ha	BGII w ha	Total ha
Belyando	0.00	0.00	0.00	0.00	134.00	0.00	134.00
Bourke	0.00	0.00	64.70	0.00	9,081.87	0.00	9,146.57
Darling Downs	0.00	0.00	3,388.26	0.00	34,267.96	90.70	37,746.92
Dawson/Callide	0.00	0.00	279.74	0.00	6,005.00	148.36	6,433.10
Dirranbandi	0.00	0.00	0.00	0.00	31,418.84	0.00	31,418.84
Emerald	0.00	0.00	0.00	0.00	14,771.26	0.00	14,771.26
Gwydir	0.00	0.00	4,550.37	0.00	73,997.69	0.00	78,548.06
Lachlan	0.00	0.00	393.81	0.00	12,868.65	526.29	13,788.75
Lower Namoi	0.00	0.00	845.80	0.00	46,037.15	3.00	46,885.95
MacIntyre	0.00	0.00	699.87	0.00	45,569.44	61.30	46,330.61
Macquarie	0.00	0.00	227.19	0.00	42,370.80	1,038.50	43,636.49
McKenzie River	0.00	0.00	0.00	0.00	418.71	0.00	418.71
Mungindi	0.00	0.00	3,116.25	0.00	19,603.85	0.00	22,720.10
Murrumbidgee	0.00	0.00	731.01	0.00	25,801.89	27.97	26,560.87
St George	0.00	0.00	141.37	0.00	28,311.19	310.95	28,763.51
Tandou	0.00	0.00	11.30	0.00	6,660.56	0.00	6,671.86
Upper Namoi	0.00	0.00	362.28	0.00	16,928.56	78.48	17,369.32
Walgett	0.00	0.00	41.85	0.00	9,849.03	0.00	9,890.88
Total ha	0.00	0.00	14,853.80	0.00	424,096.45	2,285.55	441,235.80

Total Bollgard II ha planted	426,248
Total Roundup Ready Flex ha planted	438,816

Note – Total Bollgard II figure includes Bollgard II, Bollgard II/Roundup Ready Flex and Bollgard II/Roundup Ready Flex figure includes Roundup Ready Flex and Bollgard II/Roundup Ready Flex.



Valley: Belyando

Boundaries: Includes the shires of Moranbah, Clermont, Kilcummin, Mistake Creek, Belyando, Elgin, Wolfgagn, Winchester, Old Labona, Gemini Mountains, Amaroo, South Copperfield, Laglan, Birimgan, Blair Athol and Pasha.

Volumes:

TUA	BGII ha	RR ha	RRF ha	BGII w RR ha	BGII w RRF ha	BGII w ha
Total	0.00	0.00	0.00	0.00	134.00	0.00

Valley: Bourke

Boundaries: West of Walgett Shire, north of Coolahbah. Includes Cunnamulla in Queensland.

Volumes:

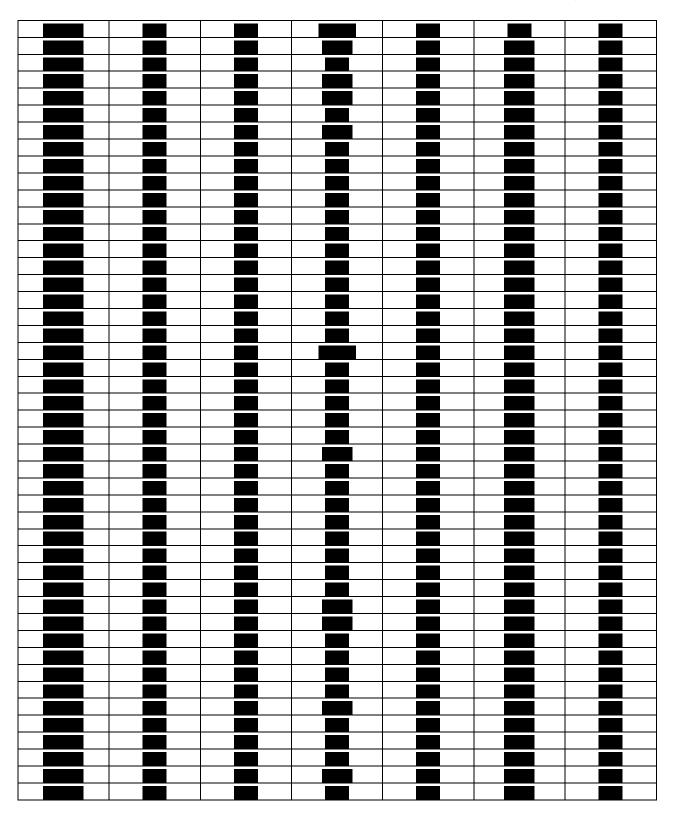
TUA	BGII ha	RR ha	RRF ha	BGII w RR ha	BGII w RRF ha	BGII w ha
Total	0.00	0.00	64.70	0.00	9,081.87	0.00

Valley: Darling Downs

Boundaries: Follows the Condamine River. Includes Toowoomba, Murgon, Dalby, Chinchilla, Condamine, and Roma. South-west boundary is Surat.

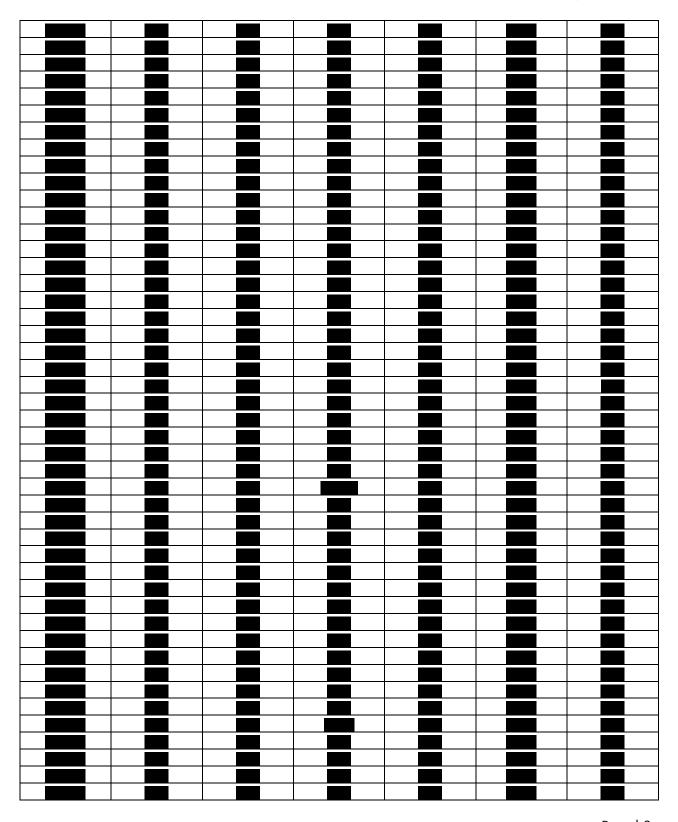
TUA	BGII ha	RR ha	RRF ha	BGII w RR ha	BGII w RRF ha	BGII w ha
121869	0.00	0.00	101.00	0.00	0.00	0.00





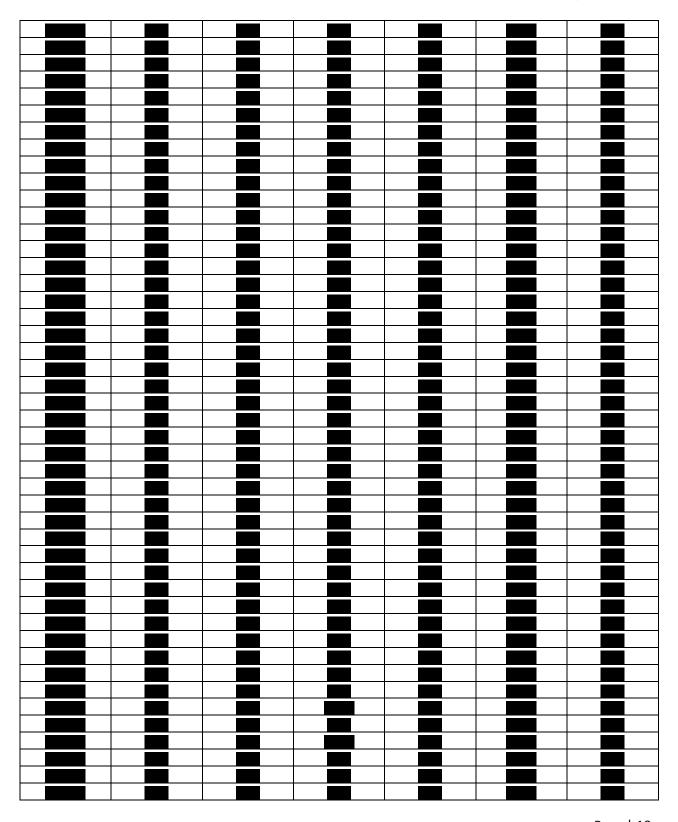
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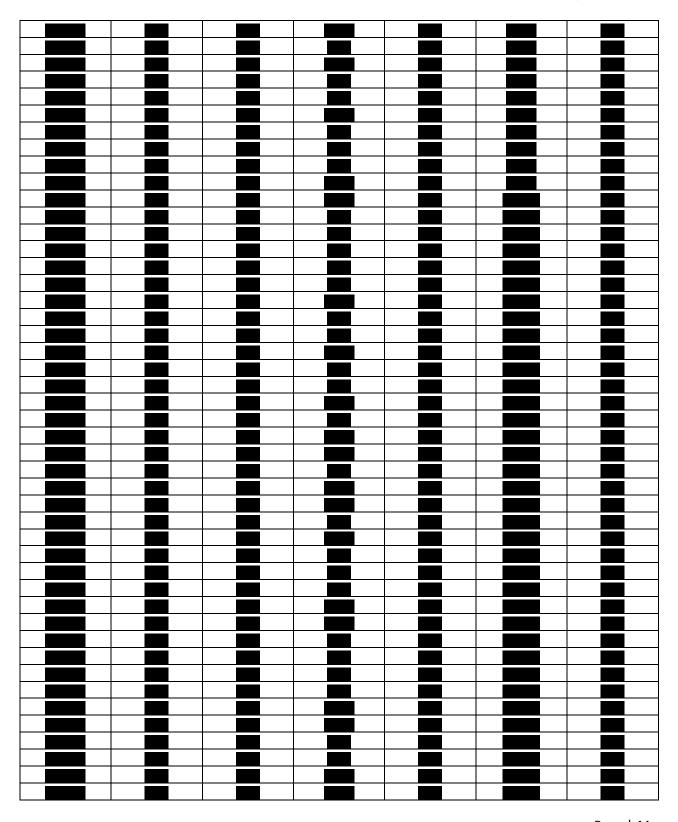
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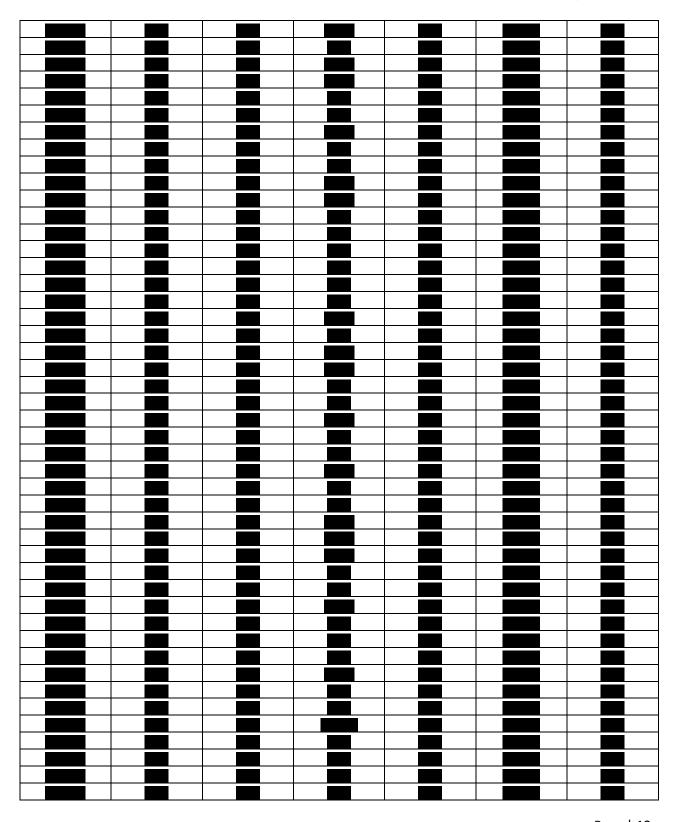
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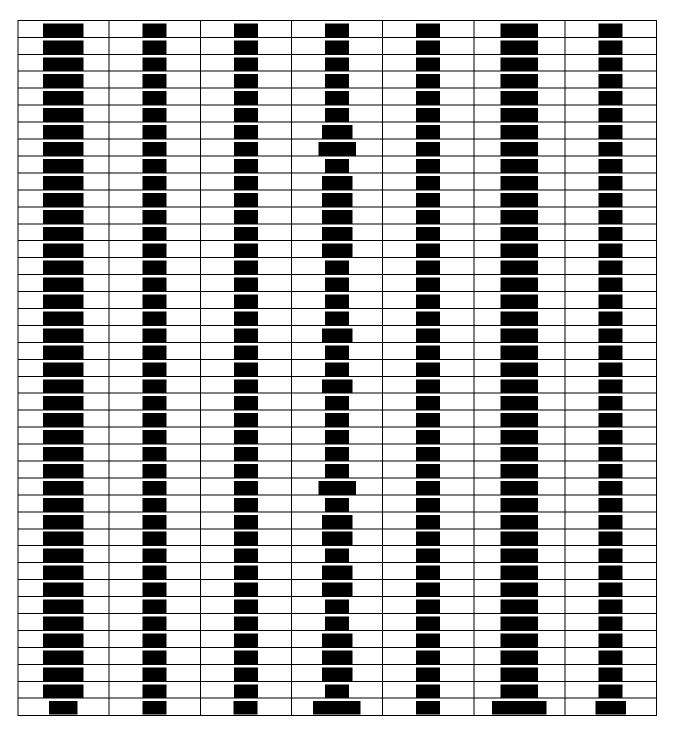
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Valley: Dawson/Callide

Boundaries: Includes Taroom, Biloela, Moura and Theodore regions.

TUA	BGII ha	RR ha	RRF ha	BGII w RR	BGII w RRF	BGII w ha
				ha	ha	
	<u> </u>			<u> </u>	<u> </u>	
						<u> </u>



Valley: Dirranbandi

Boundaries: Runs north toward St George and includes Lower Plains, follows south along the Balonne

River right down to the NSW border.

TUA	BGII ha	RR ha	RRF ha	BGII w RR	BGII w RRF	BGII w ha
				ha	ha	



Valley: Emerald

Boundaries: South-eastern boundary formed by the Expedition Ranges between Rolleston and Bauhinia. Region runs north-west from there to include Emerald and Dysart.

TUA	BGII ha	RR ha	RRF ha	BGII w RR		BGII w ha
				ha	ha	

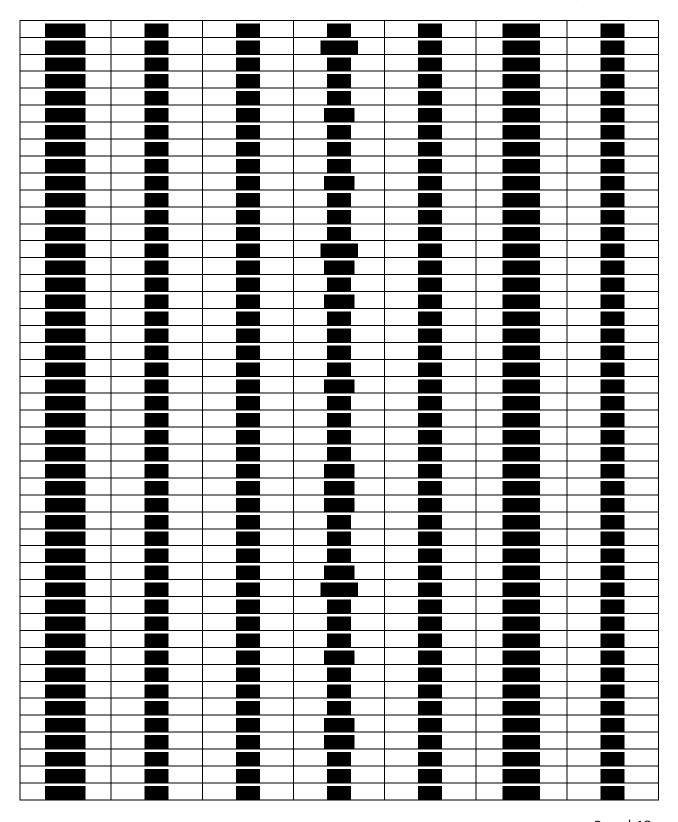


Valley: Gwydir

Boundaries: South of Fox Lane, north-west to Garah, west to Collarenebri, south to Bellata. The road that runs east-west through Bellata and to Rowena is southern boundary.

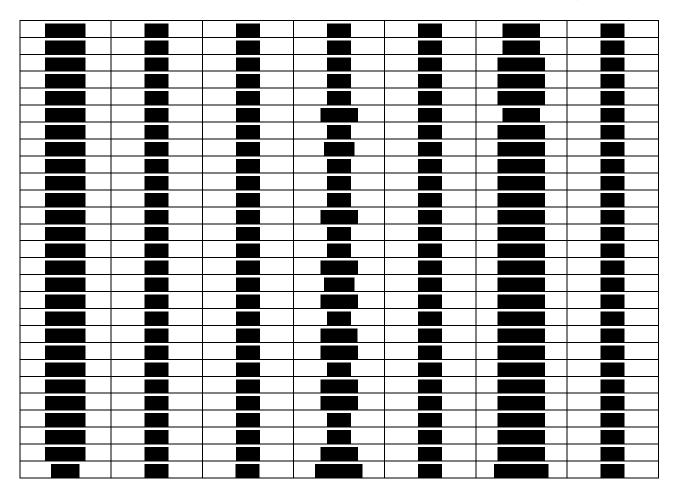
TUA	BGII ha	RR ha	RRF ha			BGII w ha
				ha	ha	





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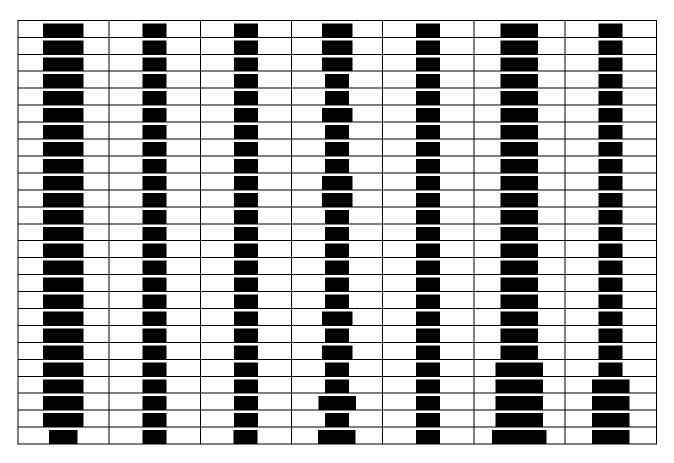
Valley: Lachlan

Boundaries: Northern boundary is Peak Hill and Tullamore and the cotton follows the Lachlan River through to Booligal. The southern boundary is the road through to Gunbar and then follows the Great Western Highway through to West Wyalong.

TUA	BGII ha	RR ha	RRF ha	BGII w RR ha	BGII w RRF ha	BGII w ha

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Valley: Lower Namoi

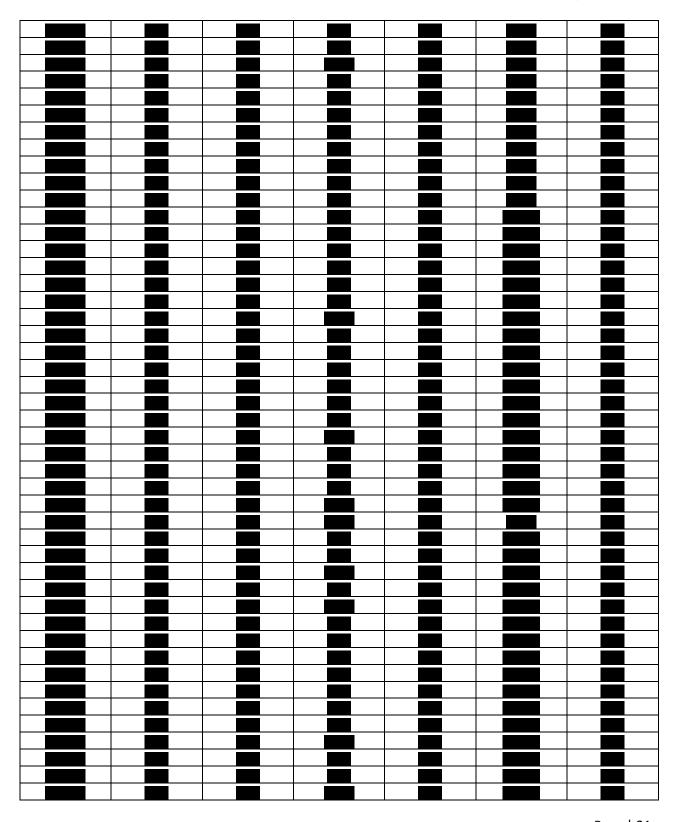
Boundaries: North-west of Baan Baa-Manilla Road and south of Bellata-Rowena Road. Western boundary is formed by the road that runs from Pilliga via Burren Junction to Collarenebri.

Volumes:

TUA	BGII ha	RR ha	RRF ha	BGII w RR ha	BGII w RRF ha	BGII w ha	

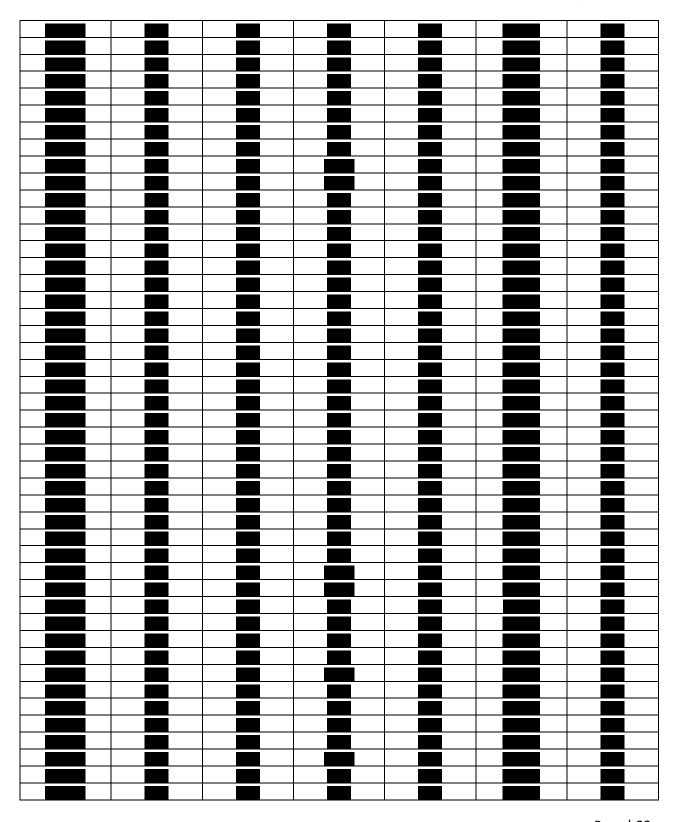
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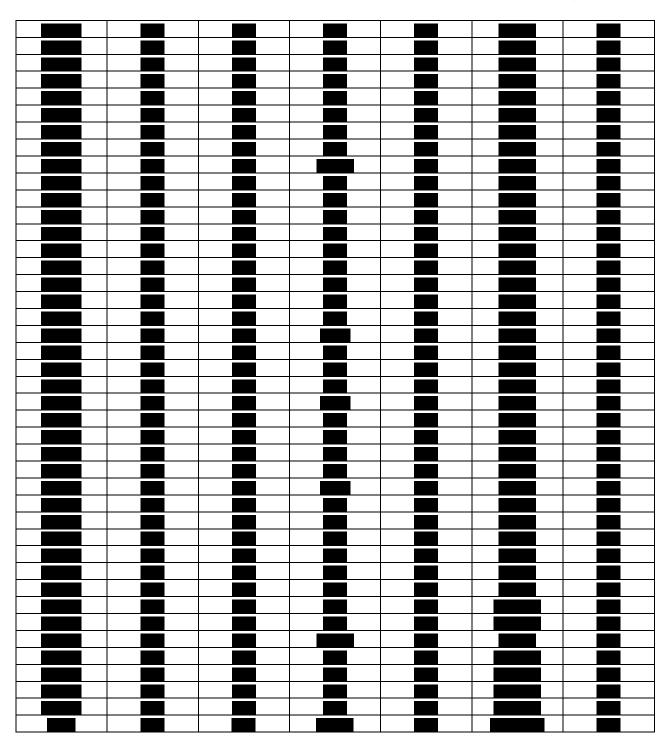
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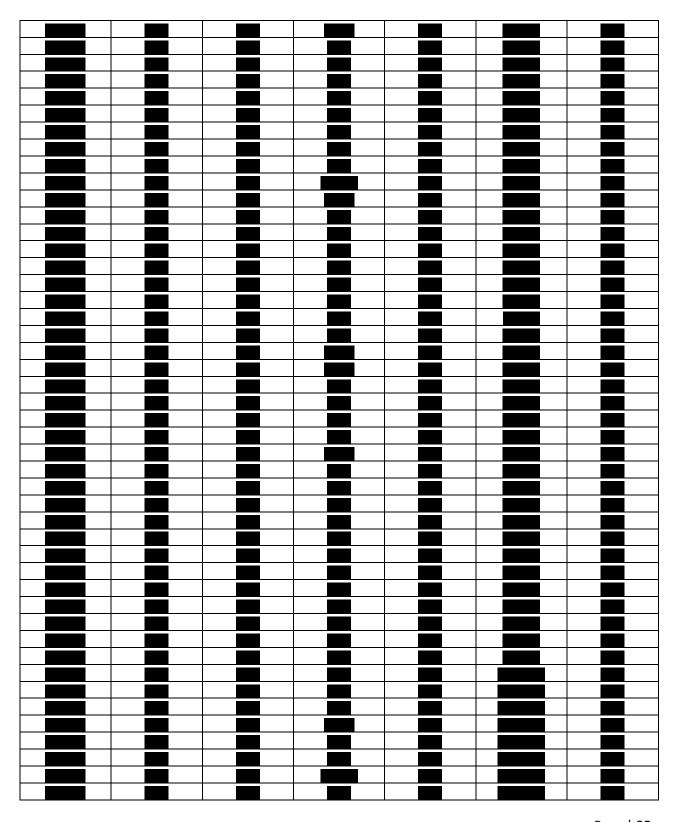
Valley: MacIntyre

Boundaries: North of Gwydir, western boundary is Garah to Talwood Road north include Moonie and east to include Texas. Southern boundary is Foxes Lane which runs Garah back to the Newell Highway and then along to Croppa Creek, Yallaroi and Coolatai.

TUA	BGII ha	RR ha	RRF ha	BGII w RR	BGII w RRF	BGII w ha
				ha	ha	

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Valley: Macquarie

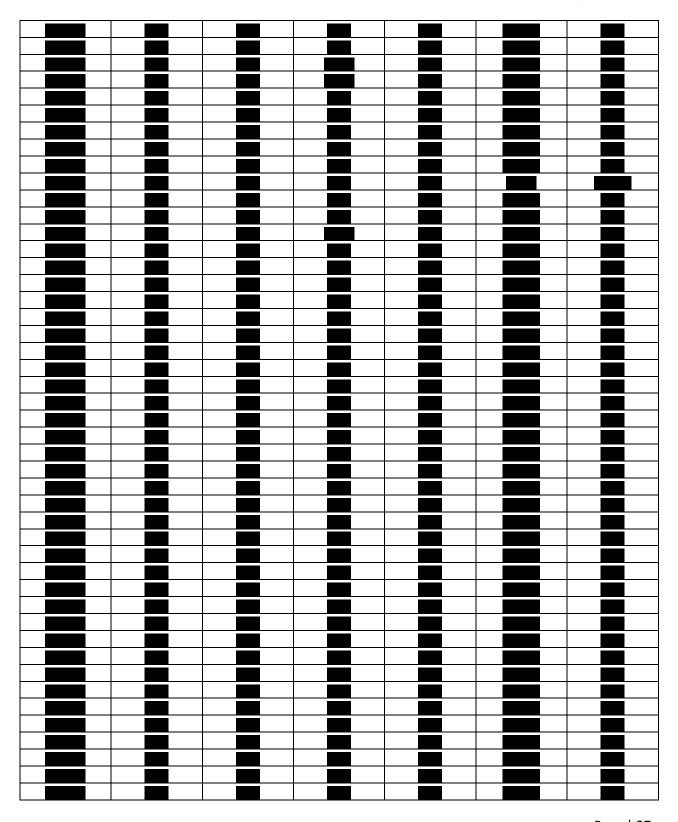
Boundaries: Dubbo and south to Peak Hill. West to Tullamore. North through Tottenham. Nyngan and Coolabah, then east via southern boundary of Walgett shire and then south back to Dubbo via Coonabarabran.

Volumes:

TUA	BGII ha	RR ha	RRF ha	BGII w RR	BGII w RRF	BGII w ha
				ha	ha	

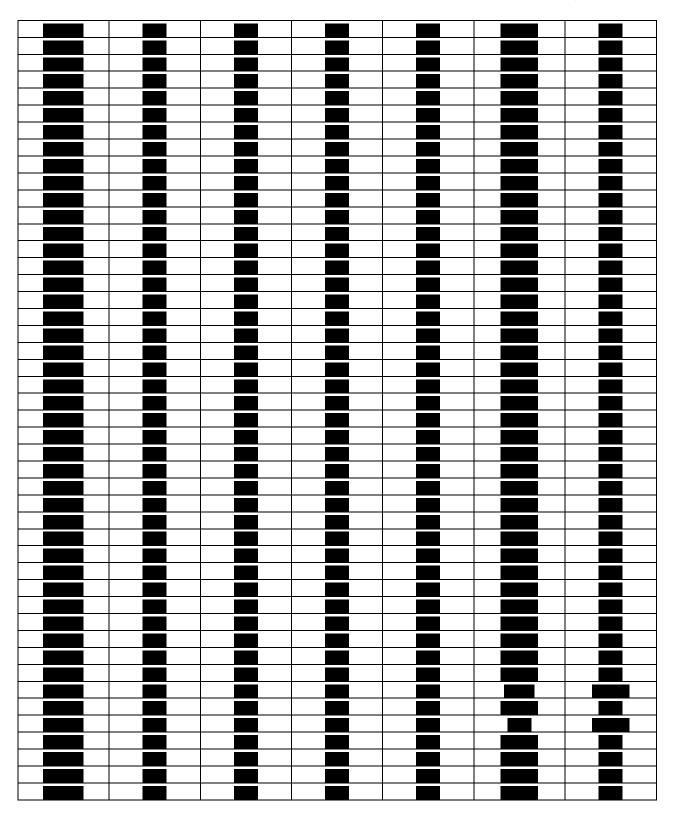
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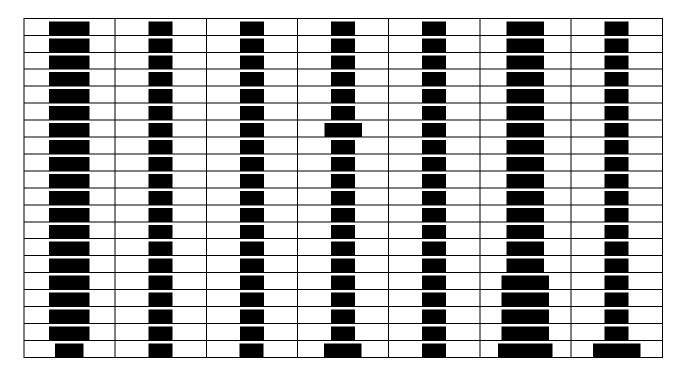
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Valley: McKenzie River

Boundaries: North West of Comet, to include McKenzie River and Alton Downs

Volumes:

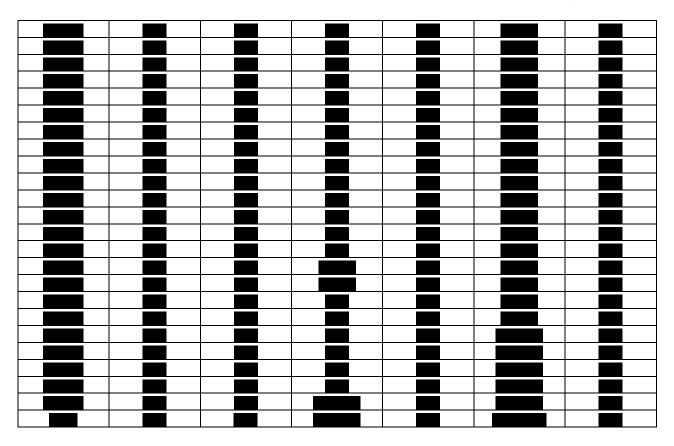
TUA	BGII ha	RR ha	RRF ha	BGII w RR ha	BGII w RRF ha	BGII w ha

Valley: Mungindi

Boundaries: West of Garah and Boomi Road to Talwood and follows Barwon River south-west of Mungindi towards Collarenebri. Southern boundary is the Watercourse Road from Colly through to Gingham and then to Garah.

TUA	BGII ha	RR ha	RRF ha	BGII w RR	BGII w RRF	F BGII w ha	
IOA	DOII IIa	INN IIa	INITHA			DGII W III	
				ha	ha		





Valley: Murrumbidgee

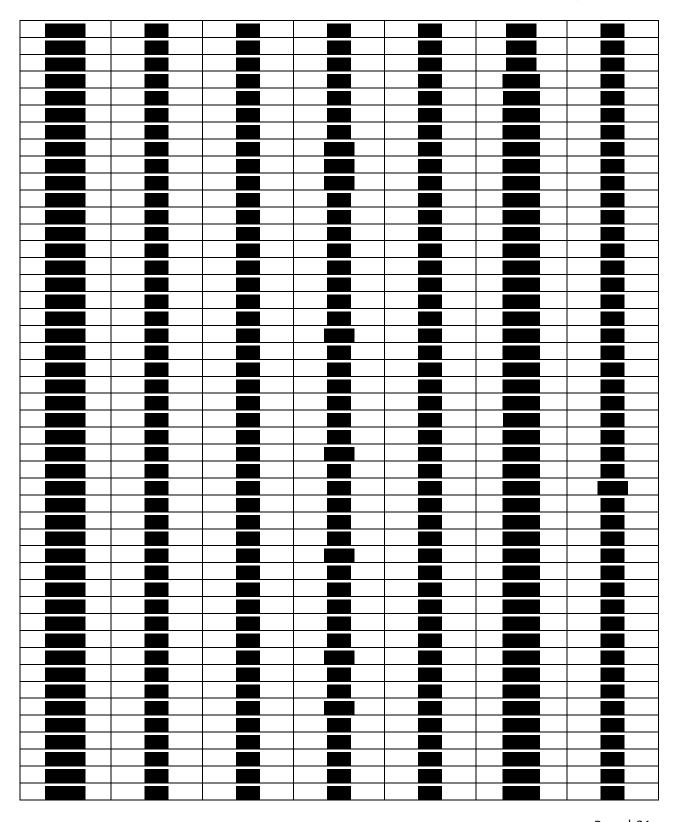
Boundaries: Northern boundary is the Great Western Highwayfrom West Wyalong through Goolgowi to Gunbar, from Gunbar west to Booligal on the Lachlan River. Downstream of Booligal on the Lachlan and south-west is the Murrumbidgee River.

Volumes:

TUA	BGII ha	RR ha	RRF ha	BGII w RR ha	BGII w RRF ha	BGII w ha

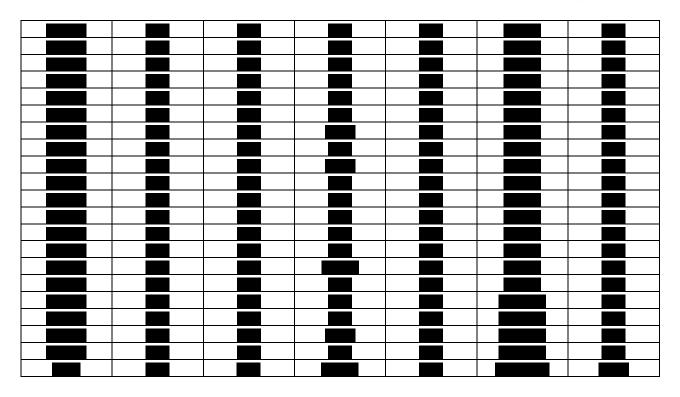
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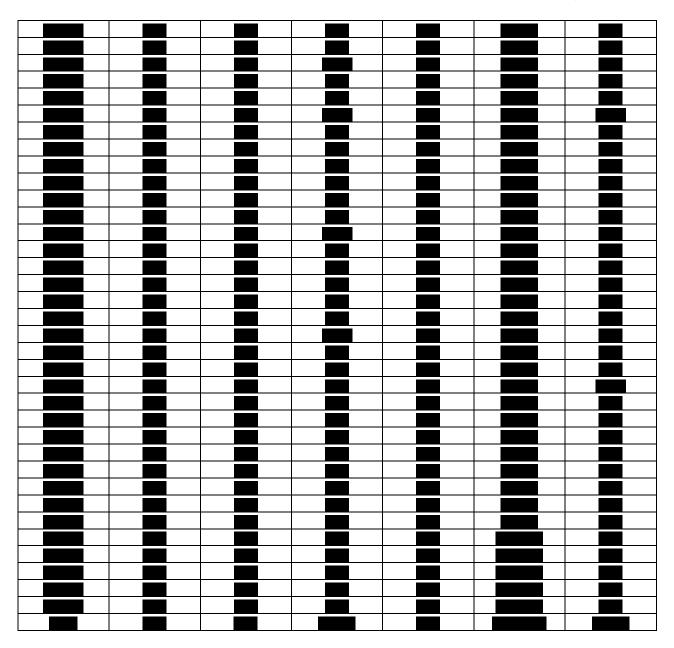
Valley: St George

Boundaries: Above Lower Plains on the southern side and north-east to include majority of Waroo Shire with the north-east boundary being Surat.

TUA	BGII ha	RR ha	RRF ha	BGII w RR ha	BGII w RRF ha	BGII w ha
				110	na e	

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Valley: Tandou

Boundaries: surrounds Menindee shire. North of Mildure and west of the SA border

TUA	BGII ha	RR ha	RRF ha	BGII w RR BGII w RRF ha		BGII w ha

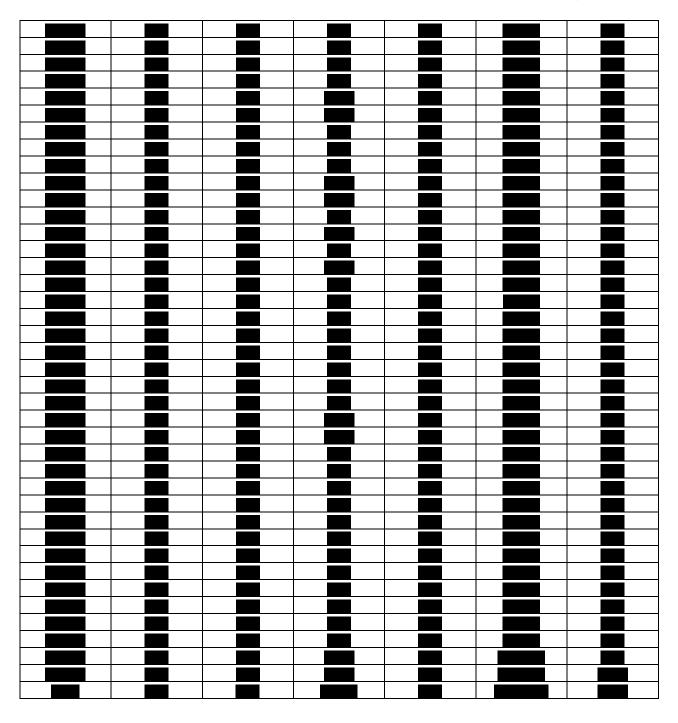


Valley: Upper Namoi

Boundaries: South-east of Baan Baa-Manilla Road. Includes Coolah, Merriwa, Mullaley, Gunnedah and Quirindi.

TUA	BGII ha	RR ha	RRF ha	BGII w RR		BGII w ha
				ha	ha	
				<u> </u>		







Valley: Walgett

Boundaries: Includes almost entirety of Walgett Shire, with eastern boundary being the road that runs south from Collarenebri to Burren Junction.

Volumes:

TUA	BGII ha	RR ha	RRF ha	BGII w RR ha	BGII w RRF ha	BGII w ha

3.4 Trial/Research Crop Locations and Volumes

Valley	BGII ha	RR ha	RRF ha	BGII w RR ha	BGII w RRF ha	BGII w ha	Total ha
Total ha	17.50	0.00	58.68	0.00	202.51	0.00	278.69





APPENDIX A -

Resistance Management Plan for Bollgard II® Cotton 2012/2013

Developed by Monsanto Australia Limited and the Transgenic and Insect Management Strategy (TIMS) Committee of Cotton Australia Ltd.

The resistance management plan is based on three basic principles: (1) minimising the exposure of *Helicoverpa* spp. to the *Bacillus thuringiensis* (Bt) proteins Cry 1Ac and Cry 2Ab; (2) providing a population of susceptible individuals that can mate with any resistant individuals, hence diluting any potential resistance; and (3) removing resistant individuals at the end of the cotton season. The three principles are supported through the implementation of 5 elements that are the key components of the Resistance Management Plan. These elements are:

- 1. Refuge crops
- 2. Planting window
- 3. Pupae busting/Trap crops
- 4. Control of volunteers and ratoon cotton and
- 5. Spray limitations.

Growers of Bollgard II cotton are required to practice preventative resistance management as set out below. Compliance with the Resistance Management Plan is required under the terms of the Bollgard II Technology User Agreement and under the conditions of registration (*Agricultural and Veterinary Chemicals Act 1994*).

Section 1 is applicable to all regions in New South Wales and Queensland that grow cotton while sections 2 and 3 detail specific requirements for New South Wales and Southern Queensland, and Central Queensland respectively.

SECTION 1: NEW SOUTH WALES, SOUTHERN QUEENSLAND & CENTRAL QUEENSLAND

1. Refuges



Growers planting Bollgard II cotton will also be required to grow a refuge crop that is capable of producing large numbers of *Helicoverpa* spp. moths which have not been exposed to selection with Bt proteins Cry 1Ac and Cry 2Ab. These unselected moths are expected to dominate matings with any survivors from Bollgard II crops and thus help to maintain resistance to Bt proteins Cry 1Ac and Cry 2Ab at low levels.

All refuge options are based on the requirement of a 10% unsprayed cotton refuge or its equivalent, as determined by the relative production of *Helicoverpa* spp. from each of the refuge types as described in Tables 1 and 2, for irrigated and dryland production scenarios respectively. Irrespective of the irrigation regime for the Bollgard II cotton, all pigeon pea refuges must be fully irrigated so that they are attractive to *Helicoverpa* spp. during the growing period of the Bollgard II cotton.

For each area of irrigated Bollgard II cotton planted, a grower is required to plant a minimum of one or a combination of the following:

Table 1. Irrigated Bollgard II cotton refuge options

Crop	Conditions	% of Bollgard II
Cotton	Irrigated, sprayed conventional cotton	100
	Irrigated, unsprayed conventional cotton	10
Pigeon pea	Fully irrigated, unsprayed	5

Table 2. Dryland Bollgard II cotton refuge options

Crop	Conditions	% of Bollgard II
Cotton	Dryland or irrigated, sprayed conventional cotton	100
	Dryland or irrigated, unsprayed conventional cotton	10
Pigeon pea	Fully irrigated, unsprayed	5

No other refuge options are approved for dryland Bollgard II.



Note: Unsprayed means not sprayed with any insecticide that targets any life stage of *Helicoverpa* spp.

Bt products must not be applied to any refuge (including sprayed cotton).

If the viability of an unsprayed conventional cotton refuge is at risk due to early season pressure by *Helicoverpa* spp., and with prior approval from the Monsanto Compliance and Stewardship Manager, a non-Bt heliocide can be applied up to the 4th true leaf stage. An unsprayed refuge should not be planted in the same field as any crop sprayed with a rate of insecticide that is registered for *Helicoverpa* spp, with the exception of Bollgard II. Sprayed crops and unsprayed refuges that are planted in adjacent fields must be separated by sufficient distance to *minimise* the likelihood of insecticide drift onto the unsprayed refuge.

For the purposes of this Resistance Management Plan, conventional cotton includes any cotton varieties that do not have Bt proteins in the plant that control *Helicoverpa* spp. moths.

General conditions for all refuges:

(a) Refuge crops are to be planted and managed so that they are attractive to *Helicoverpa* spp. during the growing period of the Bollgard II cotton varieties.

Irrigated: It is preferable that all refuge is planted within the 2 week period prior to planting Bollgard II. If this is not possible, refuge planting must be completed within 3 weeks of the first day of sowing of Bollgard II. At this time, sufficient refuge must have been planted to cover all of the Bollgard II cotton proposed to be planted for the season (including Bollgard II already planted and any that remains unplanted). Should additional Bollgard II planting be made after this date, which is not already covered by refuge, additional refuge must be planted as soon as possible and no more than 2 weeks after sowing of the additional Bollgard II.

Dryland: A dryland refuge must be planted within the 2 week period prior to the first day of planting Bollgard II cotton.

- (b) Pigeon pea refuges should not be planted until the soil temperature reaches 17°C, which is a requirement for germination, and should also be planted into moisture to ensure successful germination. If soil temperatures are not suitable to allow germination of pigeon peas in line with condition (a), an alternative refuge must be planted in its place within the prescribed period (under (a) above).
- (c) Once Bollgard II cotton begins to flower the corresponding refuge should not be cultivated.
- (d) Insecticide preparations containing Bt may be used on Bollgard II cotton throughout the season BUT NOT on any refuge crops.



- (e) All refuges are to be planted within the farm unit growing Bollgard II cotton. Subject to clause (f) below, all reasonable effort should be taken to plant the refuge either on one side of, or next to a Bollgard II cotton field and all Bollgard II fields must be no more than 2 km from the nearest associated Bollgard II refuge.
- (f) To minimise the possibility of refuge attractiveness being affected by herbicide drift, non-herbicide tolerant refuges should be separated from herbicide tolerant Bollgard II cotton crops by a sufficient distance to minimise such drift, but no more than 2km from the Bollgard II cotton.
- (g) To account for possible insecticide drift, the options for the width of refuge crops vary according to spray regime. If any sprayed conventional cotton is grown on the same farm unit, Bollgard II refuge crops must be at least 48 metres wide and each refuge area must be a minimum of 2 hectares. If no sprayed conventional cotton is grown on the same farm unit, Bollgard II refuge crops must be at least 24 metres wide and 24 metres long. Different unsprayed refuge options may be planted in the same field as a single unit; however a sprayed conventional cotton refuge must not be planted in a field that is also planted to an unsprayed refuge type.
- (h) In all regions, destruction of refuges should only be carried out after Bollgard II cotton lint removal has been completed.
- (i) Refuges for dryland Bollgard II cotton crops must be planted in the same row configuration as the Bollgard II crop unless the refuge is irrigated. If an irrigated option is utilised for a dryland Bollgard II crop, then that refuge may be planted in a solid configuration. Dryland cotton is measured as green hectares (calculated as defined in the Technology User Agreement).

2. Control of volunteer and ration cotton

Volunteer and ratoon cotton may impose additional selection pressure on *Helicoverpa* spp. to develop resistance to the Bt Cry 1Ac and Cry 2Ab proteins produced by Bollgard II cotton.

Growers must make all reasonable efforts to remove volunteer and ration plants, as soon as possible from all fields, including fallow areas, Bollgard II crops, conventional cotton crops and all refuges. The presence of Bollgard II volunteers/ration cotton in any refuge will diminish the value of the refuge and must be removed as soon as possible.

Note: The refuge should preferably be planted into fallow or rotation fields that have not been planted to cotton in the previous season.

3. <u>Post-harvest crop destruction</u>



As soon as practical after harvest, Bollgard II cotton crops must be destroyed by cultivation or herbicide so that they do not continue to act as hosts for *Helicoverpa* spp.

SECTION 2: NEW SOUTH WALES AND SOUTHERN QUEENSLAND ONLY

1. Planting windows

All Bollgard II crops are to be planted into moisture or watered-up by 15 November, unless otherwise advised by a Bollgard II Planting Window Variation Notice.

2. Pupae destruction

In Bollgard II cotton fields, each grower will be required to undertake *Helicoverpa* spp. pupae destruction after harvest according to the following key guidelines:

- Bollgard II crops should be slashed or mulched and fields cultivated for pupae control within 4 weeks
 of harvesting. All pupae busting must be completed by July 31.
- Ensure disturbance of the whole soil surface to a depth of 10 cm.
- All fields that are sown to any winter crop following a Bollgard II crop must be inspected by the Technology Service Provider before sowing commences in order to ensure that pupae busting has occurred.

In Refuge crops:

In New South Wales and Southern Queensland, to ensure maximum emergence of late pupae from associated refuges, soil disturbance of refuge crops should not be undertaken until after the pupae busting in Bollgard II cotton crops on the farm unit is complete. All unsprayed refuges, should preferably be left uncultivated until the following October.

3. <u>Failed crops</u>

Bollgard II crops that will not be grown through to harvest for various reasons and are declared to, and verified by, Monsanto as failed must be destroyed within two weeks after verification, in such a way that prevents regrowth. Crops abandoned before February 28 do not require pupae busting. Crops abandoned on February 28 or later must be pupae busted.

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NB: If any grower encounters problems in complying with the Resistance Management Plan please contact your local Monsanto Regional Business Manager.

SECTION 3: CENTRAL QUEENSLAND ONLY

1. Planting Windows

Emerald: All Bollgard II crops are to be planted into moisture or watered-up in the period between September 15 and October 26, unless advised otherwise by a Bollgard II Planting Window Variation Notice.

Dawson Callide Valleys: All Bollgard II crops are to be planted into moisture or watered-up in the period between September 15 and October 26, unless advised otherwise by a Bollgard II Planting Window Variation Notice.

Belyando: All Bollgard II crops are to be planted into moisture or watered-up in the period between October 10 and November 20, unless advised otherwise by a Bollgard II Planting Window Variation Notice.

2. Refuges

Pigeon Pea refuge should preferably be planted into a fallow or rotation field that has not been planted to cotton in the previous season to avoid volunteer and ration cotton.

In Central Queensland soil disturbance of refuge crops can only occur 2 weeks after final defoliation of the Bollgard II cotton.

3. <u>Late summer pigeon pea trap crop</u>

A late summer trap crop (pigeon pea) must be planted for all Bollgard II cotton grown in Central Queensland. The planting configuration of the trap crop should be the same as that of the Bollgard II crop. Irrigated Bollgard II must have an irrigated trap crop. Table 3 shows the requirements for the late summer pigeon pea trap crop. Dryland Bollgard II growers who do not have any irrigated cotton on their farm should contact their Monsanto Regional Business Manager for alternative options.

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Refuge and late summer trap crops have different purposes and, if pigeon pea is selected for both, two separate plantings may be required. However, where a pigeon pea refuge is utilised as a trap crop the full 5% pigeon pea refuge area must be managed to become the late summer trap crop and must adhere to the requirements in Table 3 below.

Table 3. Late summer pigeon pea trap crop requirements in Central Queensland

Criterion	Trap crop*
Minimum area & dimension (Requirement)	A minimum trap crop of 1% of planted Bollgard II cotton crop is required. If sprayed conventional cotton is grown on that farm unit: the trap crop must be at least 48m x 48m. If no sprayed conventional cotton is grown on that farm unit: the trap crop must be at least 24m x 24m.
Planting time	The trap crop should preferably be planted between November 1 and November 30 Note: if growers choose to plant their trap crop to coincide with the planting of pigeon pea refuges they must manage the trap crop in such a way that it remains attractive to <i>Helicoverpa</i> spp. 2-4 weeks after final defoliation.
Planting rate **	35kg/ha (recommended establishment greater than 4 plants per metre)
Insect control	The trap crop can be sprayed with virus after flowering; while avoiding insecticide spray drift.
Irrigation	The trap crop must be planted into an area where it can receive the additional irrigation required to keep the trap crop attractive to <i>Helicoverpa</i> spp. until after the cotton is defoliated.
Weed control	The trap crop should be kept free of weeds and particularly volunteer Bollgard II cotton.
Crop destruction	The trap crop must be destroyed 2-4 weeks (but not before 2 weeks) after final defoliation of the Bollgard II cotton crop, (slash and pupae bust – full soil disturbance to a depth of 10cm across the entire trap crop area).



- * A pigeon pea trap crop is to be planted so that it is attractive (flowering) to *Helicoverpa* spp. after the cotton crop has cut out, and as any survivors from the Bollgard II crop emerge. Planting pigeon pea too early (e.g. before November) or too late (e.g. mid December) is not adequate for cotton crops planted during September through to October.
- ** The planting rate is a recommendation based on a minimum of 85% seed germination.

NB: <u>If any grower encounters problems in complying with the resistance management plan, please</u> <u>contact your Monsanto Regional Business Manager.</u>

For further background information on the various components of this plan see the "Preamble to the Resistance Management Plan for Bollgard II" in the current Cotton Pest Management Guide.



APPENDIX B

Resistance Management Plan for Bollgard II® Cotton 2012/2013 - Ord River Irrigation and Burdekin Bowen Basin Areas

Ord River Irrigation, Burdekin Bowen Basin and Richmond Areas

Developed by Monsanto Australia Limited and the Transgenic and Insect Management Strategy (TIMS) Committee of Cotton Australia Limited.

The resistance management plan is based on three basic principles: (1) minimising the exposure of *Helicoverpa* spp. to the *Bacillus thuringiensis* (Bt) proteins Cry 1Ac and Cry 2Ab; (2) providing a population of susceptible individuals that can mate with any resistant individuals, hence diluting any potential resistance; and (3) removing resistant individuals at the end of the cotton season. The three principles are supported through the implementation of 5 elements that are the key components of the Resistance Management Plan. These elements are:

- 1. Refuge crops
- 2. Planting window
- 3. Pupae busting/Trap crops
- 4. Control of volunteers and ratoon cotton and
- 5. Spray limitations.

Growers of Bollgard II cotton are required to practice preventative resistance management as set out below. Compliance with the Resistance Management Plan is required under the terms of the Bollgard II Technology User Agreement and under the conditions of registration (*Agricultural and Veterinary Chemicals Act, 1994*).

This RMP is for the following areas:

- Ord River Irrigation Area, Western Australia
- Burdekin Bowen Basin Area, Queensland
- Richmond Area, Queensland

1. Refuges

Growers planting Bollgard II cotton will also be required to grow a refuge crop that is capable of producing large numbers of *Helicoverpa* spp. moths which have not been exposed to selection with Bt proteins Cry 1Ac and Cry 2Ab. These unselected moths are expected to dominate matings with any survivors from Bollgard II crops and thus help to maintain resistance to Bt proteins Cry 1Ac and Cry 2Ab at low levels.



All refuge options are based on the requirement of a 10% unsprayed cotton refuge or its equivalent as determined by the relative production of *Helicoverpa* spp. from each of the refuge types as described in the tables below.

For each area of irrigated Bollgard II cotton planted, a grower is required to plant a minimum of one, or a combination of, the following:

Table 1. Irrigated Bollgard II cotton refuge options

Crop	Conditions	% of Bollgard II	Regions permitted
Conventional Cotton	Irrigated, unsprayed conventional cotton	10	All Regions
Pigeon pea	Fully irrigated, unsprayed	5	All Regions

Note: Unsprayed means not sprayed with insecticides that target any life stage of *Helicoverpa* spp. Bt products must not be applied to any refuge.

If the viability of an unsprayed refuge is at risk due to early or late season pressure by *Helicoverpa* spp., or any other caterpillar species, contact Monsanto immediately. With prior approval from the Monsanto Compliance and Stewardship Manager, a non-Bt heliocide can be applied.

An unsprayed refuge should not be planted in the same field as any crop sprayed with a rate of insecticide that is registered for Helicoverpa spp, with the exception of Bollgard II unless a sufficient buffer is in place to prevent insecticide drift.

Sprayed crops and unsprayed refuges that are planted in adjacent fields must also be separated by sufficient distance to *minimise the likelihood of insecticide drift onto the unsprayed refuge*. For the purposes of this Resistance Management Plan, conventional cotton includes any cotton varieties that do not have Bt proteins in the plant that control *Helicoverpa* spp. larvae.

General conditions for all refuges:

(a) Refuge crops are to be planted and managed so that they are attractive to *Helicoverpa* spp. during the growing period of the Bollgard II cotton varieties.

Ord River Irrigation Area

It is preferable that all refuge is planted within the 2 week period prior to planting Bollgard II. If this is not possible, refuge planting must be completed within 3 weeks of the first day of sowing of Bollgard II. At this time, sufficient refuge must have been planted to cover all of the Bollgard II cotton proposed to be planted for the season (including Bollgard II already planted and any that remains unplanted). Should additional Bollgard II planting be made after this date, which is not already covered by refuge, additional refuge must be planted as soon as possible and no more than 2 weeks after sowing of the additional Bollgard II.

Burdekin Bowen and Richmond Areas

Refuges must be sown within the 2 weeks prior to planting any Bollgard II. This timing attempts to mitigate wet season planting risks.



- (b) Group J legume innoculant should be used to treat pigeon pea planting seed just prior to sowing to ensure effective root zone colonisation by nitrogen fixing rhizobium bacteria
- (c) Once the Bollgard II cotton begins to flower the corresponding refuge must not be cultivated.
- (d) Insecticide preparations containing Bt may be used on Bollgard II cotton throughout the season BUT NOT on any refuge crops.
- (e) All refuges are to be planted within the farm unit growing Bollgard II cotton. Subject to clause (f) below, all reasonable effort should be taken to plant the refuge either on one side of, or next to, a Bollgard II cotton field, and all Bollgard II fields must be no more than 2 km from the nearest Bollgard II refuge.
- (f) To minimise the possibility of refuge attractiveness being affected by herbicide drift, non-herbicide tolerant refuges should be separated from herbicide tolerant Bollgard II cotton crops by a sufficient distance to minimise such drift, but no more than 2km from the Bollgard II cotton.
- (g) To account for possible insecticide drift, Bollgard II refuge crops must be at least 24 metres wide and 24 metres long. Different unsprayed refuge options may be planted in the same field as a single unit.
- (h) Slashing of plants within the refuge should only be carried out after Bollgard II cotton lint removal has been completed. Soil disturbance of refuge crops can only occur 2 weeks after Bollgard II cotton plants have been harvested.
- (i) Refuges for Bollgard II crops must be planted in the same row configuration as the Bollgard II crop.

2. Control of volunteer and ratoon cotton

Volunteer and ratoon cotton may impose additional selection pressure on *Helicoverpa* spp. to develop resistance to the Bt proteins Cry 1Ac and Cry 2Ab produced by Bollgard II cotton.

Growers must make all reasonable efforts to remove volunteer and ration plants as soon as possible from all fields - including fallow areas, Bollgard II crops, conventional cotton crops and all refuges. The presence of Bollgard II volunteers/ration cotton in any refuge will diminish the value of the refuge and must be removed as soon as possible.

Note: The refuge should preferably be planted into fallow or rotation fields that have not been planted to cotton in the previous season.

3. Post-harvest crop destruction

As soon as practical after harvest, Bollgard II cotton crops must be destroyed by cultivation or herbicide so that they do not continue to act as hosts for *Helicoverpa* spp. Unsprayed refuges must be left uncultivated for two weeks after harvest to allow emergence of any pupating *Helicoverpa* spp.

4. Planting windows

All Bollgard II crops and cotton refuges are to be planted into moisture or watered-up in a five week window. In each region, the start date of the planting window will be determined by TIMS in consultation with local growers and reflected in a regionally amended "Bollgard II Planting Window Variation Notice".

The planting window will occur within the following periods:

Ord River Irrigation Area: March 1 and May 1.

Burdekin Bowen Basin Area: December 1 and April 1.

Richmond Area: December 1 and April 1.

5. Refuge

Unsprayed Pigeon Pea refuge should preferably be planted into a fallow or rotation field that has not been planted to cotton in the previous season.



6. End of season chick pea trap crop

An end of season chick pea trap crop must be planted. The planting configuration of the trap crop should be the same as that of the Bollgard II crop. Table 2 shows the requirements for the chick pea trap crop.

Table 2. End of season chick pea trap crop requirements Criterion	End of season chick pea trap crop
Minimum area & dimensions	A trap crop of 1% of planted Bollgard II crop area is required. This planting must be at least 24 m x 24m wide.
Planting time	In April for Burdekin Bowen Area. In July/August for Ord area. The trap crop is to be planted such that it is attractive to <i>Helicoverpa</i> spp. from 2 weeks before defoliation of the Bollgard II cotton. It must remain attractive to <i>Helicoverpa</i> spp. until at least 2 weeks after defoliation of the Bollgard II cotton.
Insect control	The trap crop should be monitored and sprayed with insecticide if the larval pressure threatens the viability of the crop.
Irrigation	The trap crop is to remain attractive to <i>Helicoverpa</i> spp. until after defoliation of cotton. In some cases this may require one additional irrigation after the cotton is defoliated. The trap crop must be planted into an area where it can receive the additional irrigation required to ensure the trap crop remains attractive to Helicoverpa spp.
Weed control	The trap crop should be kept free of weeds and particularly volunteer Bollgard II cotton.
Crop destruction	The trap crop must be destroyed 2-4 weeks after defoliation of the Bollgard II cotton crop, but not before 3 weeks (slash and pupae bust – full soil disturbance to a depth of 10 cm across the entire trap crop area). All Bollgard II cotton and associated trap crops must be destroyed by: Burdekin Bowen Basin/Richmond Area – August 31 Ord River Irrigation Area – December 10

NB: If any grower encounters problems in complying with the resistance management plan, please contact your Monsanto Regional Business Manager.

For further background information on the various components of this plan see the "Preamble to the Resistance Management Plan for Bollgard II" in the current Cotton Pest Management Guide.



LICENCE NO: DIR066

LICENCE HOLDER: Monsanto Australia Limited

PROJECT SUPERVISOR:

ACCREDITATION NO: ACCR 034/2002

SUBMISSION: 2011 Annual Report for Commercial release of GM

herbicide tolerant and/or insect resistant cotton lines

REPORTING PERIOD: 26 October 2010 – 26 October 2011

(covering 2010/11 cotton growing season)

DATE: 19 December, 2011

PREPARED BY:

Information and data submitted herein contains trade secrets, or privileged or confidential information the property of Monsanto Australia Limited and no government agency or representative thereof is authorized to disclose such data and information without written permission from Monsanto Australia Limited.

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SECTION 1. LICENCE HOLDER DETAILS

Name: Monsanto Australia Limited

Address: 600 St Kilda rd, Melbourne 3004

PO Box 6051 St Kilda rd Central Victoria, 8008

Telephone: (03)9522 7122

Facsimilie: (03)9522 6122

Contact email:

Accreditation

Number: ACCR 034/2002

SCOPE OF THE REPORT

This report addresses the annual reporting condition of the DIR066 commercial licence covering Roundup Ready Cotton, Roundup Ready Flex Cotton and the Bollgard II trait issues to Monsanto Australia Limited by the Office of the Gene Technology Regulator.

This report details compliance with general and specific conditions of Sections 2 to 6 of the DIR066 licence as issued to Monsanto Australia Limited on 26 October 2006, and as varied 22 December 2006, 6 December 2007 and 15 April 2009.

This report covers the period of time from 26 October 2010 to 26 October 2011, including the 2010/11 cotton growing season.



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SECTION 2. GENERAL CONDITIONS

2.1 Duration of Licence

DIR066 has not been suspended, cancelled or surrendered.

2.2 Holder of Licence

Monsanto Australia Limited (Monsanto) remains the holder of the licence.

2.3 Project Supervisor

is the project supervisor as per attachment A of the licence. This licence was varied 15 April 2009 to reflect the change of contact details.

2.4 No dealings with GMOs except as authorized by this Licence

Persons covered by the licence did not deal with GMOs except as expressly permitted by the licence.

2.5 Location

The licence allows for dealings with GMOs to be conducted anywhere in Australia. This licence supersedes any previous licences regarding location.

2.6 Persons covered by this GMO Licence

Monsanto acknowledges that the persons covered by the 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.

2.7 Informing people of their obligations

DIR066 was issued in October 2006, permitting dealings with the GMOs to be undertaken during the cotton growing seasons 2006/07, 2007/08, 2008/09 and 2009/10.

Monsanto Australia Limited informed all persons covered by the DIR066 licence of the obligations imposed on them as a result of the conditions of the licence. This was primarily achieved through the Monsanto accreditation program and the information course, which includes information on regulatory obligations as well as management of the crop.



Accreditation programs require all persons having management responsibility for Roundup Ready, Roundup Ready Flex and Bollgard II cotton crops to undergo training.

2.8 Applicant to notify of circumstances that might affect suitability

During the reporting period, Monsanto Australia Ltd did not receive a relevant conviction occurring after the commencement of this licence; nor was there any revocation or suspension of a licence or permit held by Monsanto Australia Ltd under a law of the Australian Government, a State or foreign country, being a law relating to the health and safety of people or the environment; or any event or circumstance occurring after the commencement of this licence that would affect the capacity of Monsanto to meet the conditions of the DIR066 licence.

2.9 Licence holder must provide information on matters related to suitability

Monsanto acknowledges that it must provide information related to its ongoing suitability to hold a licence when requested to do so in writing by the Regulator and must provide information within a time period stipulated by the Regulator.

2.10 Additional information must be given to the Regulator

During the reporting period, Monsanto did not become aware of any additional information as to any risks to the health and safety of people, or to the environment, associated with the dealings authorized by this licence; or of any unintended effects of the dealings authorized by this licence.

2.11 People dealing with the GMOs must allow auditing and monitoring if the dealing

Monsanto acknowledges that if a person authorized 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 authorized by the Regulator, to enter the premises where the dealing is being undertaken, for the purposes of auditing or monitoring the dealing.

2.12 Remaining an Accredited organization

At all times, Monsanto remained an accredited organization and complied with conditions of accreditation as set out in the OGTR Guidelines for Accreditation of Organisations.



SECTION 3. GROWING THE GMOS

3.1 GMOs covered by this licence

The only dealings with GMOs under this licence were those with the GMOs described in DIR066 Licence.

3.2 Permitted dealings

Sales and planting of the Roundup Ready Cotton (RRC), Roundup Ready Flex (RRF), Bollgard II (BGII) and Bollgard II stacked with were undertaken under a Tecdhnology User Agreement, which sets out the conditions for planting and growing a cotton crop containing RRC, RRF and BGII technology. In order to be eligible to sign such an agreement, a grower was required to attend an accreditation program and pass a test based on the material covered in the accreditation program.

3.3 Crop Locations and Volumes

Valley	BGII ha	RR ha	RRF ha	BGII w RR	BGII w	BGII w	Total ha
•				ha	RRF ha	ha	
Belyando	0.00	0.00	458.16	0.00	3,211.06	0.00	3,669.22
Bourke	0.00	0.00	198.37	0.00	10,092.77	0.00	10,291.14
Burdekin	0.00	0.00	25.06	0.00	293.68	0.00	318.88
Darling Downs	110.35	0.00	4,967.99	0.00	76,913.01	796.43	83,159.60
Dawson/Callide	0.00	0.00	456.56	0.00	3,569.67	9.74	4,035.97
Dirranbandi	0.00	0.00	0.00	0.00	31,816.71	0.00	31,816.71
Emerald	0.00	0.00	974.1	0.00	21,872.46	440.57	23,287.13
Gwydir	0.00	0.00	15,435.03	0.00	79,359.46	268.94	95,346.30
Lachlan	0.00	0.00	200.74	0.00	6,771.58	0.00	6,987.92
Lower Namoi	100.00	0.00	1,958.9	0.00	50,398.12	0.00	52,618.64
MacIntyre	193.56	0.00	3,608.33	0.00	59,990.82	513.16	64,504.14
Macquarie	0.00	0.00	419.21	0.00	15,197.78	21	15,885.16
McKenzie River	0.00	0.00	111.05	0.00	1,672.7	0.00	1,783.75
Mungindi	363.63	0.00	8,153.58	0.00	16,950.95	0.00	29,166.43
Murrumbidgee	0.00	0.00	521.5	0.00	15,573.15	0.00	16,132.65
St George	0.00	0.00	808.08	0.00	26,957.53	0.00	27,972.01
Tandou	0.00	0.00	449	0.00	3,141.38	0.00	4,028.08
The Ord	54.8	0.00	104.46	0.00	776.93	0.00	940.79
Upper Namoi	0.00	0.00	721.56	0.00	24,066.3	74.54	24,862.4
Walgett	0.00	0.00	657.05	0.00	8,518.44	0.00	9,175.49
Total ha	822.34	0.00	40,228.73	0.00	457,144.5	2,124.38	50,5982.41

Total Bollgard II ha planted	460,091.22
Total Roundup Ready Flex ha planted	497,373.23

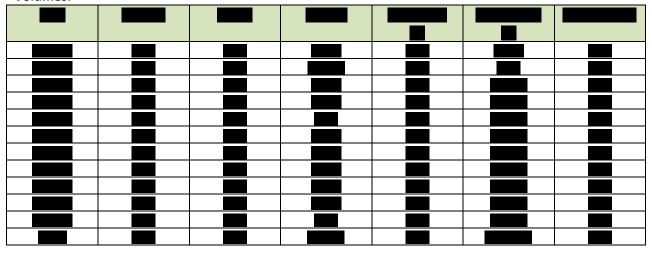


**Denotes trial/research site

Valley: Belyando

Boundaries: Includes the shires of Moranbah, Clermont, Kilcummin, Mistake Creek, Belyando, Elgin, Wolfgagn, Winchester, Old Labona, Gemini Mountains, Amaroo, South Copperfield, Laglan, Birimgan, Blair Athol and Pasha.

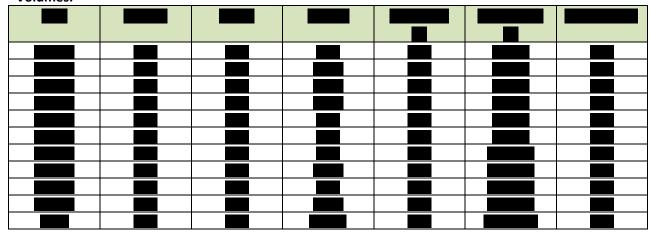
Volumes:



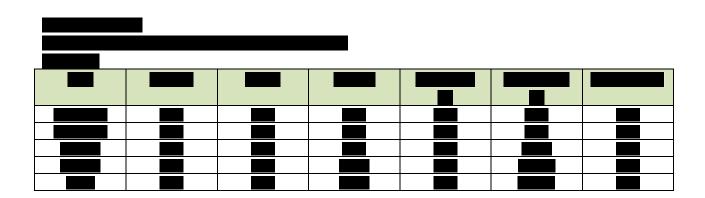
Valley: Bourke

Boundaries: West of Walgett Shire, north of Coolahbah. Includes Cunnamulla in Queensland.

Volumes:



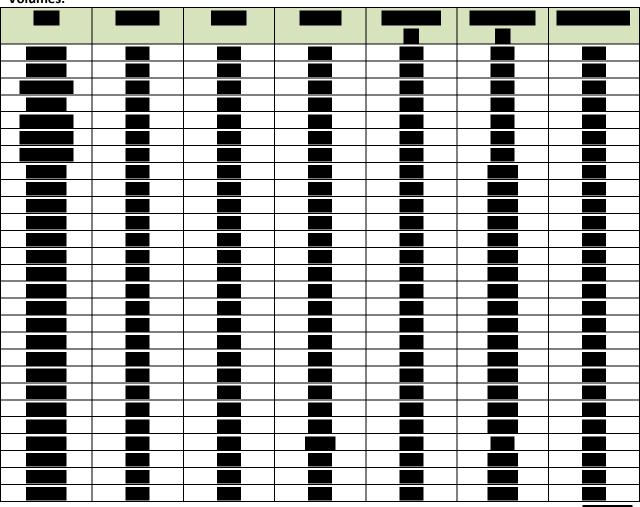




Valley: Darling Downs

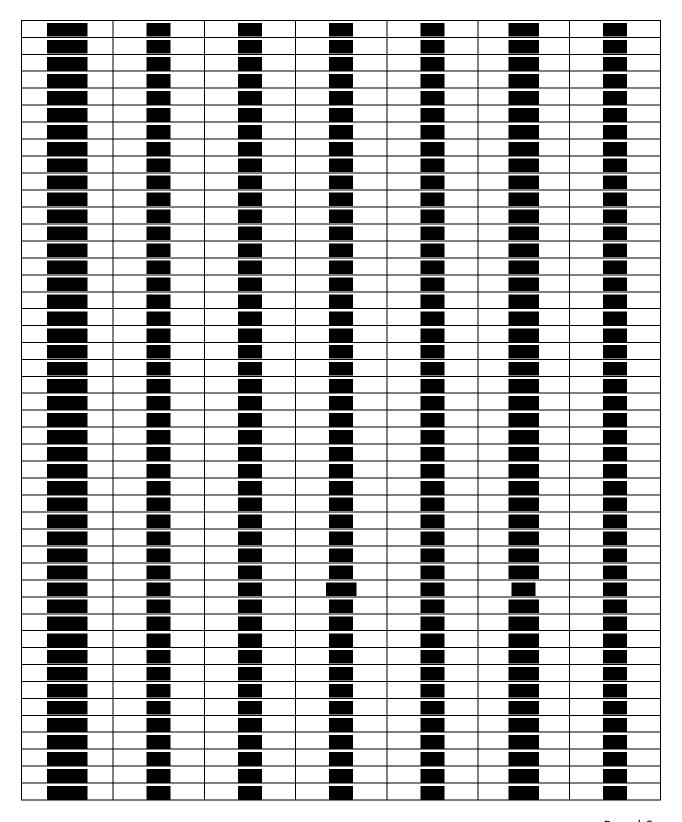
Boundaries: Follows the Condamine River. Includes Toowoomba, Murgon, Dalby, Chinchilla, Condamine, and Roma. South-west boundary is Surat.

Volumes:



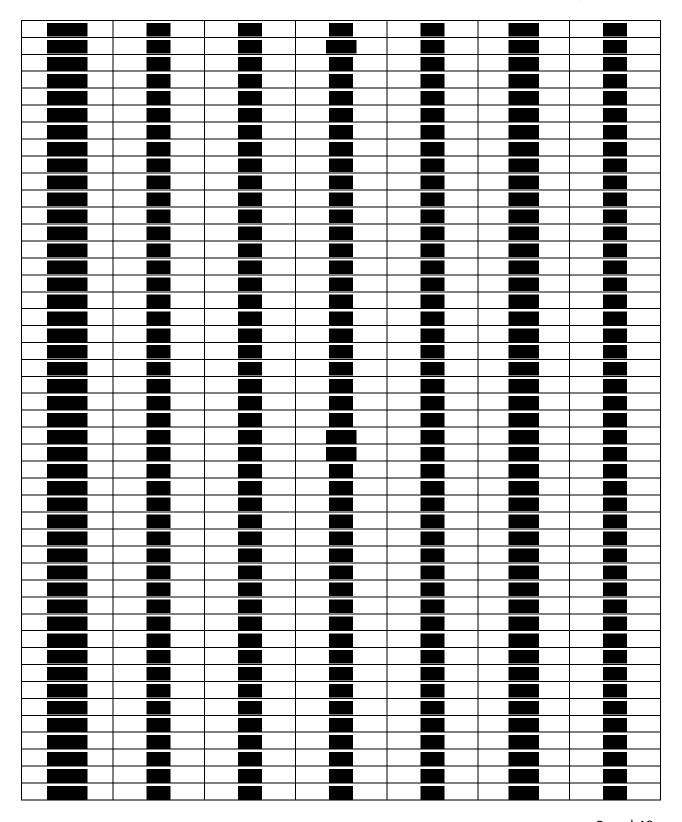






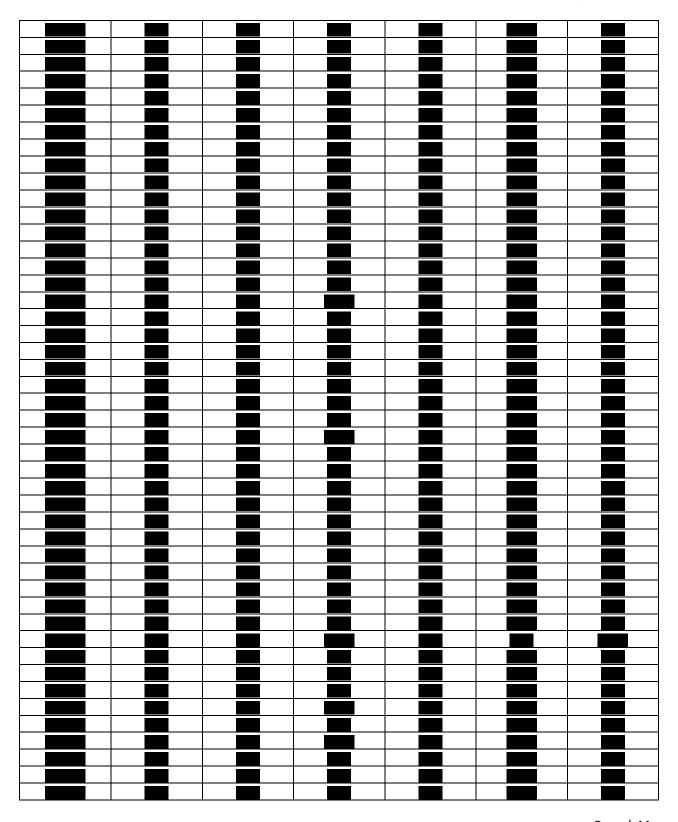
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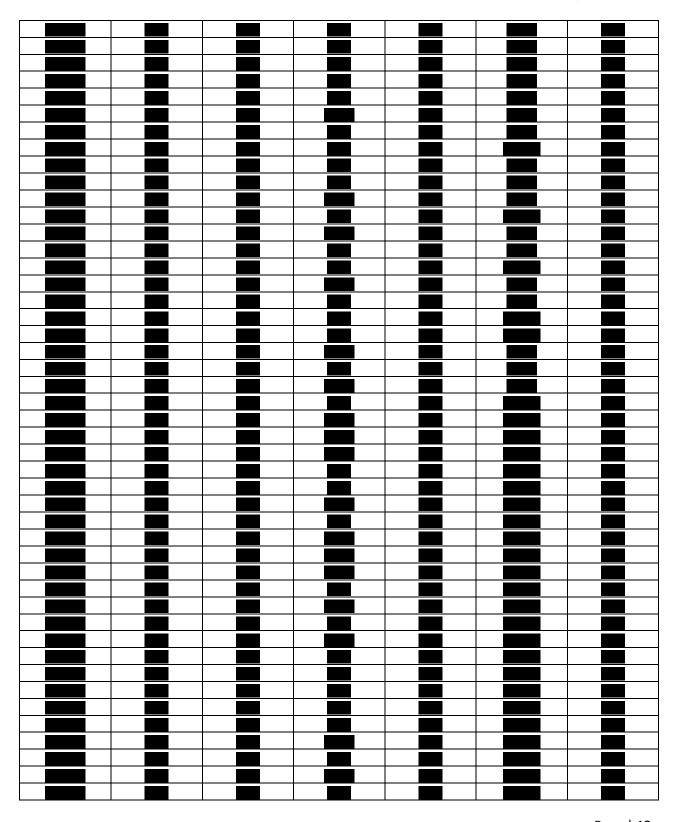
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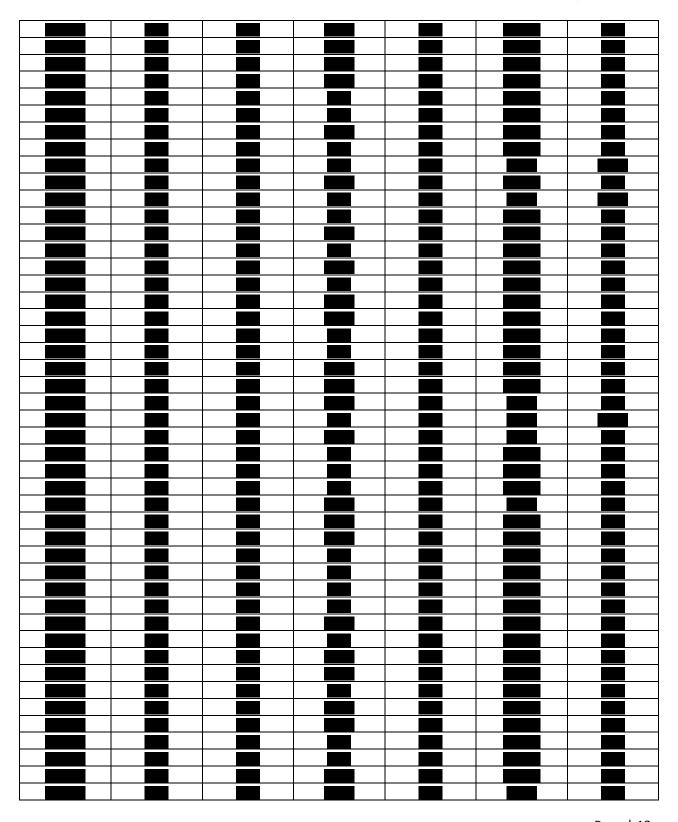
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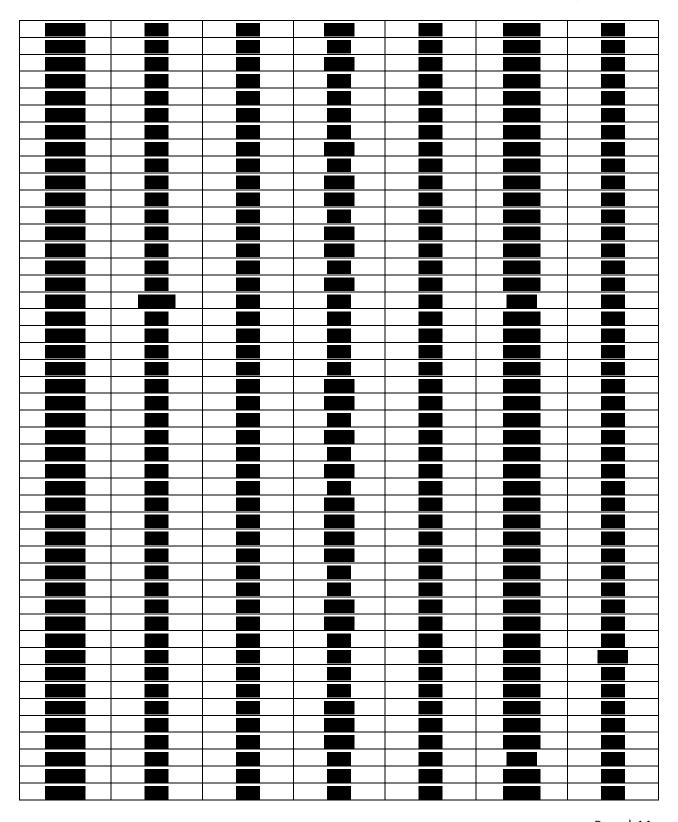
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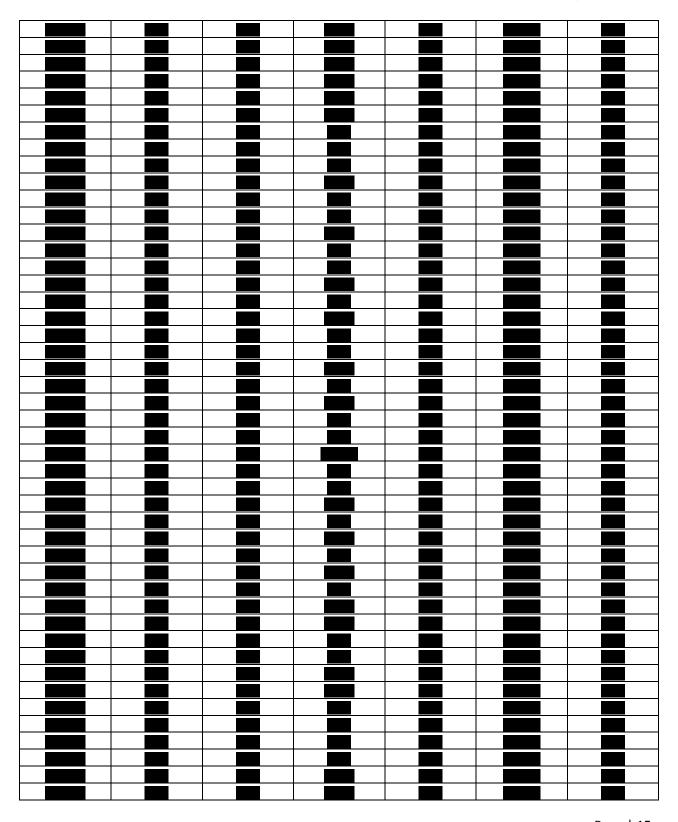
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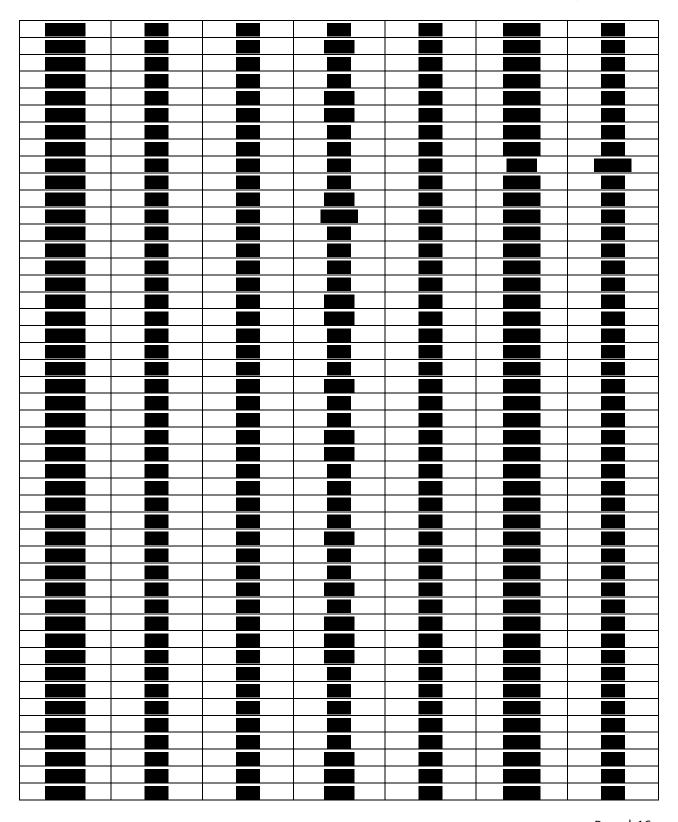
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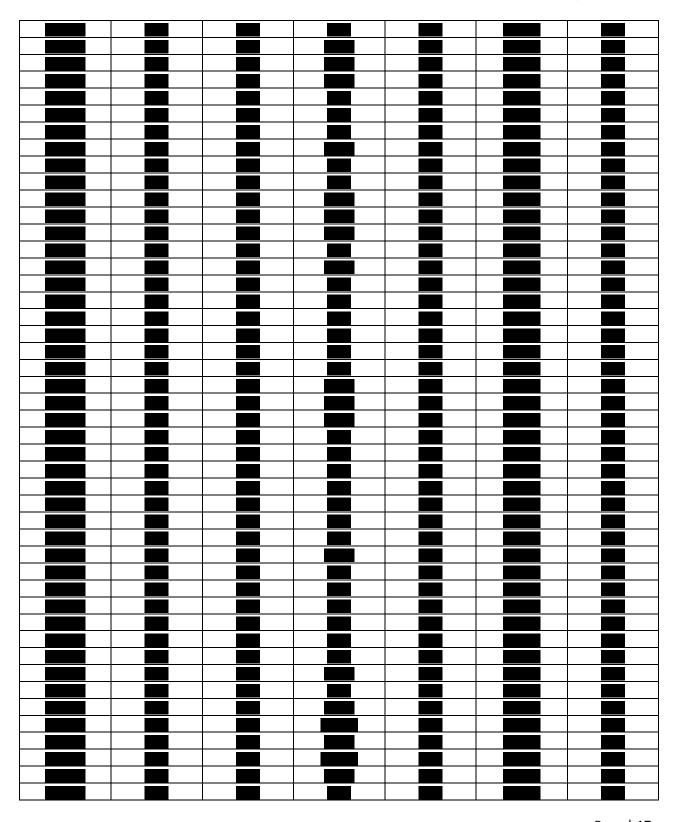
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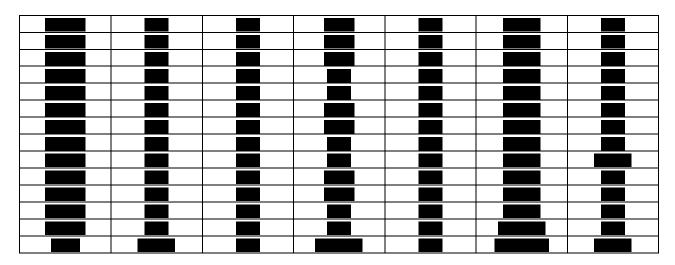
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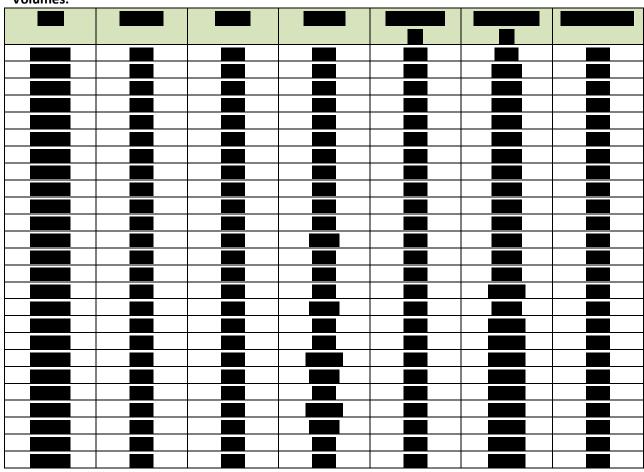




Valley: Dawson/Callide

Boundaries: Includes Taroom, Biloela, Moura and Theodore regions.

Volumes:



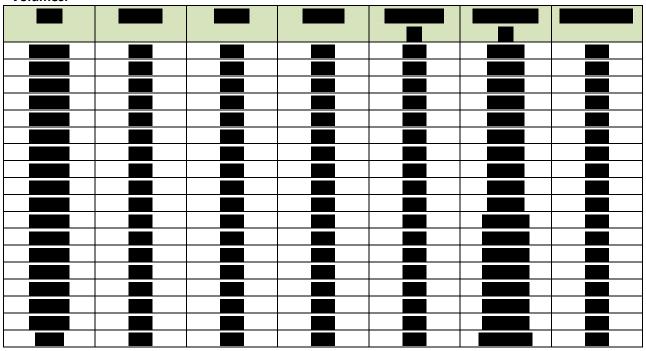
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Valley: Dirranbandi

Boundaries: Runs north toward St George and includes Lower Plains, follows south along the Balonne River right down to the NSW border.

Volumes:



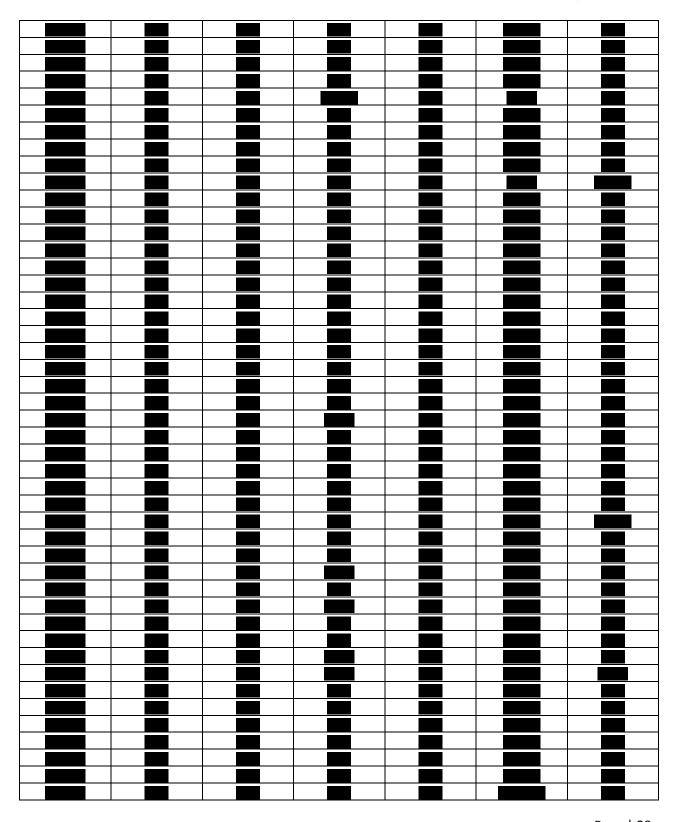
Valley: Emerald

Boundaries: South-eastern boundary formed by the Expedition Ranges between Rolleston and Bauhinia. Region runs north-west from there to include Emerald and Dysart.

Volumes:

voidines.			





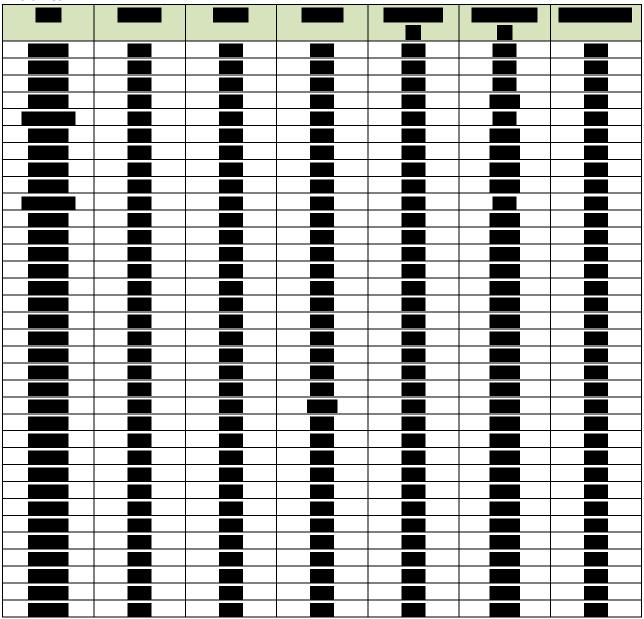
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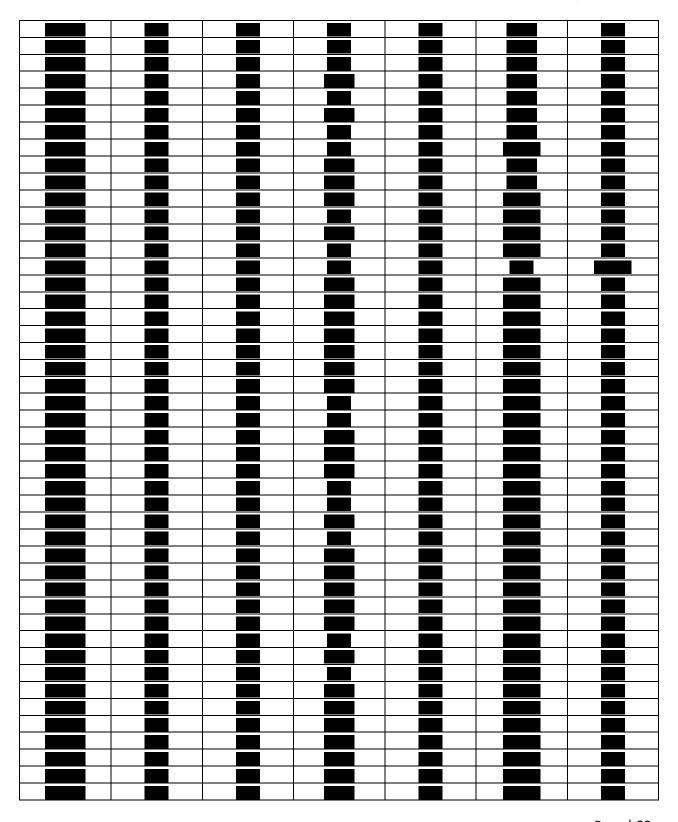
Valley: Gwydir

Boundaries: South of Fox Lane, north-west to Garah, west to Collarenebri, south to Bellata. The road that runs east-west through Bellata and to Rowena is southern boundary.

Volumes:

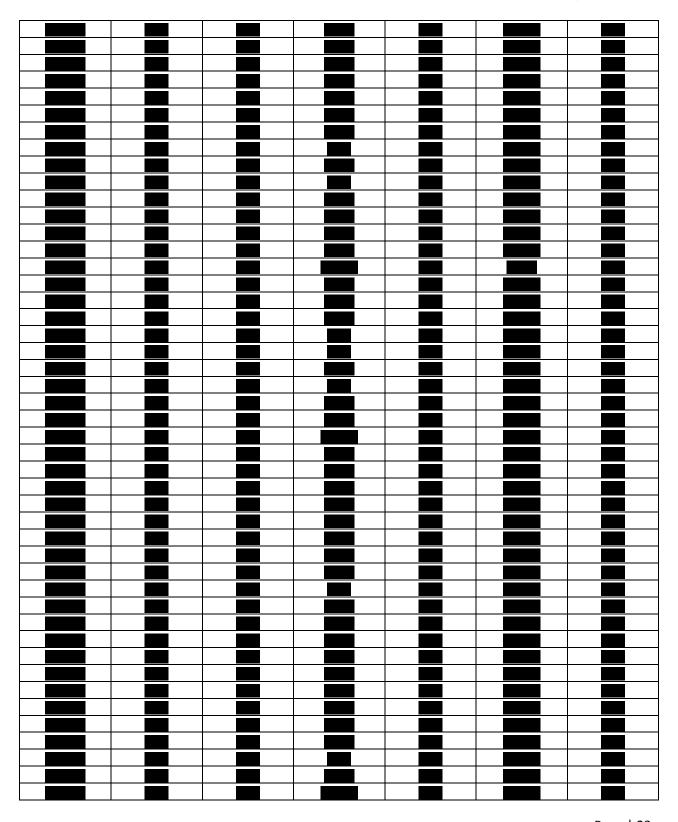






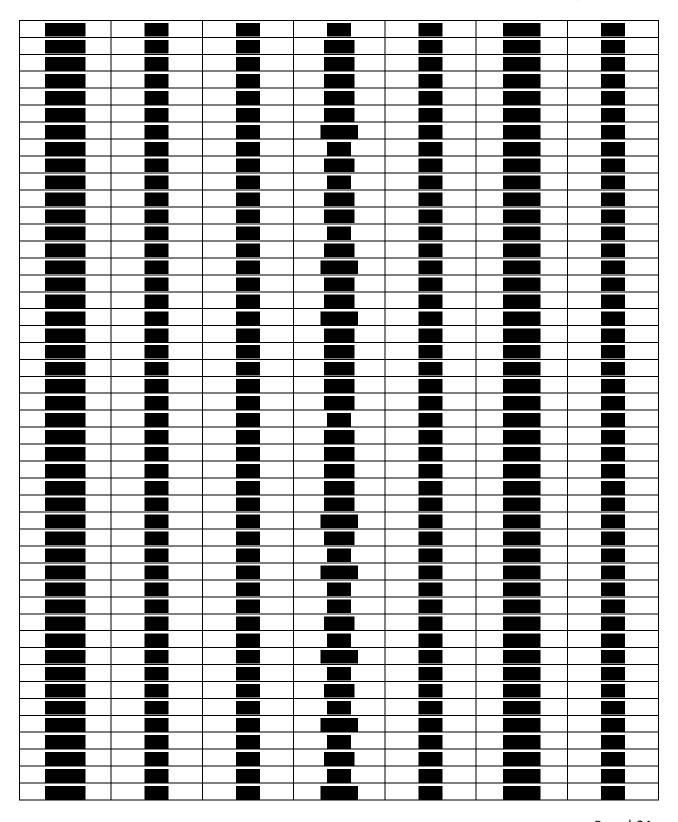
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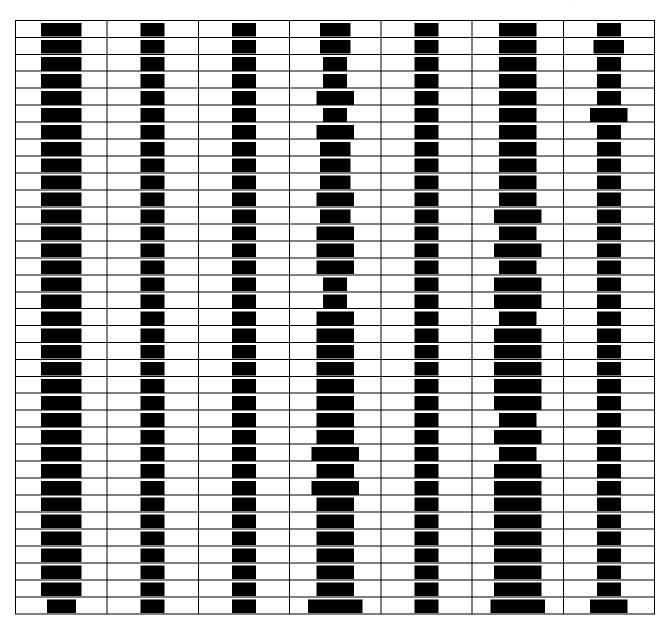
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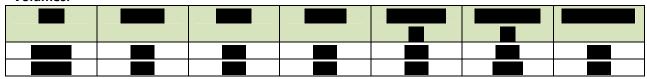




Valley: Lachlan

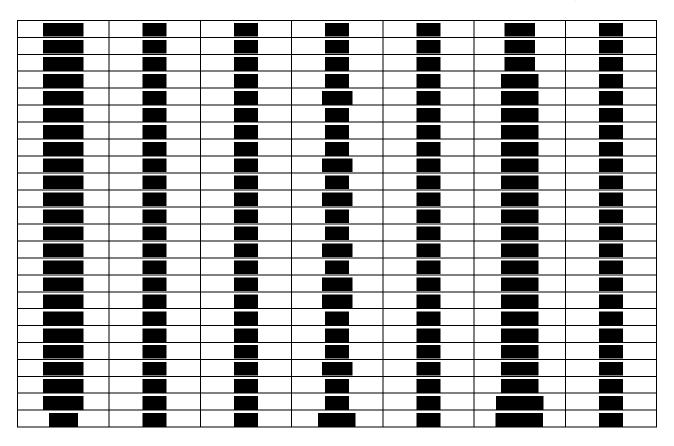
Boundaries: Northern boundary is Peak Hill and Tullamore and the cotton follows the Lachlan River through to Booligal. The southern boundary is the road through to Gunbar and then follows the Great Western Highway through to West Wyalong.

Volumes:



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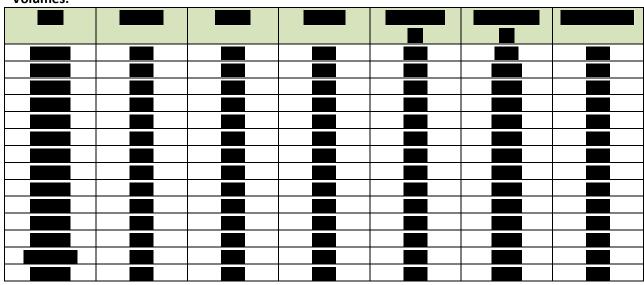




Valley: Lower Namoi

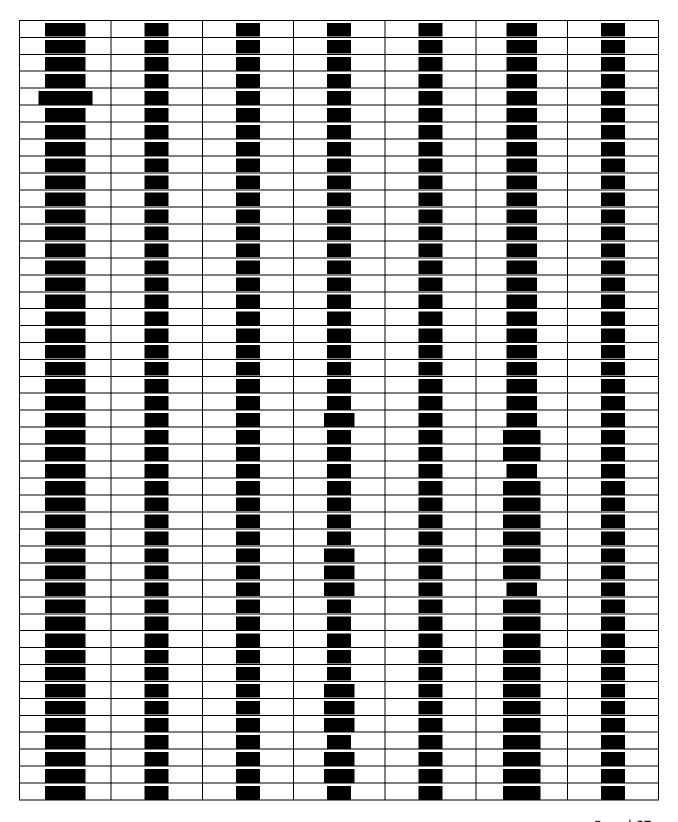
Boundaries: North-west of Baan Baa-Manilla Road and south of Bellata-Rowena Road. Western boundary is formed by the road that runs from Pilliga via Burren Junction to Collarenebri.

Volumes:



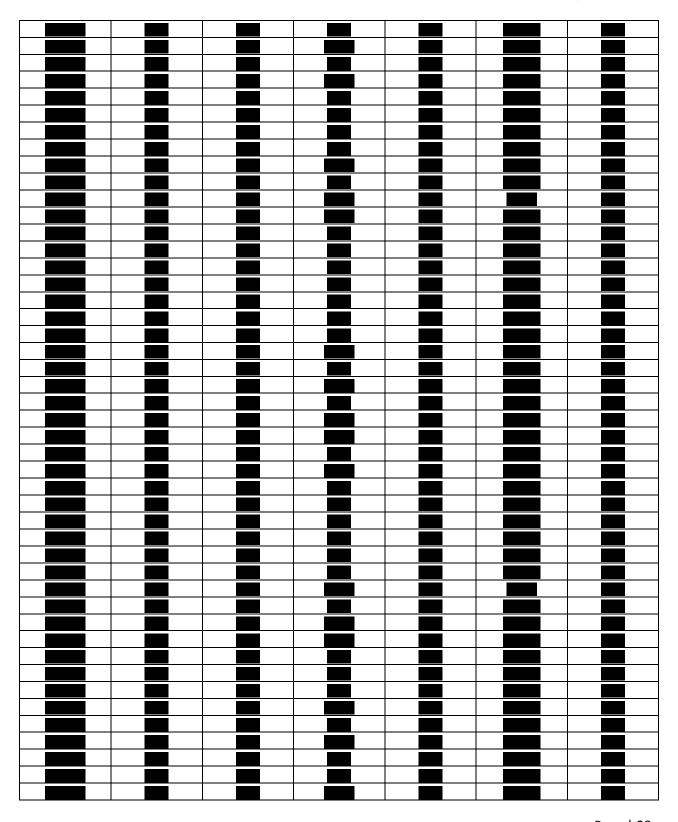
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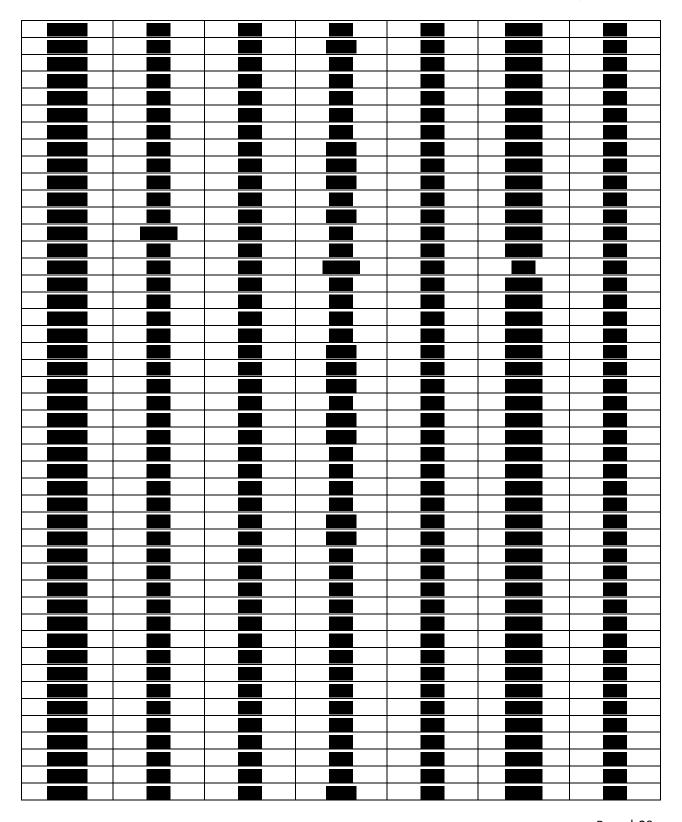
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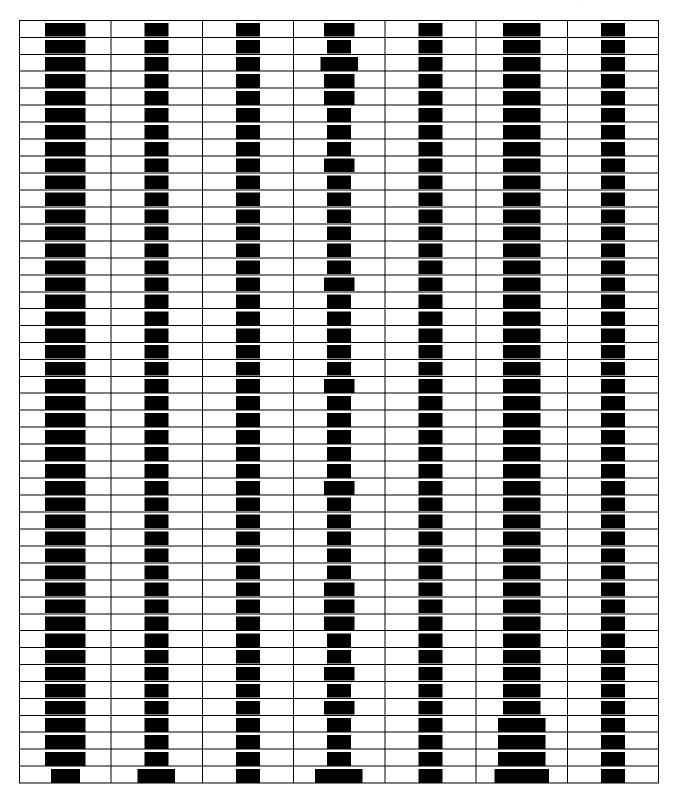
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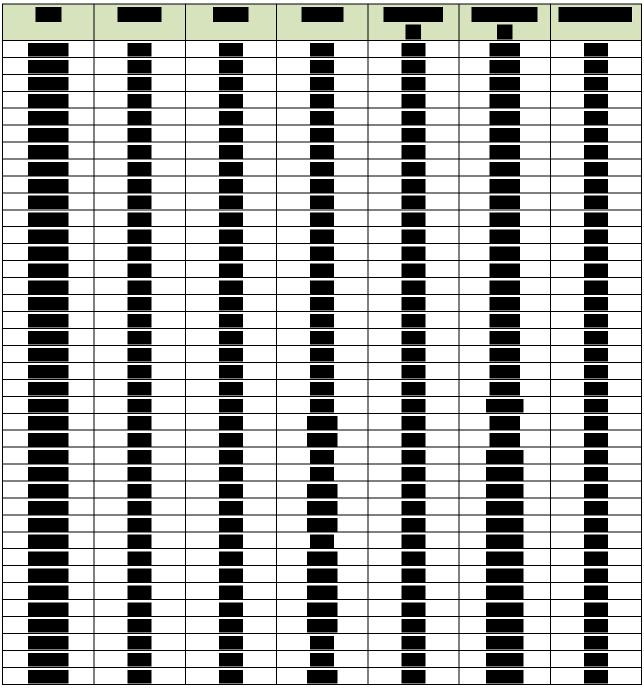
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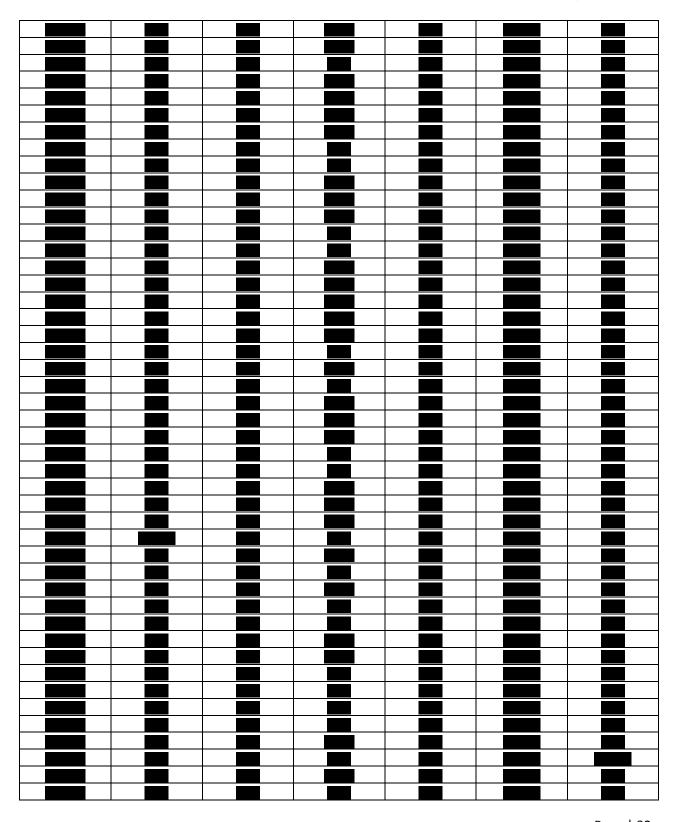
Valley: MacIntyre

Boundaries: North of Gwydir, western boundary is Garah to Talwood Road north include Moonie and east to include Texas. Southern boundary is Foxes Lane which runs Garah back to the Newell Highway and then along to Croppa Creek, Yallaroi and Coolatai.

Volumes:

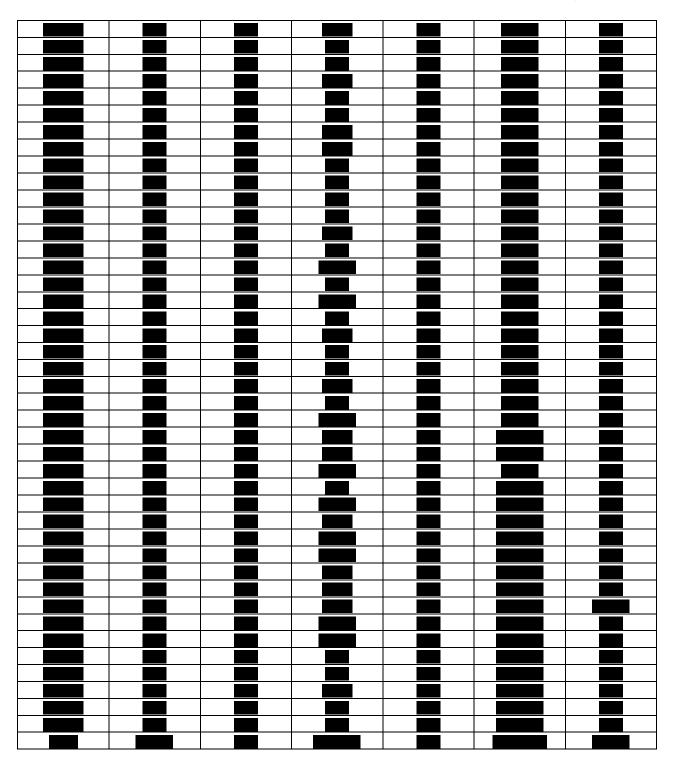






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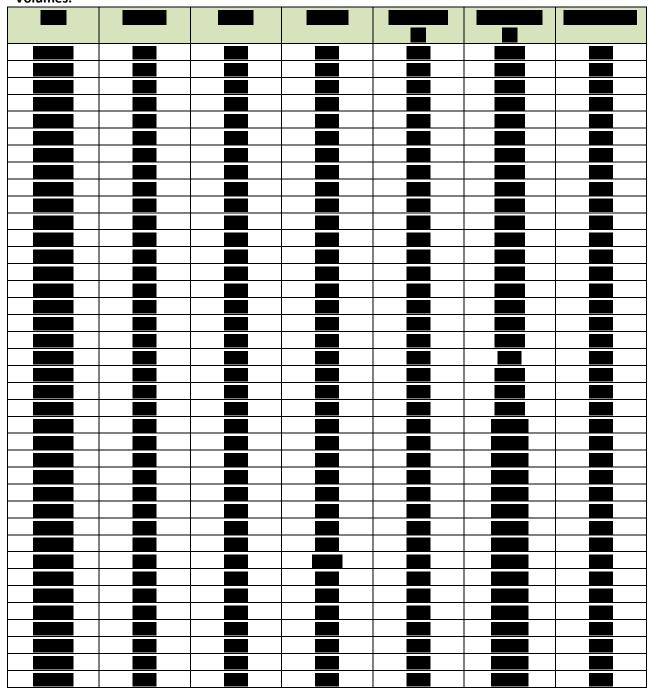




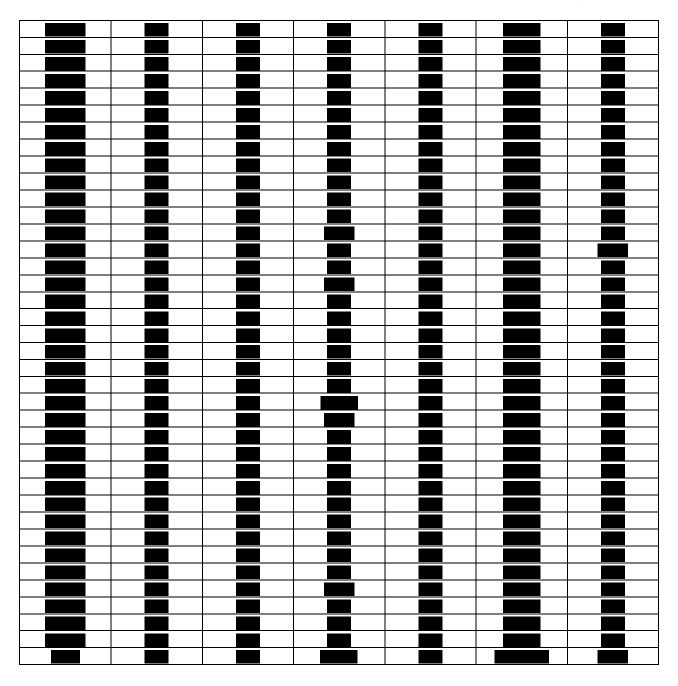
Valley: Macquarie

Boundaries: Dubbo and south to Peak Hill. West to Tullamore. North through Tottenham. Nyngan and Coolabah, then east via southern boundary of Walgett shire and then south back to Dubbo via Coonabarabran.

Volumes:









Valley: McKenzie River

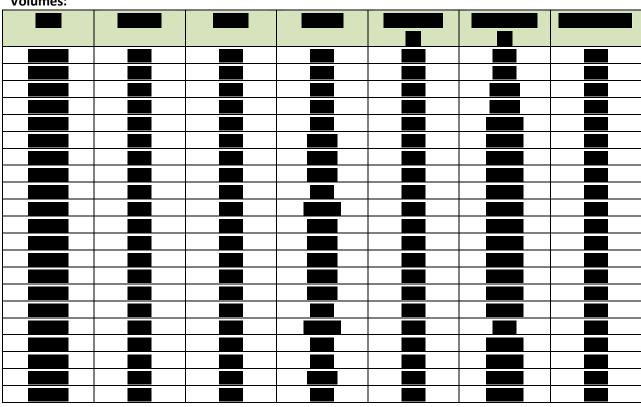
Boundaries: North West of Comet, to include McKenzie River and Alton Downs

Volumes:

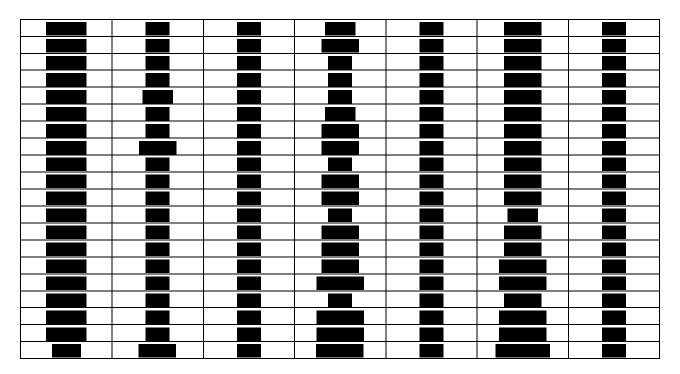
Valley: Mungindi

Boundaries: West of Garah and Boomi Road to Talwood and follows Barwon River south-west of Mungindi towards Collarenebri. Southern boundary is the Watercourse Road from Colly through to Gingham and then to Garah.

Volumes:



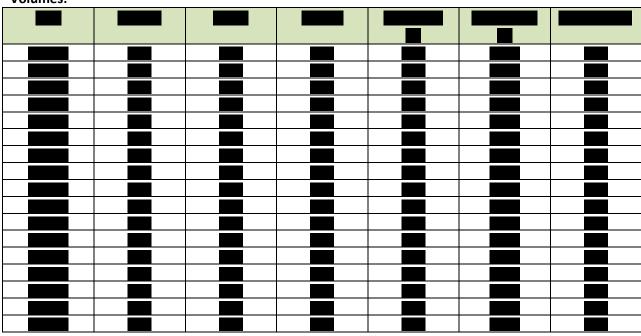




Valley: Murrumbidgee

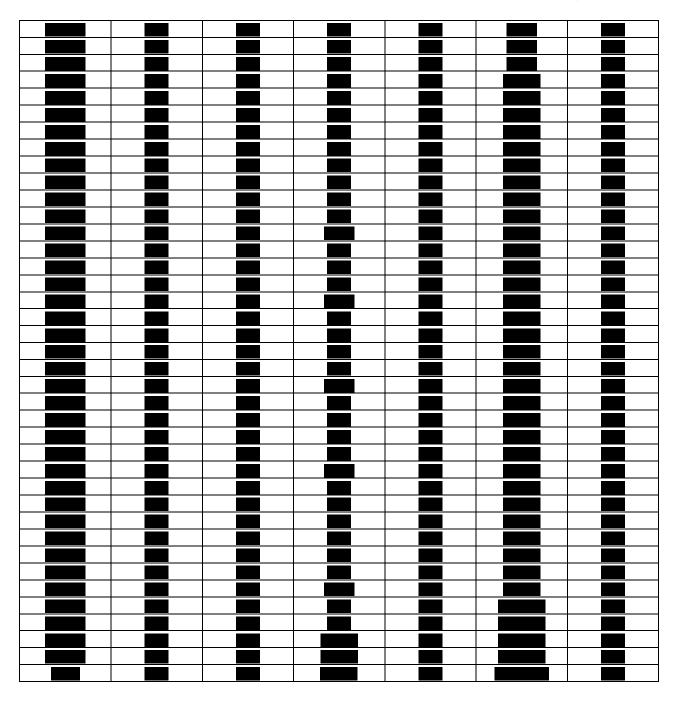
Boundaries: Northern boundary is the Great Western Highwayfrom West Wyalong through Goolgowi to Gunbar, from Gunbar west to Booligal on the Lachlan River. Downstream of Booligal on the Lachlan and south-west is the Murrumbidgee River.

Volumes:



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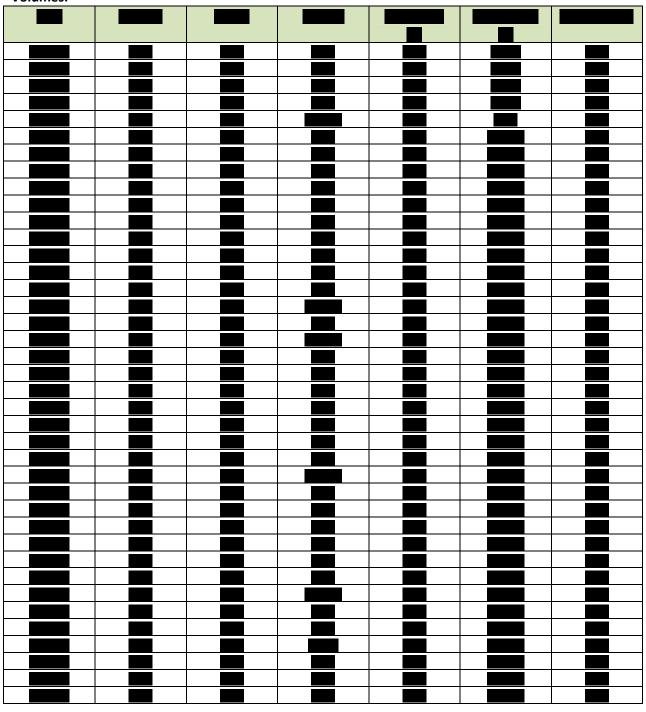




Valley: St George

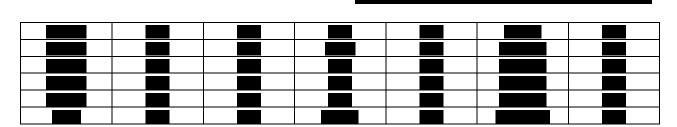
Boundaries: Above Lower Plains on the southern side and north-east to include majority of Waroo Shire with the north-east boundary being Surat.

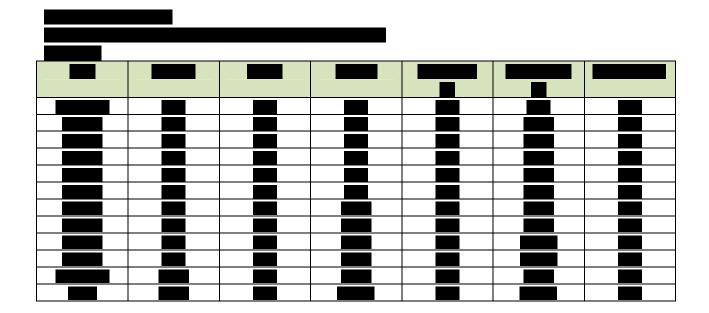
Volumes:



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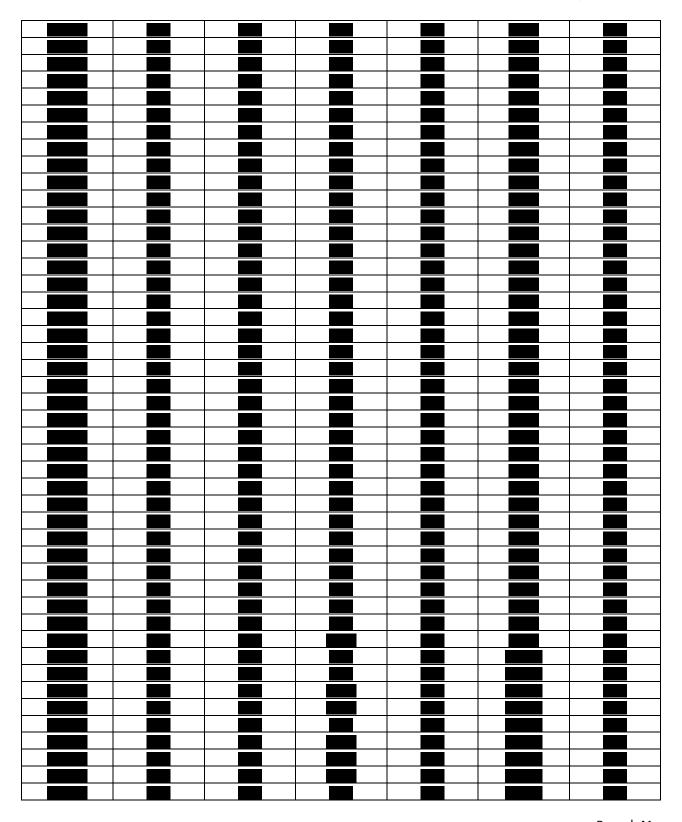
Valley: Upper Namoi

Boundaries: South-east of Baan Baa-Manilla Road. Includes Coolah, Merriwa, Mullaley, Gunnedah and Quirindi.

Volumes:

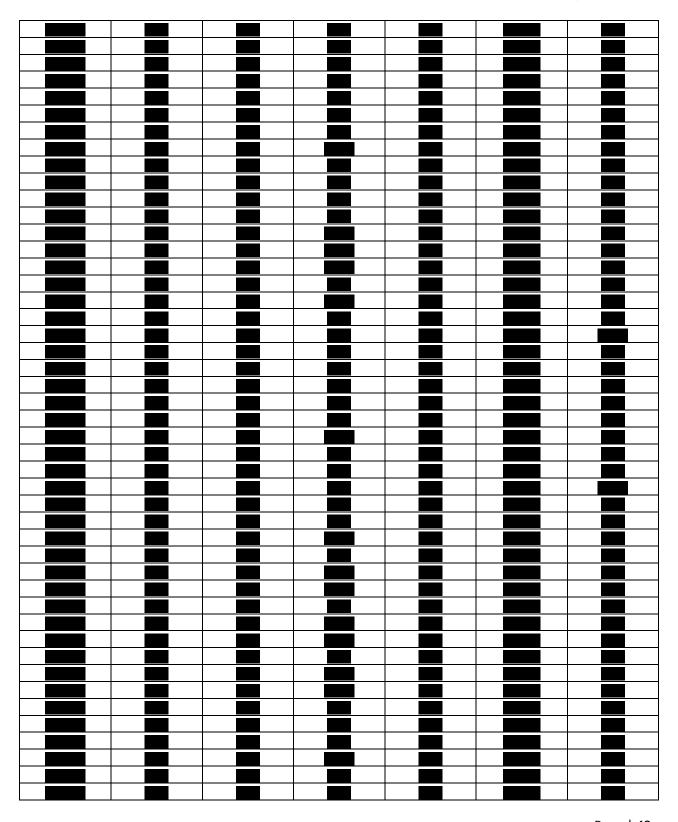






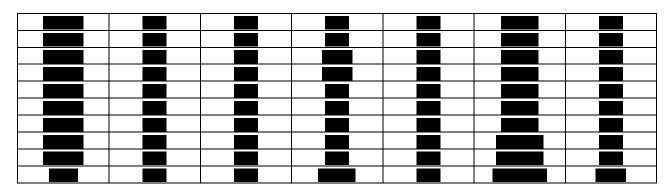
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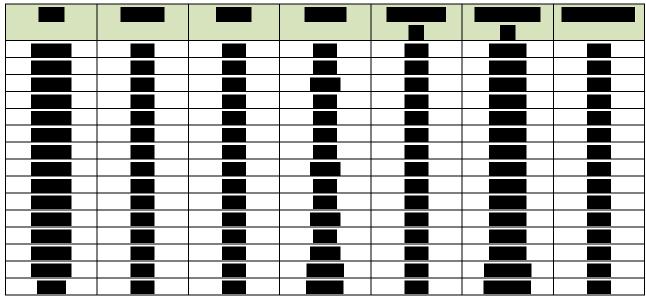




Valley: Walgett

Boundaries: Includes almost entirety of Walgett Shire, with eastern boundary being the road that runs south from Collarenebri to Burren Junction.

Volumes:





3.4 Research Trial Site Locations

Valley	TUA	BGII ha	RR ha	RRF ha	BGII w RR	BGII w RRF	BGII w
					ha	ha	ha
Total		154.80	0.00	35.13	0.00	294.46	0.00



Appendix A - Resistance Management Plan for Bollgard II Cotton 2010/2011

Developed by Monsanto Australia Limited and the Transgenic and Insect Management Strategy (TIMS) Committee of Cotton Australia Ltd.

The resistance management plan is based on three basic principles: (1) minimising the exposure of *Helicoverpa* spp. to the *Bacillus thuringiensis* (Bt) proteins Cry 1Ac and Cry 2Ab; (2) providing a population of susceptible individuals that can mate with any resistant individuals, hence diluting any potential resistance; and (3) removing resistant individuals at the end of the cotton season. The three principles are supported through the implementation of 5 elements that are the key components of the Resistance Management Plan. These elements are:

- 1. Refuge crops
- 2. Planting window
- 3. Pupae busting/Trap crops
- 4. Control of volunteers and ratoon cotton and
- 5. Spray limitations.

Growers of Bollgard II cotton are required to practice preventative resistance management as set out below. Compliance with the Resistance Management Plan is required under the terms of the Bollgard II Technology User Agreement and under the conditions of registration (*Agricultural and Veterinary Chemicals Act 1994*).

Section 1 is applicable to all regions in New South Wales and Queensland that grow cotton while sections 2 and 3 detail specific requirements for New South Wales and Southern Queensland, and Central Queensland respectively.

SECTION 1: NEW SOUTH WALES, SOUTHERN QUEENSLAND & CENTRAL QUEENSLAND

1. Refuges

Growers planting Bollgard II cotton will also be required to grow a refuge crop that is capable of producing large numbers of *Helicoverpa* spp. moths which have not been exposed to selection with Bt proteins Cry 1Ac and Cry 2Ab. These unselected moths are expected to dominate matings with any survivors from Bollgard II crops and thus help to maintain resistance to Bt proteins Cry 1Ac and Cry 2Ab at low levels.



All refuge options are based on the requirement of a 10% unsprayed cotton refuge or its equivalent, as determined by the relative production of *Helicoverpa* spp. from each of the refuge types as described in Tables 1 and 2, for irrigated and dryland production scenarios respectively. Irrespective of the irrigation regime for the Bollgard II cotton, all pigeon pea refuges must be fully irrigated so that they are attractive to *Helicoverpa* spp. during the growing period of the Bollgard II cotton.

For each area of irrigated Bollgard II cotton planted, a grower is required to plant a minimum of one or a combination of the following:

Table 1. Irrigated Bollgard II cotton refuge options

Crop	Conditions	% of Bollgard II
Cotton	Irrigated, sprayed conventional cotton	100
	Irrigated, unsprayed conventional cotton	10
Pigeon pea	Fully irrigated, unsprayed	5

Table 2. Dryland Bollgard II cotton refuge options

Crop	Conditions	% of Bollgard II
Cotton	Dryland or irrigated, sprayed conventional cotton	100
	Dryland or irrigated, unsprayed conventional cotton	10
Pigeon pea	Fully irrigated, unsprayed	5

No other refuge options are approved for dryland Bollgard II.

Note: Unsprayed means not sprayed with any insecticide that targets any life stage of *Helicoverpa* spp. Bt products must not be applied to any refuge (including sprayed cotton).

If the viability of an unsprayed conventional cotton refuge is at risk due to early season pressure by *Helicoverpa* spp., and with prior approval from the Monsanto Compliance and Stewardship Manager, a non-Bt heliocide can be applied up to the 4th true leaf stage. An unsprayed refuge should not be planted in the same field as any crop sprayed with a rate of insecticide that is registered for *Helicoverpa* spp, with the exception of Bollgard II. Sprayed crops and unsprayed



refuges that are planted in adjacent fields must be separated by sufficient distance to *minimise* the likelihood of insecticide drift onto the unsprayed refuge.

For the purposes of this Resistance Management Plan, conventional cotton includes any cotton varieties that do not have Bt proteins in the plant that control *Helicoverpa* spp. moths.

General conditions for all refuges:

(a) Refuge crops are to be planted and managed so that they are attractive to *Helicoverpa* spp. during the growing period of the Bollgard II cotton varieties.

Irrigated: It is preferable that all refuge is planted within the 2 week period prior to planting Bollgard II. If this is not possible, refuge planting must be completed within 3 weeks of the first day of sowing of Bollgard II. At this time, sufficient refuge must have been planted to cover all of the Bollgard II cotton proposed to be planted for the season (including Bollgard II already planted and any that remains unplanted). Should additional Bollgard II planting be made after this date, which is not already covered by refuge, additional refuge must be planted as soon as possible and no more than 2 weeks after sowing of the additional Bollgard II.

Dryland: A dryland refuge must be planted within the 2 week period prior to the first day of planting Bollgard II cotton.

- (b) Pigeon pea refuges should not be planted until the soil temperature reaches 17°C, which is a requirement for germination, and should also be planted into moisture to ensure successful germination. If soil temperatures are not suitable to allow germination of pigeon peas in line with condition (a), an alternative refuge must be planted in its place within the prescribed period (under (a) above).
- (c) Once Bollgard II cotton begins to flower the corresponding refuge should not be cultivated.
- (d) Insecticide preparations containing Bt may be used on Bollgard II cotton throughout the season BUT NOT on any refuge crops.
- (e) All refuges are to be planted within the farm unit growing Bollgard II cotton. Subject to clause (f) below, all reasonable effort should be taken to plant the refuge either on one side of, or next to a Bollgard II cotton field and all Bollgard II fields must be no more than 2 km from the nearest associated Bollgard II refuge.
- (f) To minimise the possibility of refuge attractiveness being affected by herbicide drift, non-herbicide tolerant refuges should be separated from herbicide tolerant Bollgard II cotton crops by a sufficient distance to minimise such drift, but no more than 2km from the Bollgard II cotton.



- (g) To account for possible insecticide drift, the options for the width of refuge crops vary according to spray regime. If any sprayed conventional cotton is grown on the same farm unit, Bollgard II refuge crops must be at least 48 metres wide and each refuge area must be a minimum of 2 hectares. If no sprayed conventional cotton is grown on the same farm unit, Bollgard II refuge crops must be at least 24 metres wide and 24 metres long. Different unsprayed refuge options may be planted in the same field as a single unit; however a sprayed conventional cotton refuge must not be planted in a field that is also planted to an unsprayed refuge type.
- (h) In all regions, destruction of refuges should only be carried out after Bollgard II cotton lint removal has been completed.
- (i) Refuges for dryland Bollgard II cotton crops must be planted in the same row configuration as the Bollgard II crop unless the refuge is irrigated. If an irrigated option is utilised for a dryland Bollgard II crop, then that refuge may be planted in a solid configuration. Dryland cotton is measured as green hectares (calculated as defined in the Technology User Agreement).

2. <u>Control of volunteer and ratoon cotton</u>

Volunteer and ratoon cotton may impose additional selection pressure on *Helicoverpa* spp. to develop resistance to the Bt Cry 1Ac and Cry 2Ab proteins produced by Bollgard II cotton.

Growers must make all reasonable efforts to remove volunteer and ration plants, as soon as possible from all fields, including fallow areas, Bollgard II crops, conventional cotton crops and all refuges. The presence of Bollgard II volunteers/ration cotton in any refuge will diminish the value of the refuge and must be removed as soon as possible.

Note: The refuge should preferably be planted into fallow or rotation fields that have not been planted to cotton in the previous season.

3. Post-harvest crop destruction

As soon as practical after harvest, Bollgard II cotton crops must be destroyed by cultivation or herbicide so that they do not continue to act as hosts for *Helicoverpa* spp.





SECTION 2: NEW SOUTH WALES AND SOUTHERN QUEENSLAND ONLY

1. Planting windows

All Bollgard II crops are to be planted into moisture or watered-up by 15 November, unless otherwise advised by a Bollgard II Planting Window Variation Notice.

2. Pupae destruction

In Bollgard II cotton fields, each grower will be required to undertake *Helicoverpa* spp. pupae destruction after harvest according to the following key guidelines:

- Bollgard II crops should be slashed or mulched and fields cultivated for pupae control within 4 weeks
 of harvesting. All pupae busting must be completed by July 31.
- Ensure disturbance of the whole soil surface to a depth of 10 cm.
- All fields that are sown to any winter crop following a Bollgard II crop must be inspected by the Technology Service Provider before sowing commences in order to ensure that pupae busting has occurred.

In Refuge crops:

In New South Wales and Southern Queensland, to ensure maximum emergence of late pupae from associated refuges, soil disturbance of refuge crops should not be undertaken until after the pupae busting in Bollgard II cotton crops on the farm unit is complete. All unsprayed refuges, should preferably be left uncultivated until the following October.

3. <u>Failed crops</u>

Bollgard II crops that will not be grown through to harvest for various reasons and are declared to, and verified by, Monsanto as failed must be destroyed within two weeks after verification, in such a way that prevents regrowth. Crops abandoned before February 28 do not require pupae busting. Crops abandoned on February 28 or later must be pupae busted.

NB: If any grower encounters problems in complying with the Resistance Management Plan please contact your local Monsanto Regional Business Manager.

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SECTION 3: CENTRAL QUEENSLAND ONLY

1. Planting Windows

Emerald: All Bollgard II crops are to be planted into moisture or watered-up in the period between September 15 and October 26, unless advised otherwise by a Bollgard II Planting Window Variation Notice.

Dawson Callide Valleys: All Bollgard II crops are to be planted into moisture or watered-up in the period between September 15 and October 26, unless advised otherwise by a Bollgard II Planting Window Variation Notice.

Belyando: All Bollgard II crops are to be planted into moisture or watered-up in the period between October 10 and November 20, unless advised otherwise by a Bollgard II Planting Window Variation Notice.

2. Refuges

Pigeon Pea refuge should preferably be planted into a fallow or rotation field that has not been planted to cotton in the previous season to avoid volunteer and ratoon cotton.

In Central Queensland soil disturbance of refuge crops can only occur 2 weeks after final defoliation of the Bollgard II cotton.

3. Late summer pigeon pea trap crop

A late summer trap crop (pigeon pea) must be planted for all Bollgard II cotton grown in Central Queensland. The planting configuration of the trap crop should be the same as that of the Bollgard II crop. Irrigated Bollgard II must have an irrigated trap crop. Table 3 shows the requirements for the late summer pigeon pea trap crop. Dryland Bollgard II growers who do not have any irrigated cotton on their farm should contact their Monsanto Regional Business Manager for alternative options.

Refuge and late summer trap crops have different purposes and, if pigeon pea is selected for both, two separate plantings may be required. However, where a pigeon pea refuge is utilised as a trap crop the full 5% pigeon pea refuge area must be managed to become the late summer trap crop and must adhere to the requirements in Table 3 below.



Table 3. Late summer pigeon pea trap crop requirements in Central Queensland

Criterion	Trap crop*
Minimum area & dimension	A minimum trap crop of 1% of planted Bollgard II cotton crop is required.
(Requirement)	If sprayed conventional cotton is grown on that farm unit: the trap crop must be at least 48m x 48m.
	If no sprayed conventional cotton is grown on that farm unit: the trap crop must be at least 24m x 24m.
Planting time	The trap crop should preferably be planted between November 1 and November 30 Note: if growers choose to plant their trap crop to coincide with the planting of pigeon pea refuges they must manage the trap crop in such a way that it remains attractive to <i>Helicoverpa</i> spp. 2-4 weeks after final defoliation.
Planting rate **	35kg/ha (recommended establishment greater than 4 plants per metre)
Insect control	The trap crop can be sprayed with virus after flowering; while avoiding insecticide spray drift.
Irrigation	The trap crop must be planted into an area where it can receive the additional irrigation required to keep the trap crop attractive to <i>Helicoverpa</i> spp. until after the cotton is defoliated.
Weed control	The trap crop should be kept free of weeds and particularly volunteer Bollgard II cotton.
Crop destruction	The trap crop must be destroyed 2-4 weeks (but not before 2 weeks) after final defoliation of the Bollgard II cotton crop, (slash and pupae bust – full soil disturbance to a depth of 10cm across the entire trap crop area).

- * A pigeon pea trap crop is to be planted so that it is attractive (flowering) to *Helicoverpa* spp. after the cotton crop has cut out, and as any survivors from the Bollgard II crop emerge. Planting pigeon pea too early (e.g. before November) or too late (e.g. mid December) is not adequate for cotton crops planted during September through to October.
- ** The planting rate is a recommendation based on a minimum of 85% seed germination.



NB: <u>If any grower encounters problems in complying with the resistance management plan, please contact your Monsanto Regional Business Manager.</u>

For further background information on the various components of this plan see the "Preamble to the Resistance Management Plan for Bollgard II" in the current Cotton Pest Management Guide.





Appendix B - Resistance Management Plan for Bollgard II Cotton 2010/2011 - Ord River Irrigation and Burdekin Bowen Basin Areas

Developed by Monsanto Australia Limited and the Transgenic and Insect Management Strategy (TIMS) Committee of Cotton Australia Limited.

The resistance management plan is based on three basic principles: (1) minimising the exposure of *Helicoverpa* spp. to the *Bacillus thuringiensis* (Bt) proteins Cry 1Ac and Cry 2Ab; (2) providing a population of susceptible individuals that can mate with any resistant individuals, hence diluting any potential resistance; and (3) removing resistant individuals at the end of the cotton season. The three principles are supported through the implementation of 5 elements that are the key components of the Resistance Management Plan. These elements are:

- 1. Refuge crops
- 2. Planting window
- 3. Pupae busting/Trap crops
- 4. Control of volunteers and ration cotton and
- 5. Spray limitations.

Growers of Bollgard II cotton are required to practice preventative resistance management as set out below. Compliance with the Resistance Management Plan is required under the terms of the Bollgard II Technology User Agreement and under the conditions of registration (*Agricultural and Veterinary Chemicals Act, 1994*).

This RMP is for the following areas:

- Ord River Irrigation Area, Western Australia
- Burdekin Bowen Basin Area, Queensland

1. Refuges

Growers planting Bollgard II cotton will also be required to grow a refuge crop that is capable of producing large numbers of *Helicoverpa* spp. moths which have not been exposed to selection with Bt proteins Cry 1Ac and Cry 2Ab. These unselected moths are expected to dominate matings with any survivors from Bollgard II crops and thus help to maintain resistance to Bt proteins Cry 1Ac and Cry 2Ab at low levels.

All refuge options are based on the requirement of a 10% unsprayed cotton refuge or its equivalent as determined by the relative production of *Helicoverpa* spp. from each of the refuge types as described in the tables below.



For each area of irrigated Bollgard II cotton planted, a grower is required to plant a minimum of one, or a combination of, the following:

Table 1. Irrigated Bollgard II cotton refuge options

Crop	Conditions	% of Bollgard II	Regions permitted
Conventional Cotton	Irrigated, unsprayed conventional cotton	10	Ord River, Burdekin Bowen
Pigeon pea	Fully irrigated, unsprayed	5	Ord River
Chick pea	Fully irrigated, unsprayed	5	Ord River

Note: Unsprayed means not sprayed with insecticides that target any life stage of *Helicoverpa* spp.

Bt products must not be applied to any refuge.

If the viability of an unsprayed conventional refuge is at risk due to early season pressure by *Helicoverpa* spp., and with prior approval from the Monsanto Compliance and Stewardship Manager, a non-Bt heliocide can be applied up to the 4th true leaf stage.

An unsprayed refuge should not be planted in the same field as any crop sprayed with a rate of insecticide that is registered for *Helicoverpa* spp, with the exception of Bollgard II. Sprayed crops and unsprayed refuges that are planted in adjacent fields must be separated by sufficient distance to *minimise the likelihood of insecticide drift onto the unsprayed refuge*.

For the purposes of this Resistance Management Plan, conventional cotton includes any cotton varieties that do not have Bt proteins in the plant that control *Helicoverpa* spp. moths.

General conditions for all refuges:

(b) Refuge crops are to be planted and managed so that they are attractive to *Helicoverpa* spp. during the growing period of the Bollgard II cotton varieties.

It is preferable that all refuge is planted within the 2 week period prior to planting Bollgard II. If this is not possible, refuge planting must be completed within 3 weeks of the first day of sowing of Bollgard II. At this time, sufficient refuge must have been planted to cover all of the Bollgard II cotton proposed to be planted for the season (including Bollgard II already planted and any that remains unplanted). Should additional Bollgard II planting be made after this date, which is not already covered by refuge, additional refuge must be planted as soon as possible and no more than 2 weeks after sowing of the additional Bollgard II.



- (b) Pigeon pea refuges should not be planted until the soil temperature reaches 17°C, which is a requirement for germination, and should also be planted into moisture to ensure successful germination. If soil temperatures are not suitable to allow germination of pigeon peas in line with condition (a), an alternative refuge must be planted in its place within the prescribed period (under (a) above).
- (c) Once the Bollgard II cotton begins to flower the corresponding refuge should not be cultivated.
- (d) Insecticide preparations containing Bt may be used on Bollgard II cotton throughout the season BUT NOT on any refuge crops.
- (e) All refuges are to be planted within the farm unit growing Bollgard II cotton. Subject to clause (f) below, all reasonable effort should be taken to plant the refuge either on one side of, or next to, a Bollgard II cotton field, and all Bollgard II fields must be no more than 2 km from the nearest Bollgard II refuge.
- (f) To minimise the possibility of refuge attractiveness being affected by herbicide drift, non-herbicide tolerant refuges should be separated from herbicide tolerant Bollgard II cotton crops by a sufficient distance to minimise such drift, but no more than 2km from the Bollgard II cotton.
- (g) To account for possible insecticide drift, Bollgard II refuge crops must be at least 24 metres wide and 24 metres long. Different unsprayed refuge options may be planted in the same field as a single unit.
- (h) Slashing of plants within the refuge should only be carried out after Bollgard II cotton lint removal has been completed. Soil disturbance of refuge crops can only occur 2 weeks after Bollgard II cotton plants have been harvested.
- (i) Refuges for Bollgard II crops must be planted in the same row configuration as the Bollgard II crop.

2. Control of volunteer and ration cotton

Volunteer and ration cotton may impose additional selection pressure on *Helicoverpa* spp. to develop resistance to the Bt proteins Cry 1Ac and Cry 2Ab produced by Bollgard II cotton.

Growers must make all reasonable efforts to remove volunteer and ration plants as soon as possible from all fields - including fallow areas, Bollgard II crops, conventional cotton crops and all refuges. The presence of Bollgard II volunteers/ration cotton in any refuge will diminish the value of the refuge and must be removed as soon as possible.

Note: The refuge should preferably be planted into fallow or rotation fields that have not been planted to cotton in the previous season.



3. Post-harvest crop destruction

As soon as practical after harvest, Bollgard II cotton crops must be destroyed by cultivation or herbicide so that they do not continue to act as hosts for *Helicoverpa* spp. Unsprayed refuges must be left uncultivated for two weeks after harvest to allow emergence of any pupating *Helicoverpa* spp.

4. Planting windows

All Bollgard II crops and cotton refuges are to be planted into moisture or watered-up in a five week window. In each region, the start date of the planting window will be determined by TIMS in consultation with local growers and reflected in a regionally amended "Bollgard II Planting Window Variation Notice".

The planting window will occur within the following periods:

Ord River Irrigation Area: March 1 and May 1.

Burdekin Bowen Basin Area: December 1 and April 1.

5. Refuge

Unsprayed Pigeon Pea refuge should preferably be planted into a fallow or rotation field that has not been planted to cotton in the previous season.

6. End of season chick pea trap crop

An end of season chick pea trap crop must be planted. The planting configuration of the trap crop should be the same as that of the Bollgard II crop. Table 2 shows the requirements for the chick pea trap crop.



Table 2. End of season chick pea trap crop requirements

Criterion	End of season chick pea trap crop
Minimum area & dimensions	A trap crop of 1% of planted Bollgard II crop area is required. This planting must be at least 24 m x 24m wide.
Planting time	In April for Burdekin Bowen Area. In July/August for Ord area. The trap crop is to be planted such that it is attractive to <i>Helicoverpa</i> spp. from 2 weeks before defoliation of the Bollgard II cotton. It must remain attractive to <i>Helicoverpa</i> spp. until at least 2 weeks after defoliation of the Bollgard II cotton.
Insect control	The trap crop should be monitored and sprayed with insecticide if the larval pressure threatens the viability of the crop.
Irrigation	The trap crop is to remain attractive to <i>Helicoverpa</i> spp. until after defoliation of cotton. In some cases this may require one additional irrigation after the cotton is defoliated. The trap crop must be planted into an area where it can receive the additional irrigation required to ensure the trap crop remains attractive to Helicoverpa spp.
Weed control	The trap crop should be kept free of weeds and particularly volunteer Bollgard II cotton.
Crop destruction	The trap crop must be destroyed 2-4 weeks after defoliation of the Bollgard II cotton crop, but not before 3 weeks (slash and pupae bust – full soil disturbance to a depth of 10 cm across the entire trap crop area).

NB: <u>If any grower encounters problems in complying with the resistance management plan, please contact your Monsanto Regional Business Manager.</u>



ABN 24 003 771 659 Level 5, 20 Rodborough Road Frenchs Forest NSW 2086

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9/04/13

Fax (02) 9776 3400 Fax (02) 9776 3400

Toll Free 1 800 700 096

Product Address

Office of the Gene Technology Regulator

Locked Bag 502 Frenchs Forest NSW 2086 www.dowagrosciences.com.au

MDP54 GPO Box 9848 Canberra ACT 2601

DIR091 'ANNUAL REPORT 2012

Since the issuing of Licence No.: DIR 091 by the OGTR on the 25 November 2009, Dow AgroSciences Australia Ltd has had nil dealings with WideStrike™ Insect Protection Cotton in Australia.

As per licence condition 32, the following statements are made:

- (a) No adverse impacts, unintended effects or new information relating to risks to human health and safety or the environment have been caused by or found in relation to WideStrike™ Insect Protection Cotton
- (b) WideStrike™ Insect Protection Cotton has not been produced commercially in any state or territory in Australia since the issuing of Licence No.: DIR 091 by the OGTR on the 25th November 2009.
- (c) WideStrike™ Insect Protection Cotton has not been produced for experimental purposes in any state or territory in Australia since the issuing of Licence No.: DIR 091 by the OGTR on the 25th November 2009.
- (d) Nil WideStrike™ Insect Protection Cotton has been fed to livestock north of latitude 22° South in Australia.
- (e) No research of the effects of WideStrike™ Insect Protection Cotton on non-target insect(s) has been conducted.
- (f) No research on volunteer incidence of WideStrike™ Insect Protection Cotton in areas north of latitude 22° South after livestock feeding has been conducted.

Regards,



Limited.

DIR 066/2006 OGTR ANNUAL REPORT 2009/10 SEASON

LICENCE No:	DIR 066/2006
LICENCE HOLDER:	Monsanto Australia Limited
PROJECT SUPERVISOR:	
ACCREDITATION NO:	ACCR 034/2002
SUBMISSION:	2010 Annual Report for Commercial release of GM herbicide tolerant and/or insect resistant cotton lines.
REPORTING PERIOD:	26 October 2009 – 26 October 2010 (Covering 2009/10 cotton growing season)
DATE:	9 December 2010
PREPARED BY:	
Information and data submitted herein	n contains trade secrets, or privileged or confidential information

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the property of Monsanto Australia Limited and no government agency or representative thereof is authorised to disclose such data and information without written permission from Monsanto Australia



SECION 1. LICENCE HOLDER DETAILS

Name: Monsanto Australia Limited

Address: 600 St Kilda Road, Melbourne 3004

PO Box 6051

St Kilda Road Central, Melbourne Victoria 8008

Telephone: 03 9522 7121 **Facsimile:** 03 9522 6121

Contact email:

Accreditation

Number: ACCR 034/2002

SCOPE OF THE REPORT

This report addresses the annual reporting condition of the DIR 066/2006 commercial licence covering Roundup Ready Cotton, Roundup Ready Flex Cotton and the Bollgard II trait issued to Monsanto Australia Limited by the Office of the Gene Technology Regulator.

This report details compliance with general and specific conditions of Sections 2 to 6 of the DIR 066 licence as issued to Monsanto Australia Limited on 26 October 2006, and as varied 22 December 2006, 6 December 2007 and 15 April 2009.

The report covers the period of time from 26 October 2009 to 26 October 2010, including the 2009/10 cotton growing season.



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SECTION 2. GENERAL CONDITIONS

2.1 Duration of Licence

DIR066/2006 (DIR066) has not been suspended, cancelled or surrendered.

2.2 Holder of Licence

Monsanto Australia Ltd (Monsanto) remains the holder of the licence.

2.3 Project Supervisor

is the project supervisor as per Attachment A of the licence. The licence was varied 15 April 2009 to reflect the change of contact details.

2.4 No dealings with GMOs except as authorised by this Licence

Persons covered by the licence did not deal with GMOs except as expressly permitted by the licence.

2.5 Location

The licence allows for dealings with GMOs to be conducted anywhere within Australia. This licence supersedes any previous licences regarding location.

2.6 Persons covered by this GMO Licence

Monsanto acknowledges that the persons covered by the 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.

2.7 Informing people of their obligations

DIR066 was issued in October 2006, permitting dealings with the GMOs to be undertaken during the cotton growing seasons in 2006/07, 2007/08 2008/09 and 2009/10.

Monsanto Australia Limited informed all persons covered by the DIR066/2006 licence of the obligations imposed on them as a result of the conditions of this licence. This was primarily achieved through the Monsanto accreditation program and information course which includes information on regulatory obligations, as well as management of the crop.

Accreditation programs require all persons having management responsibility for Roundup Ready, Roundup Ready Flex and Bollgard II cotton crops, to undergo training.

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2.8 Applicant to notify of circumstances that might affect suitability

During the reporting period, Monsanto Australia Ltd did not receive a relevant conviction occurring after the commencement of this licence; nor was there any revocation or suspension of a licence or permit held by Monsanto Australia Ltd 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; or any event or circumstance occurring after the commencement of the licence that would affect the capacity of Monsanto to meet the conditions of the DIR 066 licence.

2.9 Licence holder must provide information on matters related to suitability

Monsanto acknowledges that it must provide information related to its ongoing suitability to hold a licence when requested to do so in writing by the Regulator and must provide the information within a time period stipulated by the Regulator.

2.10 Additional information must be given to the Regulator

During the reporting period, Monsanto did not become 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 of any unintended effects of the dealings authorised by the licence.

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

Monsanto acknowledges that 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.

2.12 Remaining an Accredited organisation

At all times, Monsanto remained an accredited organisation and complied with conditions of accreditation as set out in the OGTR Guidelines for Accreditation of Organisations.

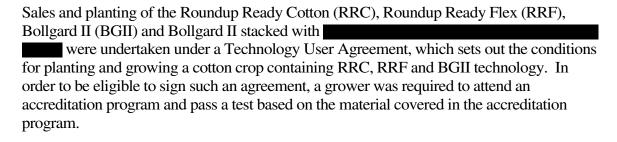


SECTION 3. GROWING THE GMOS

3.1 GMOs covered by this licence

The only dealings with GMOs under this licence were those with the GMOs described in DIR 066/2006 Licence.

3.2 Permitted dealings





3.3 Crop Location and Volumes

Valley	BGII ha	RR ha	RRF ha	BGII w RR ha	BGII w RRF ha	BGII w LL ha	Total ha
Bourke	-	-	-	-	5,792.14	123.00	5,915.14
Darling Downs	261.30	-	1,522.29	182.95	24,843.97	349.04	27,159.55
Dawson/Callide	149.20	-	274.38	-	4,770.84	-	5,194.42
Dirranbandi	-	-	-	-	2,189.58	-	2,189.58
Emerald	8.46	-	435.11	-	16,158.84	214.98	16,817.39
Gwydir	94.65	2.67	8,966.24	168.00	19,781.74	-	29,013.30
Lachlan	-	-	-	117.00	2,027.23	-	2,144.23
Lower Namoi	136.31	121.32	2,246.49	476.82	23,144.04	186.00	26,310.98
MacIntyre	2,231.75	-	1,331.22	-	21,039.16	147.63	24,749.76
Macquarie	-	-	727.04	429.88	4,754.58	-	5,911.50
Mungindi	344.36	-	4,517.27	-	6,486.40	15.80	11,363.83
Murrumbidgee	-	-	-	-	1,164.74	-	1,164.74
St George	129.03	-	315.42	-	8,318.90	75.07	8,838.42
Upper Namoi	-	13.29	115.68	885.99	8,940.62	30.20	9,985.78
Walgett	-	-	-	-	3,429.47	-	3,429.47
Burdekin	-	-	55.49	-	585.26	-	640.75
The Ord W.A.	-	-	-	-	3.90	-	3.90
Grand Total	3,355.06	137.28	20,506.63	2,260.64	153,431.41	1,141.72	180,832.74

Total Bollgard II Hectares planted:

160,188.83 Ha

Total Roundup Ready/Roundup Ready Flex Hectares planted:

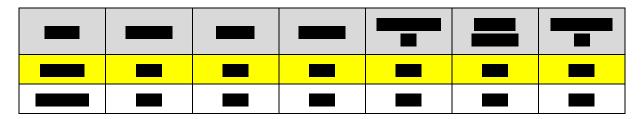
176,335.96 Ha



Valley: Ord (WA)

Boundaries: Area north of 22° south in Western Australia.

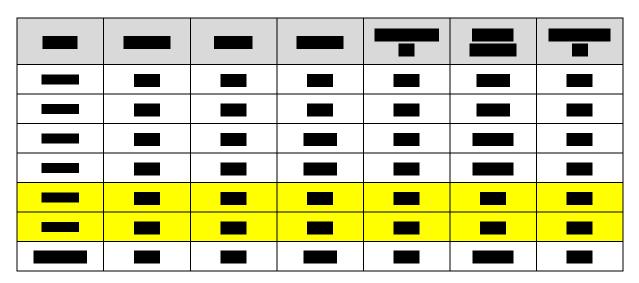
Crop Location:



Valley: Burdekin (QLD)

Boundaries: Area north of 22° South in Queensland.

Crop Locations:



Note: Yellow highlight indicates research trial sites

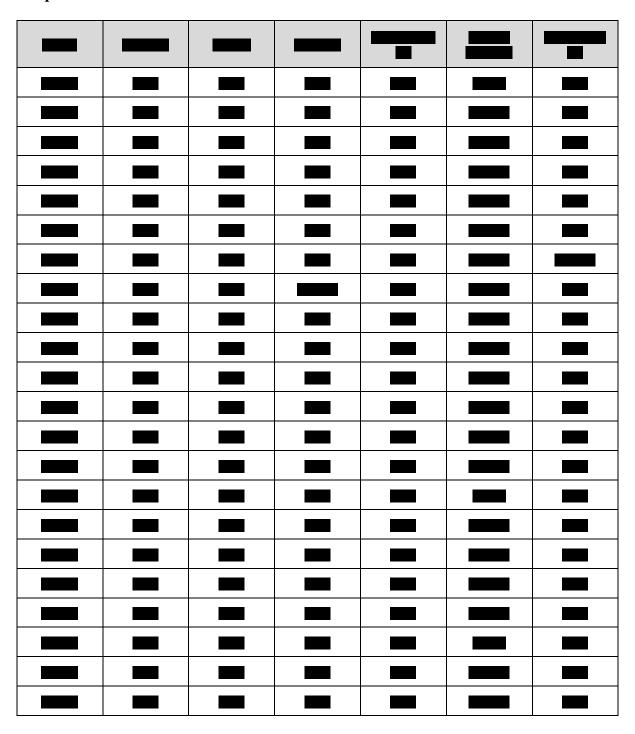


Valley: Emerald (QLD)

Boundaries: South-eastern boundary formed by the Expedition Ranges between

Rolleston and Bauhinia. Region runs north-west from there to include

Emerald and Dysart.





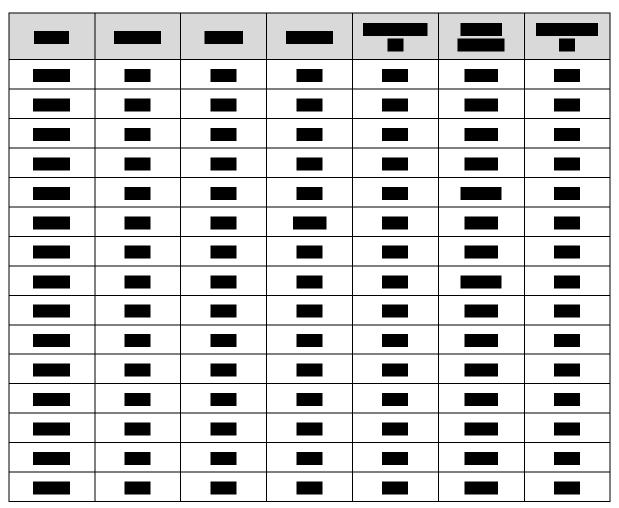
Valley: Dawson/Callide (QLD)
Boundaries: Includes Taroom, Biloela, Moura and Theodore regions.



Valley: Darling Downs (QLD)

Boundaries: Follows the Condamine River. Includes Toowoomba, Murgon, Dalby,

Chinchilla, Condamine, and Roma. South-west boundary is Surat.



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Valley: St George (QLD)

Boundaries: Above Lower Plains on the southern side and north-east to include majority of Waroo Shire with the north-east boundary being Surat.



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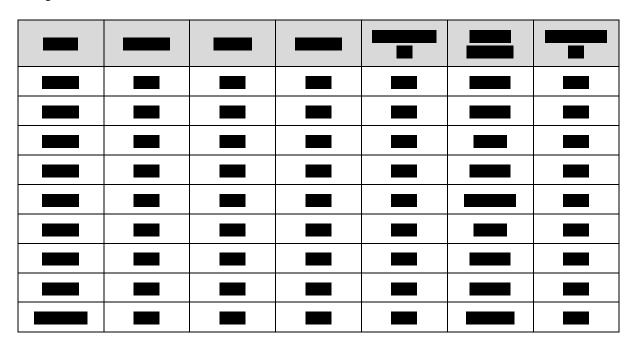


Crop Locations:

Valley: Dirranbandi (QLD)

Boundaries: Runs north toward St George and includes Lower Plains, follows south

along the Balonne River right down to the NSW border.





Valley: Macintyre (NSW/QLD)

Boundaries: North of Gwydir, western boundary is Garah to Talwood Road north include

Moonie and east to include Texas. Southern boundary is Foxes Lane which runs Garah back to the Newell Highway and then along to Croppa Creek,

Yallaroi and Coolatai.







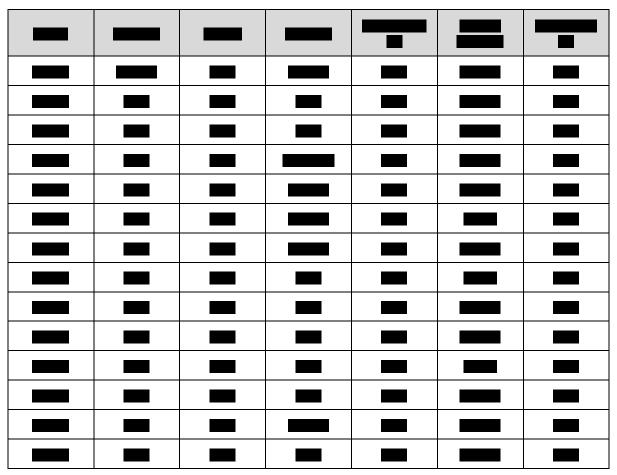
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Valley: Mungindi (NSW/QLD)

Boundaries: West of Garah and Boomi Road to Talwood and follows Barwon River

south-west of Mungindi towards Collarenebri. Southern boundary is the

Watercourse Road from Colly through to Gingham and then to Garah.



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Valley: Gwydir (NSW)

Boundaries: South of Fox Lane, north-west to Garah, west to Collarenebri, south to

Bellata. The road that runs east-west through Bellata and to Rowena is

southern boundary.

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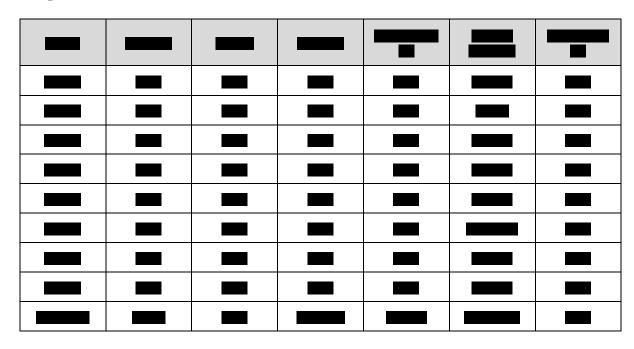


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Valley: Walgett (NSW)

Boundaries: Includes almost entirety of Walgett Shire, with eastern boundary being the

road that runs south from Collarenebri to Burren Junction.





Valley: Bourke (NSW/QLD)

Boundaries: West of Walgett Shire, north of Coolahbah. Includes Cunnamulla in

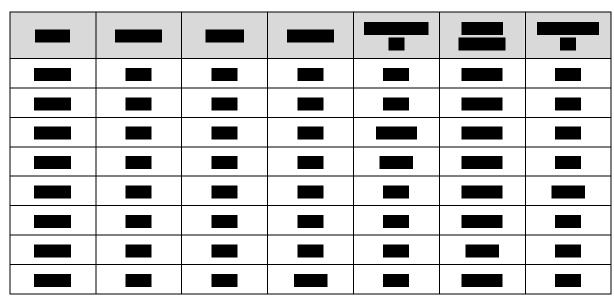
Queensland.

Crop Locations:

Valley: Upper Namoi (NSW)

Boundaries: South-east of Baan Baa-Manilla Road. Includes Coolah, Merriwa, Mullaley,

Gunnedah and Quirindi.







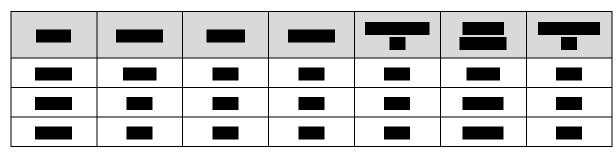
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Valley: Lower Namoi (NSW)

Boundaries: North-west of Baan Baa-Manilla Road and south of Bellata-Rowena Road.

Western boundary is formed by the road that runs from Pilliga via Burren

Junction to Collarenebri.



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Valley: Macquarie (NSW)

Boundaries: Dubbo and south to Peak Hill. West to Tullamore. North through

Tottenham. Nyngan and Coolabah, then east via southern boundary of

Walgett shire and then south back to Dubbo via Coonabarabran.

Crop Locations:



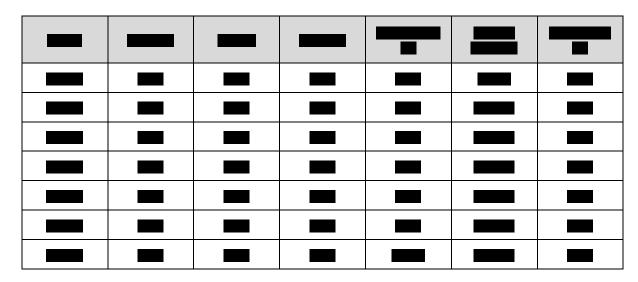
Valley: Lachlan (NSW)

Boundaries: Northern boundary is Peak Hill and Tullamore and the cotton follows the

Lachlan River through to Booligal. The southern boundary is the road through to Gunbar and then follows the Great Western Highway through to

West Wyalong.

Crop Locations:





Valley: Murrumbidgee (NSW)

Boundaries: Northern boundary is the Great Western Highwayfrom West Wyalong

through Goolgowi to Gunbar, from Gunbar west to Booligal on the Lachlan River. Downstream of Booligal on the Lachlan and south-west is the

Murrumbidgee River.

Crop Locations:

			_

Research Trial Site Locations:

Valley	TUA#	BGII ha	RR ha	RRF ha	BGII w RR ha	BGII w RRF ha	BGII w ■ ha
Subtotal		4.40	0.00	23.97	0.00	167.59	28.53



3.4 Resistance Management Plan for Bollgard II 2009/10

SCHEDULE A -

Resistance Management Plan for Bollgard II® Cotton 2009/2010

Developed by Monsanto Australia Limited and the Transgenic and Insect Management Strategy (TIMS) Committee of Cotton Australia Ltd.

The resistance management plan is based on three basic principles: (1) minimising the exposure of *Helicoverpa* spp. to the *Bacillus thuringiensis* (Bt) proteins Cry 1Ac and Cry 2Ab; (2) providing a population of susceptible individuals that can mate with any resistant individuals, hence diluting any potential resistance; and (3) removing resistant individuals at the end of the cotton season.

Growers of Bollgard II cotton are required to practice preventative resistance management as set out below. Compliance with the Resistance Management Plan is required under the terms of the Bollgard II Technology User Agreement and under the conditions of registration (*Agricultural and Veterinary Chemicals Act 1994*).

Section 1 is applicable to all regions in New South Wales and Queensland that grow cotton while sections 2 and 3 detail specific requirements for New South Wales and Southern Queensland, and Central Queensland respectively.

<u>SECTION 1: NEW SOUTH WALES, SOUTHERN QUEENSLAND & CENTRAL QUEENSLAND</u>

1. <u>Refuges</u>

Growers planting Bollgard II cotton will also be required to grow a refuge crop that is capable of producing large numbers of *Helicoverpa* spp. moths which have not been exposed to selection with Bt proteins Cry 1Ac and Cry 2Ab. These unselected moths are expected to dominate matings with any survivors from Bollgard II crops and thus help to maintain resistance to Bt proteins Cry 1Ac and Cry 2Ab at low levels.

All refuge options are based on the requirement of a 10% unsprayed cotton refuge or its equivalent, as determined by the relative production of *Helicoverpa* spp. from each of the refuge types as described in Tables 1 and 2, for irrigated and dryland production scenarios respectively.

For each area of irrigated Bollgard II cotton planted, a grower is required to plant a minimum of one or a combination of the following:



Table 1. Irrigated Bollgard II cotton refuge options

Crop	Conditions	% of Bollgard II
Cotton	Irrigated, sprayed conventional cotton	100
	Irrigated, unsprayed conventional cotton	10
Pigeon pea	Irrigated, unsprayed	5
Sorghum	Irrigated, unsprayed - conditions apply, see box below	15
Corn	Irrigated, unsprayed – conditions apply, see box below	20

Table 2. Dryland Bollgard II cotton refuge options

Crop	Conditions	% of Bollgard II
Cotton	Dryland or irrigated, sprayed conventional cotton	100
	Dryland or irrigated, unsprayed conventional cotton	10
Pigeon pea	Irrigated, unsprayed pigeon pea	5

No other refuge options are approved for dryland Bollgard II.

Note: Unsprayed means not sprayed with any insecticide that targets any life stage of *Helicoverpa* spp.

Bt products must not be applied to any refuge (including sprayed cotton).

If the viability of an unsprayed conventional cotton refuge is at risk due to early season pressure by *Helicoverpa* spp., and with prior approval from the Monsanto Compliance and Stewardship Manager, a non-Bt heliocide can be applied up to the 4th true leaf stage.

An unsprayed refuge should not be planted in the same field as any crop sprayed with a rate of insecticide that is registered for *Helicoverpa* spp, with the exception of Bollgard II. Sprayed crops and unsprayed refuges that are planted in adjacent fields must be separated by sufficient distance to *minimise the likelihood of insecticide drift onto the unsprayed refuge*.

For the purposes of this Resistance Management Plan, conventional cotton includes any cotton varieties that do not have Bt proteins in the plant that control *Helicoverpa* spp. moths.



Irrigated sorghum or corn.

NB: The following special conditions apply to growers who wish to grow sorghum or corn as refuges.

- A plan indicating how either of these refuges will be managed must be submitted to, and approved by, the local Accounts & Stewardship Specialist before planting either of these two options. A farm map must be included with the plan.
 - Either refuge option requires three sequential plantings of the same variety. The initial planting date should be determined by the time taken to flower for the varieties chosen for use in each particular area so that the need for part of the refuge to be in flower from January 15 is satisfied. Subsequent plantings should follow at 2-weekly intervals so that some of the refuge is continuously in flower until February 28.
- A single planting of mixed maturity varieties is not acceptable.
- Each planting should be one third of the total area required for that refuge type, as described in Table 1 or Table 2. If there is no sprayed conventional cotton on the same farm unit the refuge must be a minimum of 24 metres wide. However, if there is sprayed conventional cotton on the same farm unit the refuge must be a minimum of 48 metres wide (see also clause (f) below).
- These refuge options will be closely monitored during the season to ensure that all such refuges are managed appropriately and are effective and attractive from January 15 to February 28.
- Corn refuges may be harvested after complete cob maturity.
- Sorghum refuges may be harvested after complete head maturity.

General conditions for all refuges:

- (a) Refuge crops are to be planted and managed so that they are attractive to *Helicoverpa* spp. during the growing period of the Bollgard II cotton varieties. It is preferable that all refuge is planted within the 2 week period prior to planting Bollgard II. If this is not possible, refuge planting must be completed within 3 weeks of the first day of sowing of Bollgard II. At this time, sufficient refuge must have been planted to cover all of the Bollgard II cotton proposed to be planted for the season (including Bollgard II already planted and any that remains unplanted). Should additional Bollgard II planting be made after this date, which is not already covered by refuge, additional refuge must be planted as soon as possible and no more than 2 weeks after sowing of the additional Bollgard II.
- (b) Pigeon pea refuges should not be planted until the soil temperature reaches 17°C, which is the requirement for germination. If soil temperatures are not suitable to allow germination of pigeon peas in line with condition (a), an alternative refuge must be planted in its place within the prescribed period (under (a) above).
- (c) Once the Bollgard II crops begin flowering, and are highly attractive to *Helicoverpa* spp. moths, cultivation of refuges (e.g. for weed control, row formation etc) must be matched by cultivation of the associated Bollgard II field(s).
- (d) Insecticide preparations containing Bt may be used on Bollgard II cotton throughout the season BUT NOT on any refuge crops.
- (e) All refuges are to be planted within the farm unit growing Bollgard II cotton. Subject

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- to clause (f) below all reasonable effort should be taken to plant the refuge either on one side of, or next to a Bollgard II cotton field, and all Bollgard II fields must be no more than 2 km from the nearest Bollgard II refuge.
- (f) To minimise the possibility of refuge attractiveness being affected by herbicide drift, non-herbicide tolerant refuges should be separated from herbicide tolerant Bollgard II cotton crops by a sufficient distance to minimise such drift but no more than 2km from the Bollgard II cotton.
- (g) To account for possible insecticide drift, the options for the width of refuge crops vary according to spray regime. If any sprayed conventional cotton is grown on the same farm unit, Bollgard II refuge crops must be at least 48 metres wide and each refuge area must be a minimum of 2 hectares. If no sprayed conventional cotton is grown on the same farm unit, Bollgard II refuge crops must be at least 24 metres wide and 24 metres long. Different unsprayed refuge options may be planted in the same field as a single unit; however a sprayed conventional cotton refuge must not be planted in a field that is also planted to an unsprayed refuge type.
- (h) In New South Wales and Southern Queensland, to ensure maximum emergence of late pupae from associated refuges, soil disturbance of refuge crops should not be undertaken until after the pupae busting in Bollgard II cotton crops on the farm unit is complete. In Central Queensland soil disturbance of refuge crops can only occur after Bollgard II cotton plants have been removed. In all regions, destruction of refuges other than corn and sorghum should only be carried out after Bollgard II cotton lint removal has been completed.
- (i) Refuges for dryland Bollgard II crops must be planted in the same row configuration as the Bollgard II crop unless the refuge is irrigated. If an irrigated option is utilised for a dryland Bollgard II crop, then that refuge may be planted in a solid configuration. Dryland cotton is measured as green hectares (calculated as defined in the Technology User Agreement).

2. Control of volunteer and ratoon cotton

Volunteer and ratoon cotton may impose additional selection pressure on *Helicoverpa* spp. to develop resistance to the Bt Cry 1Ac and Cry 2Ab proteins produced by Bollgard II cotton.

Growers must make all reasonable efforts to remove volunteer and ratoon plants, as soon as possible from all fields, including fallow areas, Bollgard II crops, conventional cotton crops and all refuges.

3. Post-harvest crop destruction

As soon as practical after harvest, Bollgard II cotton crops must be destroyed by cultivation or herbicide so that they do not continue to act as hosts for *Helicoverpa* spp. Unsprayed refuges must be left uncultivated for two weeks after harvest to allow emergence of any pupating *Helicoverpa* spp.



SECTION 2: NEW SOUTH WALES AND SOUTHERN QUEENSLAND ONLY

1. Planting windows

All Bollgard II crops are to be planted into moisture or watered-up by 15 November, unless otherwise advised by a Bollgard II Planting Window Variation Notice.

2. Pupae destruction

In Bollgard II cotton fields, each grower will be required to undertake *Helicoverpa* spp. pupae destruction after harvest according to the following key guidelines:

- Bollgard II crops should be slashed or mulched and fields cultivated for pupae control within 4 weeks of harvesting. All pupae busting must be completed by July 31.
- Ensure disturbance of the whole soil surface to a depth of 10 cm.
- All fields that are sown to any winter crop following a Bollgard II crop must be inspected by the Technology Service Provider before sowing commences in order to ensure that pupae busting has occurred.

In Refuge crops:

All unsprayed refuges should preferably be left uncultivated until the following October.

3. Failed crops

Bollgard II crops that will not be grown through to harvest for various reasons and are declared to, and verified by, Monsanto as failed must be destroyed within two weeks after verification, in such a way that prevents regrowth. Crops abandoned before February 28 do not require pupae busting. Crops abandoned on February 28 or later must be pupae busted.

NB: If any grower encounters problems in complying with the Resistance Management Plan please contact your local Accounts & Stewardship Specialist.

SECTION 3: CENTRAL QUEENSLAND ONLY

1. Planting Windows

Emerald: All Bollgard II crops are to be planted into moisture or watered-up in the period between September 15 and October 26, unless advised otherwise by a Bollgard II Planting Window Variation Notice.

Dawson Callide Valleys: All Bollgard II crops are to be planted into moisture or watered-up in the period between September 15 and October 26, unless advised otherwise by a Bollgard II Planting Window Variation Notice.

Belyando: All Bollgard II crops are to be planted into moisture or watered-up in the period between October 10 and November 20, unless advised otherwise by a Bollgard II Planting Window Variation Notice.

2. <u>Late summer pigeon pea trap crop</u>

A late summer trap crop (pigeon pea) must be planted for all Bollgard II cotton grown in Central Queensland. The planting configuration of the trap crop should be the same as that of the Bollgard II crop. Irrigated Bollgard II must have an irrigated trap crop. Table 3



shows the requirements for the late summer pigeon pea trap crop. Dryland Bollgard II growers who do not have any irrigated cotton on their farm should contact their Accounts & Stewardship Specialist for alternative options.

Refuge and late summer trap crops have different purposes and, if pigeon pea is selected for both, two separate plantings are required.

Table 3. Late summer pigeon pea trap crop requirements in Central Queensland

Criterion	Trap crop**
Minimum area & dimension (Requirement)	A trap crop of 1% of planted Bollgard II crop is required. If sprayed conventional cotton is grown on that farm unit: the trap crop must be at least 48m x 48m.
	If no sprayed conventional cotton is grown on that farm unit: the trap crop must be at least 24m x 24m.
Planting time	The trap crop must be planted between November 20 and December 20.
Planting rate ***	35kg/ha (recommended establishment greater than 4 plants per metre)
Insect control	The trap crop can be sprayed with virus after flowering; while avoiding insecticide spray drift.
Irrigation	Irrigation of the trap crop must be the same as for cotton, plus one additional irrigation after cotton is finished.
Weed control	The trap crop must be kept free of weeds.
Crop destruction	The trap crop must be destroyed 2 to 4 weeks after defoliation of Bollgard II cotton (slash and pupae bust – full soil disturbance to a depth of 10cm across the entire trap crop area).

- ** A pigeon pea trap crop is to be planted so that it is attractive (flowering) to *Helicoverpa* spp. after the cotton crop has cut out, and as any survivors from the Bollgard II crop emerge. Planting pigeon pea too early (e.g. before mid-November) or too late (e.g. January) is not adequate for cotton crops planted during September through to October.
- *** The planting rate is a recommendation based on a minimum of 85% seed germination.

NB: <u>If any grower encounters problems in complying with the resistance management plan, please contact your Accounts & Stewardship Specialist.</u>

For further background information on the various components of this plan see the "Preamble to the Resistance Management Plan for Bollgard II" in the current Cotton Pest Management Guide



SCHEDULE A -

Resistance Management Plan for Bollgard II® Cotton 2009/2010

Ord River Irrigation and Burdekin Bowen Basin Areas

Developed by Monsanto Australia Limited and the Transgenic and Insect Management Strategy (TIMS) Committee of Cotton Australia Limited.

The resistance management plan is based on three basic principles: (1) minimising the exposure of *Helicoverpa* spp. to the *Bacillus thuringiensis* (Bt) proteins Cry 1Ac and Cry 2Ab; (2) providing a population of susceptible individuals that can mate with any resistant individuals, hence diluting any potential resistance; and (3) removing resistant individuals at the end of the cotton season.

Growers of Bollgard II cotton are required to practice preventative resistance management as set out below. Compliance with the Resistance Management Plan is required under the terms of the Bollgard II Technology User Agreement and under the conditions of registration (*Agricultural and Veterinary Chemicals Act, 1994*).

This RMP is for the following areas:

- Ord River Irrigation Area, Western Australia
- Burdekin Bowen Basin Area, Queensland

1. Refuges

Growers planting Bollgard II cotton will also be required to grow a refuge crop that is capable of producing large numbers of *Helicoverpa* spp. moths which have not been exposed to selection with Bt proteins Cry 1Ac and Cry 2Ab. These unselected moths are expected to dominate matings with any survivors from Bollgard II crops and thus help to maintain resistance to Bt proteins Cry 1Ac and Cry 2Ab at low levels.

All refuge options are based on the requirement of a 10% unsprayed cotton refuge or its equivalent as determined by the relative production of *Helicoverpa* spp. from each of the refuge types as described in the tables below.

For each area of irrigated Bollgard II cotton planted, a grower is required to plant a minimum of one, or a combination of, the following:

Table 1. Irrigated Bollgard II cotton refuge options

Crop	Conditions	% of Bollgard II	Regions permitted
Cotton	Irrigated, unsprayed conventional cotton	10	Ord River, Burdekin Bowen
Pigeon pea	Irrigated, unsprayed	5	Ord River
Chick pea	Irrigated, unsprayed	5	Ord River
Corn	Irrigated, unsprayed – conditions apply, see box below	10	Ord River

Note: Unsprayed means not sprayed with insecticides that target any life stage of *Helicoverpa* spp.

Bt products must not be applied to any refuge.

If the viability of an unsprayed refuge is at risk due to early season pressure by *Helicoverpa* spp., and with prior approval from the Monsanto Compliance and Stewardship Manager, a non-Bt heliocide can be applied up to the 4th true leaf stage.

An unsprayed refuge should not be planted in the same field as any crop sprayed with a rate of insecticide that is registered for *Helicoverpa* spp, with the exception of Bollgard II. Sprayed crops and unsprayed refuges that are planted in adjacent fields must be separated by sufficient distance to *minimise the likelihood of insecticide drift onto the unsprayed refuge*.

For the purposes of this Resistance Management Plan, conventional cotton includes any cotton varieties that do not have Bt proteins in the plant that control *Helicoverpa* spp. moths.

Irrigated corn

NB: The following special conditions apply to growers who wish to grow corn as a refuge.

- A plan indicating how the refuge will be managed must be submitted to, and approved by, the local Accounts & Stewardship Specialist before planting. A farm map must be included with the plan.
- Corn refuge option requires three sequential plantings of the same variety. The initial planting date should be determined by the time taken to flower for the varieties chosen for use in each particular area so that the chosen variety is to flower simultaneously with the Bollgard II crop in the region. Subsequent plantings should follow at 2-weekly intervals so that some of the refuge is continuously in flower during this period.
- A single planting of mixed maturity varieties is not acceptable.



- Each planting should be one third of the total area required for that refuge type. If there is no sprayed conventional cotton on the same farm unit, the refuge must be a minimum of 24 metres wide.
- This refuge option will be closely monitored during the season to ensure that all such refuges are managed appropriately and are effective and attractive whilst the Bollgard II cotton crop is flowering.
- Corn refuges may be harvested after complete cob maturity.

General conditions for all refuges:

- (a) Refuge crops are to be planted and managed so that they are attractive to *Helicoverpa* spp. during the growing period of the Bollgard II cotton varieties. It is preferable that all refuge is planted within the 2 week period prior to planting Bollgard II. If this is not possible, refuge planting must be completed within 3 weeks of the first day of sowing of Bollgard II. At this time, sufficient refuge must have been planted to cover all of the Bollgard II cotton proposed to be planted for the season (including Bollgard II already planted and any that remains unplanted). Should additional Bollgard II planting occur after this date, which is not already covered by refuge, additional refuge must be planted as soon as possible and no more than 2 weeks after sowing of the additional Bollgard II.
- (b) Pigeon pea refuges should not be planted until the soil temperature reaches 17 °C, which is the requirement for germination. If soil temperatures are not suitable to allow germination of pigeon peas in line with condition (a), an alternative refuge must be planted in its place within the prescribed period (under (a) above).
- (c) Once the Bollgard II crops begin flowering, and are highly attractive to Helicoverpa moths, cultivation of refuges (e.g. for weed control, row formation etc) must be matched by cultivation of the associated Bollgard II field(s).
- (d) Insecticide preparations containing Bt may be used on Bollgard II cotton throughout the season BUT NOT on any refuge crops.
- (e) All refuges are to be planted within the farm unit growing Bollgard II cotton. Subject to clause (f) below, all reasonable efforts should be taken to plant the refuge either on one side of, or next to, a Bollgard II cotton field, and all Bollgard II fields must be no more than 2 km from the nearest Bollgard II refuge.
- (f) To minimise the possibility of refuge attractiveness being affected by herbicide drift, non-herbicide tolerant refuges should be separated from herbicide tolerant Bollgard II cotton crops by a sufficient distance to minimise such drift, but no more than 2km from the Bollgard II cotton.
- (g) To account for possible insecticide drift, Bollgard II refuge crops must be at least 24 metres wide and 24 metres long. Different unsprayed refuge options may be planted in the same field as a single unit.
- (h) Soil disturbance of refuge crops can only occur after Bollgard II cotton plants have been removed. Destruction of refuges other than corn should only be carried out after

In Confidence



Bollgard II cotton lint removal has been completed.

(j) Refuges for Bollgard II crops must be planted in the same row configuration as the Bollgard II crop.

2. Control of volunteer and ratoon cotton

Volunteer and ratoon cotton may impose additional selection pressure on *Helicoverpa* spp. to develop resistance to the Bt proteins Cry 1Ac and Cry 2Ab produced by Bollgard II cotton.

Growers must make all reasonable efforts to remove volunteer and ratoon plants as soon as possible from all fields - including fallow areas, Bollgard II crops, conventional cotton crops and all refuges.

3. Post-harvest crop destruction

As soon as practical after harvest, Bollgard II cotton crops must be destroyed by cultivation or herbicide so that they do not continue to act as hosts for *Helicoverpa* spp. Unsprayed refuges must be left uncultivated for two weeks after harvest to allow emergence of any pupating *Helicoverpa* spp.

4. Planting windows

All Bollgard II crops and cotton refuges are to be planted into moisture or watered-up in a five week window. In each region, the start date of the planting window will be determined by TIMS in consultation with local growers and reflected in a regionally amended "Bollgard II Planting Window Variation Notice".

The planting window will occur within the following periods:

Ord River Irrigation Area: March 1 and May 1.

Burdekin Bowen Basin Area: December 1 and April 1.

5. End of season chick pea trap crop

An end of season chick pea trap crop must be planted. The planting configuration of the trap crop should be the same as that of the Bollgard II crop. Table 2 shows the requirements for the chick pea trap crop.

Table 2. End of season chick pea trap crop requirements

Criterion	End of season chick pea trap crop
Minimum area & dimensions	A trap crop of 1% of planted Bollgard II crop area is required. This planting must be at least 24 m wide.
Planting time	In April for Burdekin Bowen Area. In July/August for Ord area. The trap crop is to be planted such that it is attractive to <i>Helicoverpa</i> spp. from 2 weeks before defoliation of the Bollgard II cotton. It must remain attractive to <i>Helicoverpa</i> spp. until at least 2 weeks after defoliation of the Bollgard II cotton.
Insect control	The trap crop should be monitored and sprayed with insecticide if the larval pressure threatens the viability of the crop.
Irrigation	The trap crop is to remain attractive to <i>Helicoverpa</i> spp. until after defoliation of cotton. In some cases this may require one additional irrigation after the cotton is defoliated.
Weed control	The trap crop must be kept free of weeds.
Crop destruction	The trap crop must be destroyed 2 to 4 weeks after defoliation of Bollgard II cotton (slash and pupae bust – full soil disturbance to a depth of 10 cm across the entire trap crop area).

NB: <u>If any grower encounters problems in complying with the resistance</u> management plan, please contact your Accounts & Stewardship Specialist.

Bayer CropScience

BioScience

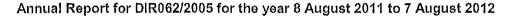
1 November 2012

Office of the Gene Technology Regulator MDP 54, GPO Box 9848 CANBERRA ACT 2601

Attention:

Application Entry Point

Dear Sir/Madam,



I refer to the requirements of the above licence (viz. Condition No. 20), to provide the OGTR with an annual report within 90 days of the licence issue date anniversary.

During the period of 8 August 2011 to 7 August 2012, commercial quantities of approximately 3,000 green ha (single row configuration) of cotton containing Liberty Link technology were planted in Australia. There were no seed production plantings conducted during the reporting period.

During the reporting period, no adverse effects were observed or reported to us as a result of dealings with Liberty Link or LLCotton25/Bollgard II cotton under licence DIR062/2005.

Yours sincerely, Bayer CropScience



Regulatory Affairs Manager BioScience





Bayer CropScience Pty Ltd 391-393 Tooronga Road East Hawthorn Vic 3123 Australia Tel. +61 3 9248 6888 Fax +61 3 9248 6800 A.B.N. 87 000 226 022 www.bayercropscience.com.ai **LICENCE Number:**

DIR 022/2002 and DIR 023/2002

LICENSE HOLDER:

Monsanto Australia Limited

PROJECT SUPERVISOR:

Accreditation No:

ACCR 034/2002

SUBMISSION:

Annual Report for INGARD® and Roundup Ready® Cotton 2006

REPORTING PERIOD:

July 2005 - June 2006

("2005/06 Cotton Growing Season")

DATE:

14 September 2006

PREPARED BY:

Compliance Manager

Information and data submitted herein contains trade secrets, or privileged or confidential information the property of Monsanto Australia Limited and no government agency or representative thereof is authorised to disclose such data and information without written permission from Monsanto Australia Limited.

LICENCE HOLDER DETAILS

Name:

Monsanto Australia Limited

Address:

600 St Kilda Road, Melbourne 3004

PO Box 6051

St Kilda Road Central, Melbourne Victoria 8008

Telephone:

03 9522 7121

Facsimile:

03 9522 6121

Contact email:

Accreditation

Number:

ACCR 034/2002

SCOPE OF THE REPORT

This report addresses the annual reporting condition of the DIR 022/2002 ("The commercial release of insecticidal (INGARD® event 531) cotton") and DIR 023/2002 ("Commercial release of herbicide tolerant (Roundup Ready® event 1445) and herbicide tolerant / insecticidal (Roundup Ready® / INGARD® event 531) cotton) licences issued to Monsanto Australia Limited by the Office of the Gene Technology Regulator.

This report details compliance with general and specific conditions of Part 3 of both DIR 022/2002 and DIR 023/2002.



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1. General Conditions

a. Informing people of their obligations

There was no INGARD® (Ingard) planted under the licence DIR 022/2002 (DIR022) in the 2005/06 season, therefore there were no persons covered by the licence.

Monsanto Australia Limited (Monsanto) informed all Roundup Ready® cotton (Roundup Ready) growers and cotton gins covered by DIR 023/2002 (DIR023), of the obligations imposed on them as a result of the conditions in the licence. This was achieved primarily through the Monsanto Accreditation program and information course which includes information on regulatory obligations, as well as management of the crop.

Roundup Ready Accreditation programs require all persons having management responsibility for Roundup Ready crops, to undergo training and pass a test on the content of the training. Growers are only required to attend these courses and pass the accreditation test once, and 1,799 growers and consultants had been accredited prior to the 2005/06 season.



b. Reporting

During the reporting period, Monsanto did not become aware of any additional information as to any risks to the health and safety of people, or to the environment associated with the dealings authorised by either DIR022 or DIR023, or of any contraventions of the above licences by a person covered by the licences, or any unintended effects of the dealings authorised by the licences.

c. Material changes in circumstances

During the reporting period, Monsanto did not become aware of any relevant conviction occurring after the commencement of these licences; any revocation or suspension of a licence or permit held by Monsanto under a law of the Commonwealth, a State or a foreign country, being a law related to the health and safety of people or the environment; or any event or circumstances occurring after the commencement of these licences that would affect the capacity of Monsanto to meet the conditions in these licences.



d. Remaining an accredited organisation

At all times, Monsanto remained an accredited organisation in accordance with the Act and complied with all conditions of accreditation as set out in the OGTR Guidelines for Accreditation of Organisations.

e. Changes to details

During the reporting period, there were no changes to any of the contact details of the Project Supervisor for either DIR022 or DIR023.

2. Specific Conditions

a. Restrictions on growing of the GMOs

There was no Ingard grown in the 2005/06 season.

Monsanto did not enter into a Technology User's Agreement (TUA) or any other agreement that permitted Roundup Ready to be grown outside the traditional cotton-growing areas of New South Wales and Queensland. The tables below show where Roundup Ready was grown in the 2005/06 season.

The tables are divided into the traditional growing areas or "Valleys" and show the TUA Number, Farm Unit name, names of Fields in which the Roundup Ready was grown and the total area of Roundup Ready, in hectares, per TUA.

Valley: Bourke (NSW / QLD)

TUA number	Farm Unit Name	Fields in which crops grown	Area (Ha)
			372.0

Valley: Darling Downs (QLD)

1	JA number	Farm Unit N	ame	Fields in which	Area (Ha)
1975 gara 188					35.0
					118.5
					25.7
					4.3
					12.5
					53.0
					2.7
					13.0
					14.6
					44.5
					40.0

MONSANTO	DIR 022/2002 & DIR 023/	2002 ANNUAL REPORT 2006
TUA number	Farm Unit Name crops grown	
		Area (Ha)
		53.3
		21.6
		-
		1.5
		21.2
		33.4
		12.6
		5.4
		40.7
		15.0
		33.0
		3.4 52.5
		<u>42.8</u> 31.6
		9.3
		6.0
		2.0
		23.7
		20.7
<u> </u>		149.0
		10.2
		39.7
		56.3
		8.0
		3.1
		65.3
		9.5
		25.1
		60.8
		7.3
		3.0
		63.4 46.8
		40.0
		14.3
		14.5
		45.7
		157.3
		11.8
		61.9
		28.7
		10.5 130.2
		130.2
		24.1

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TUA.		Farm Unit		Fields i	n which	
S MEDAGI	I e i i i i e i e i e i e i e i e i e i	2 mp 3 6 4 1 1 20 0 1 4 6 1 40	Name		rown	Area (Ha)
						8.2
						7.2
						4.2
						2,1
						3.0
						4.8
						5.4
						5.3
						5.8
						11.2

Valley:

Dawson/Callide (QLD)

TUA number	Farm Unit Name	Fields in which crops grown	Area (Ha)
			3.3 2.0

Valley:

Emerald (QLD)

Fields in which TUA number Farm Unit Name crops grown	Area (Ha)
	137.5
	44.1 39.2

Valley:

Gwydir (NSW)

TUA number	Farm Unit Name	Fields in which crops grown	Area (Ha)
			53.0
			675.3
		_	74.0
			18.5
			217.9
			188.6
			177.8
			8.6
			26.5
			173.5
			950.6
			586.0
			588.2

TUA number	Farm Unit Name	Fields in which crops grown	Area (Ha)
		a ciopo gionii	The same of the sa
			755.8
			440.2
-			73.0
			6.9
			100.1
			185.9
			460.8
			190.0
			130.0
			644.5
			430.0
			460.0
			96.1
			17.5
			50.5
			18.9
-			4.4
			8.7
			18.2
			233.5
			4.3
			138.2
			21.3
			4.7
			0.8
			224.7
			260.0
			362.2
			101.9 90.7
			186.0
			100,0
			753.6
			44.9
			29.9
			416.8
			22.4
			22.9
			9.3
			0.0

TUA number	Farm Unit Name	Fields in which crops grown	Area (Ha)
			100 5
			196.5 72.5
			15.7
			143.3
			10.4
			7.0
			237.8
			4.9
			14.2
			19.3
			174.8
			8.2
			7.8
			3.4

Valley:

Lachlan (NSW)

	Fields in which	
TUA number Farm Unit Name	crops grown	Area (Ha)
		120.0

Valley:

Lower Namoi (NSW)

	Fields in which	
TUA number Farm Unit Name	crops grown	Area (Ha)
		17.9
		10.0
		11.8
		8.0
		6.6
		32.5
		18.4
		99.5
<u></u>	_	28.8
		42.4
		1,274.4
		46.0
		195.0
	_	11.5
		4.0
		70.5

(2) (2) (2) (2) (3) (3) (4) (4) (4) (4) (4) (4)(4) (4) (4) (4) (4) (4) (4) (4)(5) (6) (6) (6) (6) (6) (6) (6) (6) (6) (6	Carlon Carlon Carlon		ZAMOAL ILLI OKI 2000
1.沙巴蘭、金屬科里亞は 1/藤		Fields in which	
TUA number F	arm Unit Name	crops grown	Area (Ha)
			56.3
			11.5
			7.0
			4.0
			41.8
		-	44.8
			29.5
			15.4
			256.9
		·	62.8
			5.7
			1.2
			1.9
			19.8
			224.7
			37.5
			91.2
			4.0
			58.5

Valley: Macintyre (NSW / QLD)

TUA number	Farm Unit Name	Fields in which crops grown	Area (Ha)
			305.6
			21.9
			34.8
			51.0
			38.0
			9.5
			113.5
			5.7
			6.0
			53.0
			9.6
			17.1
			22.5
			106.0
			7.2
			28.1
			36.6
			210.9

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	THE PARTY LOOP

TUA number Farm Unit Name	Fields in which crops grown Area (Ha)
	2.0
	33.0
	10.8
	48.4
	22.3
	10.8

Valley: Macquarie (NSW)

		Fields in which	
TUA number	Farm Unit Name	crops grown	Area (Ha)
			9.8
			9.1
			127.7
			121,7
			131.8
			48.6
A.I.			55.7
			433.4
			49.0
			738.6
			69.3
			42.6
			20.0
			89.0
			4.0
			599.0
			86.5
			6.3
			4.3
			-
			635.7

Valley: Mungindi (NSW / QLD)

TUA number	Farm Unit Name	Fields in which crops grown	Area (Ha)
			1,275.0

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TUA number	Farm Unit Name	Fields in which crops grown	Area (Ha)
,			
			52.4
			102.3
			443.4
			151.6
			202.9
			0.3
			4.7
			20.9
			13.0
			13.2

Valley: Murrumbidgee (NSW)

TUA number Farm Unit Name	Fields in which crops grown Area (Ha)
	115.0
	293.3
	121.5

Valley: St George (QLD)

	TUA number	Farm (Jnit Name	Fields in which crops grown	Area (Ha)
<u> </u>					500.5
<u> </u>					10.0
					51.6
					130.8
					205.5

Valley: Tandou (NSW)

TUA number Farm Unit Name crops grown	Area (Ha)
	696.5

Valley: Upper Namoi (NSW)

TUA number	Farm Unit Name	Fields in which crops grown	Area (Ha)
	10		50.8



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TUA number	Farm Unit	Name	Fields in which crops grown	Area (Ha)
			_	5.6
				3.6
				9.0
				4.0
				5.4
				26.0
				13.3
				1.33

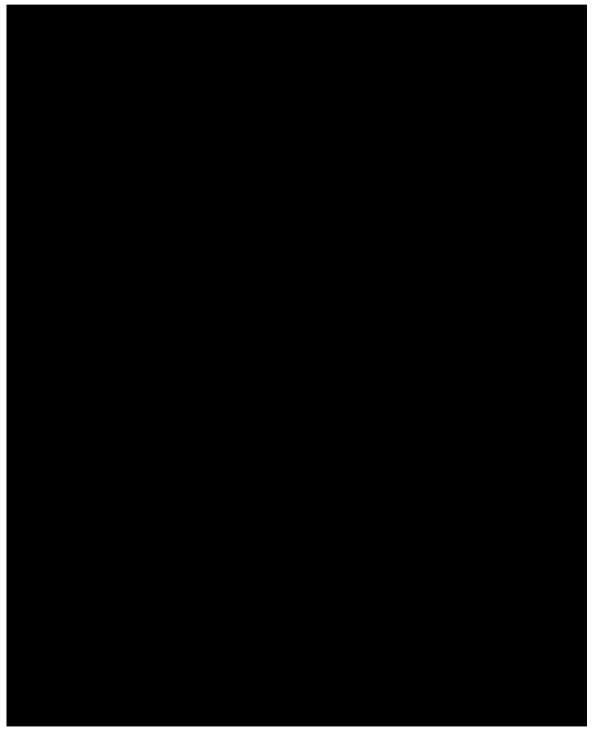
Valley: Walgett (NSW)

TUA number Farm Unit Name	Fields in which crops grown Area (Ha)
	1,481.0
	16.0
	65.0
	10.0



b. Transport of GM whole cotton seed into the Restricted Zone

Monsanto provided written notification to all commercial cotton gins in Australia in December 2005, stating the requirements for transportation of GM whole cotton seed into the Restricted Zone.

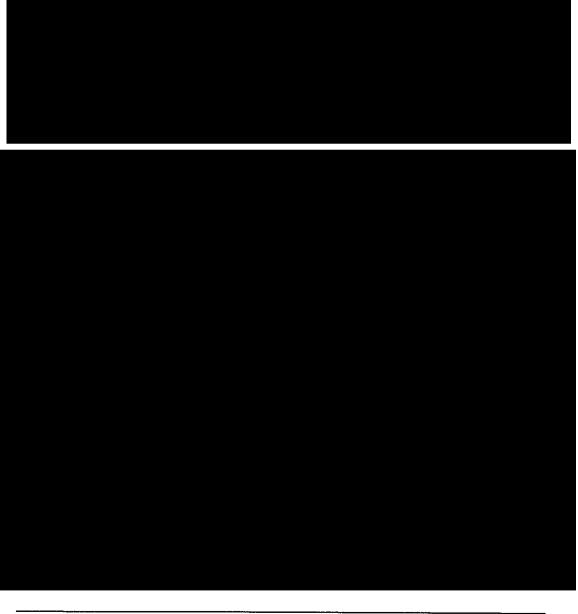




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Compilance Management Figh

A written Compliance Management Plan, for both Ingard and Roundup Ready, was provided to the Regulator prior to planting of the GMOs.

Testing Methodology f.

A written Testing Methodology, for both Ingard and Roundup Ready, was provided to the Regulator within 30 days of planting of the GMOs.

In Confidence

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Bayer CropScience **BioScience**





DIR 062/2005 Annual Report Filing

Bayer CropScience Ptv Ltd

391-393 Tooronga Road East Hawthorn Vic 3123

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Fax +61 3 9248 6680

A.B.N. 87 000 226 022 www.bayercropscience.com.au

Australia

Office of the Gene Technology Regulator MDP 54 PO Box 100 WODEN ACT 2606

Attention:

Applications Entry Point

10 October 2007

Dear Dr Meek,

Subject: Annual Report, Licence No. DIR 062/2005

I refer to the requirements of the above licence, (viz. condition No 20), to provide the OGTR with an annual report within 90 days of the licence issue date anniversary.

During the period of 8th of August 2006 to the 7th of August 2007, only small scale commercial activities were undertaken with Liberty Link cotton in Australia. The first year of a larger commercial program is scheduled for 2007.

During the period from August 2006 through to August 2007, no adverse effects had been noticed at any of the locations where Liberty Link cotton has been planted. No unexpected adverse effects have been reported to us resulting from dealings with Liberty Link cotton approved under Licence No. DIR 062/2005.

Recently, activities conducted under DIR 056/2004 were added to DIR 062/2005. These activities include the stacking of Liberty Link cotton and Bollgard II. As the time of including the DIR 56 activities in DIR 62, two locations were in the post harvest monitoring phase. No adverse affects have been observed at either of these two sites.

Yours sincerely,

Senior Regulatory Affairs Associate **BioScience**

Bayer CropScience

BioScience



19 October 2011

Office of the Gene Technology Regulator MDP 54, GPO Box 9848 CANBERRA ACT 2601 Bayer CropScience Pty Ltd 391-393 Tooronga Road East Hawthorn Vic 3123 Australia Tel. +61 3 9248 6888 Fax +61 3 9248 6800 A.B.N. 87 000 226 022

www.bayercropsclence.com.a

Attention:

Application Entry Point

Dear Sir/Madam,

Annual Report for DIR062/2005 for the year 8 August 2010 to 7 August 2011

I refer to the requirements of the above licence (viz. Condition No. 20), to provide the OGTR with an annual report within 90 days of the licence issue date anniversary.

During the period of 8 August 2010 to 7 August 2011, commercial quantities of approximately 2,635 green ha (single row configuration) of cotton containing Liberty Link technology were planted in Australia. Seed production plantings equalled 19.6 green ha and small-scale field trials of 1.27 green ha were conducted by CSIRO.

During the reporting period, no adverse effects were observed or reported to us as a result of dealings with Liberty Link or LLCotton25/Bollgard II cotton under licence DIR062/2005.

Yours sincerely, Bayer CropScience



Regulatory Affairs Manager BioScience



LICENCE Number:

DIR 022/2002 and DIR 023/2003

LICENSE HOLDER:

Monsanto Australia Limited

PROJECT SUPERVISOR:

ACCR 034/2002

Accreditation No:

SUBMISSION:

Annual Report for Roundup Ready® Cotton and INGARD® 2004

REPORTING PERIOD:

21 June 2003 - 20 June 2004

("2003/04 Cotton Growing Season")

DATE:

15 October 2004

PREPARED BY:

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General Conditions

a. Informing people of their obligations

Monsanto Australia Limited informed all cotton growers and cotton gins covered by the DIR 022 (INGARD) and DIR 023 (Roundup Ready cotton) licences of the obligations imposed on them as a result of the conditions of these licences. This was achieved primarily through Monsanto Accreditation programs and information courses.

Roundup Ready® cotton Accreditation programs require all persons having management responsibility for Roundup Ready® Cotton crops, to undergo training and pass a test on the content of the training. Growers were only required to attend these courses and pass the accreditation test once, and therefore may have attended these courses prior to the 2003/04 cotton season. 1,293 growers were accredited in regulatory obligations and conditions, and management of Roundup Ready® cotton technology for the 2002/03 season. A further 208 cotton growers attended Roundup Ready® accreditation programs in the 2003/04 season.

Previous to 2002, INGARD® information sessions were offered in which training to conduct dealings with INGARD® according to licence conditions and obligations was an integral component. In 2002, INGARD® information sessions were replaced with Bollgard II® Accreditation programs due to the intended phasing out of INGARD® in the 2003/04 season. However, the key components of the Bollgard II® program pertaining to compliance with conditions of the licence would also enable the growers to comply with conditions of the DIR 022 / 2002 licence. In the 2003/04 season, 961 people attended the Bollgard II Accreditation program.

Gins known to transport cotton seed into the restricted zone were notified by letter that they were permitted to transport seed north of 22° south provided they adhered to all conditions and obligations associated with the use of cotton seed within the restricted zone.

b. Reporting

During the reporting period, the licence holder did not become aware of any additional information related to any risks to the health and safety of people, or to the environment associated with the dealings authorised by either the INGARD® or the Roundup Ready® cotton licence, or of any unintended effects of the dealings authorised by the licence.

During the reporting period, the licence holder did not become aware of any contraventions of either DIR 022 / 2002 or DIR 023 / 2003 by a person covered by the licence.

c. Material changes in circumstances

During the 2003/04 reporting period, Monsanto Australia Limited did not become aware of any relevant conviction of the licence holder occurring after the commencement of this licence; any revocation or suspension of a licence of permit held by Monsanto Australia Limited; or any event or circumstance that would affect the capacity of Monsanto Australia Limited to meet the conditions of either the DIR 022 / 2002 or DIR 023 / 2002 licences.

d. Remaining an accredited organisation

At all times, Monsanto Australia Limited remained an accredited organisation and complied with conditions of accreditation as set out in the OGTR Guidelines for Accreditation of Organisations.

In Confidence Page 1

e. Changes to details

During the 2003/04 reporting period, Monsanto Australia Limited notified the Office of the Gene Technology Regulator of a change in project supervisor. On 18 February 2004, as project supervisor in Attachment A of both DIR 022 / 2003 and DIR 023 / 2002.

2. Restrictions on growing of the GMO

The licence holder must not enter into a Technology User's Agreement or any other agreement which would permit the GMO to be grown outside of the traditional cotton-growing areas of New South Wales and Queensland south of latitude 22° south or north of 22° south.

Roundup Ready® cotton and INGARD® were only grown in the traditional cotton-growing regions of NSW and Queensland. More information on the locations where all Roundup Ready® cotton and INGARD® cotton crops were grown during the 2003/04 cotton growing season are given in **Parts 2a** and **2b**.

a. Crop plantings of INGARD® cotton

i) Conditions for Growing Crop

In the 2003-04 cotton growing season, Bollgard II was introduced into the market, while plans for the phase-out of INGARD were put in place. Therefore in 2003-04, there were significant plantings of both varieties. The TIMS Technical Panel formulated a resistance management plan for the 2003-04 season which aimed at limiting the amount of INGARD planted, while encouraging cotton growers to adopt Bollgard II.

The "25% / 40% Rule" was implemented for the 2003-04 cotton season. Growers were able to:

- Plant cotton containing the INGARD gene to a total area of 25% of total cotton grown on that farm unit.
- Plant cotton containing either the INGARD gene, or the Bollgard II gene to a total area of 40% of total cotton grown on that farm unit (the area of cotton containing the INGARD gene must not exceed 25% of total cotton).
- Plant cotton containing the Bollgard II gene to a total area of 40% of total cotton grown on that farm unit.

(Where total cotton is defined as all emerged and viable commercial cotton being grown in a valley and includes all INGARD, Bollgard II, Roundup Ready cotton and conventional varieties, including sprayed and unsprayed cotton refuges.)

Sales and planting of INGARD® were undertaken under a Technology User Agreement (TUA), which sets out the conditions for planting and growing the crop. In order to be eligible to sign such an agreement, a grower was required to attend an INGARD® or Bollgard II® accreditation program, and pass a test based on the material covered in the accreditation program.



ii) Crop Locations

The first audit involved the identification of all fields in which INGARD[®] was grown. These are listed below (by TUA and Farm Unit). In total, **30,399.30 Ha** of INGARD[®] was grown during the 2003-04 cotton season.

Note that locations are sorted by valley, with the approximate boundary of each valley, described at the start of each listing and illustrated below.

Valley:

Bourke (NSW/QLD)

Boundaries:

West of Walgett Shire, north of Coolahbah. Includes Cunnamulla in

Queensland.

Crop Locations:

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Valley:

Darling Downs (QLD)

Boundaries:

Follows the Condamine River. Includes Toowoomba, Murgon, Dalby,

Chinchilla, Condamine and Roma. South-west boundary is Surat.

TUA NUMBER 30.0 30.0 48.8 31.5 26.3 60.3 25.0 7.8 28.5 46.2 22.0 20.0 27.0 41.0 45.1 43.0 32.0 47.8 38.7 17.0 99.0 42.0 20.0 20.0 20.0 20.0 31.0	Helidadin Whiteleter	
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Dawson/Callide (QLD)

Includes Taroom, Biloela, Moura and Theodore regions. **Boundaries:**

Crop Locations:

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			85.4
			148.9

Valley:

Boundaries:

Dirranbandi (QLD) Runs north toward St George and includes Lower Plains, follows south along

the Balonne River right down to NSW border.

Crop Locations:

Olop 2000	
	Filefiel Hawliteland (Pies Auges (Pies)
Traversum geter a festim might (general)	28.3
	13.0

Valley:

Boundaries:

South-eastern boundary formed by the Expedition Ranges between Rolleston

and Bauhinia. Region runs north-west from there to include Emerald and

Dysart.

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Boundaries:

Gwydir (NSW)
South of Fox Lane, north-west to Garah, west to Collarenebri, south to Bellata. The road that runs east-west through Bellata and to Rowena is the

southern boundary.

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Valley: Boundaries: Lachlan (NSW)

Northern boundary is Peak Hill and Tullamore and the cotton follows the Lachlan River through to Booligal. The southern boundary is the road from Booligal through to Gunbar and then follows the Great Western Hwy through

to West Wyalong.

Crop Locations:

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· · · · · · · · · · · · · · · · · · ·	63.0
	646.0

Valley:

Lower Namoi (NSW)

Boundaries:

North-west of Baan Baa-Manilla Road and south of Bellata-Rowena Road.

Western boundary is formed by the road that runs from Pilliga via Burren

Junction to Collarenebri.

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Valley:

Macintyre (NSW / QLD)

Boundaries:

North of Gwydir, western boundary is Garah to Talwood Road north to include Moonie and east to include Texas. Southern boundary is Foxes Lane, which runs Garah back to the Newell Hwy and then along to Croppa Creek,

Yallaroi and Coolatai.

indictional description	/wes (655)
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	29.1
	52.2
	109.6
	63.5
	81.7
	102.5
	177.0
	86.8
	25.0
	73.2
	28.5

Faten Unit Visione - Grown	A Alfea (Haj)
dische territoria del servicio	8.5
	50.7
	136.0
	42.0
	roz 0
	527.3

Boundaries:

Macquarie (NSW)
Dubbo and south to Peak Hill. West to Tullamore. North through Tottenham.
Nyngan and Coolabah, then east via southern boundary of Walgett shire to

Pilliga and then south back to Dubbo via Coonabarabran.

Fields in which crops	
TUA number 252 Farm Unit Name grown	Area ((Hä))
	14.4 47.8
	47.8
	48.7
	16.5
	20.7
	57.6
	41.6
wild an action of Addition of The Control of The Co	37.3
	118.1
	18.7
	16.0
	31.9
	21.0
Name of the state	
	90.3
	164.8
	18.5
	55.8
	39.3
	213.0
	96.0
	44.0
	47.6
	94.7
	25.0
	58.2
	15.7
	101.0
	73.4
	23.9
	76.0
	59.0
	38.2
	34.6
	68.9
	32.4
	26.0
	16.0
	8.1



TUA number Family in the state of the stat	(1989 /ANGERI(1819)
Ministration (1990) (1990)	34.3
	44.0
	47.5
- The second sec	35.0
	76.0
	58.4
	9.9
	57.2
	23.0
	46.9
	273.0
	40.1

Mungindi (NSW / QLD)

Boundaries:

West of Garah and Boomi Road to Talwood and follows Barwon River south-

west of Mungindi towards Collarenebri. Southern boundary is the

Watercourse Road from Colly through to Gingham and then to Garah.

Crop Locations:

Fileldedianolitelarian	Aron (file)
The Control of the Co	45.7
	12.0
	20.0
	349.0
	43.0
	28.4
	60.0
	10.0
	25,2

Valley:

Murrumbidgee (NSW)

Boundaries:

Northern boundary is the Great Western Hwy from West Wyalong through Goolgowi to Gunbar, from Gunbar west to Booligal on the Lachlan River. Downstream of Booligal on the Lachlan and south-west is the Murrumbidgee

River.

onicesiti. carekista aridanunggun.	official control (file) (file)
	207.0
	397.0 196.2
	325.7
	377.0



St George (QLD)

Boundaries:

Above Lower Plains on the southern side and north-east to include majority of

Waroo Shire with the north-east boundary being Surat.

Crop Locations:

Flateblicher Germanischer Groven	(Area (Ala)
NATIONAL CONTRACTOR OF THE PROPERTY OF THE PRO	94.6
THE PROPERTY ALL	167.9
	22.0
	91.7
	83.6
	12.0
	55.3
	50.0
	52.5
	95.7
	38.6
	44.0
- 	34.3
	136.4
	36.0
	45.0
	24.0
	25.0
	97.0
	63.2
	122.2
	41.4
	60.0

Valley:

Boundaries:

Upper Namoi (NSW)South-east of Baan Baa-Manilla Road. Includes Coolah, Merriwa, Mullaley,

Gunnedah and Quirindi.

TUAmumber Famin Unit Name grown	Arrosa (Osla))
	21.5
	58.5
<u></u>	12.0
	113.3
	137.0
	81.6
	64.0
	59.0
	26.5
	80.4
	30.0
	26.1
	78.4



Jennielanden jakan j Jennielan jakan jaka	Alexi((gk))
	88.7
	37.6
	70.0
	89.3
	51.8
	44.9
	143.0
	40.0
	98.7
	59.0
	86.3
	55.0
	12.8
	10.0
	14.1
	50.2

Walgett (NSW)

Boundaries:

Includes almost entirety of Walgett Shire, with eastern boundary being the

road that runs south from Collarenebri to Burren Junction.

Crop Locations:

สมิเสียงการเกี่ยว (เรียวการเกียวการเกียวการเกียวการเกียวการเกียวการเกียวการเกียวการเกียวการเกียวการเกียวการเกีย เดิมสนานารเกียวการเกียวการเกียวการเกียวการเกียวการเกียวการเกียวการเกียวการเกียวการเกียวการเกียวการเกียวการเกีย	/Area ((Sta))
	39.0
	27.5

b. Crop plantings of Roundup Ready® cotton

i) Conditions for Growing Crop

Sales and planting of Roundup Ready[®] Cotton were undertaken under a Technology User Agreement (TUA), which sets out the conditions for planting and growing the crop. In order to be eligible to sign such an agreement, a grower was required to attend a Roundup Ready[®] Cotton accreditation program, and pass a test based on the material covered in the accreditation program.

As a part of the agreement, growers were required to fulfil certain obligations, including undergoing two audits:

- Firstly, an audit of the seed variety, and area of Roundup Ready[®] Cotton crop planted, undertaken by a Technology Service Provider (TSP) on behalf of Monsanto.
- Secondly, completing an audit of the weed control program, satisfaction levels and weeds surviving Roundup Ready Herbicide applications, completed by the grower.

ii) Roundup Ready® growers and valleys

The first audit involved the identification of all fields in which Roundup Ready® cotton was grown. These are listed below (by TUA and Farm Unit). In total, **84,230 Ha** of Roundup Ready® Cotton was grown during the 2003/04 cotton season (an 8% decrease from the previous season due to continued drought conditions). Despite this, of the growers with valid TUAs, **68%** grew Roundup Ready® cotton this season, a 2% increase over last season, the Chart below provides a breakdown of Roundup Ready® cotton hectares by valley, and the percentage of Roundup Ready® cotton grown.

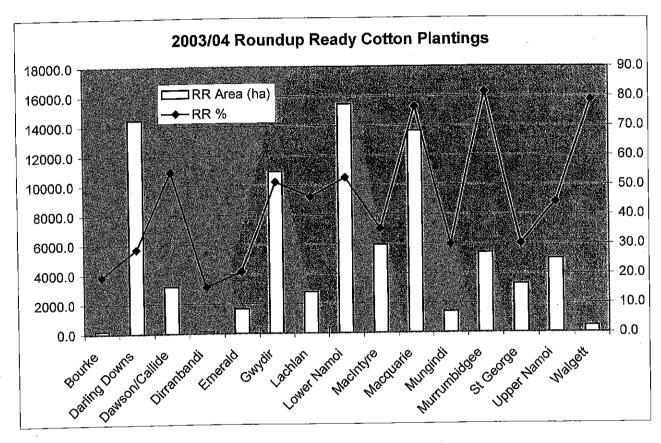


Figure 1. Roundup Ready® cotton hectares and growers per valley.

iii) Crop Locations

In the tables below, all fields in which Roundup Ready[®] cotton was grown are listed by TUA and Farm Unit. Note that locations are sorted by valley, with the approximate boundary of each valley, described at the start of each listing.

Valley:

Bourke (NSW/QLD)

Boundaries:

West of Walgett Shire, north of Coolahbah. Includes Cunnamulla in

Queensland.

Crop Locations:

ដែលប្រជាជន និងក្រោយជានិងក្រាន ខ្យាល់ប្រជាជនិងក្រាស់ និងក្រាស់ និងក្រាស់ប្រជាជនិងក្រាស់ប្រាស់ប្រជាជនិងក្រាស់ប្រជាជនិងក្រាស់ប្រជាជនិងក្រាស់ប្រជាជនិងក្រាស់ប្រជាជនិងក្រាស់ប្រជាជនិងក្រាសក្រាស់ប្រជាជនិងក្រាស់ប្រជាជនិងក្រាស់ប្រជាជនិងក្រាស់ប្រជាជនិងក្រាសក្រាស់ប្រជាជនិងក្រាស់ប្រជាជនិងក្រាស់ប្រជាជនិងក្រាស់ប្រជាជនិងក្រាស់ប្រជាជនិងក្រាស់ប្រជាជនិងក្រាស់ប្ជាជនិងក្រាស់ប្រជាជនិង	/Akest (file)
	35.8
	36.9
	124.8

Valley:

Darling Downs (QLD)

Boundaries:

Follows the Condamine River. Includes Toowoomba, Murgon, Dalby, Chinchilla, Condamine and Roma. South-west boundary is Surat.

	210 mm 2100 mm 1400 mm 1400 mm	98.550 (10.00 19.55 19.00 (10.00 (1		
+117.4	5-40-7-10	ล์เปลี้ยากับ	liftette flavdaldireteps Glovua	/Ancer ((tite))
A NO.		<u> </u>	<u> 19 de l'Espain d'est, abril est passe en essencial es esse</u>	19
				30
				37.6
				23.35
				136.5
				93
				102.7
				102.7
				303.948533
				47.8
				228
				88.666
				55
				66.1684003
				98
				81.5
				66.7350203
				103.5
				142.433
				28
				6.9
				49.55
·				15.35
· · · ·				87.55
···				34.306
				85.5

TUZMOMOMOGE TReum Unit Weine Grewn	://veer((Altr))
	20
	38 95
	55
	135.4
	135.4
	173
	157.8
	04
	21
	266.2
	153.93433

	263.3
	31.725
	212
	147.9
	147.9
	483.4
	28.5
<u></u>	52.5
	294.548062
~~~	67.7
	225.1
	35.3
	7.4
	74 149.3
	11.6672501
	4.25 79.9382
	189.341
	47.8
	102
	8.3
	36
	58
	14
	62.96
	75
	66.95
	88.1434
	JU. 17J7
	40.85
	286.1
	32.5349603
	98.0022004

Held In Whitehorous	
THE HIM MINING THE SECOND OF T	Avery((8E)
	43.3
	697
	60.8
	102
	28.0014002
	29.1
	45.4689404
	81.3374007 48
	40
<u>-</u>	141.940431
	149
	174.8
	40.1
	226.3
	113.2
	· ·
<del></del>	506.6
	-
	110.06964
	46
	52
	65
	58
············	105
<del></del>	42
	261
	. 82
	67
	86
	118.672601
	11
	160.26782
	100.20102
	103.5
	67.5367106
	45.5349103
	32,25
	79 54.6
	34.0
	4070 1715
	1072.15436



esepsion distribilished in the confession of the contract of t	Aver(He)
A STRYALAN	(ANGELIANEA)
	72.5
	43.7355204
	38.6686003
	40
	94.4014502
<u></u> _	20
- Andrew Control of the Control of t	53
·	30
	69
	238.3
	21.5
·	25
	130.903921
	58.4029205
	66
	118.6694
	61.7364205
	126.7
	264.384432
	20.435
	42
	11.5
	53
	97.3
	16.2
	74.5
	74.5
	338.680102
	69.1
	130.673201
	185.8
	34
	38
1,	65

Valley: Dawson/Callide (QLD)
Boundaries: Includes Taroom, Biloela, Moura and Theodore regions.
Crop Locations:

Maskinden Eenmillelikkens assus	NPE.
	269
	155.5
	205



	Fields lin which droes	
TUA number Farm Unit Name	grown	Area (Ha)
	<u>.</u>	97
		163
		94.3
		130.2
		243.3
		151.7
		280.2
		87.7
		207.9
		195.2
		162.8
		47.6
		149.4
		50
		206.6
		150.6
		225
		14

Boundaries:

**Dirranbandi (QLD)**Runs north toward St George and includes Lower Plains, follows south along the Balonne River right down to NSW border.

TUA number: Efarm Unit Name: grown	Area((Ha)
	56
	60
	30.2



Emerald (QLD)

Boundaries:

South-eastern boundary formed by the Expedition Ranges between Rolleston

and Bauhinia. Region runs north-west from there to include Emerald and

Dysart.

**Crop Locations:** 

italien in whitehouse in the constant of the constant in the c	Alger(ffe)
	121.8
	4.6
	2.3
	90.7
	17.5
	21
	29.3
L ₁₀	34.4
; 	135.5
——————————————————————————————————————	57.1
	30
	48.3
	247
	12
	229.1
	99.2
	150.6
	60
	50.3
	167.6
	46.8
	21.25

Valley:

Gwydir (NSW)

Boundaries:

South of Fox Lane, north-west to Garah, west to Collarenebri, south to

Bellata. The road that runs east-west through Bellata and to Rowena is the

southern boundary.

pauvostatiatos les secontentials les les la Willebronopis les secontentials les les les les les les les les les l	Aven (HE) 303.5
	331.75
	162.6
	142
	148.8
	461



	FieldsijnWhidhchops Avea (GE)
i an	171.1
_	80
	154
	434.2
	16.2
	194.2
	93.5
	60
	71
	365.5
	365.5
	1723.5
	154.6
	152.3
	427.006251
	427.000251
	528
	233.2
	•
	12
<u></u>	211.2
	48.1
	99.4
	69.2
	2020 2
	2028.3 12.4672901
	12.407.2301
	393.152993
	135.3
	41.5
	32
	115
	470
	453
	209.6
	93.9
	25.3
	260.5
	230.1
	78.6706007
	74.1370406
	49
	175
	18.65

AHHIGEMAYAHGARAPA Persambah Persambah Persamba	AVCEN(GIE))
	23.45
	30
	54
	63.9365305
Augustian and the second and the sec	13.75

Valley:

Lachlan (NSW)

Boundaries:

Northern boundary is Peak Hill and Tullamore and the cotton follows the Lachlan River through to Booligal. The southern boundary is the road from Booligal through to Gunbar and then follows the Great Western Hwy through to West Wyalong.

**Crop Locations:** 

 I		
		498
		129.9
		· · · · · · · · · · · · · · · · · · ·
		466
	7	132
		88
		104.5
		95
		86
		140
		37.7
	No1-4	64
		135
		195
	-	, ,
-		1122

Valley:

Lower Namoi (NSW)

**Boundaries:** 

North-west of Baan Baa-Manilla Road and south of Bellata-Rowena Road. Western boundary is formed by the road that runs from Pilliga via Burren

Junction to Collarenebri.

TUAknumber Estem Unitriklande enköyye	Asier (##))
	64.4
	87.5
	46.4
	158.8
	63.2
	473.9
	293.4
	172.5
	72.4
	153.2
	250

สมาชิก เลืองเกิดเลือง เลืองเกิดเลืองเกิดเลืองเกิดเลืองเกิดเลืองเกิดเลืองเกิดเลืองเกิดเลืองเกิดเลืองเกิดเลืองเก เลืองเกิดเลืองเกิดเลืองเกิดเลืองเกิดเลืองเกิดเลืองเกิดเลืองเกิดเลืองเกิดเลืองเกิดเลืองเกิดเลืองเกิดเลืองเกิดเล	A VIEW
AND	A(eq.(fit))
	32.2016103 67.7
	137.9
	52.1
	175.1
	1/5.1
	655.4
· ·	122
	27
	60.8
	189.6
	47.4690404
	140.5
	118.4
	58.8
	294.1
	96.4
	132
	40.5
	195
	141
	562.2
-	295.4
	482
	460 E
	162.5 91.5
	61
	101
	125
	63.6
	03.0
	440
	· · · · · · · · · · · · · · · · · · ·
	202.5
	16
	172.770181
	160
	41.2
	49.5
	117
	474.9
	42
40.0	28.7
	95.1
	30(1
	563.2
	184.9
	265.3

TUA number Term Unit Neme grown	Aker((He))
	166.5
	44.5
	222.1
	434
	2241.6
	32.9 48.4
	133.6
	60
	98.6
	0.160008
	626.7
	47
	271
	56.8
	330.149843
	97
	200
	123.2
	72.1
	42.9
	12.5
	26
	115.4
	80.8
	22.2
	37.3
	20.0010002



Macintyre (NSW / QLD)

Boundaries: North of Gwydir, western boundary is Garah to Talwood Road north to

include Moonie and east to include Texas. Southern boundary is Foxes Lane, which runs Garah back to the Newell Hwy and then along to Croppa Creek,

Yallaroi and Coolatai.

	History Family White Grown	ZANGER ((UKa))
		16
		. 35.5
		230
		131
		81.45
		283.2
		20.4
		99.4
		42
		79.8
		21.35
		87.95
		86.8
		133.35
		18.1
		000 000 4 5 4
		386.839151
		37.85
		198.5
		75.15
		448.3
		194.3
		126.4
		164.8
		80.3
		57.0028505
		67.5
		257.8
		301.4
		142.65
		113.5
		4
- "		4.1
		18.0009001
		465
		502.8
		181.7
		152



agoroaddilwydifelfi. a chindrolladdinasti. acthur Aust	(Area (He))
	586.5
	21.1

Macquarie (NSW)

**Boundaries:** 

Dubbo and south to Peak Hill. West to Tullamore. North through Tottenham. Nyngan and Coolabah, then east via southern boundary of Walgett shire to

Pilliga and then south back to Dubbo via Coonabarabran.

TUA number	Benin Wittelfice	ા   ાતિ પશ્ચિમ માત્ર પ્રદેશ હોય છે. જો છે. -   હોલ્ડિપ્રેપ્રત	Aver ((8E))
		en kan die Eringer de Eringer in der State der Sta State der State der	86
		-	472.8
			165
		-	96.2
		-	16.5
		-	48.8
		-	46.6
			149.8
			102.9
			239.3
			119.99
			188
			120.2
			591
			33.9
			118.6
		~	178.6
			157.4
			130.6
			199.5
			58
			84
			432.2
			1.A qu' pr
•			543.8
			66
			112.5
			76.4
			286
			63
			679
			200
			289
			115

elogania en enekkijali in e	
150V-sublinged Remutally/pules (1990/0)	Avera ((Sta))
	44
	342.9
	144.3
	114.7
	109
	79.7
	269.6
	64.7
	69.3
	361
	136.3
	97.5
	245.5
	236.2
	183.7
	201.8
	335.7
	195.8
	52.7
de de la companya de	209.6
	126.1
	123.9
	77.7
	172.3
	169.7
(1) (1) (1) (1) (1) (1) (1) (1) (1) (1)	
	76.7
waka mana shi ili Ma	149
	147.3
	475
	177
	199.2
	61
	182.6
	76
	245.9
	40.9
	TVIV
	230
	191
	59.2
	681
	66.7
	52.9
	215.7
	39.5
	39

TUNA antiastara: Frank Wall (Verine tavionia)	Anders (Alleg)
	198
	196.3
	18
	116.7

Valley:

Mungindi (NSW / QLD)

Boundaries:

West of Garah and Boomi Road to Talwood and follows Barwon River south-

west of Mungindi towards Collarenebri. Southern boundary is the

Watercourse Road from Colly through to Gingham and then to Garah.

**Crop Locations:** 

FUA'number Ennin Unflikkeine eiksyvä	Air-rai((#13))
Parameter Management	298
	111.5
	412.7
	12
	88
	25
	314
	36.6
	57
	22
	41.7

Valley:

Murrumbidgee (NSW)

Boundaries:

Northern boundary is the Great Western Hwy from West Wyalong through Goolgowi to Gunbar, from Gunbar west to Booligal on the Lachlan River. Downstream of Booligal on the Lachlan and south-west is the Murrumbidgee

River.





St George (QLD)

Above Lower Plains on the southern side and north-east to include majority of Boundaries:

Waroo Shire with the north-east boundary being Surat.

**Crop Locations:** 

TUA number 2 - Farm Wali Name 2 - 1712 - 1712 - 1712 - 1712 - 1712 - 1712 - 1712 - 1712 - 1712 - 1712 - 1712 - 1712 - 1712 - 1712 - 1712 - 1712 - 1712 - 1712 - 1712 - 1712 - 1712 - 1712 - 1712 - 1712 - 1712 - 1712 - 1712 - 1712 - 1712 - 1712 - 1712 - 1712 - 1712 - 1712 - 1712 - 1712 - 1712 - 1712 - 1712 - 1712 - 1712 - 1712 - 1712 - 1712 - 1712 - 1712 - 1712 - 1712 - 1712 - 1712 - 1712 - 1712 - 1712 - 1712 - 1712 - 1712 - 1712 - 1712 - 1712 - 1712 - 1712 - 1712 - 1712 - 1712 - 1712 - 1712 - 1712 - 1712 - 1712 - 1712 - 1712 - 1712 - 1712 - 1712 - 1712 - 1712 - 1712 - 1712 - 1712 - 1712 - 1712 - 1712 - 1712 - 1712 - 1712 - 1712 - 1712 - 1712 - 1712 - 1712 - 1712 - 1712 - 1712 - 1712 - 1712 - 1712 - 1712 - 1712 - 1712 - 1712 - 1712 - 1712 - 1712 - 1712 - 1712 - 1712 - 1712 - 1712 - 1712 - 1712 - 1712 - 1712 - 1712 - 1712 - 1712 - 1712 - 1712 - 1712 - 1712 - 1712 - 1712 - 1712 - 1712 - 1712 - 1712 - 1712 - 1712 - 1712 - 1712 - 1712 - 1712 - 1712 - 1712 - 1712 - 1712 - 1712 - 1712 - 1712 - 1712 - 1712 - 1712 - 1712 - 1712 - 1712 - 1712 - 1712 - 1712 - 1712 - 1712 - 1712 - 1712 - 1712 - 1712 - 1712 - 1712 - 1712 - 1712 - 1712 - 1712 - 1712 - 1712 - 1712 - 1712 - 1712 - 1712 - 1712 - 1712 - 1712 - 1712 - 1712 - 1712 - 1712 - 1712 - 1712 - 1712 - 1712 - 1712 - 1712 - 1712 - 1712 - 1712 - 1712 - 1712 - 1712 - 1712 - 1712 - 1712 - 1712 - 1712 - 1712 - 1712 - 1712 - 1712 - 1712 - 1712 - 1712 - 1712 - 1712 - 1712 - 1712 - 1712 - 1712 - 1712 - 1712 - 1712 - 1712 - 1712 - 1712 - 1712 - 1712 - 1712 - 1712 - 1712 - 1712 - 1712 - 1712 - 1712 - 1712 - 1712 - 1712 - 1712 - 1712 - 1712 - 1712 - 1712 - 1712 - 1712 - 1712 - 1712 - 1712 - 1712 - 1712 - 1712 - 1712 - 1712 - 1712 - 1712 - 1712 - 1712 - 1712 - 1712 - 1712 - 1712 - 1712 - 1712 - 1712 - 1712 - 1712 - 1712 - 1712 - 1712 - 1712 - 1712 - 1712 - 1712 - 1712 - 1712 - 1712 - 1712 - 1712 - 1712 - 1712 - 1712 - 1712 - 1712 - 1712 - 1712 - 1712 - 1712 - 1712 - 1712 - 1712 - 1712 - 1712 - 1712 - 1712 - 1712 - 1712 - 1712 - 1712 - 1712 - 1712 - 1712 - 1712 - 1712 - 1712 - 1712 - 171	io (Aragai (Hra))
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	132.3
	304.6
	40
· · · · · · · · · · · · · · · · · · ·	19,26
	127.3
	·
	250

Valley:

Upper Namoi (NSW)

Boundaries:

South-east of Baan Baa-Manilla Road. Includes Coolah, Merriwa, Mullaley,

Gunnedah and Quirindi.

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	202.2
	292.8
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	173.7
	424

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	124.3362
	219.9
	17.4
	138.4
	52.3
	171.3
	124
	14.5
	268.2
	243.7
	71.6
	146.6
	68.7
	58.2
	184.1
	386.9 64
	04
	332.8
_	59
	51.3
	152.1
	171.5
	18.8
	52
	55
	79.5
	65.4 13.4673401
	13.40/ 3401
	279.5



Walgett (NSW)

Includes almost entirety of Walgett Shire, with eastern boundary being the **Boundaries:** 

road that runs south from Collarenebri to Burren Junction.

**Crop Locations:** 

THEIGHTHAY THE TENEST OF THE T	Zaven ((BE))
PARTIES NO STATES AND	28.6
	63
	114
	76
	169.8

# Transport and use of GM whole cotton seed in the Restricted Zone 3.

#### **Background** i)

On 12 August 2003, both the Roundup Ready cotton and INGARD licences (DIR 023 / 2002 and DIR 022 / 2002) were varied to incorporate a communication strategy. The objective of the communication strategy was to develop a method for the dispersal of information regarding both the use and transport of ginned GM whole cotton seed into and within the restricted zone; and to provide information to end users of cotton seed regarding the need to monitor and control volunteer cotton within the restricted zone.

Newly introduced conditions relating to the transport of GM whole cotton seed into the restricted zone require that Monsanto Australia Limited 1) provide written notification to cotton gins from which GM whole cotton seed will be transported into the Restricted Zone stating the requirements for transportation into the Restricted zone, and notification to cotton gins that they must notify transporters of GM whole cotton seed into the Restricted Zone of the transport requirements; and 2) provision to these gins sufficient copies of a sign to accompany each shipment of cotton seed into the Restricted Zone.

Conditions relating to the use of GM whole cotton seed within the Restricted Zone require Monsanto Australia Limited to take all reasonable steps to distribute a document to 1) recipients of GM whole cotton seed within the Restricted Zone, 2) cotton gins from which GM whole cotton seed is sourced for transport into and within the Restricted Zone, and 3) transporters of GM whole cotton seed into and within the Restricted Zone, conveying the importance of appropriate control of cotton volunteers.

# Preparation of Strategy

An information sheet, or 'tech topic' was prepared that carried the 'key messages' of the communication strategy, i.e. the importance of monitoring and controlling volunteer cotton within the Restricted Zone.

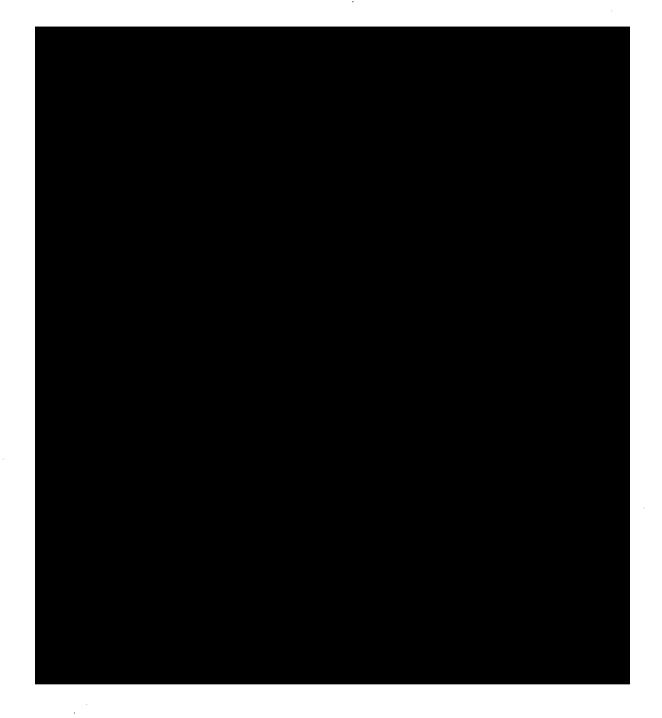
Notices for transporters of ginned GM whole cotton seed into the Restricted Zone were developed to inform transporters of their responsibilities, and signs to attach to loads of cotton seed were printed giving phone numbers to call in case of spillage or misdirection of cotton seed.



# iii) Consultation / informing people of conditions and their responsibilities

The following is a summary of all meeting, letters, emails and phone calls to inform people of conditions and responsibilities associated with the use and transport of ginned GM whole cotton seed within the Restricted Zone.





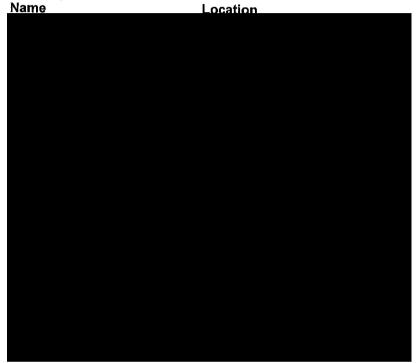


# Cotton gins in Australia

Action

All cotton gins in cotton growing regions in Queensland and New South Wales were sent a letter informing them of the conditions relating to the use and transport of ginned GM whole cotton seed in the Restricted Zone. Cotton gins were requested to contact Monsanto if they were involved in the transport of cotton seed into the Restricted Zone.

Cotton gins that were sent letter





#### 4. Research

i) Survey of feral cotton populations in Queensland (INGARD licence: DIR 022 / 2002)

The licence holder must, in consultation with the OGTR, conduct a survey of feral cotton populations in Queensland and determine their distance from cotton production locations. The survey locations must be based on, but need not be limited to, existing herbarium records of Gossypium hirsutum and Gossypium barbadense. The results of the survey must be reported to the Regulator in the first annual report to the Regulator prepared in relation to this licence.

In response to conditions of the DIR 022 / 2002 licence (INGARD) to provide further information of naturalised populations of *Gossypium hirsutum* and *Gossypium barbadense* in Queensland, please find the following information in **Table 1**:

- Botanical name of naturalised cotton population
- Region Name
- District Name
- Locality
- Latitude / Longitude

These populations of Gossypium hirsutum and Gossypium barbadense have been mapped according to GPS coordinates given in Queensland herbarium records (see Figures 2 and 3).

It is very difficult to determine the distances between the feral cotton populations documented in the Queensland herbarium records, and cotton production locations as GPS coordinates of areas of cotton productions locations have not been recorded. However, **Figure 4** indicates the shires that feral cotton populations occur in (orange) as compared to shires of cotton production (blue). As can be seen (**Figure 4**) documented feral cotton populations occur in only 3 shires where cotton production occurs, and one shire adjacent to a cotton production shire. It is undetermined however, exactly how much distance is between commercial fields of cotton and the feral cotton populations and it is possible that this might be hundreds of kilometres apart. Furthermore, documented populations of feral cotton in northern Queensland (i.e. north of 22° south) indicate that these shires are significantly isolated from shires where commercial cotton production occurs.

# DIR 022 / 2002 & DIR 023 / 2002 ANNUAL REPORT

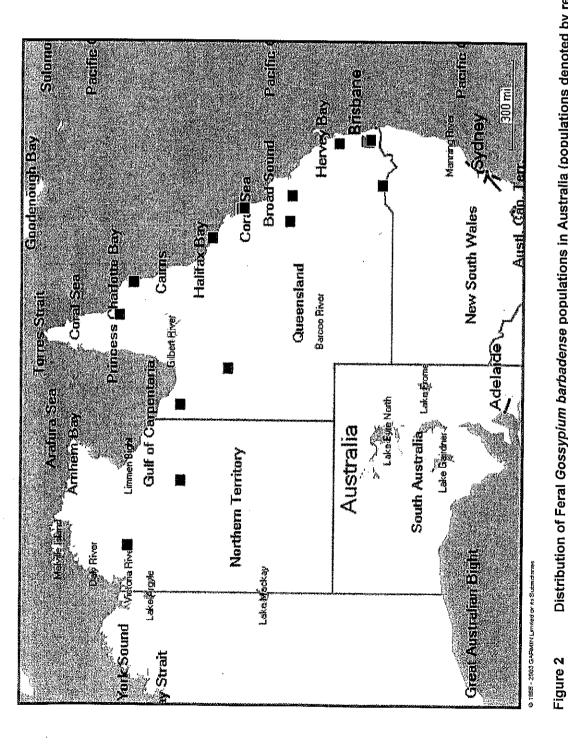
Herbarium data for Gossypium hirsutum and Gossypium barbadense in Queensland Table 1

Sefanteal Marrie	Regions Name	PISHROP NAME	Localific	amude	. Longitude
Gossypium barbadense	Queensland	Wide Bay	Gympie	S26 10 27.00	E152 40 15.00
		(Cooloola Shire)			
Gossypium barbadense	Queensland	Cook	Cooktown	S15 29 53.00	E145 13 33.00
Gossypium barbadense	Queensland	Cook	Cooktown Airport	S15 27 03.00	E145 11 11.00
Gossypium barbadense	Queensland	Cook	Cooktown Botanic Gardens	S15 28 17.00	E145 15 22.00
Gossypium barbadense	Queensland	Cook	Cooktown Airport	S15 27 02.00	E145 11 13.00
Gossypium barbadense	Queensland	North Kennedy	Rita Island, Mouth of Burdekin River	S19 35	E147 35
Gossypium barbadense	Queensland	Cook	South of Endeavour River, North Cooktown	S15 28 30.00	E145 14 30.00
Gossypium barbadense	Queensland	Leichhardt	43 km north of Dingo, towards Nebo	S23 17 51.00	E149 11 19.00
Gossypium barbadense	Queensland	Darling Downs	15km east of Goondiwindi to Yelarbon	S28 29 49.00	E150 24 40.00
Gossypium barbadense	Queensland	Moreton	Warrego Highway Southern Side Footpath, 2 km East of Piepers Road Marburg	S27 34 30.00	E152 35 30.00
Gossypium barbadense	Queensland	Cook	Near Musgrave Station	S14 45	E143 35
Gossypium barbadense	Queensland	Cook	Musgrave Snt River Crossing Cape York Peninsula	S14 45	E143 35
Gossvoium barbadense	Queensland	Cook	Kamerunga (North - North West of Cairns)	S16 55	E145 55
Gossypium barbadense	Queensland	Bourke	Ernest Henry Environmental Research Facility,	S20 26 49.79	E140 4 01.20
			Cloncurry Shire		
Gossypium barbadense	Queensland	South Kennedy	Bucasia Beach, Mackay	S21 02 30.00	E149 09 30.00
Gossypium barbadense	Queensland	South Kennedy	Mackay	S21 13 30.00	E149 10 30.00
Gossypium barbadense	Queensland	Cook	Mabuiag Island Torres Strait (Between airstrip and village)	S9 57 18.00	E142 11 30.00
Gossypium barbadense	Queensland	Cook	Darnley Island Torres Strait	S9 35 58.00	E143 45 48.00
Gossypium barbadense	Queensland	Cook	Musgrave Roadhouse	S14 46 57.00	E143 30 06.00
Gossypium barbadense	Queensland	Bourke	Doomadgee Township	S17 56 42.00	E138 49 42.00
Gossypium barbadense	Queensland	Cook	Kubin Village, Moa Island, Torres Strait	S10 14 06.00	E142 12 54.00
Gossypium barbadense	Queensland	Cook	Mabuiag Island, Torres Strait	S9 57 12.00	E142 11 30.00
Gossypium barbadense	Queensland	Cook	Cooktown Airport	S15 26 53.34	E145 11 10.62
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DIR 022 / 2002 & DIR 023 / 2002 ANNUAL REPORT

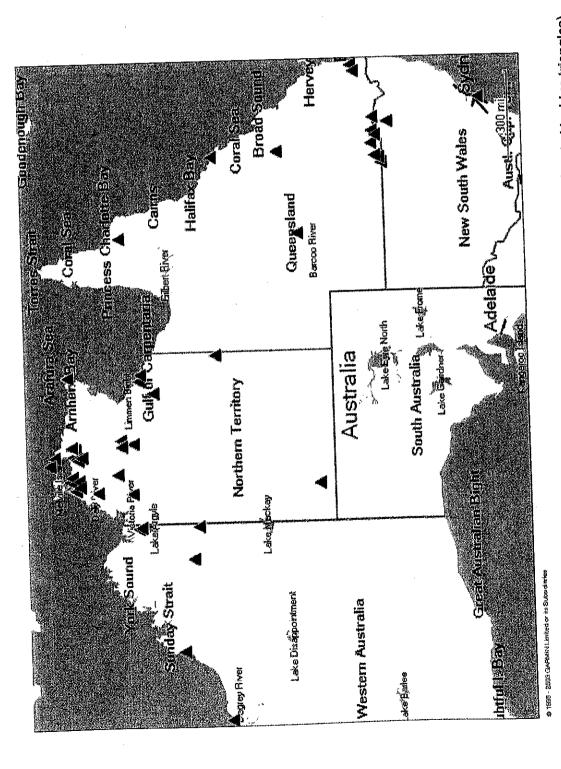
Sittentigal Name	Regionikame	District Marne	Locality	Labiatide	
Gossypium barbadense	Queensland	Port Curtis	1 km East of Edungalba Turnoff, Capricorn Highway	S23 45 30.00	E149 51 30.00
Gossypium barbadense	Queensland	Leichhardt	4 km from Comet on Emerald Road	\$23 36 23.00	E148 30 24.00
Gossypium barbadense	Queensland	Moreton	Flinders Park, 25 km south of Ipswich near	S27 48 30.00	E152 48 30.00
			LIGAL OF CATA		
Gossypium barbadense	Queensland	Moreton	Flinders Peak Crossing, 20 km south of Ipswich	S27 49 30.00	E152 49 30.00
Gossypium barbadense	Queensland	Wide Bay	Gympie	S26 11 30.00	E152 39 30.00
Gossypium barbadense	Queensland	South Kennedy	Mackay	S21 05	E149 15
Gossypium barbadense	Queensland	Moreton	Mt Flinders	S27 45	E152 45
Gossypium barbadense	Queensland	Moreton	Flinders Park, South of Ipswich	S27 49 30.00	E152 49 30.00
Gossypium barbadense	Queensland	Moreton	1 km north of Swanbank Powerhouse Raceview, Ipswich	S27 37 30.00	E152 47 30.00
Gossypium hirsutum L.	Queensland	Darling Downs	20 kms west of Goondiwindi on St George Road	S28 30 08.00	E150 13 25.00
Gossypium hirsutum L.	Queensland	Maranoa	4 kms north of Hebel on road to Dirranbandi	S28 57 45.00	E147 49 36.00
Gossypium hirsutum L.	Queensland	Maranoa	34 kms north of Hebel on road to Dirranbandi	S28 48 28.00	E148 06 13.00
Gossypium hirsutum L.	Queensland	Maranoa	1.4 kms along Cubby Road from Dirranbandi- Bollon Road, 8 km west of Dirranbandi	S28 35 41.00	E148 09 23.00
Gossypium hirsutum L.	Queensland	Maranoa	23 kms north of Thallon along road (Canarvon Highway) to St George	S28 26 21.00	E148 49 37.00
Gossypium hirsutum L.	Queensland	Maranoa	Well River Crossing, Hungerford Bridge, 4.7 kms east from Talwood along Barwon Highway towards Goondiwindi	S28 28 34.00	E149 30 31.00
Gossypium hirsutum L.	Queensland	Moreton	Haigslea, 1 km west on Brisbane-Toowoomba Highway	S27 34 30.00	E152 38 30.00
Gossypium hirsutum L.	Queensland	Cook	Fairview Station	S15 05	E144 05



Distribution of Feral Gossypium barbadense populations in Australia (populations denoted by red squares).

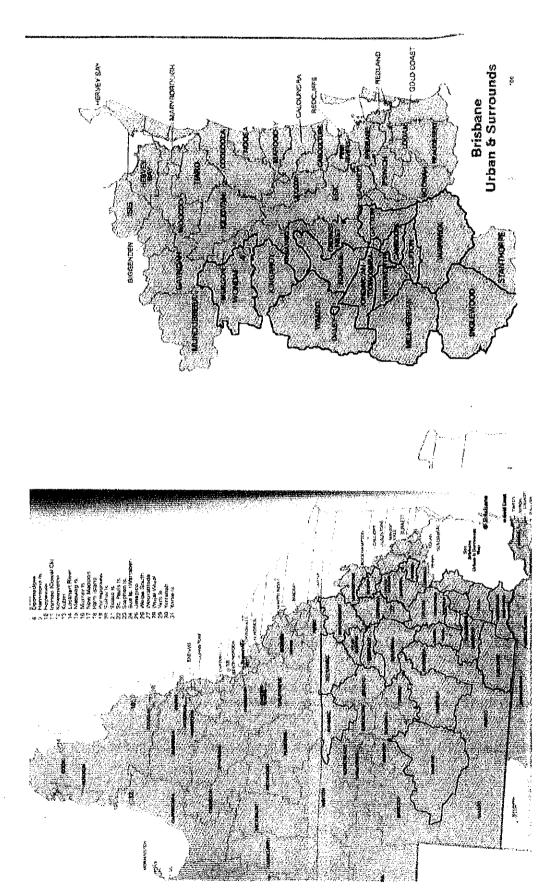
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Distribution of Feral Gossypium hirsutum populations in Australia (denoted by blue triangles)

DIR 022 / 2002 & DIR 023 / 2002 ANNUAL REPORT



Shires where feral cotton populations have been recorded (orange) compared to shires where commercial cotton grown (blue) Figure 4



# ii) Findings of Annual Survey within the Restricted Zone of incidence of volunteer cotton

In order to satisfy licence conditions involving an annual survey of the use and transport of ginned cotton seed as a feed supplement north of 22° south, a survey has been developed that:

- Assesses the incidence of volunteer cotton in areas where stock were fed cotton seed;
- 2) Assesses the incidence of volunteer cotton in areas where stock graze after being fed cotton seed; and
- Assesses the extent to which the document "Stockfeed and Volunteer Cotton in Northern Australia" was effective in its key messages and its distribution.

Please see Stockfeed and Volunteer Cotton in Northern Australia Questionnaire in **Attachment** 

Communication with government personnel in the Northern Territory and northern Western Australia has indicated that from the 2002-03 cotton season, there were no known users of cotton seed as a feed supplement and therefore the survey was only conducted in the areas of the Atherton Tablelands, and Eungella in Queensland.

The strategy involved a number of approaches to survey as many people as possible in regions where livestock may have been fed cottonseed.

People involved in the dairy or beef industry as extension officers, field service officers and business managers were asked to forward the survey on to people who were known to feed cottonseed to their livestock. Only about 5 surveys were distributed as 'key personnel' could only identify as many who fed cottonseed to their livestock.

From this mail out, only two surveys were returned. Both surveys indicated that they used cottonseed to feed livestock, and that they had noticed volunteer cotton plants in areas where they fed livestock however in both cases they indicated that volunteer cotton plants were never observed to reach maturity, flower or set seed. One of these people returning the survey had received "Stockfeed and volunteer control in northern Australia" while the other had not.

In order to reach a wider audience, a phone survey was conducted in the Atherton Tablelands and Eungella regions in Queensland of all those in the Yellow Pages who were listed as farmers. This included a search on all of the following post codes: 4883, 4872, 4885, and 4886. Of 89 phone numbers dialled, there were 40 'no answers'. Of the 49 people who were contacted, 4 people were unwilling to participate in a phone survey, 5 had retired from farming, and 13 did not have livestock. Of the 27 remaining participants, 20 had livestock but did not use cottonseed and 6 had used cottonseed previously but not in the past 12 months. Only one person was recorded as having used cottonseed for livestock feed.

The one person who did feed cottonseed to their livestock had been using cottonseed for approximately 10-15 years. They typically source approximately 20 tonnes from Despite using cottonseed for such a long period of time, they indicated that the small number of volunteer cotton plants that they observed germinating didn't continue to grow to maturity and they had never seen flowering cotton in areas where livestock had been fed cottonseed.



Numbers dialled	89
No answers	40
Using cottonseed	1
Used cottonseed previously (not in last 12 months)	6
Don't use cottonseed	20
No livestock	13
Retired from farming	5
Not willing to participate	4
Total surveyed	49

Therefore, results from the annual survey of the incidence of volunteer cotton in areas where stock are fed whole cottonseed and areas where stock graze after being fed whole cottonseed indicate that very little cottonseed is used as stock feed for livestock. Where cottonseed was fed to livestock, it was never observed to be problematic, or even reach maturity.

# 5. Compliance Management Plan

A Compliance Management Plan for both INGARD® and Roundup Ready® Cotton were provided to the OGTR following issue of the licences and before planting of the GMOs.

# 6. Testing Methodology

Testing Methodologies for both INGARD® and Roundup Ready® Cotton has been provided.

In Confidence

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2/1/2014

Office of the Gene Technology Regulator (MDP54)
GPO Box 9848
Canberra ACT 2601

#### **DIR091 ANNUAL REPORT 2013**

Since the issuing of Licence No.: DIR 091 by the OGTR on the 25 November 2009, Dow AgroSciences Australia Ltd has had nil dealings with WideStrike™ Insect Protection Cotton in Australia.

As per licence condition 32, the following statements are made:

- (a) No adverse impacts, unintended effects or new information relating to risks to human health and safety or the environment have been caused by or found in relation to WideStrike™ Insect Protection Cotton
- (b) WideStrike™ Insect Protection Cotton has not been produced commercially in any state or territory in Australia since the Issuing of Licence No.: DIR 091 by the OGTR on the 25th November 2009.
- (c) WideStrike[™] Insect Protection Cotton has not been produced for experimental purposes in any state or territory in Australia since the Issuing of Licence No.: DIR 091 by the OGTR on the 25th November 2009.
- (d) Nil WideStrike™ Insect Protection Cotton has been fed to livestock north of latitude 22º South in Australia.
- (e) No research of the effects of WideStrike™ Insect Protection Cotton on non-target Insect(s) has been conducted.
- (f) No research on volunteer incidence of WideStrike™ Insect Protection Cotton in areas north of latitude 22° South after livestock feeding has been conducted.

Regards,







LICENCE Number:

DIR 022/2002 and DIR 023/2003

LICENSE HOLDER:

Monsanto Australia Limited

PROJECT SUPERVISOR:

Accreditation No:

ACCR 034/2002

SUBMISSION:

Annual Report for Roundup Ready® Cotton and

INGARD® 2005

REPORTING PERIOD:

21 June 2004 - 20 June 2005

("2004/05 Cotton Growing Season")

DATE:

8 September 2005

PREPARED BY:

Regulatory Product Manager

Information and data submitted herein contains trade secrets, or privileged or confidential information the property of Monsanto Australia Limited and no government agency or representative thereof is authorised to disclose such data and information without written permission from Monsanto Australia Limited.

® Registered trademark of Monsanto Technology LLC

(



# LICENCE HOLDER DETAILS

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Telephone:

03 9522 7102

Facsimile:

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**Accreditation** 

Number:

ACCR 034/2002

# **SCOPE OF THE REPORT**

This report addresses the annual reporting condition of the DIR 022 / 2002 ("The commercial release of insecticidal (INGARD® event 531) cotton") and DIR 023 / 2002 ("Commercial release of herbicide tolerant (Roundup Ready® event 1445) and herbicide tolerant / insecticidal (Roundup Ready® / INGARD® event 531) cotton) licences issued to Monsanto Australia Limited by the Office of the Gene Technology Regulator.

This report details compliance with general and specific conditions of Part 3 of both DIR 022 / 2002 and DIR 023 / 2003.

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Attachment 1

Monsanto Australia Limited. 2004. Roundup Ready cotton: Environmental Monitoring Program. Roadside Monitoring Report.

In Confidence



# I. General Conditions

# a. Informing people of their obligations

The introduction of Bollgard II into the market in 2002, saw the 'phase-out' of INGARD over a period of two years. The period between 21 June 2004 and 20 June 2005 was the first season in which no Technology User Agreements for INGARD were given, nor was any INGARD seed distributed. Growers were informed that INGARD would not be permitted through the Bollgard II / Roundup Ready cotton Technology User Agreement which stated in Clause 3.3 "The Grower must not exploit INGARD technology and/or plant INGARD cotton seed, in compliance with Clause 1(f) of the Licence".

As there was no INGARD planted under the licence DIR 023 / 2002, there were no 'persons covered by this licence' and therefore no persons were informed of conditions of the licence.

Monsanto Australia Limited Informed all cotton growers and cotton gins covered by DIR 023 (Roundup Ready cotton) licence of the obligations imposed on them as a result of the conditions this licence. This was achieved primarily through the Monsanto Accreditation program and information course which includes information on regulatory obligations, as well as management of the crop.

Roundup Ready® cotton Accreditation programs require all persons having management responsibility for Roundup Ready® Cotton crops, to undergo training and pass a test on the content of the training. Growers were only required to attend these courses and pass the accreditation test once, and therefore may have attended these courses prior to the 2004/05 cotton season. 1,293 growers were accredited in regulatory obligations and conditions, and management of Roundup Ready cotton technology in the 2002/2003 season. A further 208 cotton growers attended Roundup Ready accreditation programs in the 2003/04 season and 298 growers and consultants attended Roundup Ready accreditation programs in the 2004/05 season.

Gins known to transport cotton seed into the restricted zone were notified by letter that they were permitted to transport seed north of 22° south provided they adhered to all conditions and obligations associated with the use of cotton seed within the restricted zone.

#### b. Reporting

During the reporting period, the licence holder did not become aware of any additional information related to any risks to the health and safety of people, or to the environment associated with the dealings authorised by either the INGARD® or the Roundup Ready® cotton licence, or of any unintended effects of the dealings authorised by the licence.

During the reporting period, the licence holder did not become aware of any contraventions of either DIR 022 / 2002 or DIR 023 / 2003 by a person covered by the licence.

#### c. Material changes in circumstances

During the 2004/05 reporting period, Monsanto Australia Limited did not become aware of any relevant conviction of the licence holder occurring after the commencement of this licence; any revocation or suspension of a licence or permit held by Monsanto Australia Limited; or any event or circumstance that would affect the capacity of Monsanto Australia Limited to meet the conditions of either Dir 022 / 2002 or DIR 023 / 2002 licences.



# d. Remaining an accredited organisation

At all times, Monsanto Australia Limited remained an accredited organisation and complied with conditions of accreditation as set out in the OGTR Guidelines for Accreditation of Organisations.

### e. Changes to details

# 2. Restrictions on growing of the GMO

The licence holder must not enter into a Technology User's Agreement or any other agreement which would permit the GMO to be grown outside of the traditional cotton-growing areas of New South Wales and Queensland south of latitude 22° south or north of 22° south.

INGARD cotton was not grown in the 2005/05 season.

Roundup Ready[®] cotton was only grown in the traditional cotton-growing regions of NSW and Queensland. More information on the locations where all Roundup Ready[®] cotton was grown during the 2004/05 cotton growing season are given in **Part 2a**.

# a. Crop plantings of Roundup Ready® cotton

# i) Conditions for Growing Crop

Sales and planting of Roundup Ready[®] Cotton were undertaken under a Technology User Agreement (TUA), which sets out the conditions for planting and growing the crop. In order to be eligible to sign such an agreement, a grower was required to attend a Roundup Ready[®] Cotton accreditation program, and pass a test based on the material covered in the accreditation program.





# ii) Crop Locations

In the tables below, all fields in which Roundup Ready® cotton was grown are listed by TUA and Farm Unit. Note that locations are sorted by valley, with the approximate boundary of each valley, described at the start of each listing.

Valley:

Bourke (NSW/QLD)

Boundaries:

West of Walgett Shire, north of Coolahbah. Includes Cunnamulla in

Queensland.

**Crop Locations:** 

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	36.8
	210.6
	370.3
	294.4
	227
	653.5
The state of the s	159.3
	867.9
	86.5
	484
	484.9
	28.6
	202.5
	163.1
	86.7

Valley:

Darling Downs (QLD)

Boundaries:

Follows the Condamine River. Includes Toowoomba, Murgon, Dalby,

Chinchilla, Condamine and Roma. South-west boundary is Surat.

TÜA number as Rama üdekland 💸 Rovins	Alger(GE)
	39.6
	35.5
	67:7
	277
	191
	199
	85.3
	42.5
	183
	67.5
	78.2
	16.3
	99.9
	16.1
	25.9
	140
	168.8

Fleices hownished seem United and the seem of the seem	Area (Ha)
	20.2
	70
	107.2
	314
	218.4
	13
	70.6
	241
	56.5
	55.8
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	38
	56.7
	61.1
	133.1
	84
	25.5
	167
The second to th	160.8
	40.4
	46.4
	90.9
	122.1
	76
	146.4
	234.8
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	8 <b>2.</b> 7
	42
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	40
	101.7
	439
	96,2
	132.1
	64 42
	20
	142.5
	110.5
	43.1
	3.6
	95
	40

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A TABLET HER THE SECTION OF THE SECT	42
	336.5
	336,3
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The state of the s	79.7
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	110 117
	41
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MARTH	48
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	435.3
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	107.0
	147.5
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	42.1
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	48.7

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			91.9
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			ا میده
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		-	127.7
		-	26.5
			155
			368
			81.6
			134.7
			25.9
			62.6
			. 52



Valley: Dawson/Callide (QLD)
Boundaries: Includes Taroom, Biloela, Moura and Theodore regions.
Crop Locations:

TUA	number : (SepinUn	(ANEmic)	afilalia alinvialidateisejs Lijovia	er Aten((fila))
				85.8
				46.8
				201.2
				158.2
				145.6
				155.7
				188
				224
				209.9
				295.7
				128.1
····				247
				216
				382.4
				35
				84.4
				8.5
				251
				106,9
				79.3
				30.2
				105
				20
				36
				242.7
				,,,,,
				240.2 24.5

Dirranbandi (QLD)

Runs north toward St George and includes Lower Plains, follows south along the Balonne River right down to NSW border. Boundaries:

**Crop Locations:** 

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3/10/20/36/60	
	9615
	946.7
	430
	231.1
	603.6
	94
	235.8
	228
	290
	78.7
	307.4

Valley:

**Boundaries:** 

Emerald (QLD)
South-eastern boundary formed by the Expedition Ranges between Rolleston and Bauhinia. Region runs north-west from there to include Emerald and

Dysart.

TEUA numpers FarmsUnitiNar	Hields in Which crops The Att sprown
	TO TAN D TO 14 10 358,5
	112
	70.2
	70.4
	87.1
	337
	150
	51
	498
	70.6
	191
	13.5
	57.5
	222.2
	367.1
	171.8

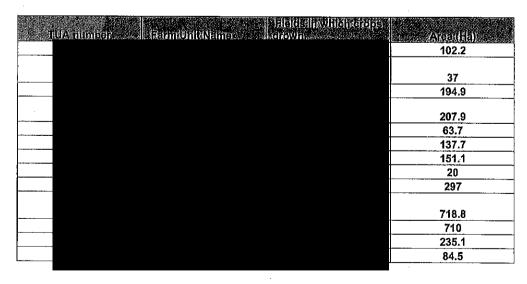
	\$  #1
taleltelinväildireitope व्यक्तिमामान्य विकासमान्य स्थापना	Aken(H)
	229.8
	229.8
	350
	294.6
	207
	229.5
	136.3
	61.6
	39.4
	48.6
	617.8
	145.3
	253.9
	200.9
	181.9
	41.1
	235.4
	63
	76
	92
	27
<u></u>	263.6
	167.3
	351.3
	92.5
	477
	1 411

Gwydir (NSW)

Boundaries:

South of Fox Lane, north-west to Garah, west to Collarenebri, south to Bellata. The road that runs east-west through Bellata and to Rowena is the

southern boundary.



Figlistowijidheigis TUAnnymber FanntuhliaDama dievyn	
ite Assumbar garini Unification gricovin	A Area (Ha)
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	128.7
	142.9
	78.4
	329
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	510.2
	78.4
	158.7
	273
	222.2
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	134.3
	183.1
	35.7 198
AN AND ALL AND AND	198
	1317
	78.7
*** *** *** *** *** *** *** *** *** **	10.7
	668.2
	67.4
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	373.7
	65
	352.1
	328
	320
	678.3
	186.2
	142.9
	142,8

TUA number: Farmilitikinama. amenyaliki hawiildirektopa	Zive(He)
The state of the s	245.6
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	166.4
	261.4
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	644
	210.7
	99
	173.3
	370.5
	218.9
	181
	111.5
	82
	141.5
	389.4
16th was recomme	84
	1404.2
	254.1 172.9
	84.3 308.2
	308.2
	262.2
	252.4
	227
	189
	75
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	150.5
	178
	715.4
	263.7
	359
	49.2

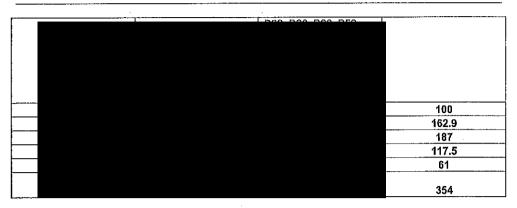
Boundaries:

Lachlan (NSW)

Northern boundary is Peak Hill and Tullamore and the cotton follows the Lachlan River through to Booligal. The southern boundary is the road from Booligal through to Gunbar and then follows the Great Western Hwy through

to West Wyalong.

TUA:number: Färm Unli Name Grown	Aidd((Ha))
	188
	299
	147.8
	121.6
	31.2
	2603



Valley: Boundaries:

Lower Namol (NSW)
North-west of Baan Baa-Manilla Road and south of Bellata-Rowena Road.

Western boundary is formed by the road that runs from Pilliga via Burren Junction to Collarenebri.

Fleidslinwinien gro- mworier dann Uniternation (1997)	R <u>B</u> Arga (Ha)
	169.2
	115.3
	87.8
	92.6
	121.5
	152.2
	101.7
	86.8
	44.2
	227.8
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	120.6
	178.3
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<del></del>	48.4
	115.1
	358.6
•	144.3
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	232
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	188.6
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	389.9
	79.9
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	198
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RUASiumbak JarimulillaNima jekovaj.	(A) open(fals)
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	175
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	850.9
	104.9
	92.3
	118.7
the state of the s	56
	244.7
	45
	305.7
	204.4
	331.1
	129.2
	161.1
	39.9
	212.6
	255.9
	209.4
	55.1
——————————————————————————————————————	48.3
	103.7
	103.7
	3407.9
	250
	136,6
	81.5
	66
	54.4
	186.8
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iduAynymber Raynddhildhine grewn	AYORI((HF)
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	69.7
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	ima a
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Fatin Williams State Turn The Tale of the	Avereg(#ED)
	280.5
<u> </u>	76.4
	106.4
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	759.2
	290.5
	307
	30

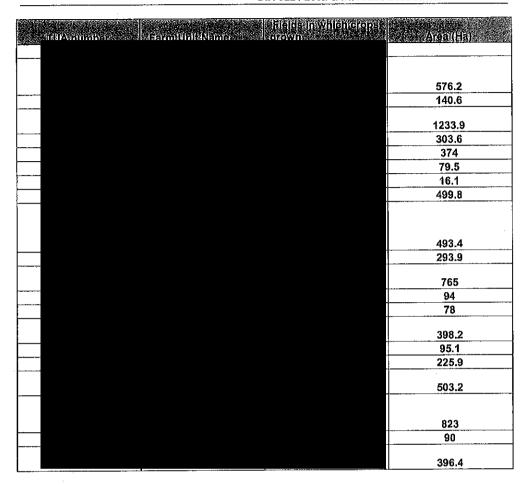
Boundaries:

Macintyre (NSW / QLD)

North of Gwydir, western boundary is Garah to Talwood Road north to include Moonie and east to include Texas. Southern boundary is Foxes Lane, which runs Garah back to the Newell Hwy and then along to Croppa Creek,

Yallaroi and Coolatal.

		Halalidatinavidlelikotopsi kaliovin	
a នៅក្នុកស្រួយប្រជាជា	l Jacima bilayemo	el@wii	Wich(Sh)
			104.2
			95
			97
			65.3
			123.6
			158.2
			390.9
			920.3
			267.2
			268.8
			-
			584
			174
			451.3
			567
			55
			115.2
			64.2
			601.8
			748
			937.7
			42
			326.6
			574.8
			··-



Boundaries:

Macquarie (NSW)
Dubbo and south to Peak Hill. West to Tuliamore. North through Tottenham.
Nyngan and Coolabah, then east via southern boundary of Walgett shire to Pilliga and then south back to Dubbo via Coonabarabran.

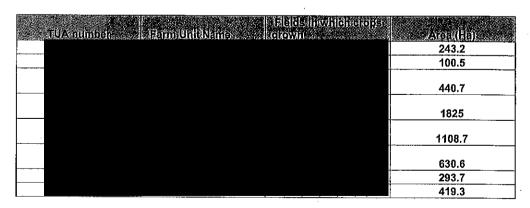
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			87.7
			132.9
			174
			353.2
			291.8
			327,5
			50.4
			101.7
			174.3
ļ			78
<del></del>			· · · · · · · · · · · · · · · · · · ·
			456.5
			69.3
			126

IrlahistikWilleliterope	zarn(Re))
NAVAMERREE OCTION AND AND AND AND AND AND AND AND AND AN	76,5
	37.7
	110
	110
	154.3
	179.2
	70.4
	198.6
	329.9
	93.8
	147
	45
	161.8
	246.2
	81.2
	46.6
	71.1
	184.8
	82
	42
	•••
	490
	342.2
	90.1
manuscopenia de april	158.7
<u>-</u>	238.2
	98
	34
	29.9
	50
	118
	57.5

Boundaries:

Mungindi (NSW / QLD)
West of Garah and Boomi Road to Talwood and follows Barwon River southwest of Mungindi towards Collarenebri. Southern boundary is the

Watercourse Road from Colly through to Gingham and then to Garah.



អង្គបានប្រកាសម្រាប់ក្រុម នៃបានប្រកាសម្រាប់ក្រុម និងស្វាប់ក្រុម និងស្វាប់ក្មាប់ក្រុម និងស្វាប់ក្រុម និងស្វាប់ក្	e Ama(Ea)
	99.4
	267
	105.9
	268.3
	94
	185
	748.5
	683.1
	217.9
	86
	37
	204.4
	232
	577.4
	152
	84

Vailey: Boundaries:

Murrumbidgee (NSW)
Northern boundary is the Great Western Hwy from West Wyalong through
Goolgowi to Gunbar, from Gunbar west to Booligal on the Lachlan River.
Downstream of Booligal on the Lachlan and south-west is the Murrumbidgee

River.

FUARNIMIDER FARMUNITENAME GROWN	DB E AYOn (Ha)
	795
	628
	529.2
	124.7
	115
	125.7

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Valley: Boundaries:

St George (QLD)
Above Lower Plains on the southern side and north-east to include majority of Waroo Shire with the north-east boundary being Surat.

ista nemeers ist janushiistaan ka jirkiin viitistu orajes istovia	<u>Accental)</u>
	162.2
**************************************	102.2
	393.6
	224.1
	££4.1
	Ì
	360.3
	256.5
	131.3
	33
	324.7
	70.9
	182.5
	32
	26.9
	37.2
	209.3
- Markethouse services	71.2
	74
	245.9
	121.6
	282.1
	79
	95.6
	312.6
	247.3
	278.2
	200
	200
AMAZA AND	241,4
	Z41,4
	204.5
	156
	105
	134.3
	253.5
	33
	29.7
	83
	145.7
	104.5
	107.0



Valley: To Boundaries: For Crop Locations: Tandou (NSW) Farms based on Lake Tandou.

gijØKAmitmber	Farm Unit Name 👀 🔻	ៅដី <b>ទៅជនរវាល់ពីថ្ងៃកែ</b> ទទ្ធន ទៅទីមាន	A SAreja (Ha)
			480

Valley: Boundaries:

**Upper Namoi (NSW)**South-east of Baan Baa-Manilla Road. Includes Coolah, Merriwa, Mullaley,

Gunnedah and Quirindi.

## **Crop Locations:**

Filaldis in while he described the state of	Area (Ha)
10 page of the last the case of the second of the case	510.6
	173.3
waterwise the second se	
	502.5
	295.6
	333.4
	173
	1/3
	572.7
	222.2
	144.6
	718.9
ALAMAN AND AND AND AND AND AND AND AND AND A	43.8
	152
- series access?	,
	215.2
	200 7
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water and the second se	22.1
	232.6
	LVLIV
	178
	26.4
	125.5
	114.5
	460.2
	220
	145.6
	391.6
	31.8
	88.1

## DIR 022 / 2002 & DIR 023 / 2002 ANNUAL REPORT

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102 135.2 39.4 (245.3 375.3 219.6 68.3 1334.5 150.8 40.5 109.3 205.5 108.6 58.6	- proper
135.2 39.4 245.3 375.3 219.6 68.3  1334.5 150.8 40.5 109.3 205.5 108.6 58.6	
39.4 ( 245.3	
245.3 375.3 219.6 68.3  1334.5 150.8 40.5 109.3 205.5 108.6 58.6	
375.3 219.6 68.3 1334.5 150.8 40.5 109.3 205.5 108.6 58.6	
219.6 68.3 1334.5 150.8 40.5 109.3 205.5 108.6 58.6	
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34	

Valley: Boundaries:

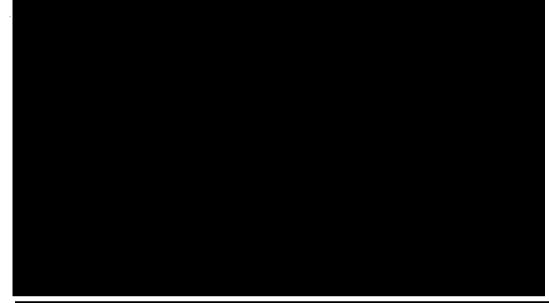
Walgett (NSW)
Includes almost entirety of Walgett Shire, with eastern boundary being the road that runs south from Collarenebri to Burren Junction.

**Crop Locations:** 

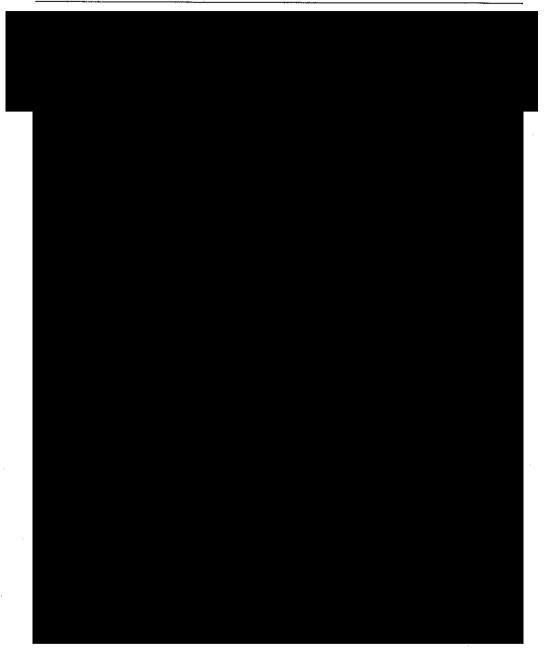
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	117.7
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	297
	303

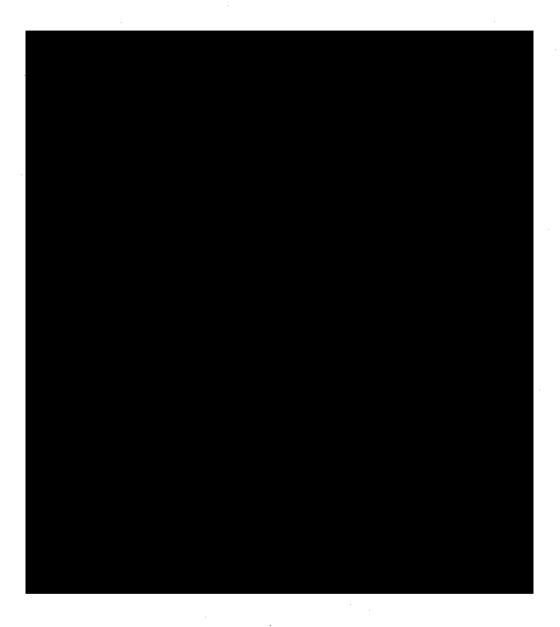


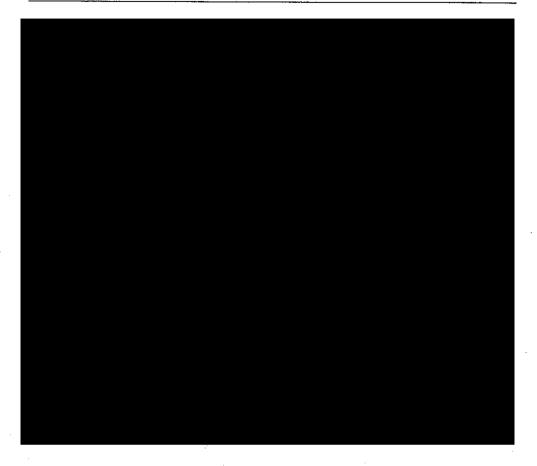
- 3. Transport and use of GM whole cotton seed in the Restricted Zone
- i) Background

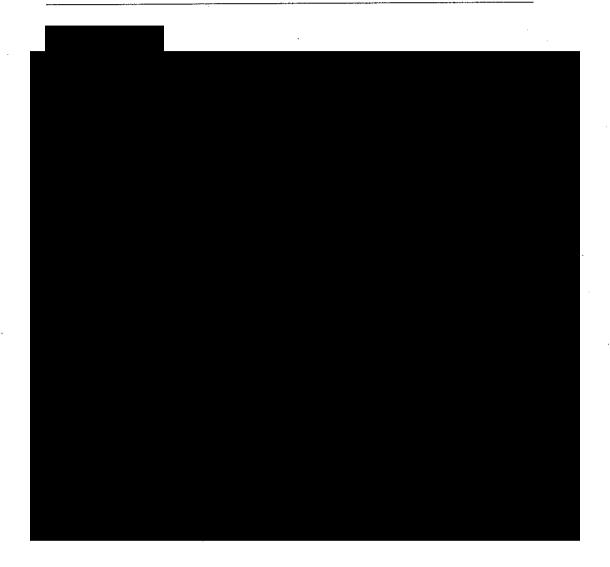




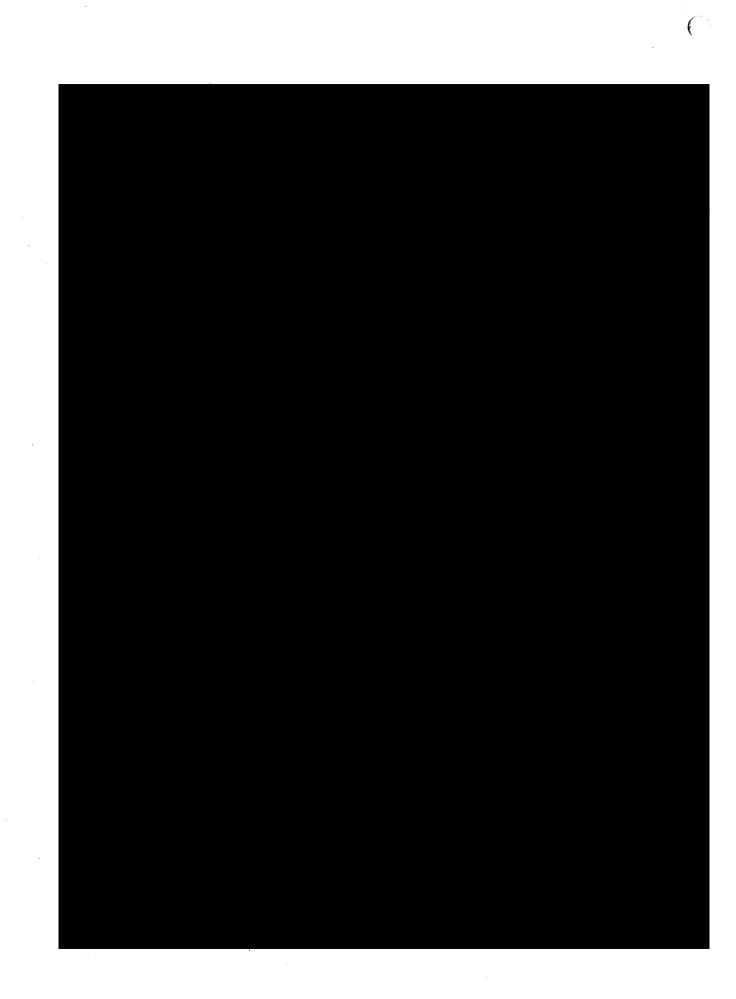




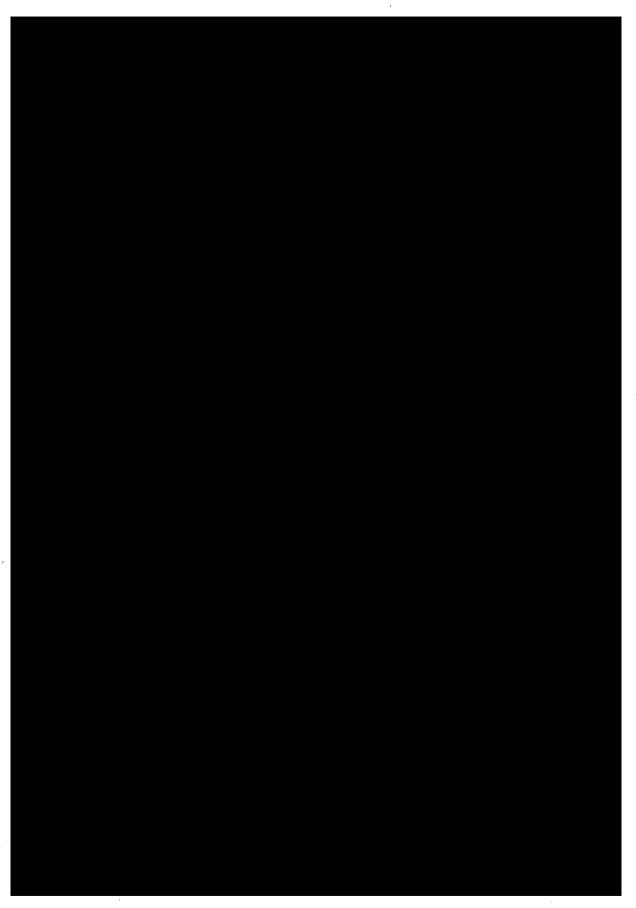


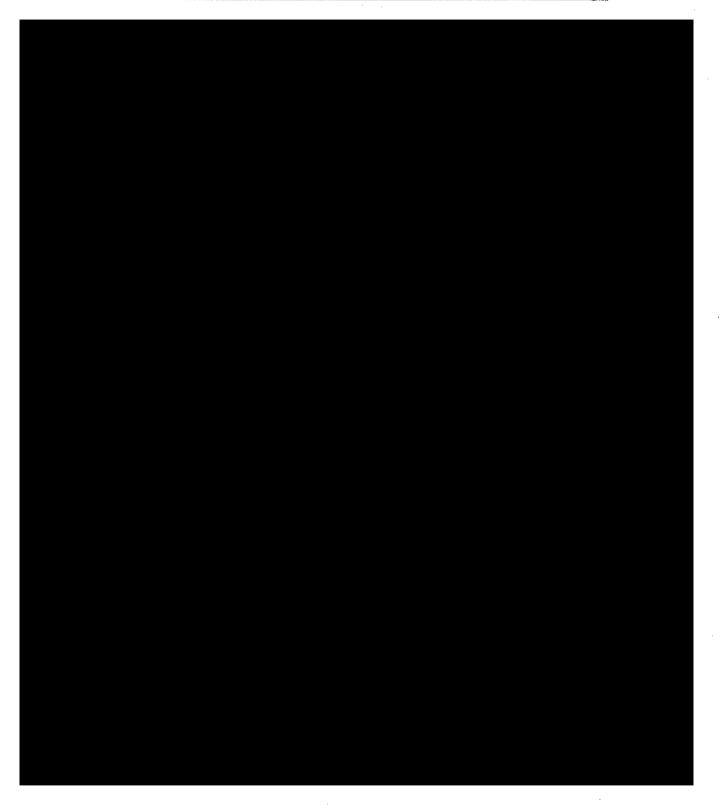




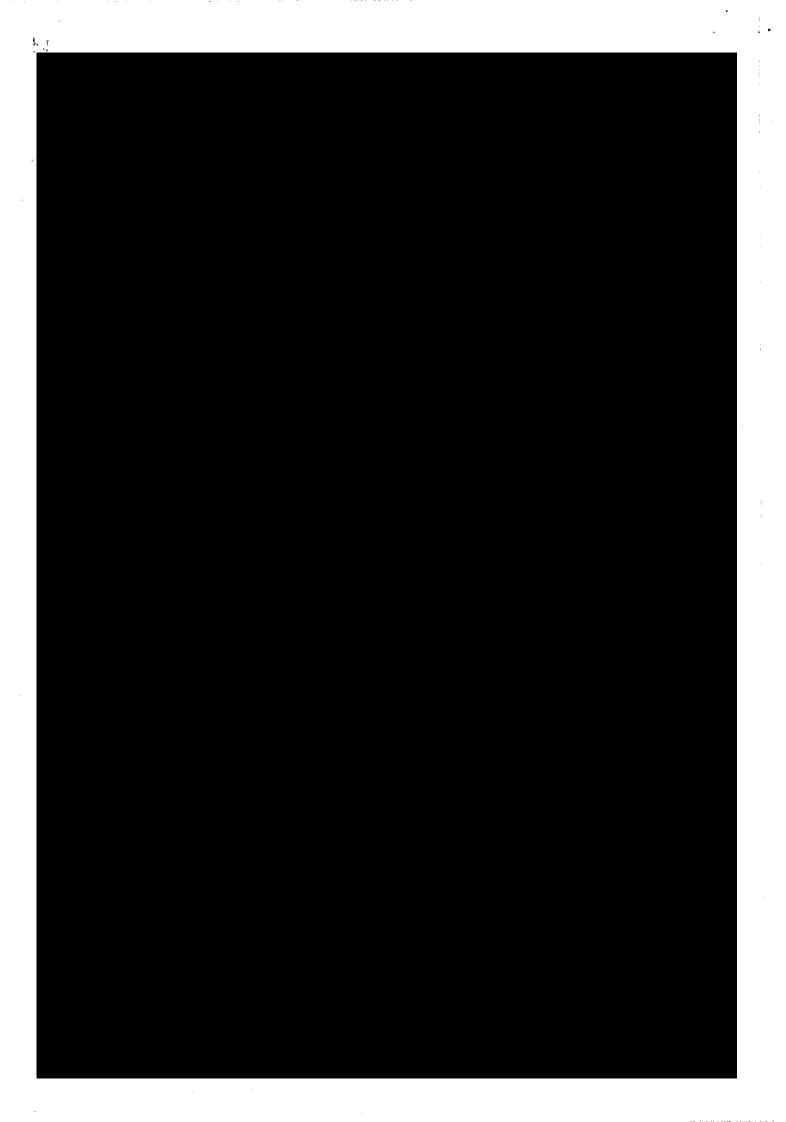


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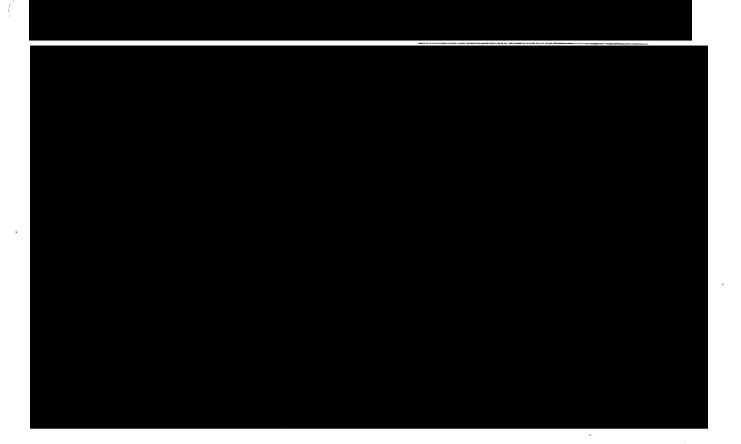


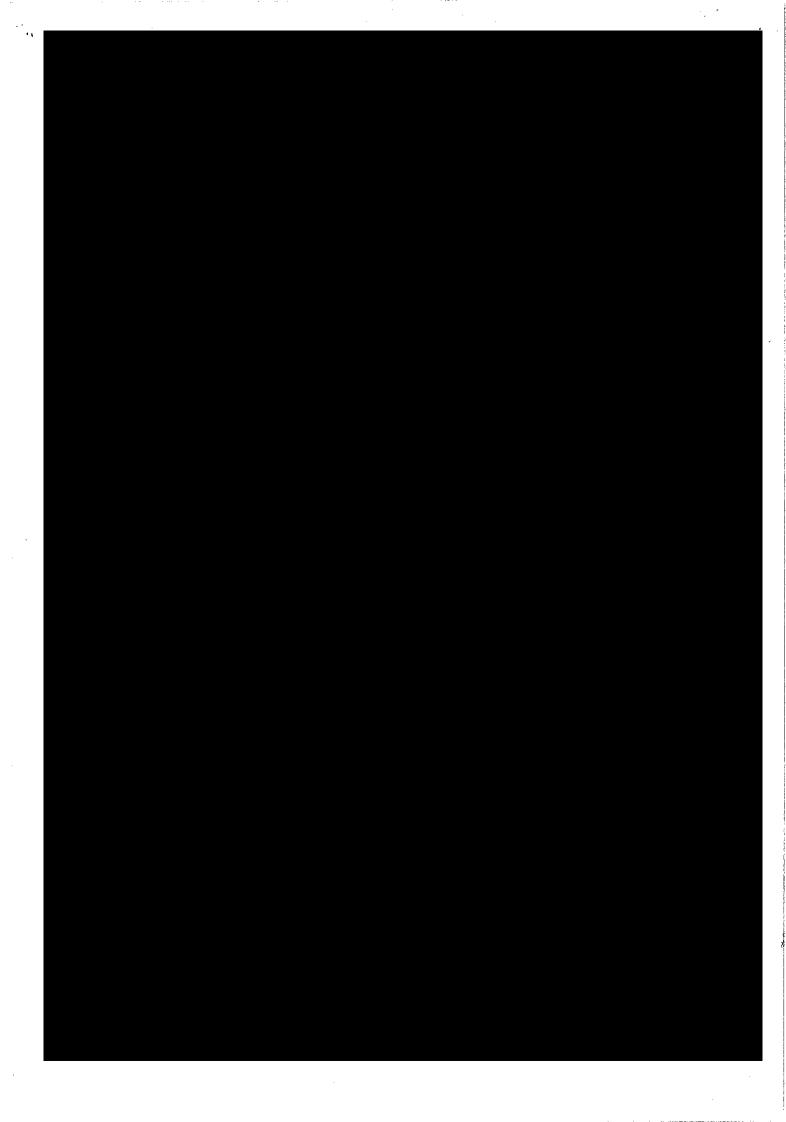
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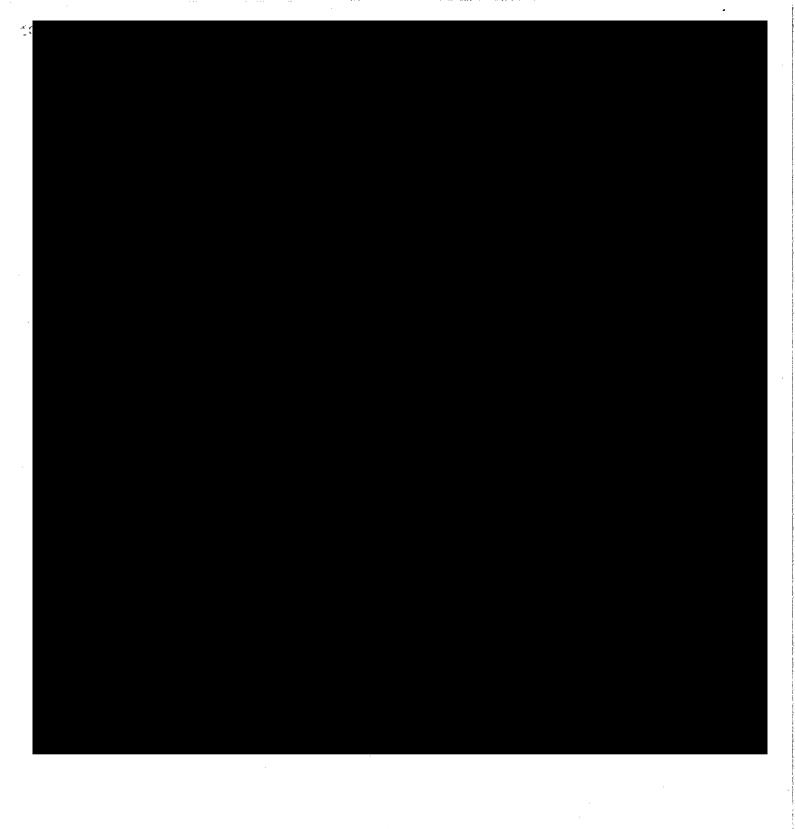


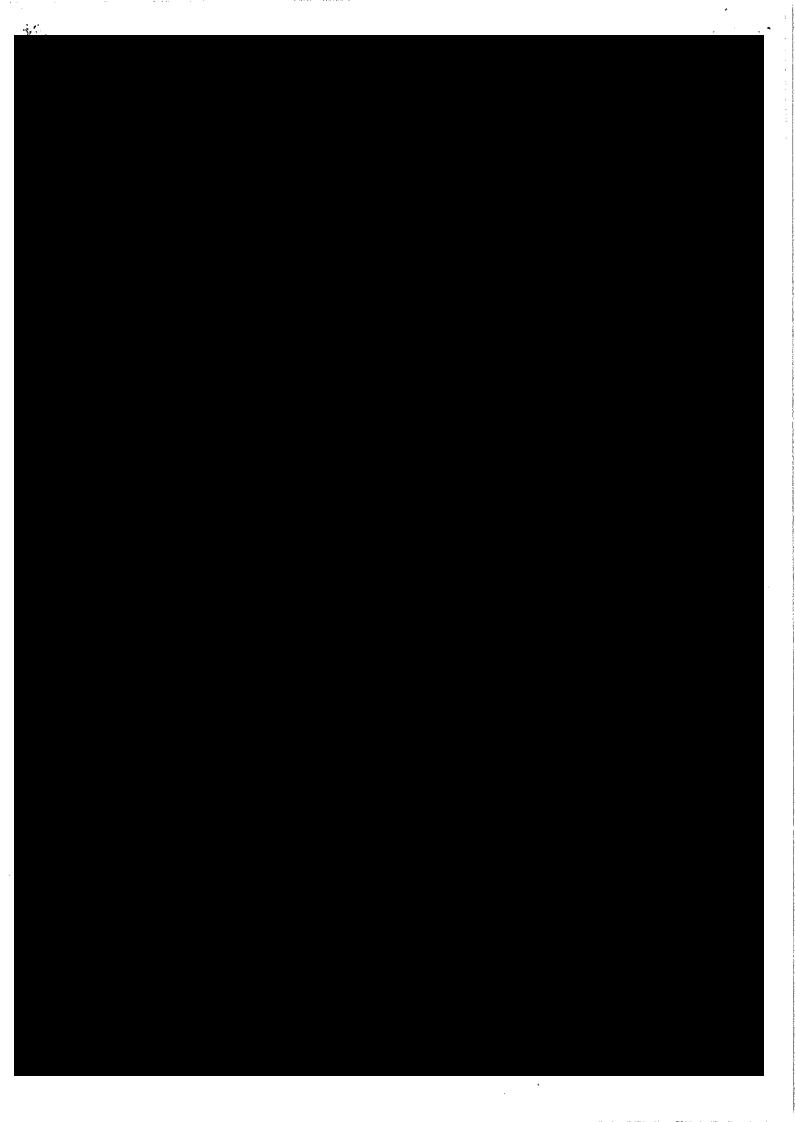












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Licence Number	DIR118
Licence Holder	Monsanto Australia Ltd
Accreditation Number	ACCR 034/2002
Submission	2015 Annual Report for the Commercial Release of GM herbicide tolerant (Roundup Ready Flex® MON 88913) pima cotton in Australia
Reporting Period	1 June 2014 – 1 June 2015
Date	30 June, 2015
Prepared By	

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## Section 1 - Licence Holder Details

Name Monsanto Australia Limited

Address Level 12

600 St Kilda rd Melbourne Victoria 3004

**Telephone** (03)9522 7122 **Facsimile** (03)9522 6122

**Contact email** 

Accreditation Number ACR 034/2002

### Scope of the Report -

This report addresses the annual reporting conditions of the DIR118 commercial licence for the release of GM herbicide tolerant (Roundup Ready Flex® MON 88913) pima cotton in Australia, issued to Monsanto Australia Limited by the Office of the Gene Technology Regulator (OGTR).

This report details compliance with the general and specific conditions of sections 2 and 3 of the DIR118 licence as issued to Monsanto on the 16 August 2013.

This report covers the period of time between the 1 July 2014 and 30 June 2015, which includes the 2014/15 cotton growing season.

### Section 2 - General Conditions

#### **Duration of the Licence**

DIR118 has not been cancelled, suspended or surrendered.

#### Holder of the Licence

Monsanto Australia Limited (Monsanto) is the holder of the licence.

### **Project Supervisor**

is the project supervisor.

## Persons covered by this licence

All persons covered by this licence are all persons in Australia.

## Informing people of their obligations

Monsanto Australia Limited informs all GM herbicide tolerant (Roundup Ready Flex® MON 88913) pima cotton growers covered by the DIR118 licence of the obligations imposed on them as a result of the conditions of this licence. This is primarily achieved through Monsanto grower training which includes information on regulatory obligations.

### Licence holder to notify of circumstances that might affect suitability

During the reporting period, Monsanto Australia did not receive a relevant conviction occurring after the commencement of this licence; nor was there any revocation or suspension of a licence or permit held by Monsanto Australia Ltd under a law of the Australian Government, a state or a foreign country, being law relating to the health and safety of people or the environment; or any event or circumstance occurring after the commencement of the licence that would affect the capacity of Monsanto to meet the conditions of the DIR118 licence.

Monsanto acknowledges that it must provide information related to their ongoing suitability to hold a licence when requested to do so in writing by the regulator and must provide the information within a time frame stipulated by the regulator.

### People dealing with the GMO must allow auditing and monitoring of the dealing

Monsanto acknowledges that if a person is authorized 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 to enter premises where the dealing is being undertaken for the purposes of auditing or monitoring the dealing.

### Remaining an accredited organization

At all times, Monsanto remained an accredited organization and complied with the conditions of the accreditation as set out in the OGTR guidelines for accreditation of organizations.

## Additional Information given to the Regulator

During the reporting period, Monsanto did not become aware of additional information as to any risks to the health and safety of people, or to the environment, associated with the dealings authorized by the licence; or of any unintended effects of the dealings authorized by the licence.

Monsanto was not requested by the Regulator, during the reporting period, to collect or provide additional information about any matter to do with the progress of the dealings authorised by DIR118.

# **Section 3 - Growing the GMO**

## 3.1 GMOs covered by this Licence

The only dealings with GMOs under this licence were those with the GMO described in attachment A of the DIR118 licence

## 3.2 Permitted Dealings

During the period of this report, only dealings with the GMO authorized were permitted

- 3.3 Commercial Volumes of GM herbicide tolerant (Roundup Ready Flex® MON 88913) pima cotton grown in each State and Territory
  - 3.3.1 Total commercial GM herbicide tolerant (Roundup Ready Flex® MON 88913) pima cotton grown in the period 1 July 2014 to 1 July 2015 Summary

STATE	Total ha
Victoria	0
New South Wales	0
Western Australia	0
Queensland	0
Total ha	0

- 3.4 Trial Volumes of GM herbicide tolerant (Roundup Ready Flex® MON 88913) pima cotton grown in each State and Territory
  - 3.4.1 Total trial GM herbicide tolerant (Roundup Ready Flex® MON 88913) pima cotton planted in the period 1 July 2014 to 1 July 2015 Summary

STATE	Total ha	
Victoria	0	
New South Wales	0	
Western Australia	0	
Queensland	0	
Total ha	0	

# 3.4 Annual Surveys

No other information on the progress of the release of the GMO, including annual surveys, was required to be submitted during this annual reporting period under specific condition 17(d) of DIR118.

# Bayer CropScience

## **BioScience**



18 November 2010

Office of the Gene Technology Regulator MDP 54, GPO Box 9848 CANBERRA ACT 2601

Attention:

**Application Entry Point** 

Dear Sir/Madam,

Bayer CropScience Pty Ltd 391-393 Tooronga Road East Hawthorn Vic 3123 . Australia Tel. +61 3 9248 6888 Fax +61 3 9248 6800 A.B.N. 87 000 226 022 www.bayercropscience.com.au

### Annual Report for DIR062/2005 for the year 8 August 2009 to 7 August 2010

I refer to the requirements of the above licence (*viz.* Condition No. 20), to provide the OGTR with an annual report within 90 days of the licence issue date anniversary.

During the period of 8 August 2009 to 7 August 2010, commercial quantities of approximately 1,965 ha of cotton-containing Liberty Link technology were planted in Australia. Seed production plantings equalled 50.4 ha and small-scale field trials of 1.17 ha total were conducted by CSIRO.

During the reporting period, no adverse effects were observed or reported to us as a result of dealings with Liberty Link or LLCotton25/Bollgard II cotton under licence DIR062/2005.

Yours sincerely, Bayer CropScience



Regulatory Affairs Manager BioScience



Dow AgroSciences Australia Ltd Level 5, 20 Rodborough Road, Frenchs Forest NSW 2086, Australia Tel: +61 2 9776 3400 Fax: +61 2 9776 3435 Toll Free: 1800 700 096 Postal: Locked Bag 502, Frenchs Forest NSW 2088, Australia www.dowagrosciences.com.au ABN 24 003 771 659

17 February 2016

Office of the Gene Technology Regulator (MDP54)
GPO Box 9848
Canberra ACT 2601

### **DIR091 ANNUAL REPORT 2015**

Since the issuing of Licence No.: DIR 091 by the OGTR on the 25 November 2009, Dow AgroSciences Australia Ltd has had nil dealings with WideStrike™ Insect Protection Cotton in Australia.

As per licence condition 32, the following statements are made:

- (a) No adverse impacts, unintended effects or new information relating to risks to human health and safety or the environment have been caused by or found in relation to WideStrike™ Insect Protection Cotton
- (b) WideStrike[™] Insect Protection Cotton has not been produced commercially in any state or territory in Australia since the issuing of Licence No.: DIR 091 by the OGTR on the 25th November 2009.
- (c) WideStrike™ Insect Protection Cotton has not been produced for experimental purposes in any state or territory in Australia since the issuing of Licence No.: DIR 091 by the OGTR on the 25th November 2009.
- (d) Nil WideStrike™ Insect Protection Cotton has been fed to livestock north of latitude 22° South in Australia.
- (e) No research of the effects of WideStrike™ Insect Protection Cotton on non-target insect(s) has been conducted.
- (f) No research on volunteer incidence of WideStrike™ Insect Protection Cotton in areas north of latitude 22° South after livestock feeding has been conducted.



LICENCE No:

DIR 012/2002

LICENCE HOLDER:

Monsanto Australia Limited

PROJECT SUPERVISOR:

**ACCREDITATION NO:** 

ACCR 034/2002

SUBMISSION:

2003 Annual Report for Bollgard II®

(Commercial Release)

**REPORTING PERIOD:** 

2002/03 Cotton Growing Season

DATE:

22 December 2003

PREPARED BY:

Regulatory Affairs Associate

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## LICENCE HOLDER DETAILS

Name:

Monsanto Australia Limited

Address:

600 St Kilda Road, Melbourne 3004

PO Box 6051

St Kilda Road Central, Melbourne Victoria 8008

Telephone: Facsimile:

03 9522 7102

03 9522 6102

Contact email:

**Accreditation** 

Number:

ACCR 034/2002

## SCOPE OF THE REPORT

This report addresses the annual reporting condition of the DIR 012 commercial release licence for Bollgard II® issued to Monsanto Australia Limited by the Office of the Gene Technology Regulator.

This report details compliance with general and specific conditions of the DIR 012 licence as issued to Monsanto Australia Limited on 23 September 2002, and varied in June and September 2003.

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## General Conditions

# a. Informing people of their obligations

In the 2002/03 cotton growing season, Monsanto Australia Limited informed all cotton growers, cotton gins, and site compliance managers covered by the DIR 012 licence of the obligations imposed on them as a result of the conditions of this licence.



### b. Reporting

During the reporting period, the licence holder did not become aware of any 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 of any unintended effects of the dealings authorised by the licence.





### c. Material changes in circumstances

During the 2002/03 reporting period, Monsanto Australia Limited did not become aware of any relevant conviction of the licence holder occurring after the commencement of this licence; any revocation or suspension of a licence or permit held by Monsanto Australia Limited; or any event or circumstance that would affect the capacity of Monsanto Australia Limited to meet the conditions of the DIR 012 licence.

## d. Remaining an accredited organisation

At all times, Monsanto Australia Limited remained an accredited organisation and complied with conditions of accreditation as set out in the OGTR Guidelines for Accreditation of Organisations.

## e. Changes to details

The contact details of the Project Supervisor did not change during the reporting period.

## f. Testing methodology

Under conditions of the licence, Monsanto Australia Limited was required to provide the Regulator with a method capable of reliably detecting the presence of the GMO.

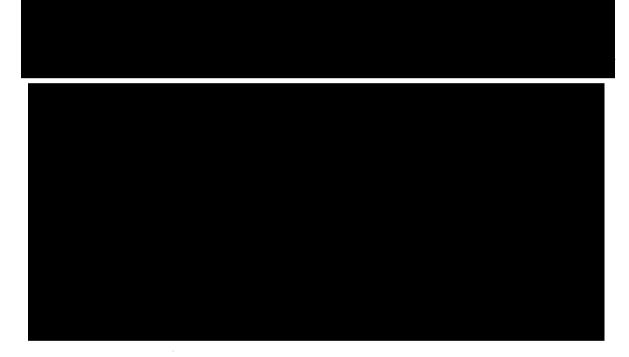
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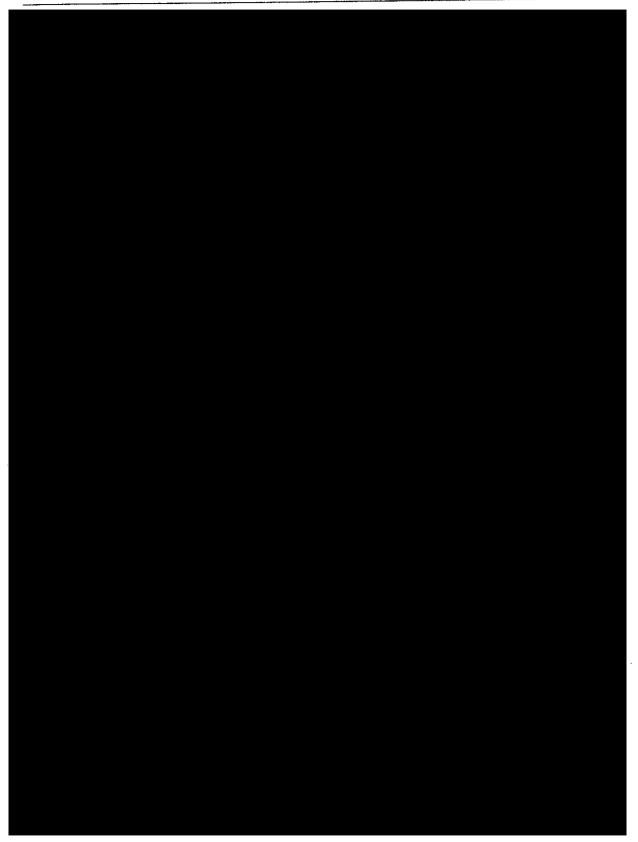
# 2. Release of Bollgard II® south of latitude 22° south (outside the Restricted Zone)

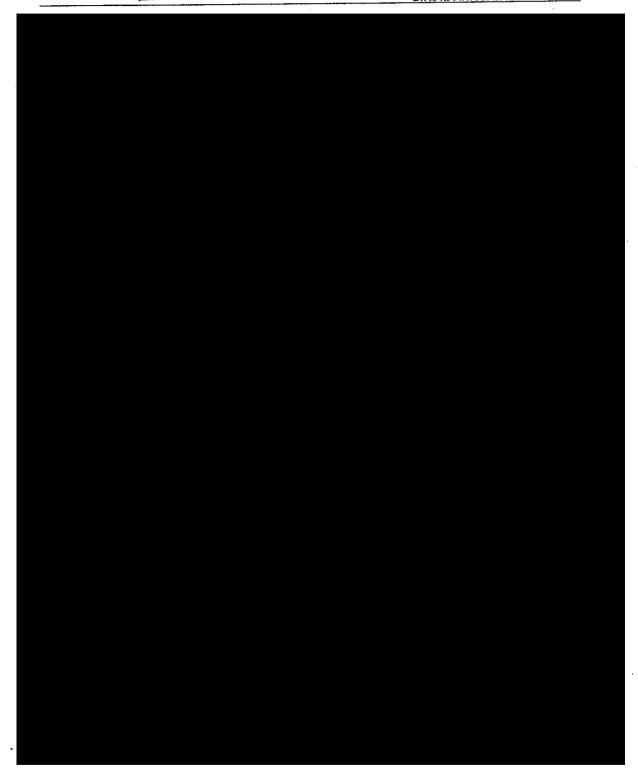
Monsanto Australia Limited was granted a licence to commercially release Bollgard II in areas south of latitude 22° south on 23 September 2002. However, in the 2002/03 cotton growing season, only eighty commercial Bollgard II sites were planted in areas south of 22° south due to the need to obtain regulatory approval from the Australian Pesticides and Veterinary Medicines Authority (APVMA) (formerly the NRA) before a wide scale release was possible. (Sites planted in the 2002/03 season were planted under APVMA permit number PER5707.)

3. Release of Bollgard II® north of latitude 22° south (within the Restricted Zone)



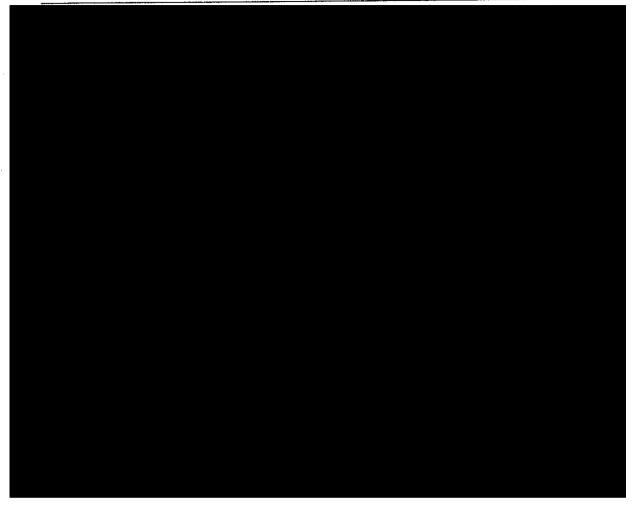






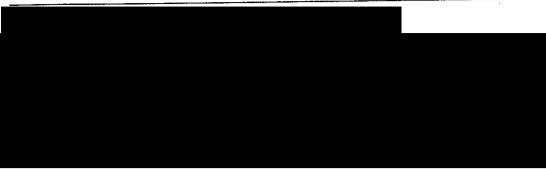
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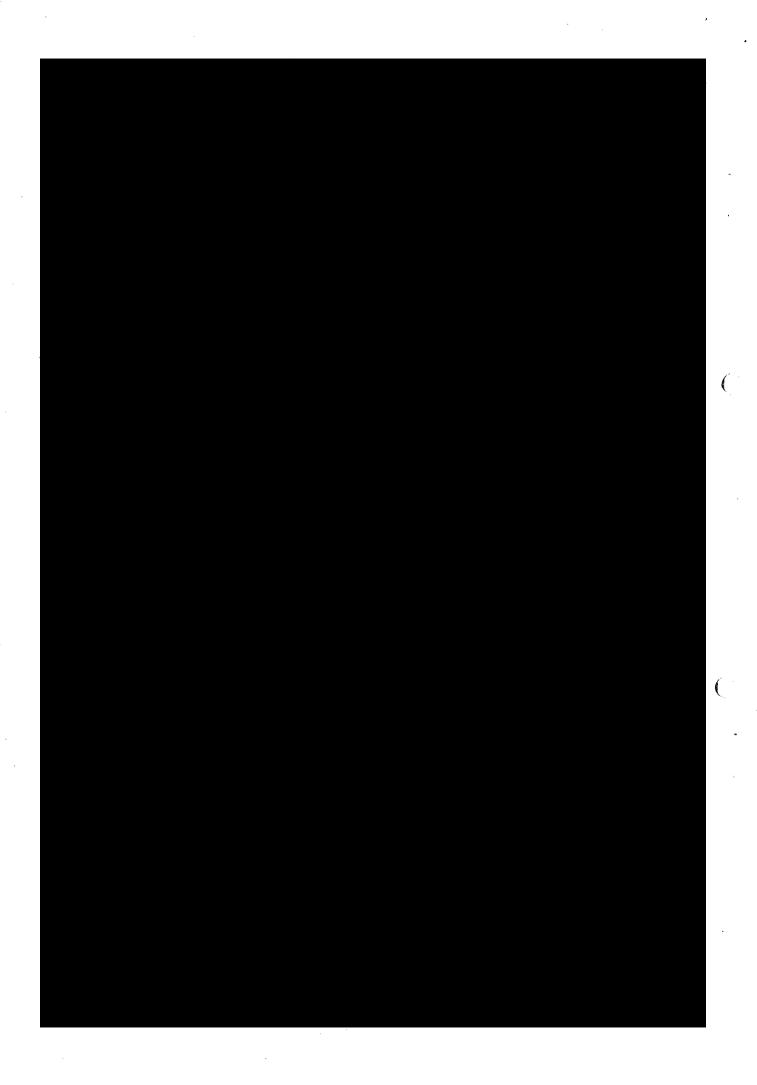
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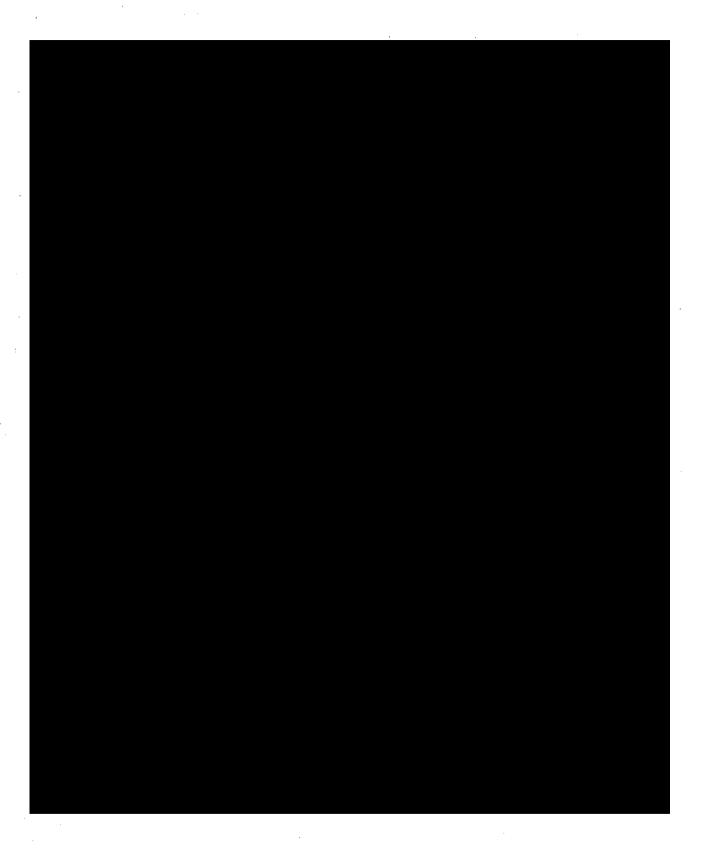
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ATTACHMENT 3





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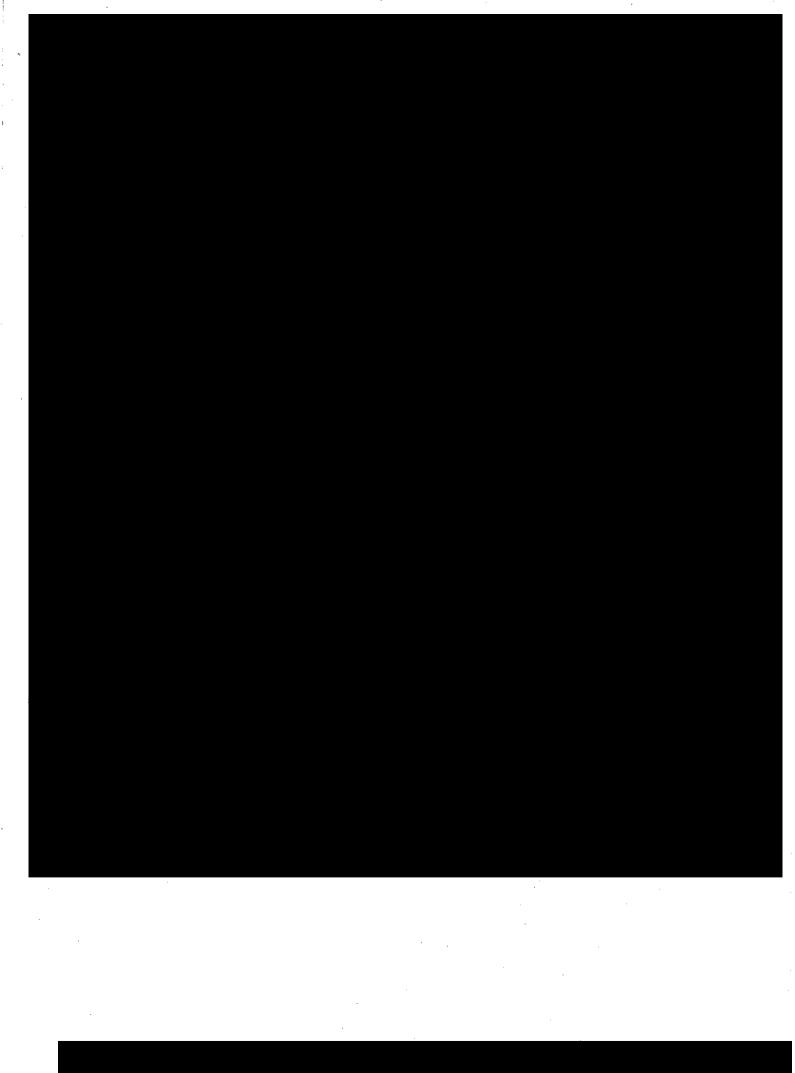
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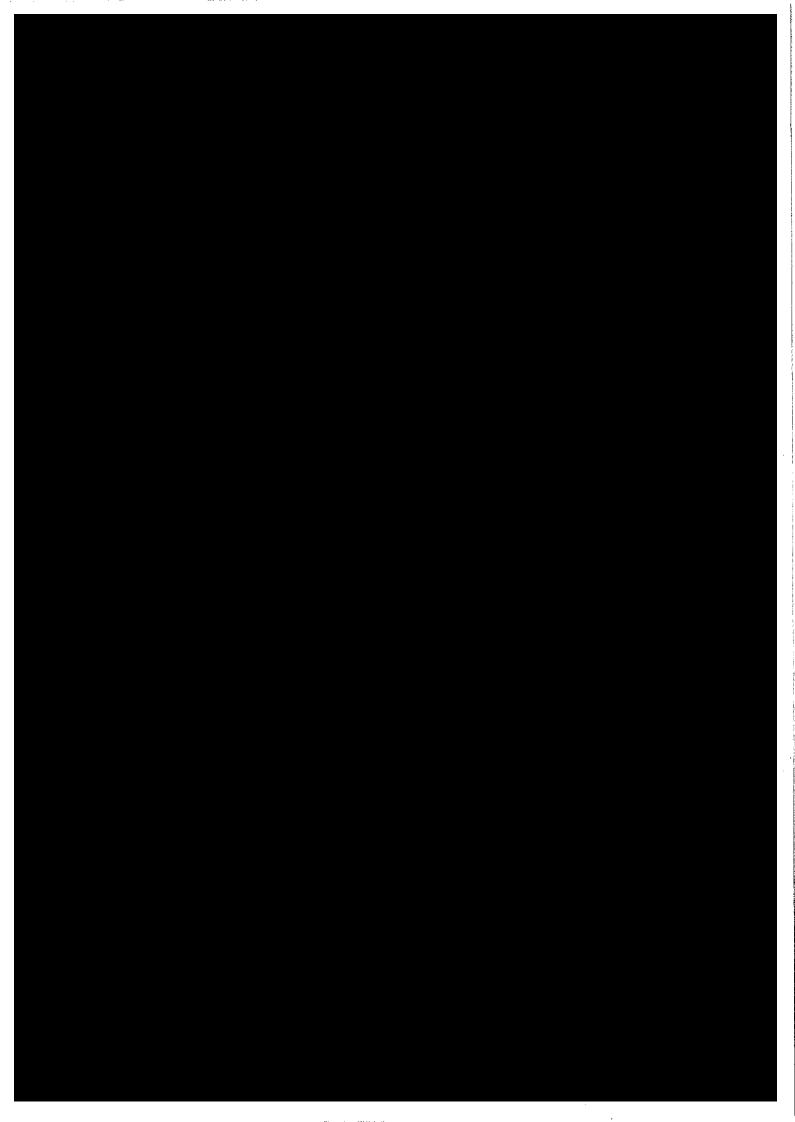
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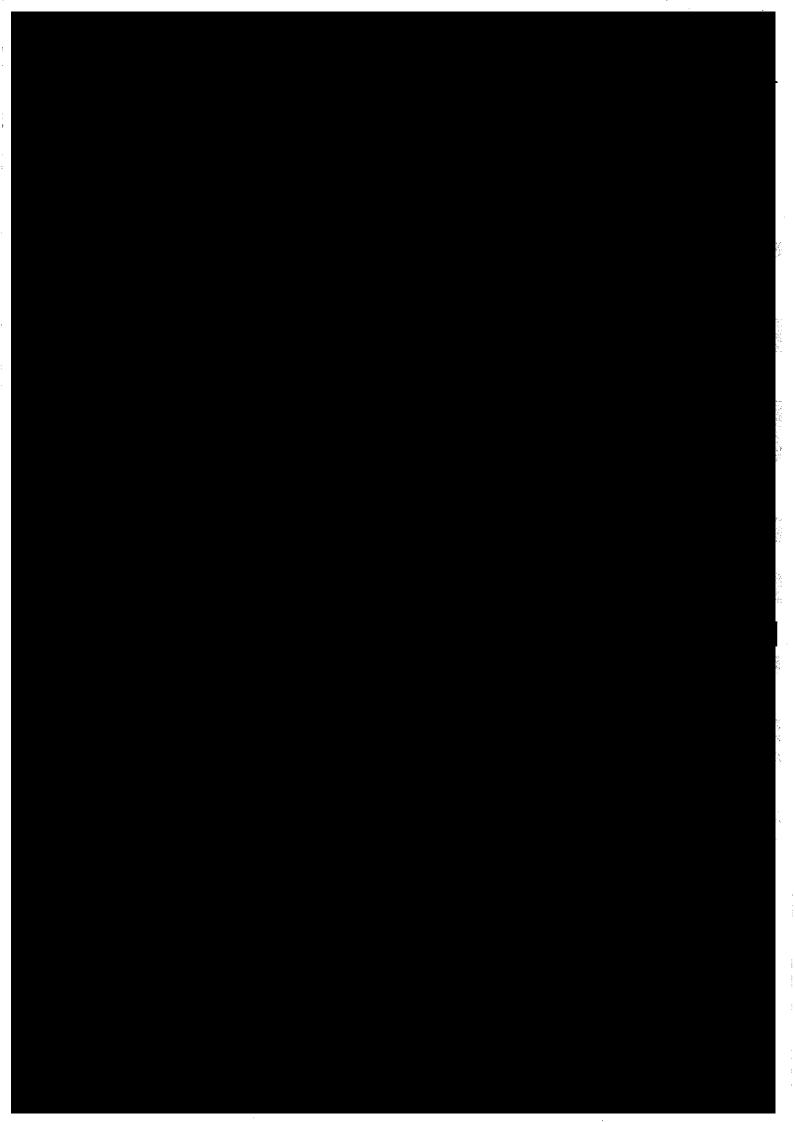


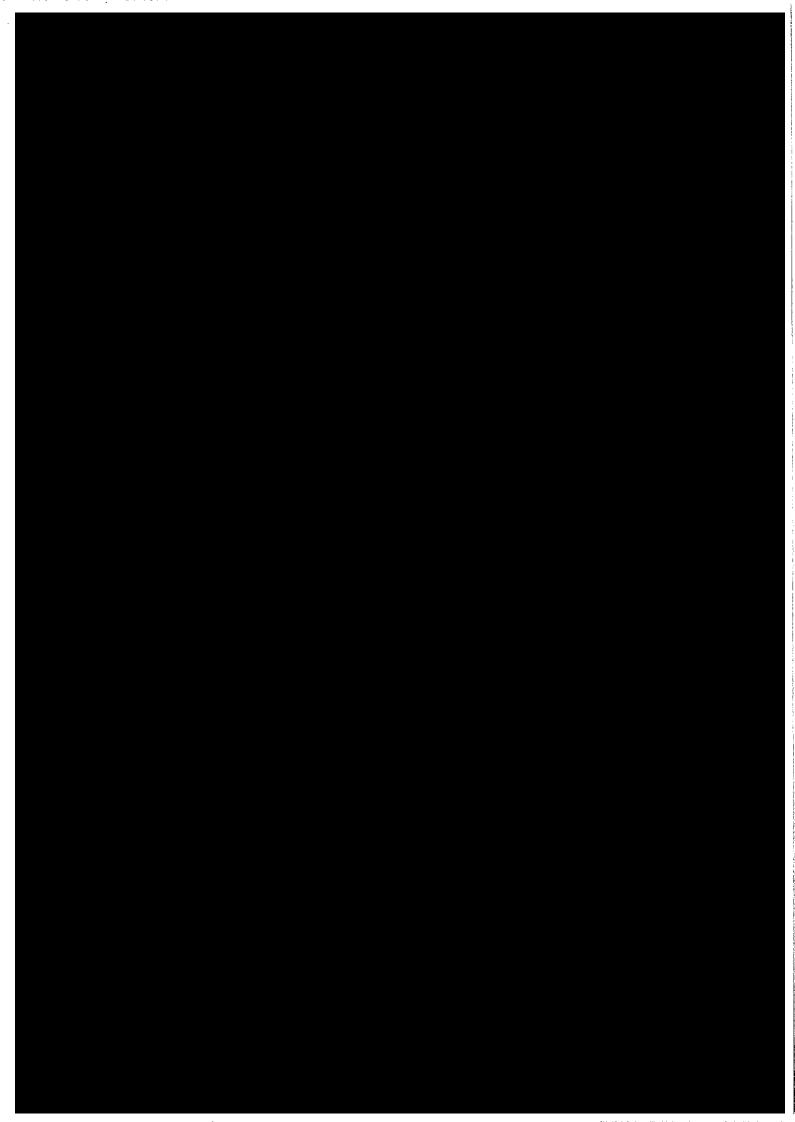














Licence Number	DIR118
Licence Holder	Monsanto Australia Ltd
Accreditation Number	ACCR 034/2002
Submission	2014 Annual Report for the Commercial Release of GM herbicide tolerant (Roundup Ready Flex® MON 88913) pima cotton in Australia
Reporting Period	1 June 2013 – 1 June 2014
Date	30 June, 2014
Prepared By	

Information and data submitted herein contains trade secrets or privileged or confidential information the property of Monsanto Australia. No government agency or representative thereof is authorized to disclose such data and information without written permission from Monsanto Australia Ltd.

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## Section 1 - Licence Holder Details

Name Monsanto Australia Limited

Address Level 12

600 St Kilda rd Melbourne Victoria 3004

**Telephone** (03)9522 7122 **Facsimile** (03)9522 6122

**Contact email** 

Accreditation Number ACR 034/2002

#### Scope of the Report -

This report addresses the annual reporting conditions of the DIR118 commercial licence for the release of GM herbicide tolerant (Roundup Ready Flex® MON 88913) pima cotton in Australia, issued to Monsanto Australia Limited by the Office of the Gene Technology Regulator (OGTR).

This report details compliance with the general and specific conditions of sections 2 and 3 of the DIR118 licence as issued to Monsanto on the 16 August 2013.

This report covers the period of time between the 1 July 2013 and 30 June 2014.

#### Section 2 - General Conditions

#### **Duration of the Licence**

DIR118 has not been cancelled, suspended or surrendered.

#### Holder of the Licence

Monsanto Australia Limited (Monsanto) is the holder of the licence.

#### **Project Supervisor**

is the project supervisor. This change of project supervisor was made and details were provided to the OGTR in January, 2014.

### Persons covered by this licence

All persons covered by this licence are all persons in Australia.

## Informing people of their obligations

Monsanto Australia Limited informs all GM herbicide tolerant (Roundup Ready Flex® MON 88913) pima cotton growers covered by the DIR118 licence of the obligations imposed on them as a result of the conditions of this licence. This is primarily achieved through Monsanto grower training which includes information on regulatory obligations.

#### Licence holder to notify of circumstances that might affect suitability

During the reporting period, Monsanto Australia did not receive a relevant conviction occurring after the commencement of this licence; nor was there any revocation or suspension of a licence or permit held by Monsanto Australia Ltd under a law of the Australian Government, a state or a foreign country, being law relating to the health and safety of people or the environment; or any event or circumstance occurring after the commencement of the licence that would affect the capacity of Monsanto to meet the conditions of the DIR118 licence.

Monsanto acknowledges that it must provide information related to their ongoing suitability to hold a licence when requested to do so in writing by the regulator and must provide the information within a time frame stipulated by the regulator.

#### People dealing with the GMO must allow auditing and monitoring of the dealing

Monsanto acknowledges that if a person is authorized 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 to enter premises where the dealing is being undertaken for the purposes of auditing or monitoring the dealing.

#### Remaining an accredited organization

At all times, Monsanto remained an accredited organization and complied with the conditions of the accreditation as set out in the OGTR guidelines for accreditation of organizations.

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## Additional Information given to the Regulator

During the reporting period, Monsanto did not become aware of additional information as to any risks to the health and safety of people, or to the environment, associated with the dealings authorized by the licence; or of any unintended effects of the dealings authorized by the licence.

Monsanto was not requested by the Regulator, during the reporting period, to collect or provide additional information about any matter to do with the progress of the dealings authorised by DIR118.

# **Section 3 - Growing the GMO**

### 3.1 GMOs covered by this Licence

The only dealings with GMOs under this licence were those with the GMO described in attachment A of the DIR118 licence

## 3.2 Permitted Dealings

During the period of this report, only dealings with the GMO authorized were permitted

- 3.3 Commercial Volumes of GM herbicide tolerant (Roundup Ready Flex® MON 88913) pima cotton grown in each State and Territory in the 2014 growing season
  - 3.3.1 Total commercial GM herbicide tolerant (Roundup Ready Flex® MON 88913) pima cotton grown in the period 1 July 2013 to 1 July 2014 Summary

STATE	Total ha
Victoria	0
New South Wales	0
Western Australia	0
Queensland	0
Total ha	0

- 3.4 Trial Volumes of GM herbicide tolerant (Roundup Ready Flex® MON 88913) pima cotton grown in each State and Territory in the 2014 growing season
  - 3.4.1 Total trial GM herbicide tolerant (Roundup Ready Flex® MON 88913) pima cotton planted in the period 1 July 2013 to 1 July 2014 Summary

STATE	Total ha
Victoria	0
New South Wales	0.067
Western Australia	0
Queensland	0
Total ha	0.067

## 3.4 Annual Surveys

No other information on the progress of the release of the GMO, including annual surveys, was required to be submitted during this annual reporting period under specific condition 17(d) of DIR118.

# DIR-062 2013, 2014 and 2015 Annual reports

Compilation of information provided to OGTR by Bayer CropScience under the annual reporting obligations for DIR062/2005

Reported hectares for both Liberty Link (LL25) cotton and LL25/Bollgard II (LL x BGII) cotton grown under DIR-062:

#### 2014-15:

<u>GMO</u>	Broadacre Ha	<u>Green Ha</u>
70BL	11.5	11.5
80L	57.16	48.21

### 2013-2014

<u>GMO</u>	<u>Broadacre Ha</u>	<u>Green Ha</u>
70BL	498.4	498.4
80L	355.84	352.882
V-18BL	267.58	173.931

### 2012-2013

<u>GMO</u>	<u>Broadacre Ha</u>	<u>Green Ha</u>
70BL	3807.17	1860.125
80L	1033.55	388.6
V-18BL	1742.13	493.11

No adverse effects were reported as a result of dealings under licence DIR 062 during 2012-2015.

## **Explanatory notes:**

Bayer codes: "L" refers to the LL25 cotton seed sold and planted, and "BL" refers to LL25  $\rm x$  Bollgard II.

Reported hectares for both LL25 cotton and LL x BGII cotton grown under DIR062.

The date references, e.g. 2012 – 2013, refer to the cotton season which commenced in September/October 2012 and was harvested in March/April 2013. The same format is the case for 2013 – 2014 and 2014 – 2015.



Dow AgroSciences Australia Ltd.
ABN 24 003 771 659
Level 5, 20 Rodborough Road
Frenchs Forest NSW 2086

19/10/11

Office of the Gene Technology Regulator

MDP54 GPO Box 9848 Canberra ACT 2601 Telephone General Office (02) 9776 3400
Fax (02) 9776 3199
Toll Free 1 800 700 096
Postal Address
Locked Bag 502
Frenchs Forest NSW 2086
www.dowagrosciences.com.au

#### **DIR091 ANNUAL REPORT 2010**

Since the issuing of Licence No.: DIR 091 by the OGTR on the 25 November 2009, Dow AgroSciences Australia Ltd has had nil dealings with WideStrike™ Insect Protection Cotton in Australia.

As per licence condition 32, the following statements are made:

- (a) No adverse impacts, unintended effects or new information relating to risks to human health and safety or the environment have been caused by or found in relation to WideStrike™ Insect Protection Cotton
- (b) WideStrike™ Insect Protection Cotton has not been produced commercially in any state or territory in Australia since the issuing of Licence No.: DIR 091 by the OGTR on the 25th November 2009.
- (c) WideStrike™ Insect Protection Cotton has not been produced for experimental purposes in any state or territory in Australia since the issuing of Licence No.: DIR 091 by the OGTR on the 25th November 2009.
- (d) Nil WideStrike™ Insect Protection Cotton has been fed to livestock north of latitude 22° South in Australia.
- (e) No research of the effects of WideStrike™ Insect Protection Cotton on non-target insect(s) has been conducted.
- (f) No research on volunteer incidence of WideStrike™ Insect Protection Cotton in areas north of latitude 22° South after livestock feeding has been conducted.

Regards,





LICENCE NO: DIR066

LICENCE HOLDER: Monsanto Australia Limited

**ACCREDITATION NO:** ACCR 034/2002

**SUBMISSION:** 2014 Annual Report for Commercial release of GM

herbicide tolerant and/or insect resistant cotton lines

**REPORTING PERIOD:** 1 June 2013 – 1 June 2014

(covering 2013/14 cotton growing season)

**DATE:** 30 June 2014

**PREPARED BY:** 

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#### **SECTION 1. LICENCE HOLDER DETAILS**

Name: Monsanto Australia Limited

Address: 600 St Kilda rd, Melbourne 3004

PO Box 6051 St Kilda rd Central Victoria, 8008

**Telephone:** (03)9522 7122

Facsimilie: (03)9522 6122

Contact email:

Accreditation

Number: ACCR 034/2002

#### **SCOPE OF THE REPORT**

This report addresses the annual reporting condition of the DIR066 commercial licence covering Roundup Ready® cotton, Roundup Ready Flex® cotton and the Bollgard II® trait issued to Monsanto Australia Limited by the Office of the Gene Technology Regulator.

This report details compliance with general and specific conditions of Sections 2 to 6 of the DIR066 licence as issued to Monsanto Australia Limited on 26 October 2006, and as varied 22 December 2006, 6 December 2007, 15 April 2009 and 20 June, 2013.

This report covers the period of time from 1 June 2013 to 1 June 2014, including the 2013/14 cotton planting season.



#### **SECTION 2. LICENCE CONDITIONS**

#### **Condition 1. Duration of Licence**

DIR066 has not been suspended, cancelled or surrendered.

#### **Condition 2. Holder of Licence**

Monsanto Australia Limited (Monsanto) remains the holder of the licence.

#### Conditions 3 and 4. Project Supervisor

The project supervisor has been changed from to to

#### Condition 5. No dealings with GMOs except as authorized by this Licence

Persons covered by the licence did not deal with GMOs except as expressly permitted by the licence.

#### Conditions 6 and 7. Location

The licence allows for dealings with GMOs to be conducted anywhere in Australia. This licence supersedes any previous licences regarding location.

#### Conditions 8 and 9. Persons covered by this GMO Licence

Monsanto acknowledges that the persons covered by the 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.

#### Conditions 10 and 11. Informing people of their obligations

DIR066 was issued in October 2006, permitting dealings with the GMOs to be undertaken during the cotton growing seasons.

Monsanto Australia Limited informed all persons covered by the DIR066 licence of the obligations imposed on them as a result of the conditions of the licence. This was primarily achieved through the Monsanto accreditation program, which includes information on regulatory obligations as well as management of the crop.

Accreditation programs require all persons having management responsibility for Roundup Ready (no longer sold commercially), Roundup Ready Flex and Bollgard II cotton crops to undergo training.



#### Condition 12. Applicant to notify of circumstances that might affect suitability

During the reporting period, Monsanto Australia Ltd did not receive a relevant conviction occurring after the commencement of this licence; nor was there any revocation or suspension of a licence or permit held by Monsanto Australia Ltd under a law of the Australian Government, a State or foreign country, being a law relating to the health and safety of people or the environment; or any event or circumstance occurring after the commencement of this licence that would affect the capacity of Monsanto to meet the conditions of the DIR066 licence.

#### Condition 13. Licence holder must provide information on matters related to suitability

Monsanto acknowledges that it must provide information related to its ongoing suitability to hold a licence when requested to do so in writing by the Regulator and must provide information within a time period stipulated by the Regulator.

#### Condition 14. People dealing with the GMOs must allow auditing and monitoring if the dealing

Monsanto acknowledges that if a person authorized 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 authorized by the Regulator, to enter the premises where the dealing is being undertaken, for the purposes of auditing or monitoring the dealing.

#### **Condition 15. Remaining an Accredited organization**

At all times, Monsanto remained an accredited organization and complied with conditions of accreditation as set out in the OGTR Guidelines for Accreditation of Organisations.

#### Conditions 16 - 19 Additional information must be given to the Regulator

During the reporting period, Monsanto did not become aware of any additional information as to any risks to the health and safety of people, or to the environment, associated with the dealings authorized by this licence; or of any unintended effects of the dealings authorized by this licence.

#### **Condition 20. Compliance Management Plan**

A Compliance Management Plan was provided to the Regulator on issuance of the DIR066 licence. A copy of the current Resistance Management Plans showing compliance metrics is in Appendix A and B.



#### **SECTION 3. GROWING THE GMOS**

#### 3.1 GMOs covered by this licence

The only dealings with GMOs under this licence were those with the GMOs described in DIR066 Licence.

#### 3.2 Permitted dealings

Sales and planting of the Roundup Ready Flex (RRF), Bollgard II (BGII) and Bollgard II were undertaken under a Technology User Agreement, which sets out the conditions for planting and growing a cotton crop containing RRF and BGII technology. Roundup Ready cotton has been removed from the market in Australia. In order to be eligible to sign such an agreement, a grower is required to attend an accreditation program and pass a test based on the material covered in the accreditation program.

#### 3.3 Commercial Crop Locations and Volumes

	•						
Valley	BGII ha	RR ha	RRF ha	BGII w RR	BGII w	BGII w LL	Total ha
valicy	Donna	IXIX IIG	MINI IIG	ha	RRF ha	ha	Total lia
Belyando	0.00	0.00	0.00	0.00	200.00	0.00	200.00
Bourke	0.00	0.00	65.95	0.00	6078.44	0.00	6144.39
Darling Downs	16.04	0.00	4523.36	0.00	40249.95	94.75	44884.10
Dawson/Callide	0.00	0.00	47.05	0.00	4672.61	0.00	4719.66
Dirranbandi	0.00	0.00	31.55	0.00	29515.74	0.00	29547.29
Emerald	0.00	0.00	0.00	0.00	14756.44	0.00	14756.44
Gwydir	4.48	0.00	4738.24	0.00	63750.60	0.00	68493.32
Lachlan	0.00	0.00	374.29	0.00	12780.40	412.00	13566.69
Lower Namoi	0.00	0.00	1676.82	0.00	46286.33	0.00	47963.15
MacIntyre	0.00	0.00	1277.78	0.00	43086.20	0.00	44363.98
Macquarie	0.00	0.00	320.42	0.00	52779.91	0.00	53100.33
McKenzie River	0.00	0.00	0.00	0.00	360.95	0.00	360.95
Mungindi	0.00	0.00	2996.13	0.00	18053.61	0.00	21049.74
Murrumbidgee	0.00	0.00	1147.05	0.00	31247.63	0.00	32394.68
St George	0.00	0.00	547.51	0.00	21901.19	0.00	22448.70
Tandou	0.00	0.00	386.20	0.00	7100.42	0.00	7486.62
Upper Namoi	0.00	0.00	726.17	0.00	18073.80	165.59	18965.56
Walgett	0.00	0.00	87.64	0.00	5137.80	0.00	5225.44
Total ha	20.52	0.00	18,946.16	0.00	389,032.02	672.34	408,671.04

Total Bollgard II ha planted	389,724.88
Total Roundup Ready Flex ha planted	407,978.18

Note – Total Bollgard II figure includes Bollgard II, Bollgard II/Roundup Ready Flex and Bollgard II/Roundup Ready Flex figure includes Roundup Ready Flex and Bollgard II/Roundup Ready Flex.



Valley: Belyando

**Boundaries:** Includes the shires of Moranbah, Clermont, Kilcummin, Mistake Creek, Belyando, Elgin, Wolfgagn, Winchester, Old Labona, Gemini Mountains, Amaroo, South Copperfield, Laglan, Birimgan, Blair Athol and Pasha.

Valley: Bourke

Boundaries: West of Walgett Shire, north of Coolahbah. Includes Cunnamulla in Queensland.

**Valley: Darling Downs** 

**Boundaries:** Follows the Condamine River. Includes Toowoomba, Murgon, Dalby, Chinchilla, Condamine, and Roma. South-west boundary is Surat.

Valley: Dawson/Callide

**Boundaries:** Includes Taroom, Biloela, Moura and Theodore regions.

Valley: Dirranbandi

**Boundaries:** Runs north toward St George and includes Lower Plains, follows south along the Balonne River right down to the NSW border.

Valley: Emerald

**Boundaries:** South-eastern boundary formed by the Expedition Ranges between Rolleston and Bauhinia. Region runs north-west from there to include Emerald and Dysart.

Valley: Gwydir

**Boundaries:** South of Fox Lane, north-west to Garah, west to Collarenebri, south to Bellata. The road that runs east-west through Bellata and to Rowena is southern boundary.

Valley: Lachlan

**Boundaries:** Northern boundary is Peak Hill and Tullamore and the cotton follows the Lachlan River through to Booligal. The southern boundary is the road through to Gunbar and then follows the Great Western Highway through to West Wyalong.

Valley: Lower Namoi

**Boundaries:** North-west of Baan Baa-Manilla Road and south of Bellata-Rowena Road. Western boundary is formed by the road that runs from Pilliga via Burren Junction to Collarenebri.

Valley: MacIntyre

**Boundaries:** North of Gwydir, western boundary is Garah to Talwood Road north include Moonie and east to include Texas. Southern boundary is Foxes Lane which runs Garah back to the Newell Highway and then along to Croppa Creek, Yallaroi and Coolatai.



Valley: Macquarie

**Boundaries:** Dubbo and south to Peak Hill. West to Tullamore. North through Tottenham. Nyngan and Coolabah, then east via southern boundary of Walgett shire and then south back to Dubbo via Coonabarabran.

Valley: McKenzie River

Boundaries: North West of Comet, to include McKenzie River and Alton Downs

Valley: Mungindi

**Boundaries:** West of Garah and Boomi Road to Talwood and follows Barwon River south-west of Mungindi towards Collarenebri. Southern boundary is the Watercourse Road from Colly through to Gingham and then to Garah.

#### Valley: Murrumbidgee

**Boundaries:** Northern boundary is the Great Western Highwayfrom West Wyalong through Goolgowi to Gunbar, from Gunbar west to Booligal on the Lachlan River. Downstream of Booligal on the Lachlan and south-west is the Murrumbidgee River.

#### Valley: St George

**Boundaries:** Above Lower Plains on the southern side and north-east to include majority of Waroo Shire with the north-east boundary being Surat.

Valley: Tandou

Boundaries: surrounds Menindee shire. North of Mildure and west of the SA border

#### Valley: Upper Namoi

**Boundaries:** South-east of Baan Baa-Manilla Road. Includes Coolah, Merriwa, Mullaley, Gunnedah and Quirindi.

#### Valley: Walgett

**Boundaries:** Includes almost entirety of Walgett Shire, with eastern boundary being the road that runs south from Collarenebri to Burren Junction.

#### 3.4 Trial/Research Crop Locations and Volumes

Valley	BGII ha	RR ha	RRF ha	BGII w RR ha	BGII w RRF ha	BGII w	Total ha
	0.00	0.00	15.47	0.00	187.09	0.00	202.56
	0.00	0.00	3.90	0.00	39	0.00	42.9
Total ha	0.00	0.00	19.37	0.00	226.09	0.00	245.46





#### **APPENDIX A -**

# Resistance Management Plan for Bollgard II® Cotton 2013/2014

Developed by Monsanto Australia Limited and the Transgenic and Insect Management Strategy (TIMS) Committee of Cotton Australia Ltd.

The resistance management plan is based on three basic principles: (1) minimising the exposure of *Helicoverpa* spp. to the *Bacillus thuringiensis* (Bt) proteins Cry 1Ac and Cry 2Ab; (2) providing a population of susceptible individuals that can mate with any resistant individuals, hence diluting any potential resistance; and (3) removing resistant individuals at the end of the cotton season. The three principles are supported through the implementation of 5 elements that are the key components of the Resistance Management Plan. These elements are:

- 1. Refuge crops
- 2. Planting window
- 3. Pupae busting/Trap crops
- 4. Control of volunteers and ratoon cotton and
- 5. Spray limitations.

Growers of Bollgard II cotton are required to practice preventative resistance management as set out below. Compliance with the Resistance Management Plan is required under the terms of the Bollgard II Technology User Agreement and under the conditions of registration (*Agricultural and Veterinary Chemicals Act 1994*).

Section 1 is applicable to all regions in New South Wales and Queensland that grow cotton while sections 2 and 3 detail specific requirements for New South Wales and Southern Queensland, and Central Queensland respectively.

#### SECTION 1: NEW SOUTH WALES, SOUTHERN QUEENSLAND & CENTRAL QUEENSLAND

#### 1. Refuges

Growers planting Bollgard II cotton will also be required to grow a refuge crop that is capable of producing large numbers of *Helicoverpa* spp. moths which have not been exposed to selection with Bt proteins Cry 1Ac and Cry 2Ab. These unselected moths are expected to dominate matings with any survivors from Bollgard II crops and thus help to maintain resistance to Bt proteins Cry 1Ac and Cry 2Ab at low levels.



All refuge options are based on the requirement of a 10% unsprayed cotton refuge or its equivalent, as determined by the relative production of *Helicoverpa* spp. from each of the refuge types as described in Tables 1 and 2, for irrigated and dryland production scenarios respectively. Irrespective of the irrigation regime for the Bollgard II cotton, all pigeon pea refuges must be fully irrigated so that they are attractive to *Helicoverpa* spp. during the growing period of the Bollgard II cotton.

For each area of irrigated Bollgard II cotton planted, a grower is required to plant a minimum of one or a combination of the following:

Table 1. Irrigated Bollgard II cotton refuge options

Сгор	Conditions	% of Bollgard II
Cotton	Irrigated, sprayed conventional cotton	100
	Irrigated, unsprayed conventional cotton	10
Pigeon pea	Fully irrigated, unsprayed	5

Table 2. Dryland Bollgard II cotton refuge options

Crop	Conditions	% of Bollgard II	
Cotton Dryland or irrigated, sprayed conventional cotton		100	
	Dryland or irrigated, unsprayed conventional cotton	10	
Pigeon pea	Fully irrigated, unsprayed	5	

No other refuge options are approved for dryland Bollgard II.

**Note:** Unsprayed means not sprayed with any insecticide that targets any life stage of *Helicoverpa* spp.

Bt products must not be applied to any refuge (including sprayed cotton).

If the viability of an unsprayed conventional cotton refuge is at risk due to early season pressure by *Helicoverpa* spp., and with prior approval from the Monsanto Compliance and Stewardship Manager, a non-Bt heliocide can be applied. An unsprayed refuge should not be planted in the same field as any crop sprayed with a rate of insecticide that is registered for *Helicoverpa* spp, with the exception of Bollgard II. Sprayed crops and unsprayed refuges that are planted in



adjacent fields must be separated by sufficient distance to *minimise the likelihood of insecticide* drift onto the unsprayed refuge.

For the purposes of this Resistance Management Plan, conventional cotton includes any cotton varieties that do not have Bt proteins in the plant that control *Helicoverpa* spp. larvae.

#### **General conditions for all refuges:**

(a) Refuge crops are to be planted and managed so that they are attractive to *Helicoverpa* spp. during the growing period of the Bollgard II cotton varieties.

Irrigated: It is preferable that all refuge is planted within the 2 week period prior to planting Bollgard II. If this is not possible, refuge planting must be completed within 3 weeks of the first day of sowing of Bollgard II. At this time, sufficient refuge must have been planted to cover all of the Bollgard II cotton proposed to be planted for the season (including Bollgard II already planted and any that remains unplanted). Should additional Bollgard II planting be made after this date, which is not already covered by refuge, additional refuge must be planted as soon as possible and no more than 2 weeks after sowing of the additional Bollgard II.

Dryland: A dryland refuge must be planted within the 2 week period prior to the first day of planting Bollgard II cotton.

- (b) Pigeon pea refuges should not be planted until the soil temperature reaches 17°C, which is a requirement for germination, and should also be planted into moisture to ensure successful germination. If soil temperatures are not suitable to allow germination of pigeon peas in line with condition (a), an alternative refuge must be planted in its place within the prescribed period (under (a) above).
- (c) Once Bollgard II cotton begins to flower the corresponding refuge should not be cultivated.
- (d) Insecticide preparations containing Bt may be used on Bollgard II cotton throughout the season BUT NOT on any refuge crops.
- (e) All refuges are to be planted within the farm unit growing Bollgard II cotton. Subject to clause (f) below, all reasonable effort should be taken to plant the refuge either on one side of, or next to a Bollgard II cotton field and all Bollgard II fields must be no more than 2 km from the nearest associated Bollgard II refuge.
- (f) To minimise the possibility of refuge attractiveness being affected by herbicide drift, non-herbicide tolerant refuges should be separated from herbicide tolerant Bollgard II cotton crops by a sufficient distance to minimise such drift, but no more than 2km from the Bollgard II cotton.



- (g) To account for possible insecticide drift, the options for the width of refuge crops vary according to spray regime. If any sprayed conventional cotton is grown on the same farm unit, Bollgard II refuge crops must be at least 48 metres wide and each refuge area must be a minimum of 2 hectares. If no sprayed conventional cotton is grown on the same farm unit, Bollgard II refuge crops must be at least 24 metres wide and 24 metres long. Different unsprayed refuge options may be planted in the same field as a single unit; however a sprayed conventional cotton refuge must not be planted in a field that is also planted to an unsprayed refuge type.
- (h) In all regions, destruction of refuges should only be carried out after Bollgard II cotton lint removal has been completed.
- (i) Refuges for dryland Bollgard II cotton crops must be planted in the same row configuration as the Bollgard II crop unless the refuge is irrigated. If an irrigated option is utilised for a dryland Bollgard II crop, then that refuge may be planted in a solid configuration. Dryland cotton is measured as green hectares (calculated as defined in the Technology User Agreement).

#### 2. <u>Control of volunteer and ratoon cotton</u>

Volunteer and ratoon cotton may impose additional selection pressure on *Helicoverpa* spp. to develop resistance to the Bt Cry 1Ac and Cry 2Ab proteins produced by Bollgard II cotton.

Growers must make all reasonable efforts to remove volunteer and ration plants, as soon as possible from all fields, including fallow areas, Bollgard II crops, conventional cotton crops and all refuges. The presence of Bollgard II volunteers/ration cotton in any refuge will diminish the value of the refuge and must be removed as soon as possible.

Note: The refuge should preferably be planted into fallow or rotation fields that have not been planted to cotton in the previous season.

#### 3. <u>Post-harvest crop destruction</u>

As soon as practical after harvest, Bollgard II cotton crops must be destroyed by cultivation or herbicide so that they do not continue to act as hosts for *Helicoverpa* spp.

#### **SECTION 2: NEW SOUTH WALES AND SOUTHERN QUEENSLAND ONLY**

#### 1. Planting windows



All Bollgard II crops are to be planted into moisture or watered-up by 15 November, unless otherwise advised by a Bollgard II Planting Window Variation Notice.

#### 2. <u>Pupae destruction</u>

In Bollgard II cotton fields, each grower will be required to undertake *Helicoverpa* spp. pupae destruction after harvest according to the following key guidelines:

- Bollgard II crops should be slashed or mulched and fields cultivated for pupae control within 4 weeks
  of harvesting. All pupae busting must be completed by July 31.
- Ensure disturbance of the whole soil surface to a depth of 10 cm.
- All fields that are sown to any winter crop following a Bollgard II crop must be inspected by the Technology Service Provider before sowing commences in order to ensure that pupae busting has occurred.

#### In Refuge crops:

In New South Wales and Southern Queensland, to ensure maximum emergence of late pupae from associated refuges, soil disturbance of refuge crops should not be undertaken until after the pupae busting in Bollgard II cotton crops on the farm unit is complete. All unsprayed refuges, should preferably be left uncultivated until the following October.

#### 3. Failed crops

Bollgard II crops that will not be grown through to harvest for various reasons and are declared to, and verified by, Monsanto as failed must be destroyed within two weeks after verification, in such a way that prevents regrowth. Crops abandoned before February 28 do not require pupae busting. Crops abandoned on February 28 or later must be pupae busted.

**NB:** If any grower encounters problems in complying with the Resistance Management Plan please contact your local Monsanto Regional Business Manager.



#### **SECTION 3: CENTRAL QUEENSLAND ONLY**

#### 1. Planting Windows

**Emerald:** All Bollgard II crops are to be planted into moisture or watered-up in the period between September 15 and October 26, unless advised otherwise by a Bollgard II Planting Window Variation Notice.

**Dawson Callide Valleys:** All Bollgard II crops are to be planted into moisture or watered-up in the period between September 15 and October 26, unless advised otherwise by a Bollgard II Planting Window Variation Notice.

**Belyando - Clermont:** All Bollgard II crops are to be planted into moisture or watered-up in the period between November 4 and Decmber 15, unless advised otherwise by a Bollgard II Planting Window Variation Notice.

**Mackenzie:** All Bollgard II crops are to be planted into moisture or watered-up in the period between November 4 and Decmber 15, unless advised otherwise by a Bollgard II Planting Window Variation Notice.

#### 2. Refuges

Pigeon Pea refuge should preferably be planted into a fallow or rotation field that has not been planted to cotton in the previous season to avoid volunteer and ratoon cotton.

In Central Queensland soil disturbance of refuge crops can only occur 2 weeks after final defoliation of the Bollgard II cotton.

#### 3. <u>Late summer pigeon pea trap crop</u>

A late summer trap crop (pigeon pea) must be planted for all Bollgard II cotton grown in Central Queensland. The planting configuration of the trap crop should be the same as that of the Bollgard II crop. Irrigated Bollgard II must have an irrigated trap crop. Table 3 shows the requirements for the late summer pigeon pea trap crop. Dryland Bollgard II growers who do not have any irrigated cotton on their farm should contact their Monsanto Regional Business Manager for alternative options.

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Refuge and late summer trap crops have different purposes and, if pigeon pea is selected for both, two separate plantings may be required. However, where a pigeon pea refuge is utilised as a trap crop the full 5% pigeon pea refuge area must be managed to become the late summer trap crop and must adhere to the requirements in Table 3 below.

Table 3. Late summer pigeon pea trap crop requirements in Central Queensland

Criterion	Trap crop*
Minimum area & dimension (Requirement)	A minimum trap crop of 1% of planted Bollgard II cotton crop is required.  If sprayed conventional cotton is grown on that farm unit: the trap crop must be at least 48m x 48m.  If no sprayed conventional cotton is grown on that farm unit: the trap crop must be at least 24m x 24m.
Planting time	The trap crop should preferably be planted between November 1 and November 30 Note: if growers choose to plant their trap crop to coincide with the planting of pigeon pea refuges they must manage the trap crop in such a way that it remains attractive to <i>Helicoverpa</i> spp. 2-4 weeks after final defoliation.
Planting rate **	35kg/ha (recommended establishment greater than 4 plants per metre)
Insect control	The trap crop can be sprayed with virus after flowering; while avoiding insecticide spray drift, except where a pigeon pea refuge is converted to a trap crop. In this case the full 5% pigeon pea refuge area managed to become the late summer trap crop can only be sprayed with virus after the first defoliation of Bollgard II cotton.
Irrigation	The trap crop must be planted into an area where it can receive the additional irrigation required to keep the trap crop attractive to <i>Helicoverpa</i> spp. until after the cotton is defoliated.
Weed control	The trap crop should be kept free of weeds and particularly volunteer Bollgard II cotton. When using the full 5% pigeon pea trap crop option, weed control must not be carried out by cultivation once flowering of the associated Bollgard II cotton crop has commenced



Crop destruction	The trap crop must be destroyed 2-4 weeks (but not before 2 weeks)
	after final defoliation of the Bollgard II cotton crop, (slash and pupae
	bust – full soil disturbance to a depth of 10cm across the entire trap
	crop area). All Bollgard II and associated trap crops must be destroyed
	by July 31.

- * A pigeon pea trap crop is to be planted so that it is attractive (flowering) to *Helicoverpa* spp. after the cotton crop has cut out, and as any survivors from the Bollgard II crop emerge. Planting pigeon pea too early (e.g. before November) or too late (e.g. mid December) is not adequate for cotton crops planted during September through to October.
- ** The planting rate is a recommendation based on a minimum of 85% seed germination.

NB: <u>If any grower encounters problems in complying with the resistance management plan, please</u> <u>contact your Monsanto Regional Business Manager.</u>

For further background information on the various components of this plan see the "Preamble to the Resistance Management Plan for Bollgard II" in the current Cotton Pest Management Guide.



#### **APPENDIX B**

# Resistance Management Plan for Bollgard II® cotton 2013/2014 - Ord River Irrigation and Burdekin Bowen Basin Areas

Ord River Irrigation, Burdekin Bowen Basin and Richmond Areas

Developed by Monsanto Australia Limited and the Transgenic and Insect Management Strategy (TIMS) Committee of Cotton Australia Limited.

The resistance management plan is based on three basic principles: (1) minimising the exposure of *Helicoverpa* spp. to the *Bacillus thuringiensis* (Bt) proteins Cry 1Ac and Cry 2Ab; (2) providing a population of susceptible individuals that can mate with any resistant individuals, hence diluting any potential resistance; and (3) removing resistant individuals at the end of the cotton season. The three principles are supported through the implementation of 5 elements that are the key components of the Resistance Management Plan. These elements are:

- 1. Refuge crops
- 2. Planting window
- 3. Pupae busting/Trap crops
- 4. Control of volunteers and ratoon cotton and
- 5. Spray limitations.

Growers of Bollgard II cotton are required to practice preventative resistance management as set out below. Compliance with the Resistance Management Plan is required under the terms of the Bollgard II Technology User Agreement and under the conditions of registration (*Agricultural and Veterinary Chemicals Act, 1994*).

#### This RMP is for the following areas:

- Ord River Irrigation Area, Western Australia
- Burdekin Bowen Basin Area, Queensland
- Richmond Area, Queensland

#### 1. Refuges

Growers planting Bollgard II cotton will also be required to grow a refuge crop that is capable of producing large numbers of *Helicoverpa* spp. moths which have not been exposed to selection with Bt proteins Cry 1Ac and Cry 2Ab. These unselected moths are expected to dominate matings with any survivors from Bollgard II crops and thus help to maintain resistance to Bt proteins Cry 1Ac and Cry 2Ab at low levels.

All refuge options are based on the requirement of a 10% unsprayed cotton refuge or its equivalent as determined by the relative production of *Helicoverpa* spp. from each of the refuge types as described in the tables below.

For each area of irrigated Bollgard II cotton planted, a grower is required to plant a minimum of one, or a combination of, the following:



Table 1. Irrigated Bollgard II cotton refuge options

Crop	Conditions	% of Bollgard II	Regions permitted
Conventional Cotton	Irrigated, unsprayed conventional cotton	10	All Regions
Pigeon pea	Fully irrigated, unsprayed	5	All Regions

**Note:** Unsprayed means not sprayed with insecticides that target any life stage of *Helicoverpa* spp. Bt products must not be applied to any refuge.

If the viability of an unsprayed refuge is at risk due to early or late season pressure by *Helicoverpa* spp., or any other caterpillar species, contact Monsanto immediately. With prior approval from the Monsanto Compliance and Stewardship Manager, a non-Bt heliocide can be applied.

An unsprayed refuge should not be planted in the same field as any crop sprayed with a rate of insecticide that is registered for Helicoverpa spp, with the exception of Bollgard II unless a sufficient buffer is in place to prevent insecticide drift.

Sprayed crops and unsprayed refuges that are planted in adjacent fields must also be separated by sufficient distance to *minimise the likelihood of insecticide drift onto the unsprayed refuge*. For the purposes of this Resistance Management Plan, conventional cotton includes any cotton varieties that do not have Bt proteins in the plant that control *Helicoverpa* spp. larvae.

#### **General conditions for all refuges:**

(a) Refuge crops are to be planted and managed so that they are attractive to *Helicoverpa* spp. during the growing period of the Bollgard II cotton varieties.

#### Ord River Irrigation Area

It is preferable that all refuge is planted within the 2 week period prior to planting Bollgard II. If this is not possible, refuge planting must be completed within 3 weeks of the first day of sowing of Bollgard II. At this time, sufficient refuge must have been planted to cover all of the Bollgard II cotton proposed to be planted for the season (including Bollgard II already planted and any that remains unplanted). Should additional Bollgard II planting be made after this date, which is not already covered by refuge, additional refuge must be planted as soon as possible and no more than 2 weeks after sowing of the additional Bollgard II.

#### Burdekin Bowen and Richmond Areas

Refuges must be sown within the 2 weeks prior to planting any Bollgard II. This timing attempts to mitigate wet season planting risks.

- (b) Group J legume innoculant should be used to treat pigeon pea planting seed just prior to sowing to ensure effective root zone colonisation by nitrogen fixing rhizobium bacteria
- (c) Once the Bollgard II cotton begins to flower the corresponding refuge must not be cultivated.
- (d) Insecticide preparations containing Bt may be used on Bollgard II cotton throughout the season BUT NOT on any refuge crops.
- (e) All refuges are to be planted within the farm unit growing Bollgard II cotton. Subject to clause (f) below, all reasonable effort should be taken to plant the refuge either on one side of, or next to, a Bollgard II cotton field, and all Bollgard II fields must be no more than 2 km from the nearest Bollgard II refuge.



- (f) To minimise the possibility of refuge attractiveness being affected by herbicide drift, non-herbicide tolerant refuges should be separated from herbicide tolerant Bollgard II cotton crops by a sufficient distance to minimise such drift, but no more than 2km from the Bollgard II cotton.
- (g) To account for possible insecticide drift, Bollgard II refuge crops must be at least 24 metres wide and 24 metres long. Different unsprayed refuge options may be planted in the same field as a single unit.
- (h) Slashing of plants within the refuge should only be carried out after Bollgard II cotton lint removal has been completed. Soil disturbance of refuge crops can only occur 2 weeks after Bollgard II cotton plants have been harvested.
- (i) Refuges for Bollgard II crops must be planted in the same row configuration as the Bollgard II crop.

#### 2. Control of volunteer and ratoon cotton

Volunteer and ratoon cotton may impose additional selection pressure on *Helicoverpa* spp. to develop resistance to the Bt proteins Cry 1Ac and Cry 2Ab produced by Bollgard II cotton.

Growers must make all reasonable efforts to remove volunteer and ration plants as soon as possible from all fields - including fallow areas, Bollgard II crops, conventional cotton crops and all refuges. The presence of Bollgard II volunteers/ration cotton in any refuge will diminish the value of the refuge and must be removed as soon as possible.

Note: The refuge should preferably be planted into fallow or rotation fields that have not been planted to cotton in the previous season.

#### 3. Post-harvest crop destruction

As soon as practical after harvest, Bollgard II cotton crops must be destroyed by cultivation or herbicide so that they do not continue to act as hosts for *Helicoverpa* spp. Unsprayed refuges must be left uncultivated for two weeks after harvest to allow emergence of any pupating *Helicoverpa* spp.

#### 4. Planting windows

All Bollgard II crops and cotton refuges are to be planted into moisture or watered-up in a five week window. In each region, the start date of the planting window will be determined by TIMS in consultation with local growers and reflected in a regionally amended "Bollgard II Planting Window Variation Notice".

The planting window will occur within the following periods:

Ord River Irrigation Area: March 1 and May 1.

**Burdekin Bowen Basin Area:** December 1 and April 1.

Richmond Area: December 1 and April 1.

#### 5. Refuge

Unsprayed Pigeon Pea refuge should preferably be planted into a fallow or rotation field that has not been planted to cotton in the previous season.

#### 6. End of season chick pea trap crop

An end of season chick pea trap crop must be planted. The planting configuration of the trap crop should be the same as that of the Bollgard II crop. Table 2 shows the requirements for the chick pea trap crop.

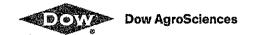
Table 2. End of season chick pea trap crop requirements Criterion	End of season chick pea trap crop
Minimum area & dimensions	A trap crop of 1% of planted Bollgard II crop area is required. This planting must be at least 24 m x 24m wide.



Planting time	In April for Burdekin Bowen Area. In July/August for
	Ord area. The trap crop is to be planted such that it
	is attractive to Helicoverpa spp. from 2 weeks
	before defoliation of the Bollgard II cotton. It must
	remain attractive to <i>Helicoverpa</i> spp. until at least 2
	weeks after defoliation of the Bollgard II cotton.
Insect control	The trap crop should be monitored and sprayed
	with insecticide if the larval pressure threatens the
	viability of the crop.
Irrigation	The trap crop is to remain attractive to Helicoverpa
	spp. until after defoliation of cotton. In some cases
	this may require one additional irrigation after the
	cotton is defoliated. The trap crop must be planted
	into an area where it can receive the additional
	irrigation required to ensure the trap crop remains
	attractive to Helicoverpa spp.
Weed control	The trap crop should be kept free of weeds and
	particularly volunteer Bollgard II cotton.
Crop destruction	The trap crop must be destroyed 2-4 weeks after
	defoliation of the Bollgard II cotton crop, but not
	before 3 weeks (slash and pupae bust – full soil
	disturbance to a depth of 10 cm across the entire
	trap crop area). All Bollgard II cotton and associated
	trap crops must be destroyed by:
	Burdekin Bowen Basin/Richmond Area – August 31
	Ord River Irrigation Area – December 10

# NB: If any grower encounters problems in complying with the resistance management plan, please contact your Monsanto Regional Business Manager.

For further background information on the various components of this plan see the "Preamble to the Resistance Management Plan for Bollgard II" in the current Cotton Pest Management Guide.



Dow AgroSciences Australia Ltd Level 5, 20 Rodborough Road, Frenchs Forest NSW 2086, Australia Tele 404 8 0778 2400 Few 464 0 0776 2438 Fell Free 4800 700 000

Tel: +61 2 9776 3400 Fax: +61 2 9776 3435 Toll Free: 1800 700 096 Postal: Locked Bag 502, Frenchs Forest NSW 2086, Australia

www.dowagrosclences.com.au ABN 24 003 771 659

6/1/2015

Office of the Gene Technology Regulator (MDP54)
GPO Box 9848
Canberra ACT 2601

#### **DIR091 ANNUAL REPORT 2014**

Since the Issuing of Licence No.: DIR 091 by the OGTR on the 25 November 2009, Dow AgroSciences Australia Ltd has had nil dealings with WideStrike™ Insect Protection Cotton in Australia.

As per licence condition 32, the following statements are made:

- (a) No adverse impacts, unintended effects or new information relating to risks to human health and safety or the environment have been caused by or found in relation to WideStrike™ Insect Protection Cotton
- (b) WideStrike™ Insect Protection Cotton has not been produced commercially in any state or territory in Australia since the issuing of Licence No.: DIR 091 by the OGTR on the 25th November 2009.
- (c) WideStrike[™] Insect Protection Cotton has not been produced for experimental purposes in any state or territory in Australia since the Issuing of Licence No.: DIR 091 by the OGTR on the 25th November 2009.
- (d) Nil WideStrike™ Insect Protection Cotton has been fed to livestock north of latitude 22º South in Australia.
- (e) No research of the effects of WideStrike™ Insect Protection Cotton on non-target insect(s) has been conducted.
- (f) No research on volunteer incidence of WideStrike™ Insect Protection Cotton in areas north of latitude 22° South after livestock feeding has been conducted.

Regards,





LICENCE No:

DIR 012/2002

LICENCE HOLDER:

Monsanto Australia Limited

PROJECT SUPERVISOR:

**ACCREDITATION NO:** 

ACCR 034/2002

SUBMISSION:

2004 Annual Report for Bollgard II®

(Commercial Release)

REPORTING PERIOD:

2003/04 Cotton Growing Season

DATE:

22 December 2004

PREPARED BY:

Regulatory Affairs Associate

Information and data submitted herein contains trade secrets, or privileged or confidential information the property of Monsanto Australia Limited and no government agency or representative thereof is authorised to disclose such data and information without written permission from Monsanto Australia Limited.

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**Telephone:** 

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Facsimile:

03 9522 6102 -

Contact email:

**Accreditation** 

Number:

ACCR 034/2002

#### **SCOPE OF THE REPORT**

This report addresses the annual reporting condition of the DIR 012 commercial release licence for Bollgard II® issued to Monsanto Australia Limited by the Office of the Gene Technology Regulator.

This report details compliance with general and specific conditions of Part 3 and 4 of the DIR 012 licence as issued to Monsanto Australia Limited on 23 September 2002, and varied in June, September and December 2003 and March, May, October and December 2004.

In Confidence



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1	a b c d e f	General Conditions Informing people of their obligations Reporting Material changes in circumstances Remaining an accredited organisation Changes to details Testing methodology	1 1 1 1 1 2
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#### 1. General Conditions

#### a. Informing people of their obligations

Monsanto Australia Limited informed all cotton growers and cotton gins covered by the DIR 012 / 2002 licence of the obligations imposed on them as a result of the conditions of these licences. This was achieved primarily through Monsanto Accreditation programs and information courses.



#### b. Reporting

During the reporting period, the licence holder did not become aware of any 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 of any unintended effects of the dealings authorised by the licence.

#### c. Material changes in circumstances

During the 2003/04 reporting period, Monsanto Australia Limited did not become aware of any relevant conviction of the licence holder occurring after the commencement of this licence; any revocation or suspension of a licence or permit held by Monsanto Australia Limited; or any event or circumstance that would affect the capacity of Monsanto Australia Limited to meet the conditions of the DIR 012 licence.

# d. Remaining an accredited organisation

At all times, Monsanto Australia Limited remained an accredited organisation and complied with conditions of accreditation as set out in the OGTR Guidelines for Accreditation of Organisations.

#### e. Changes to details

During the 2003/04 reporting period, Monsanto Australia Limited notified the Office of the Gene Technology Regulator of a change in project supervisor.

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# f. Testing methodology

Under conditions of the licence, Monsanto Australia Limited was required to provide the Regulator with a method capable of reliably detecting the presence of the GMO.

In Confidence Page 2



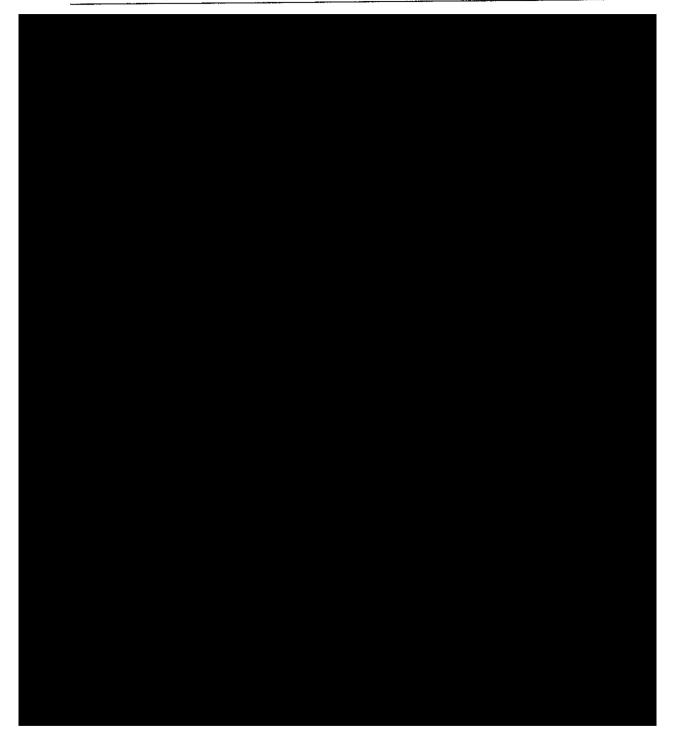
# 2. Release of Bollgard II® south of latitude 22° south (outside the Restricted Zone)

The licence holder may conduct dealings with the GMOs south of latitude 22 degrees south.

In the 2003/04 reporting period, Bollgard II cotton was grown in the traditional cotton-growing regions south of latitude 22° south in NSW and Queensland. More information on the locations where all Bollgard II cotton crops were grown during the 2003/04 cotton growing season are given in **Part 2a**.

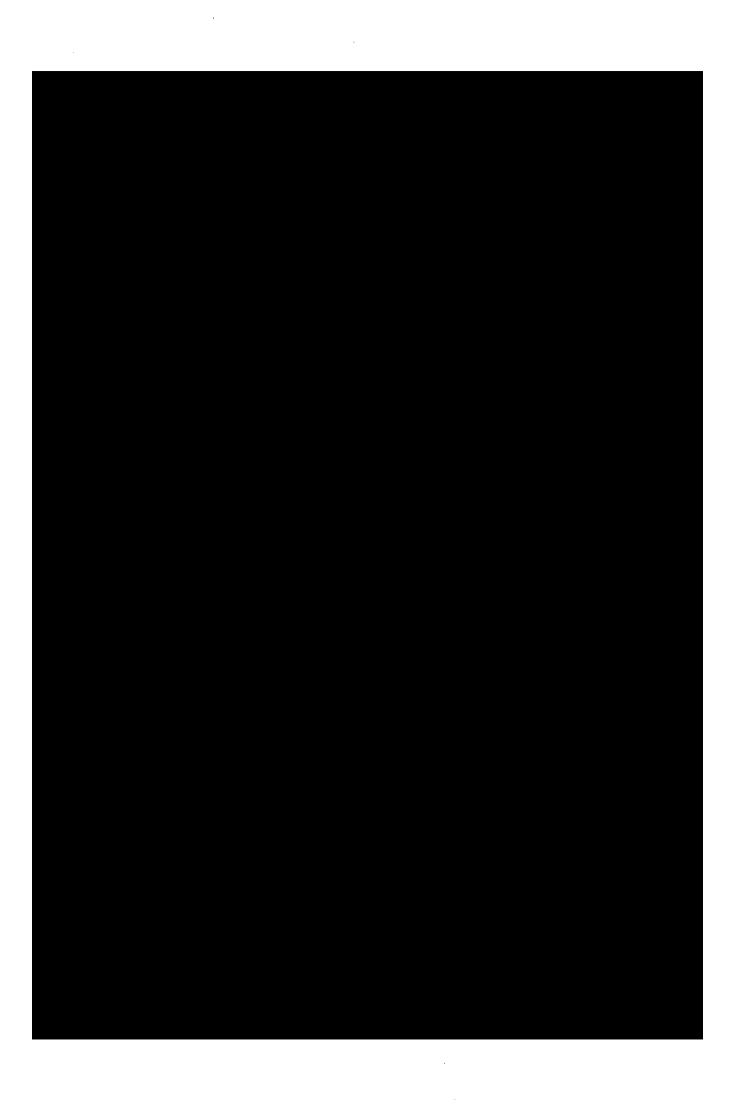
- a. Crop plantings of Bollgard II® cotton
- i) Conditions for Growing Crop



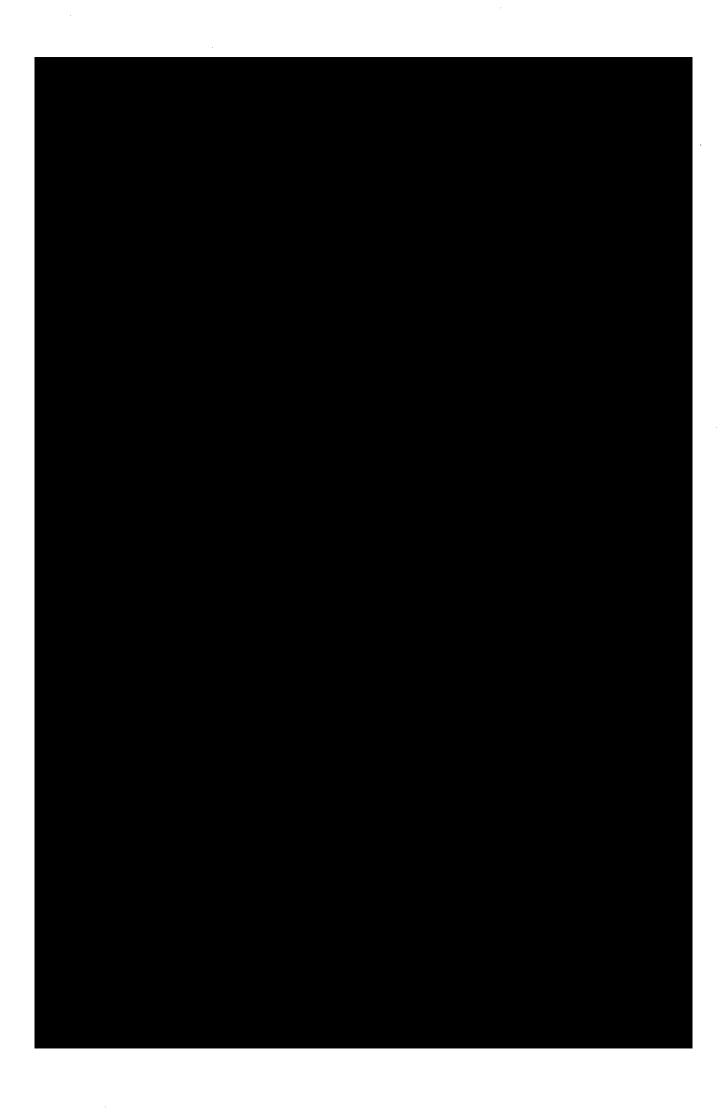


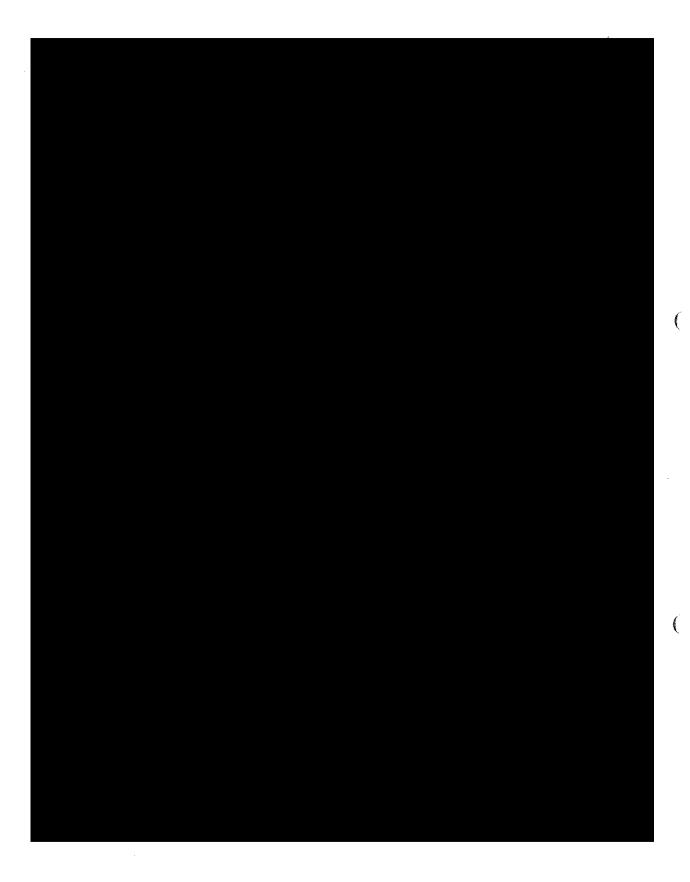
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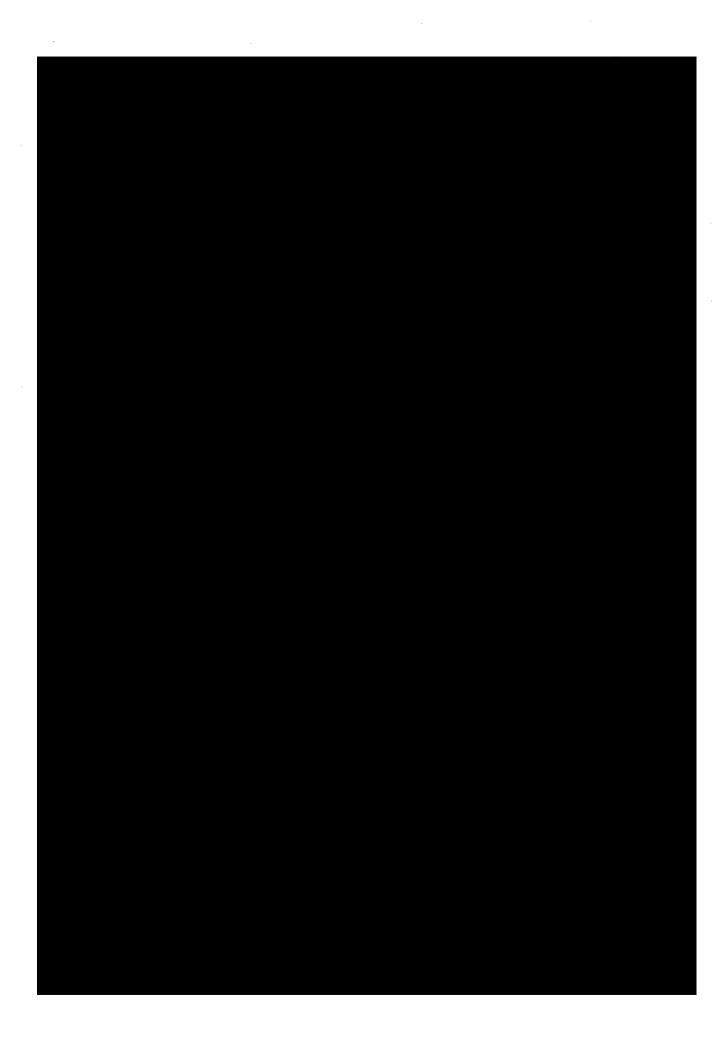












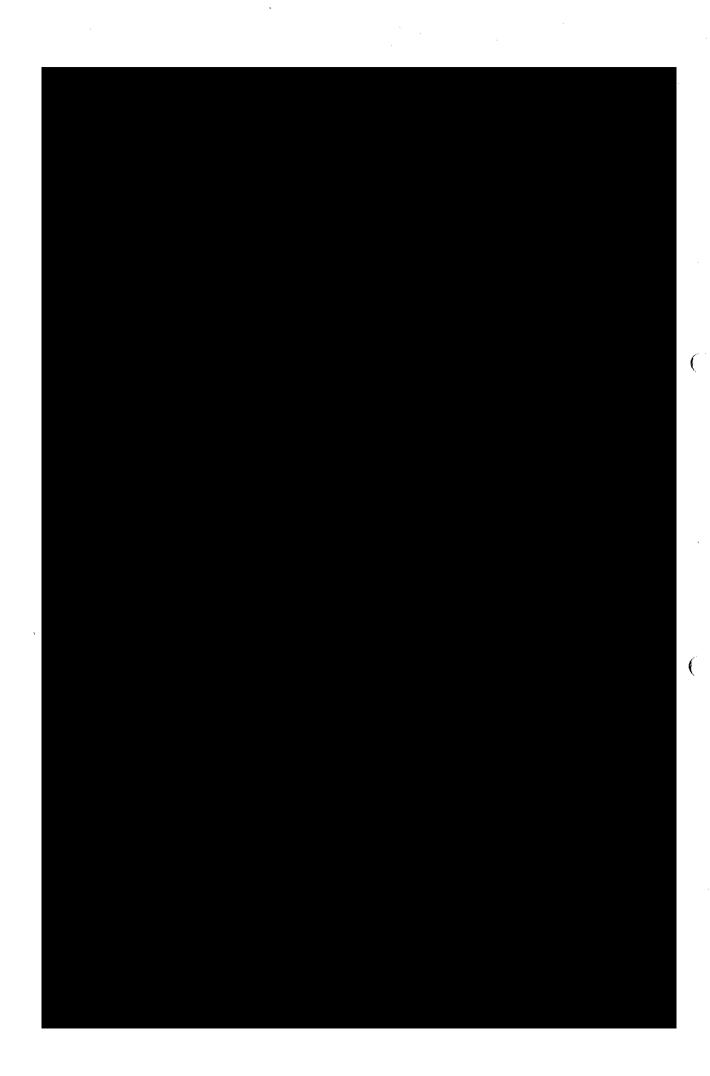




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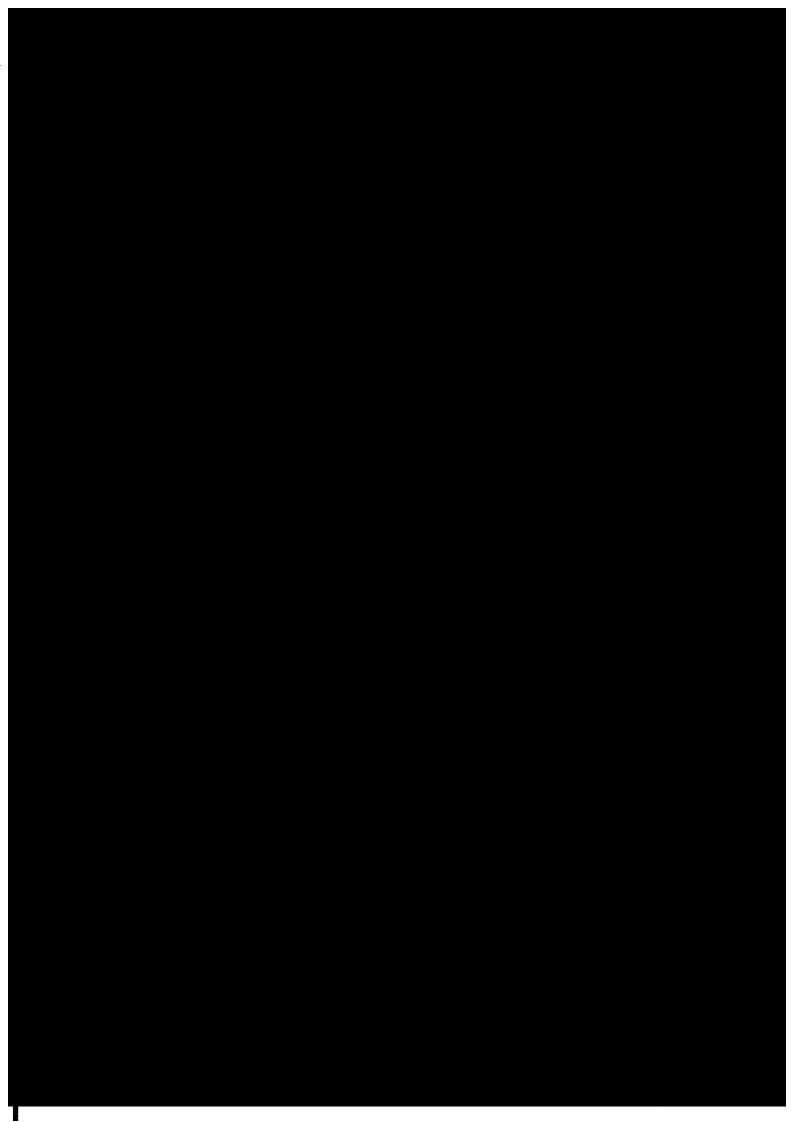


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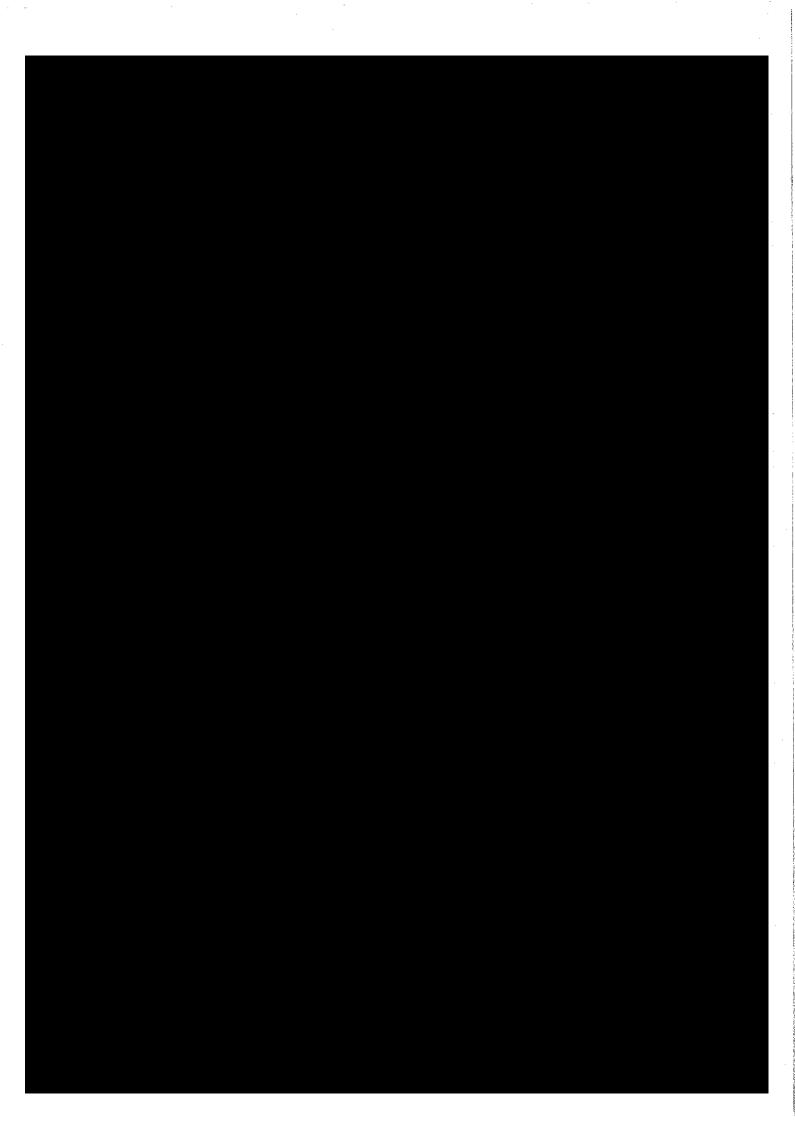
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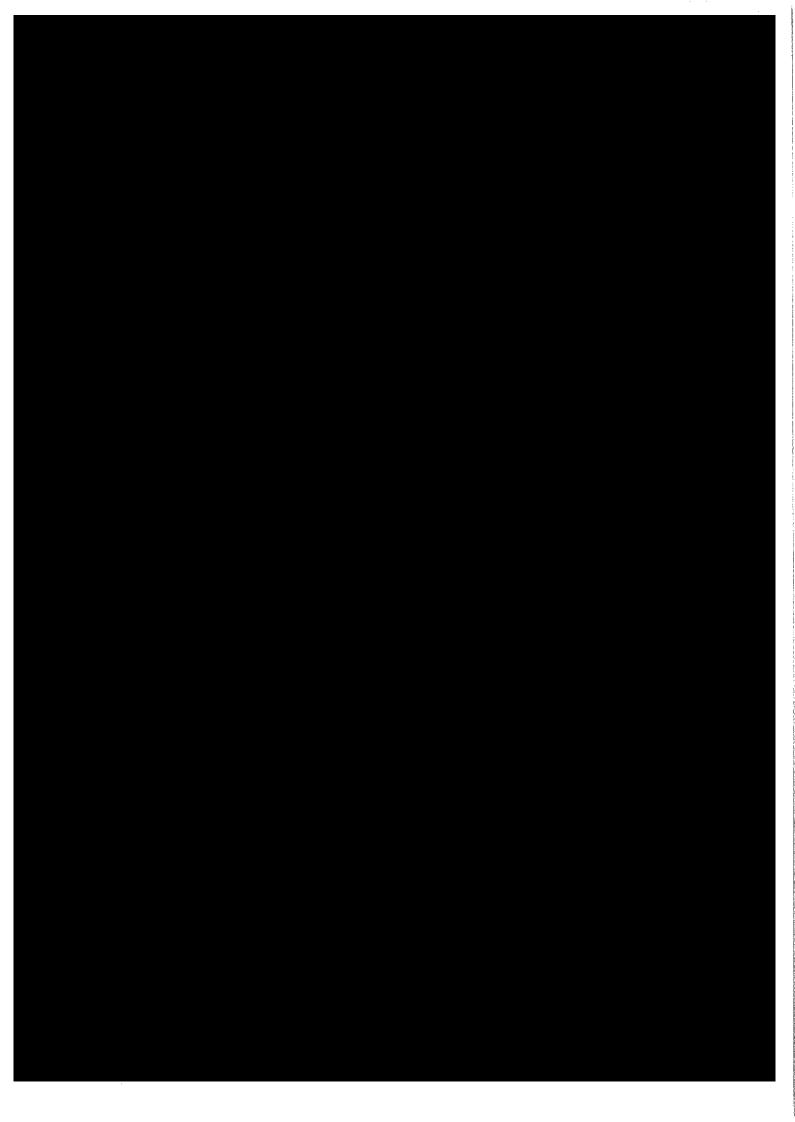
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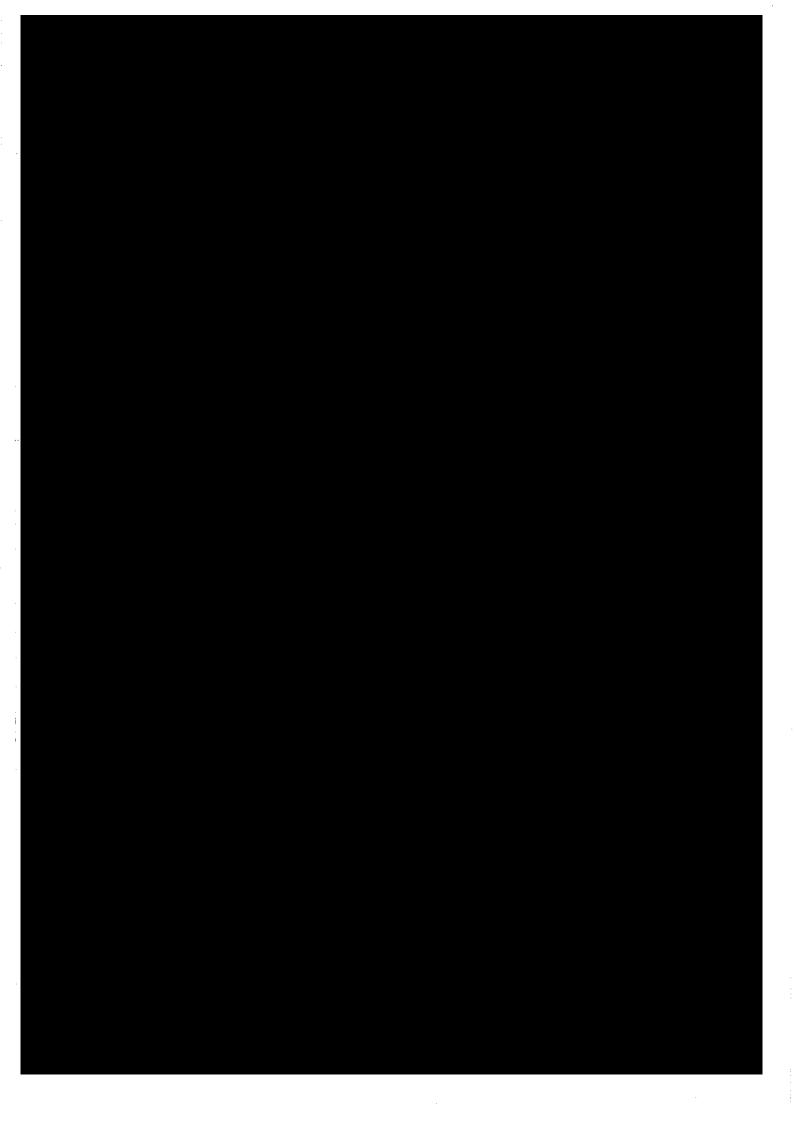


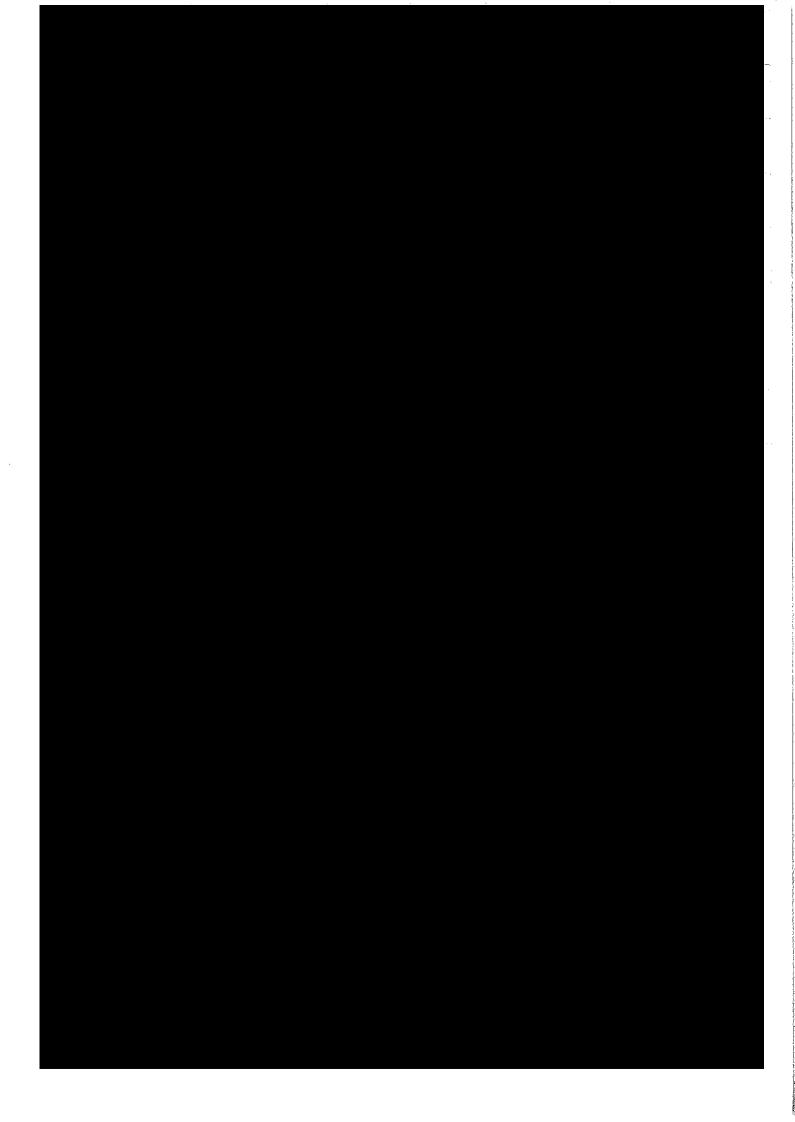






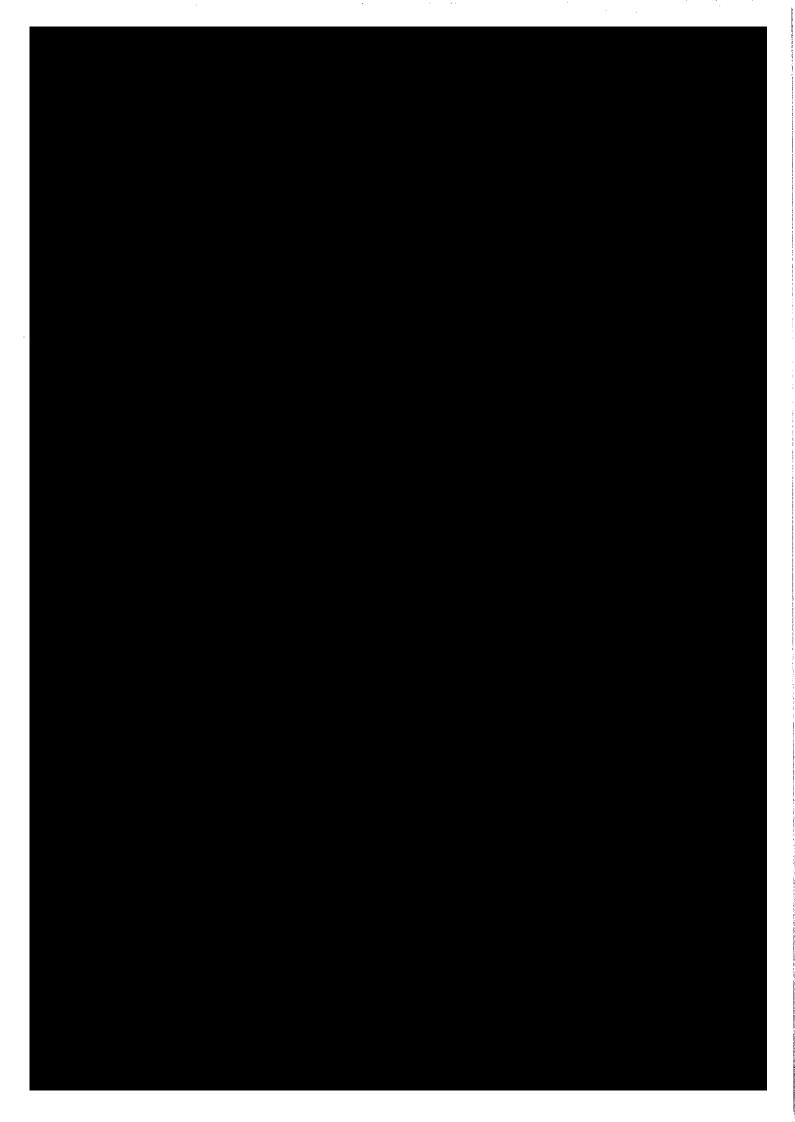






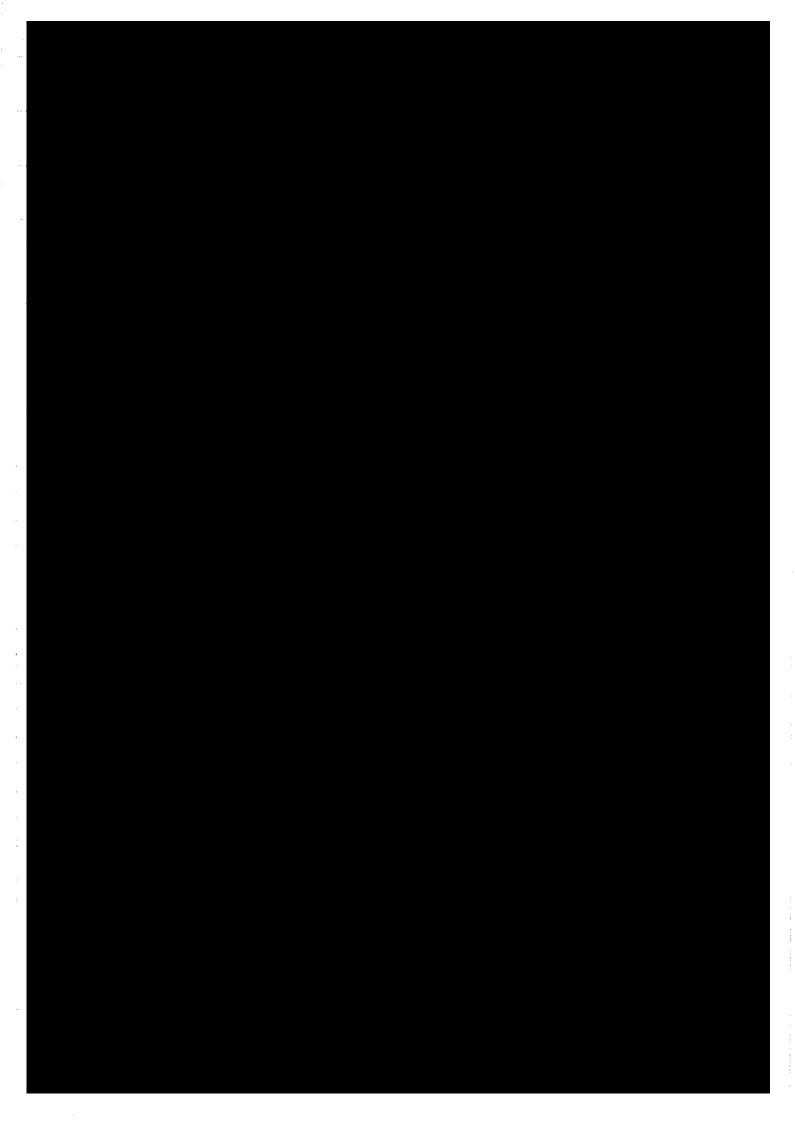


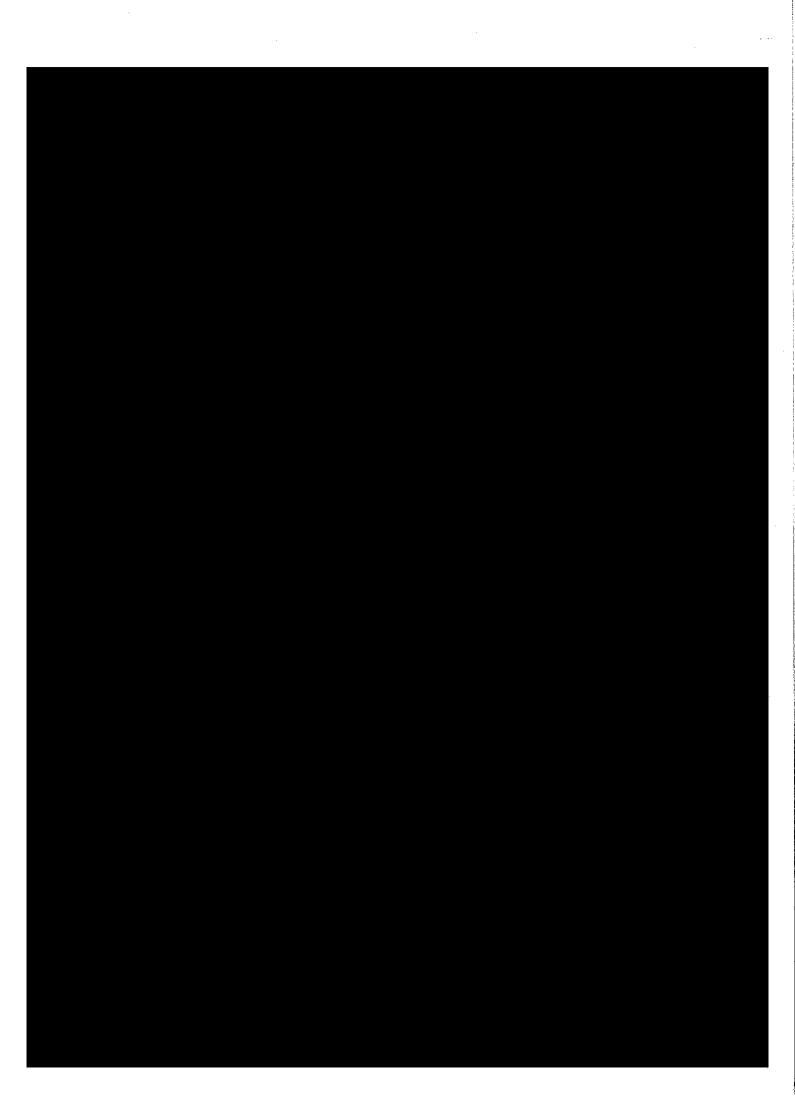
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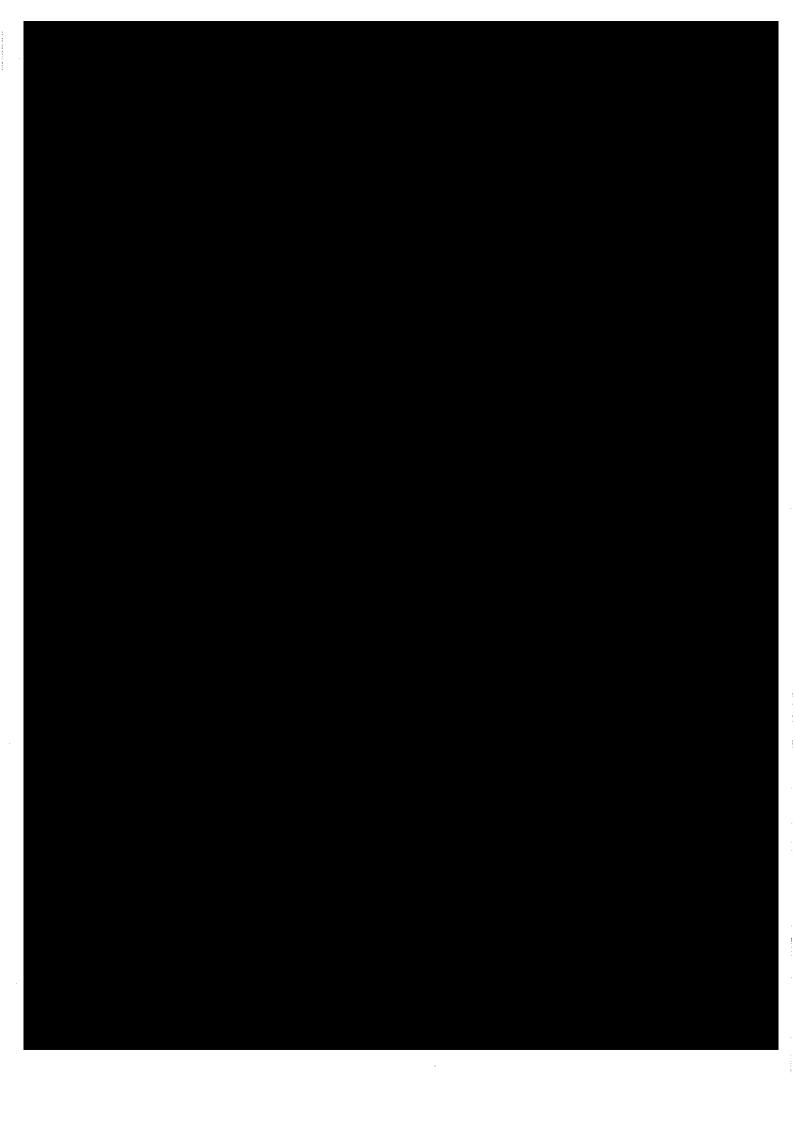


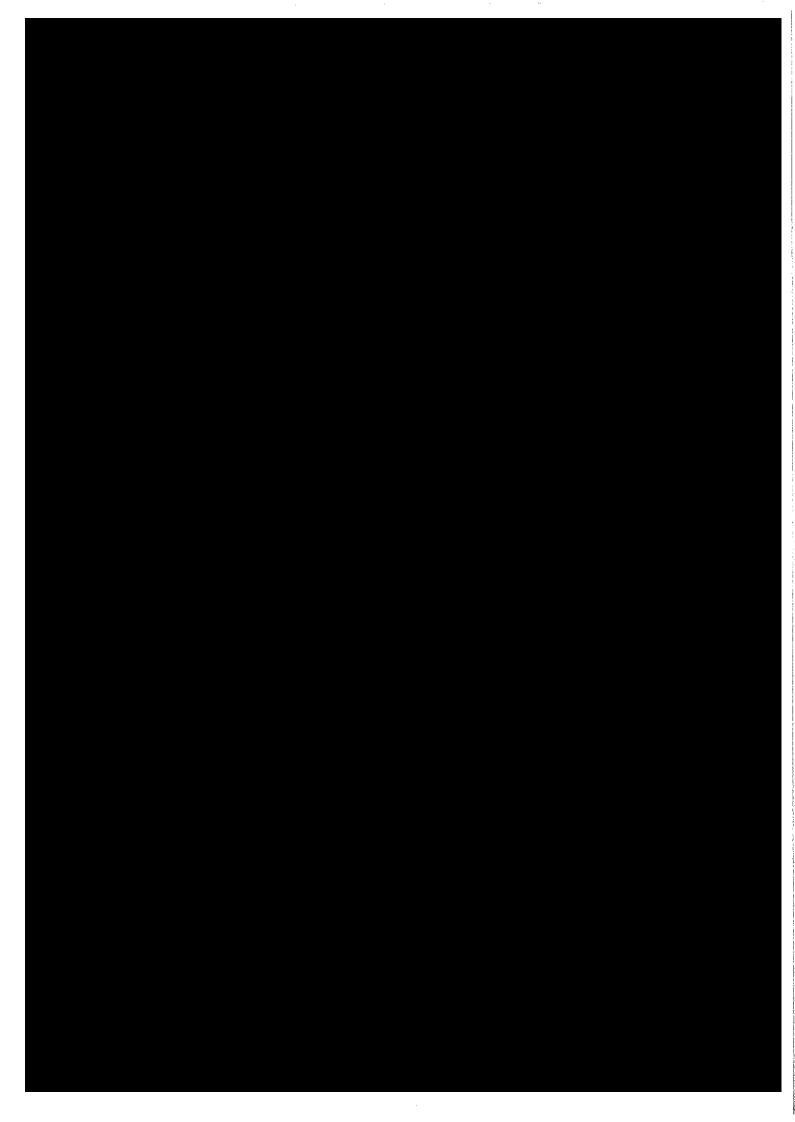


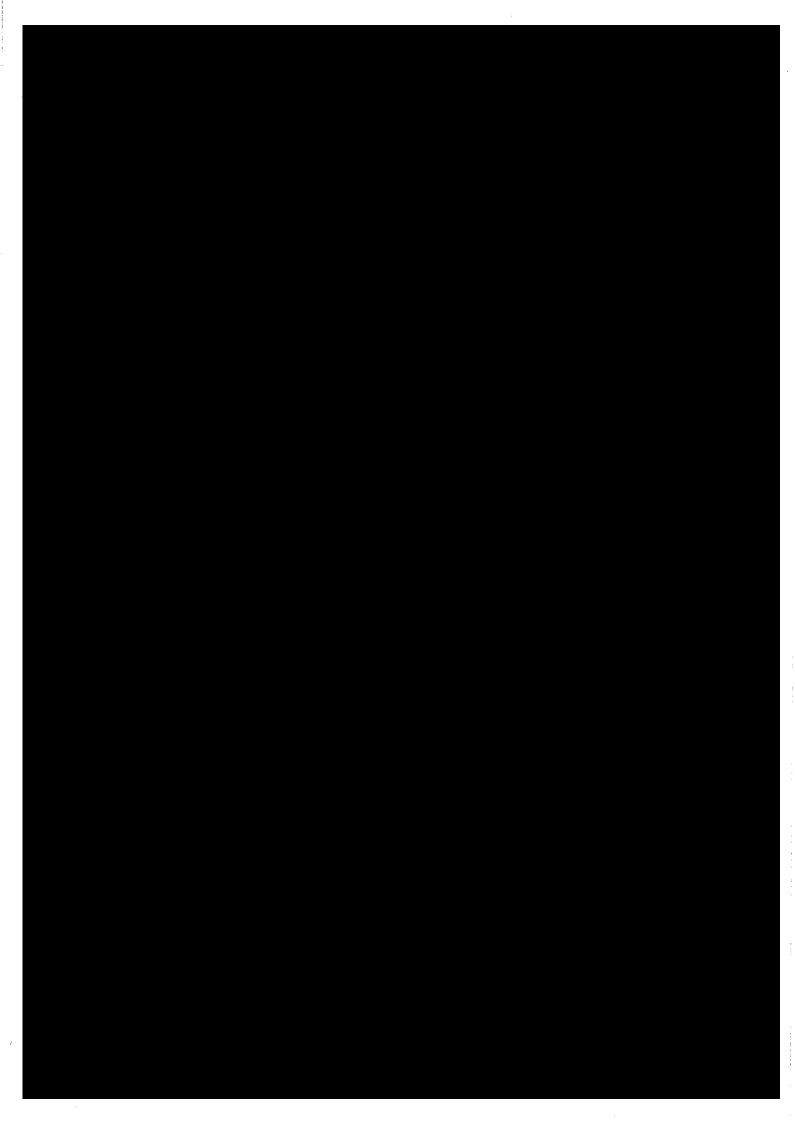


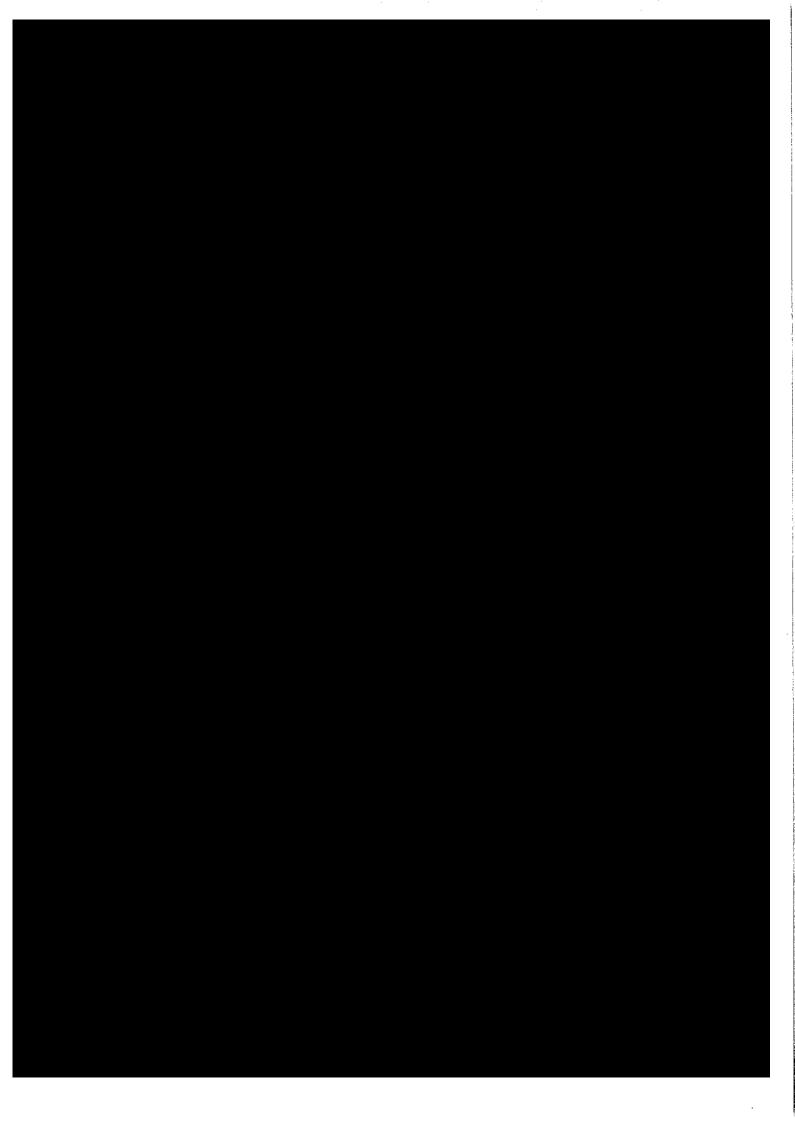


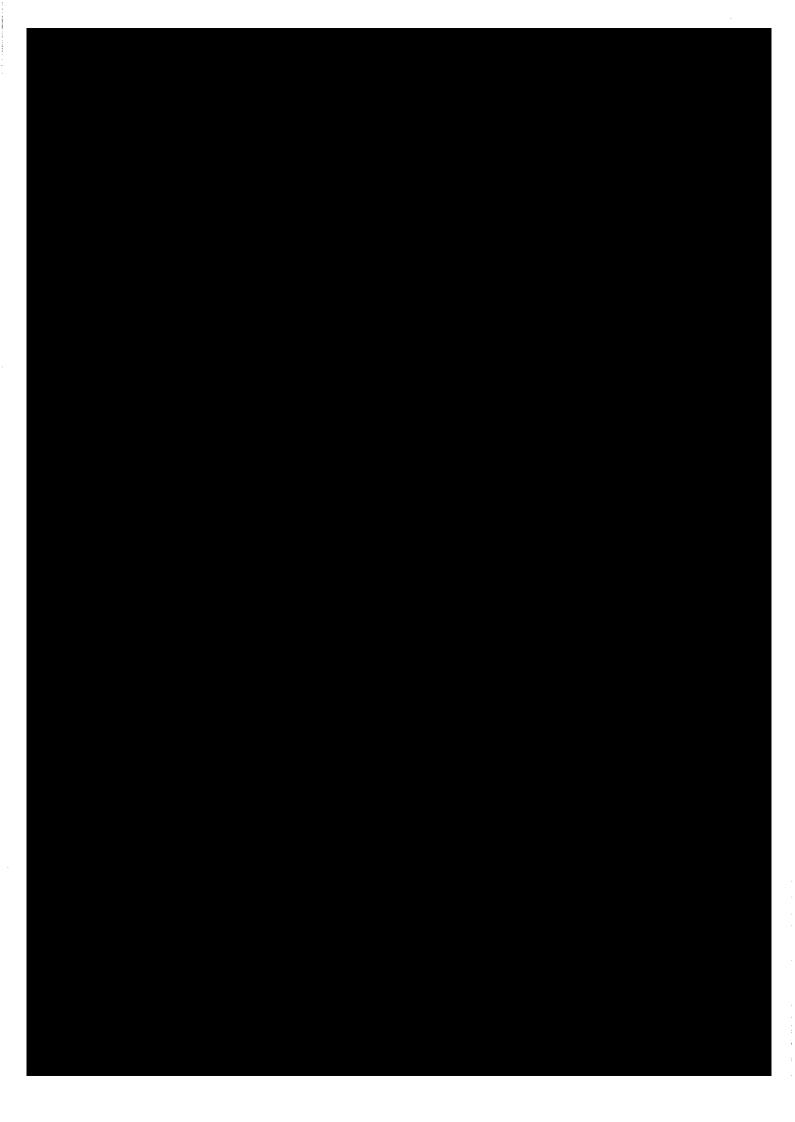






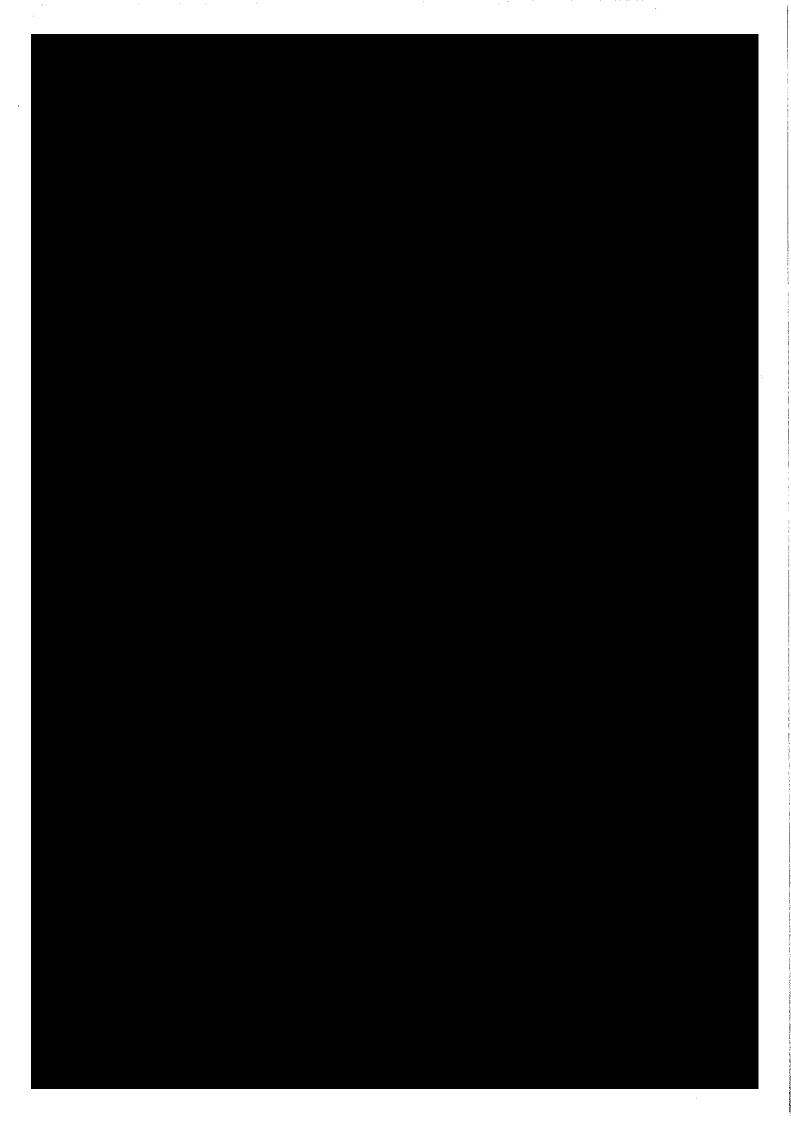




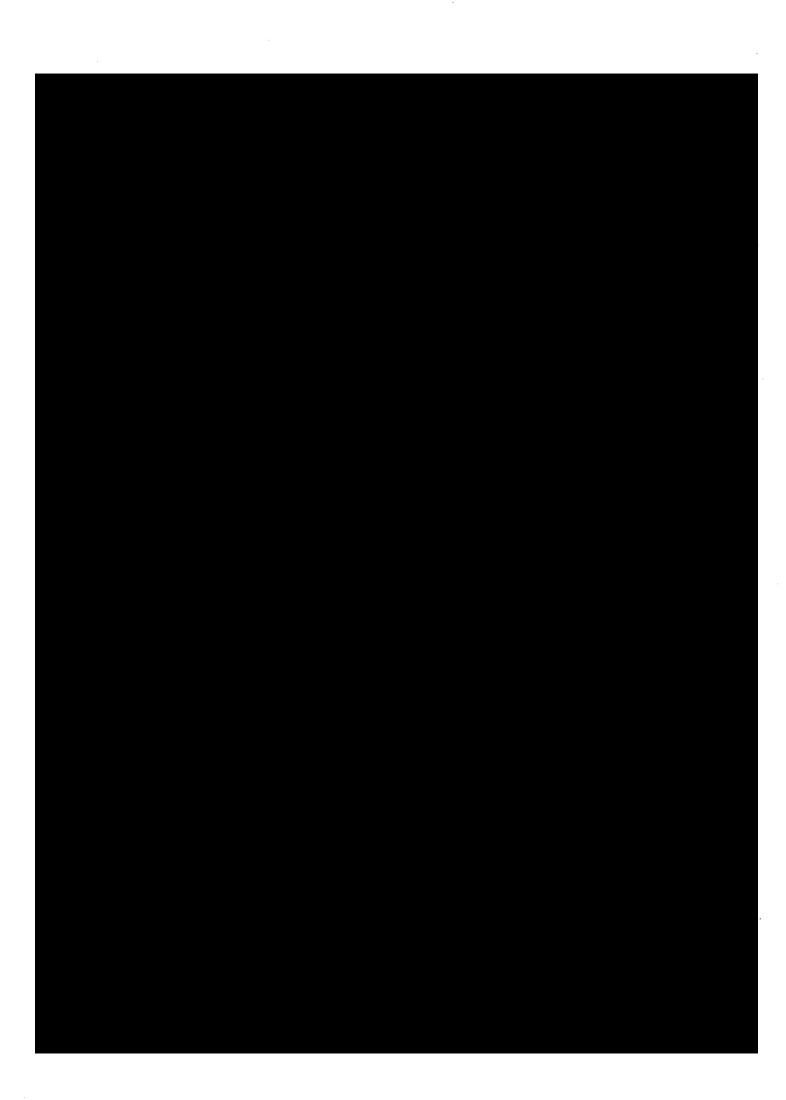




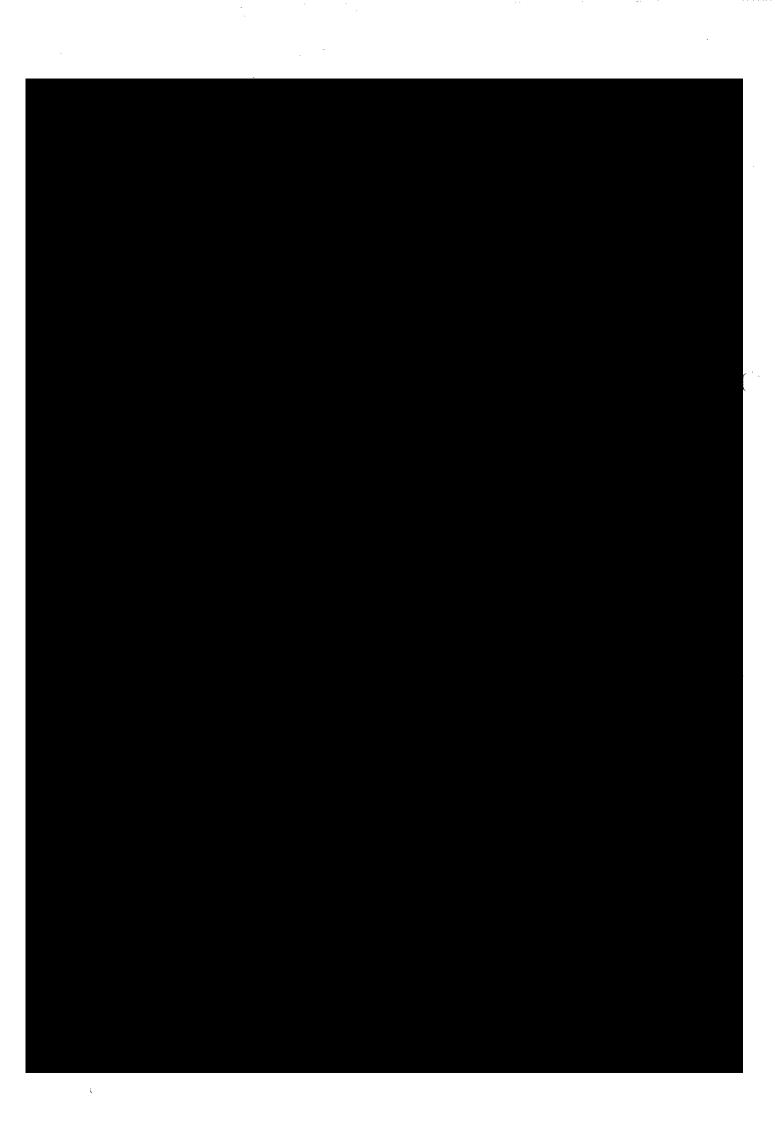


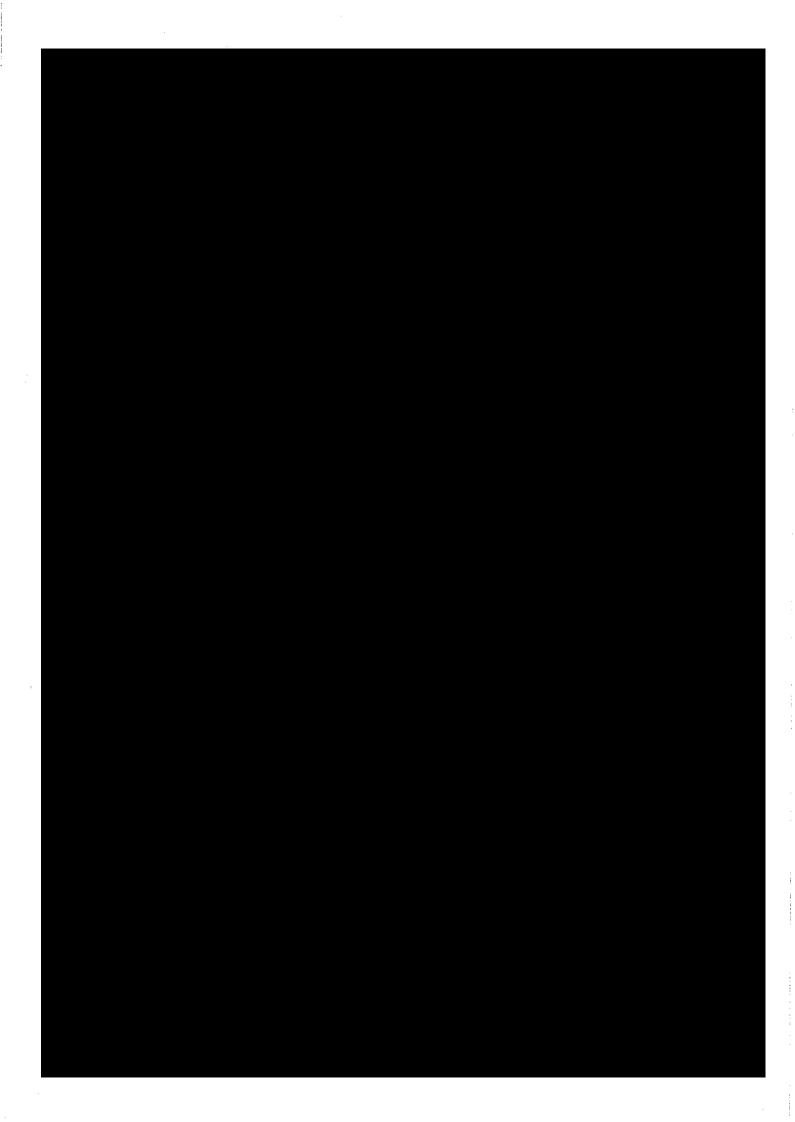


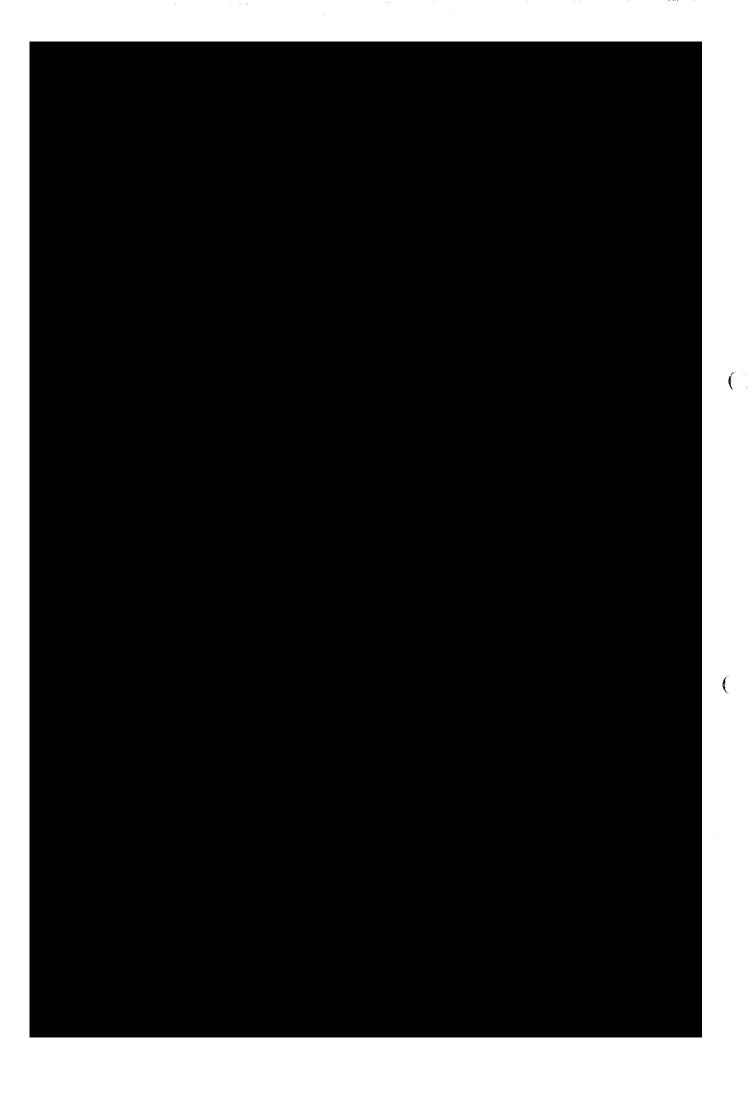










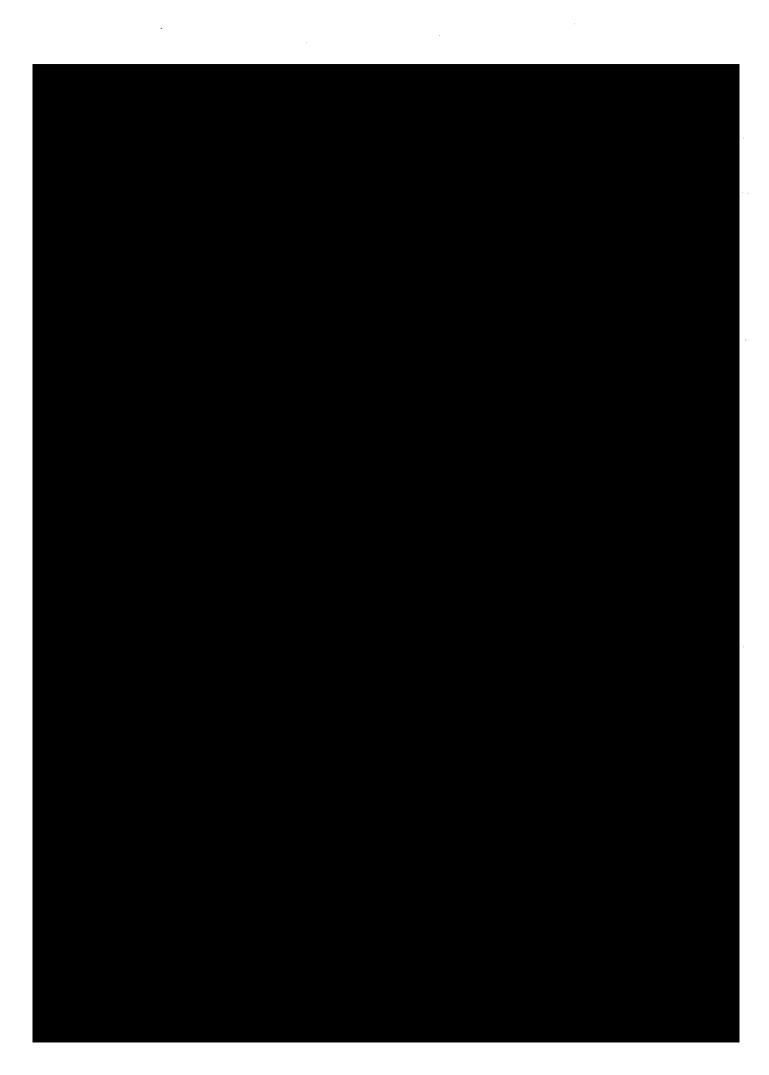








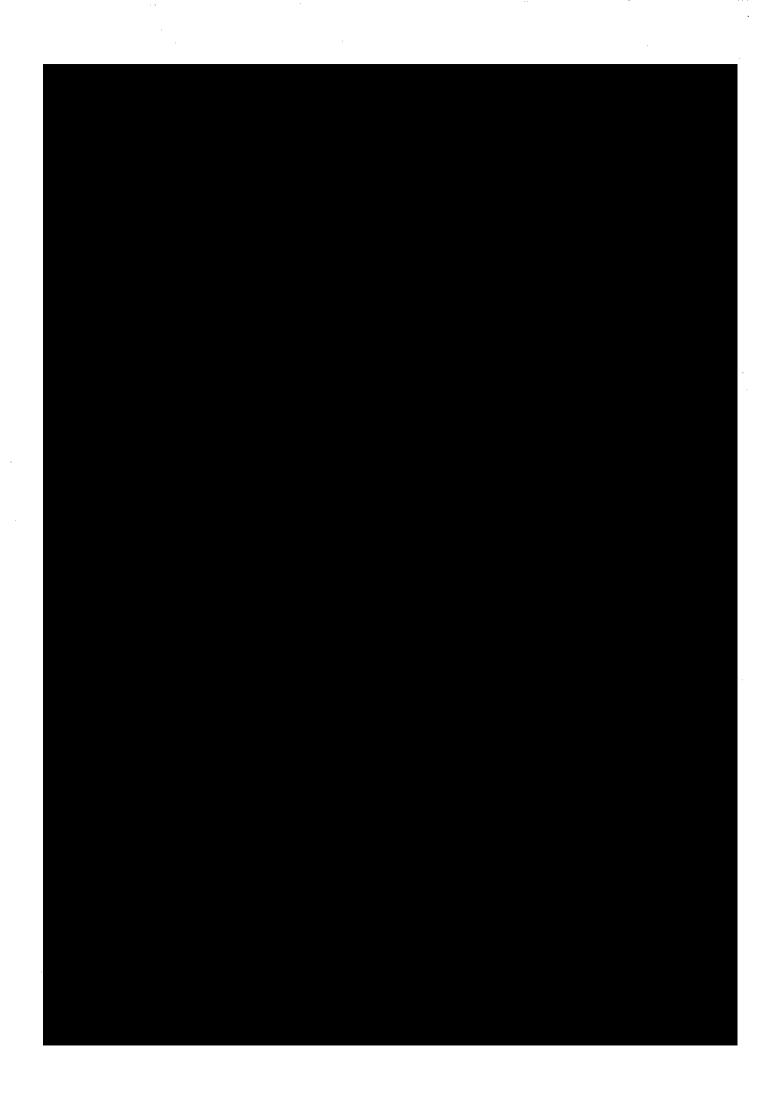


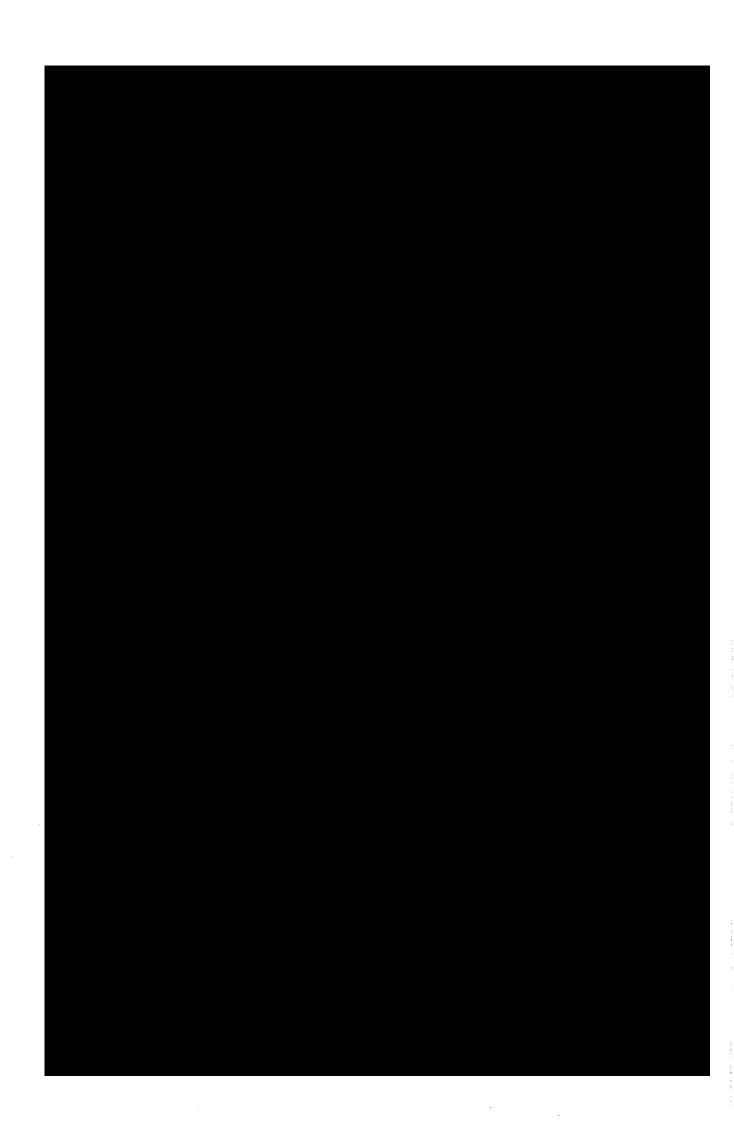


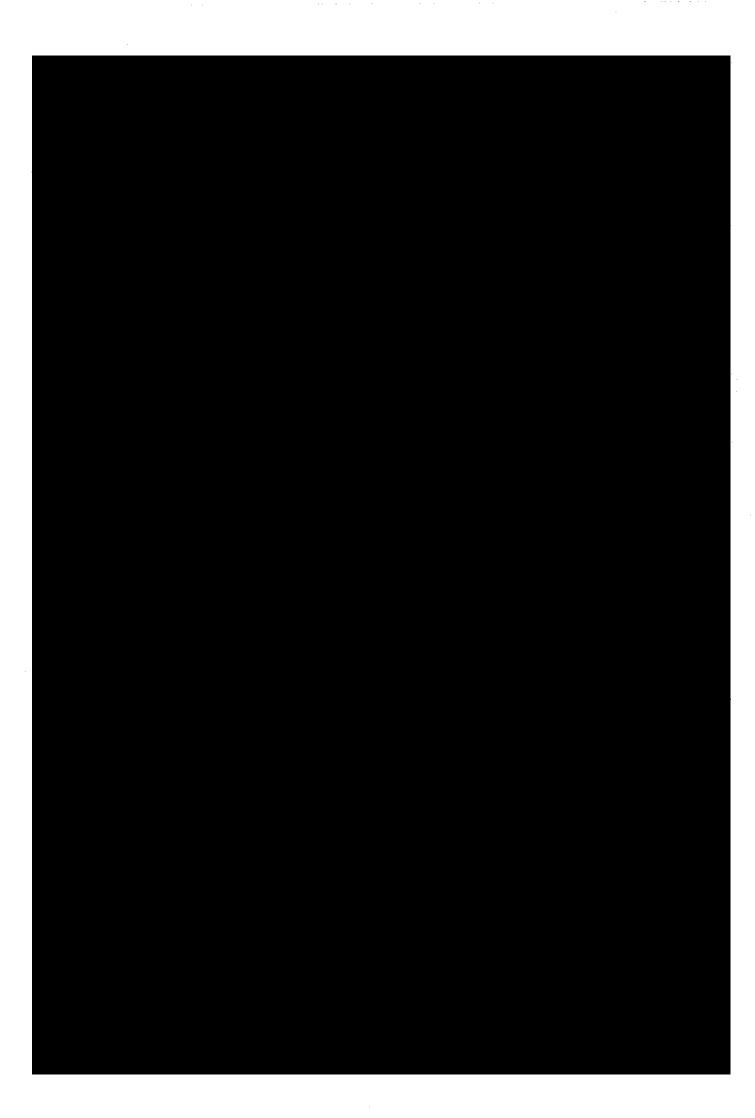




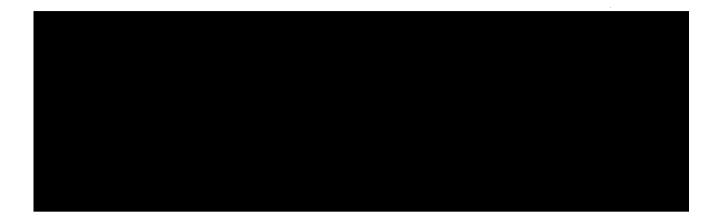








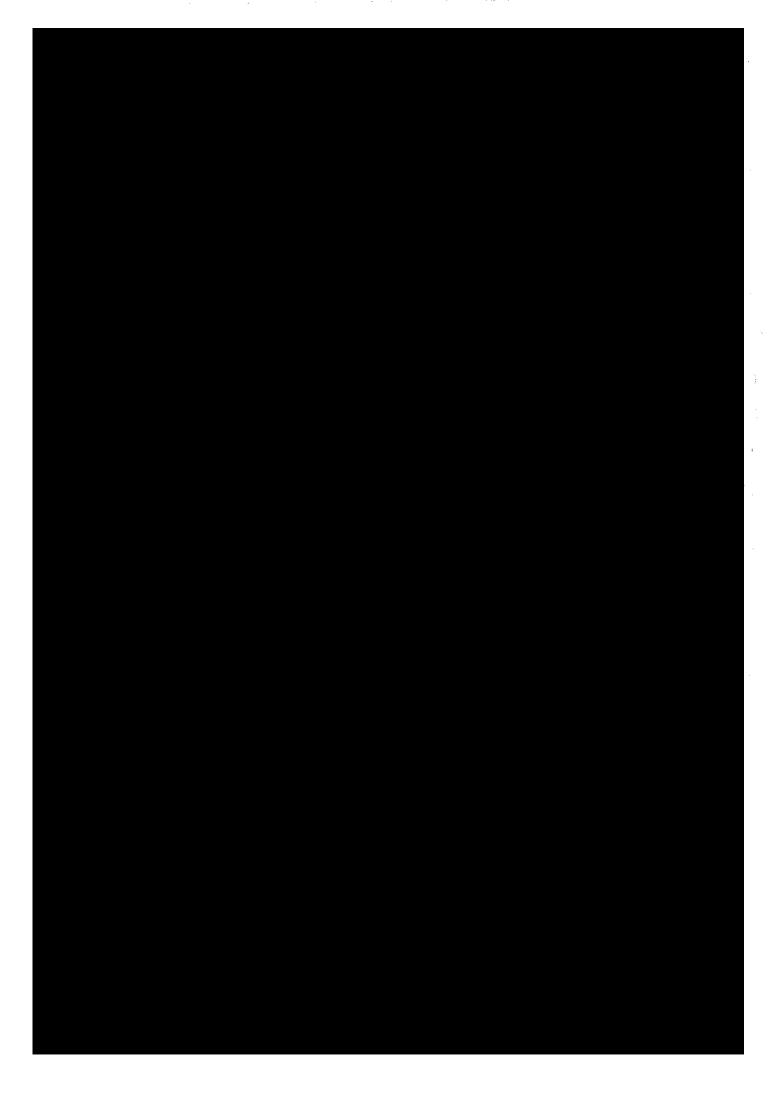




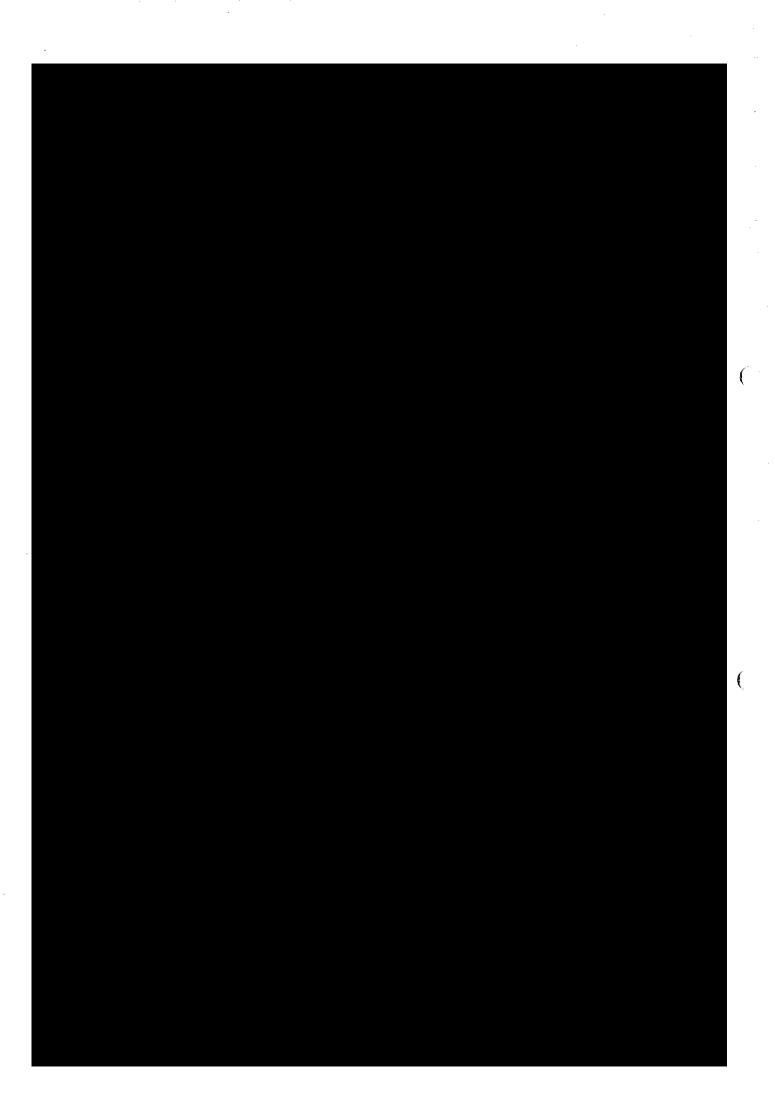


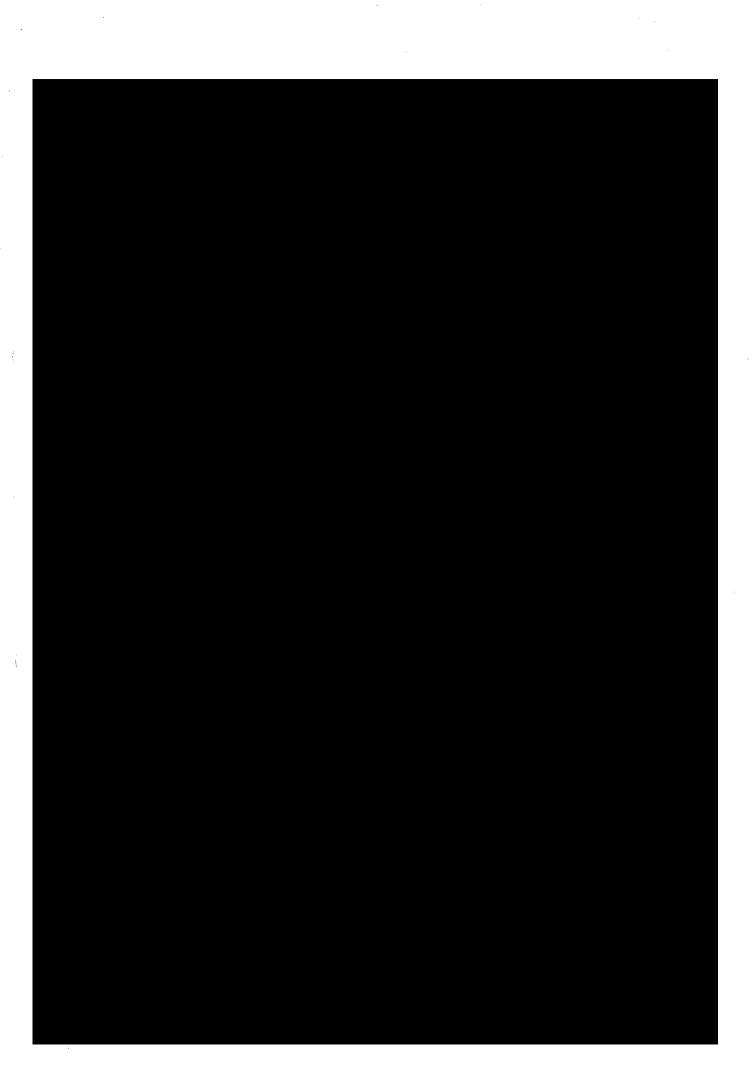
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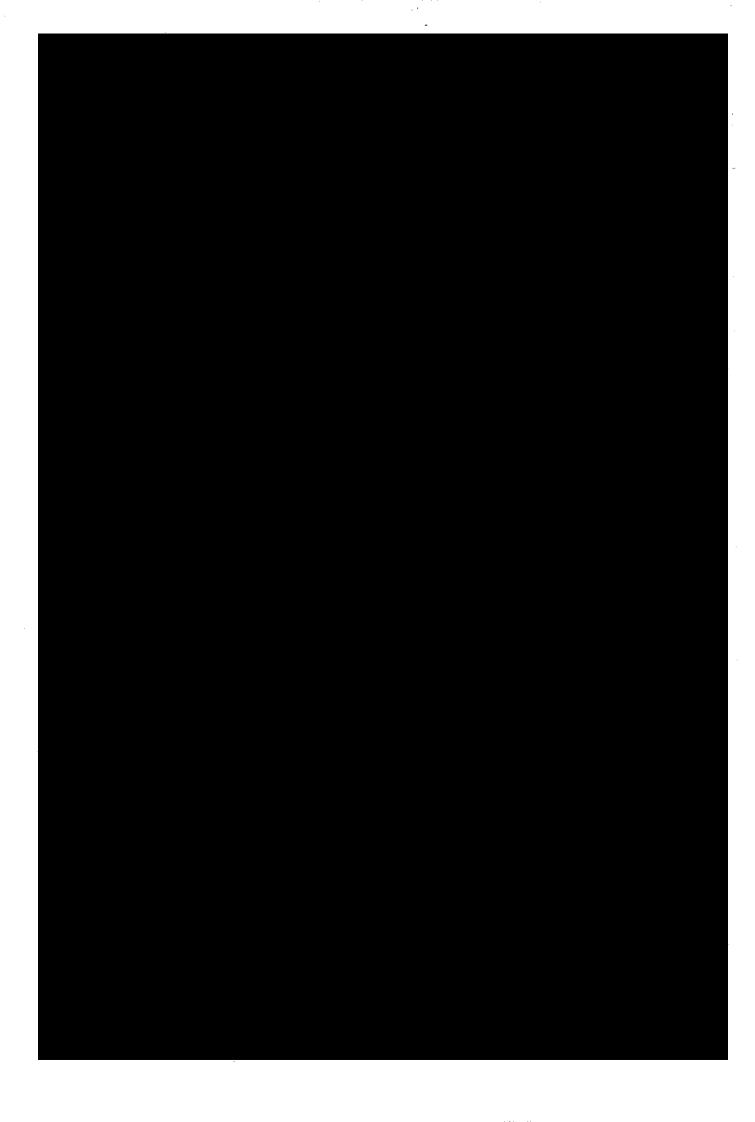






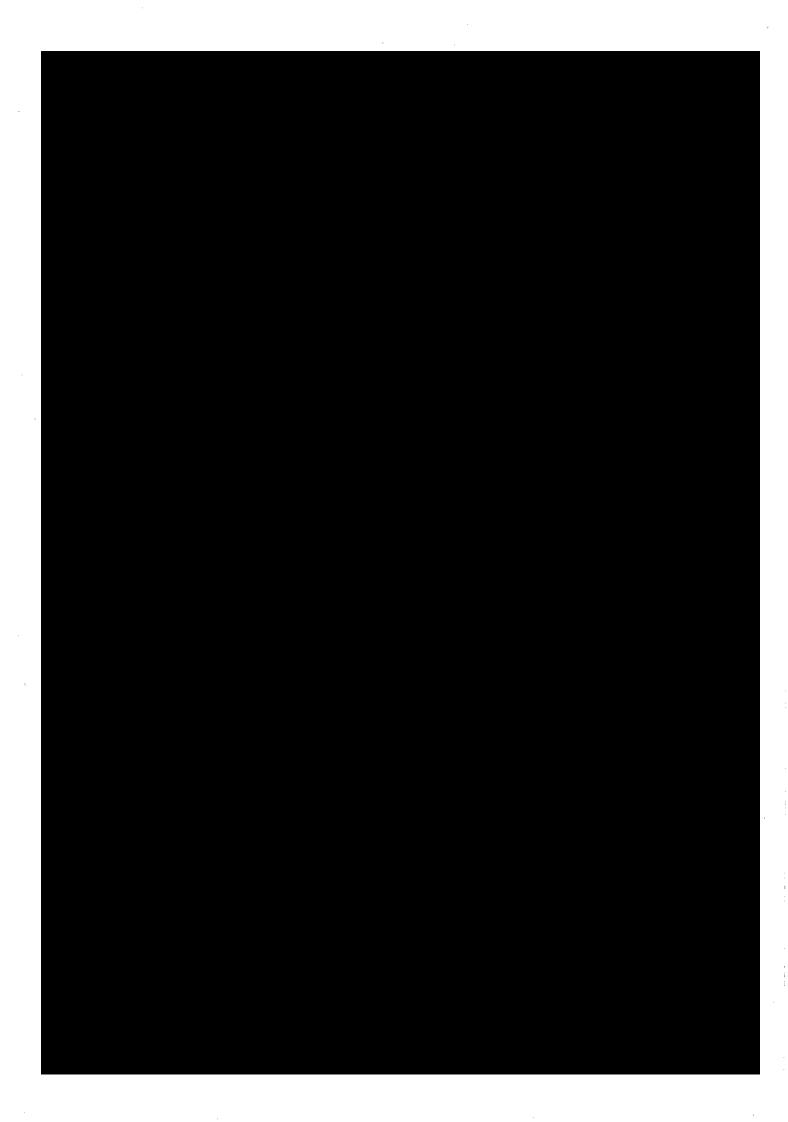






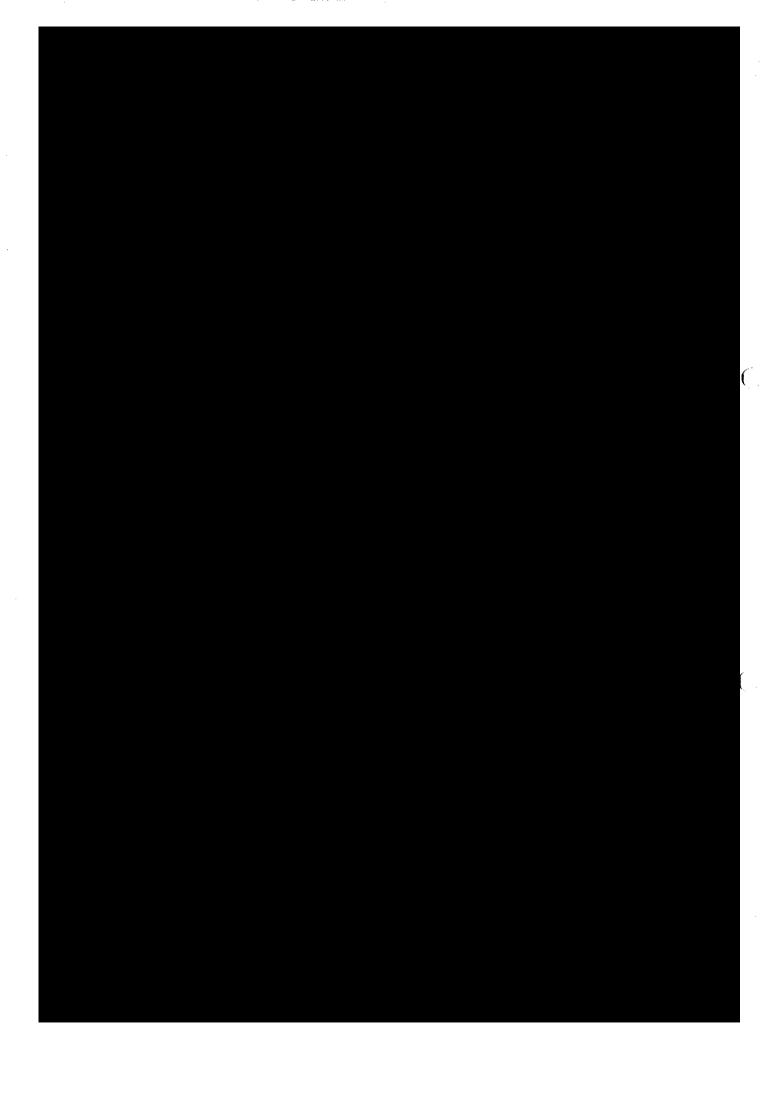


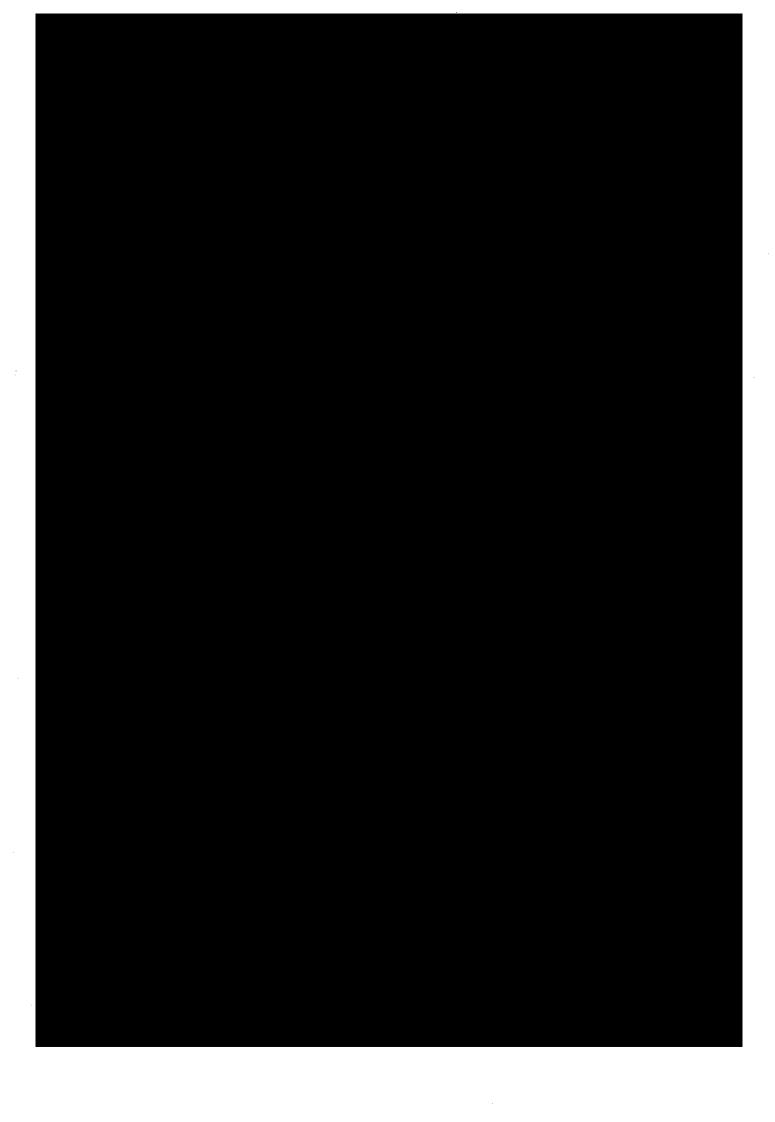






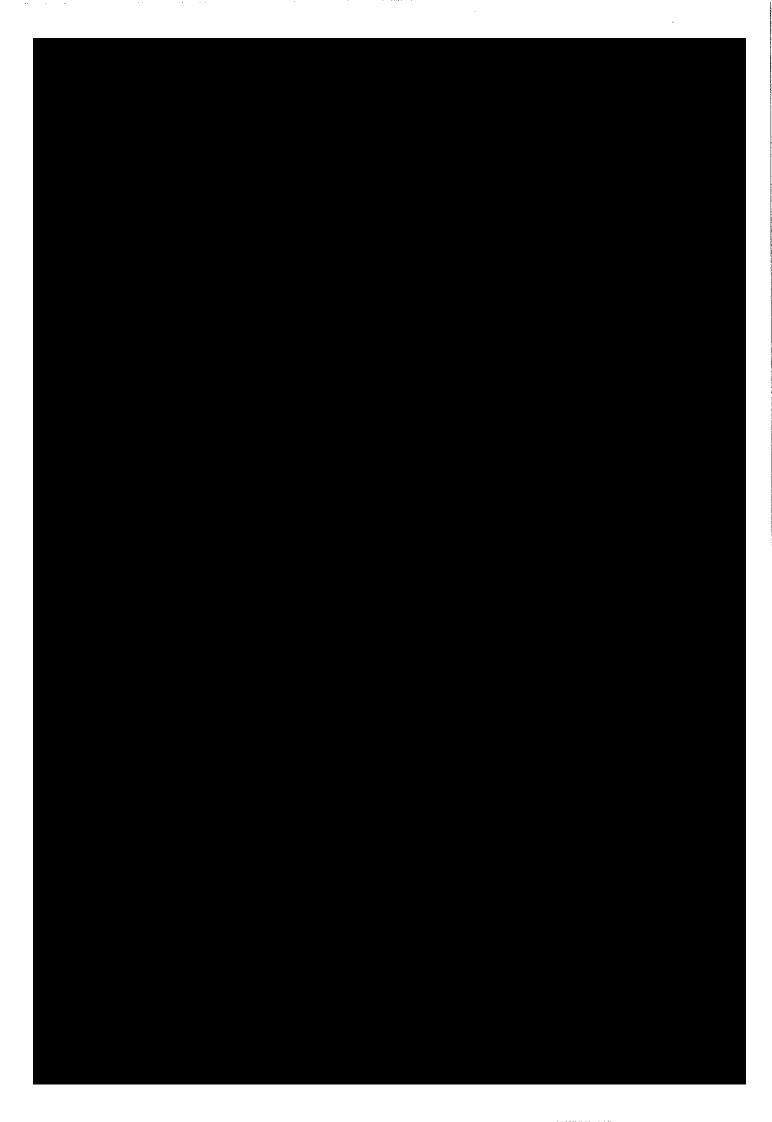




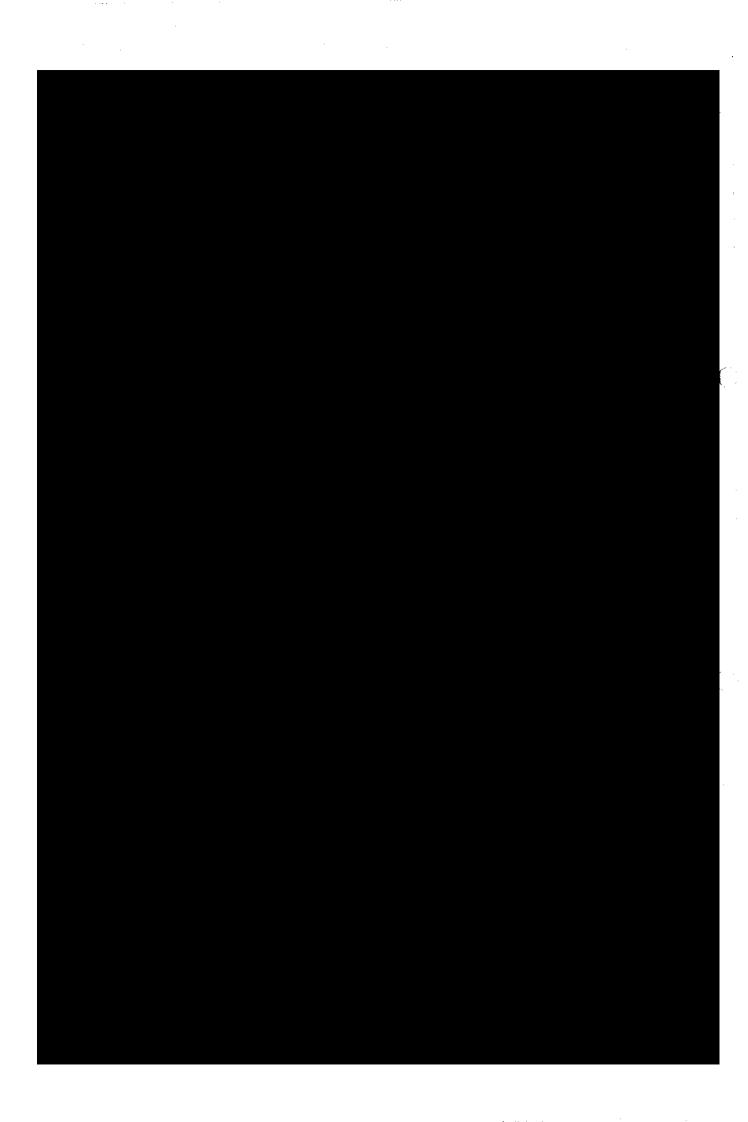




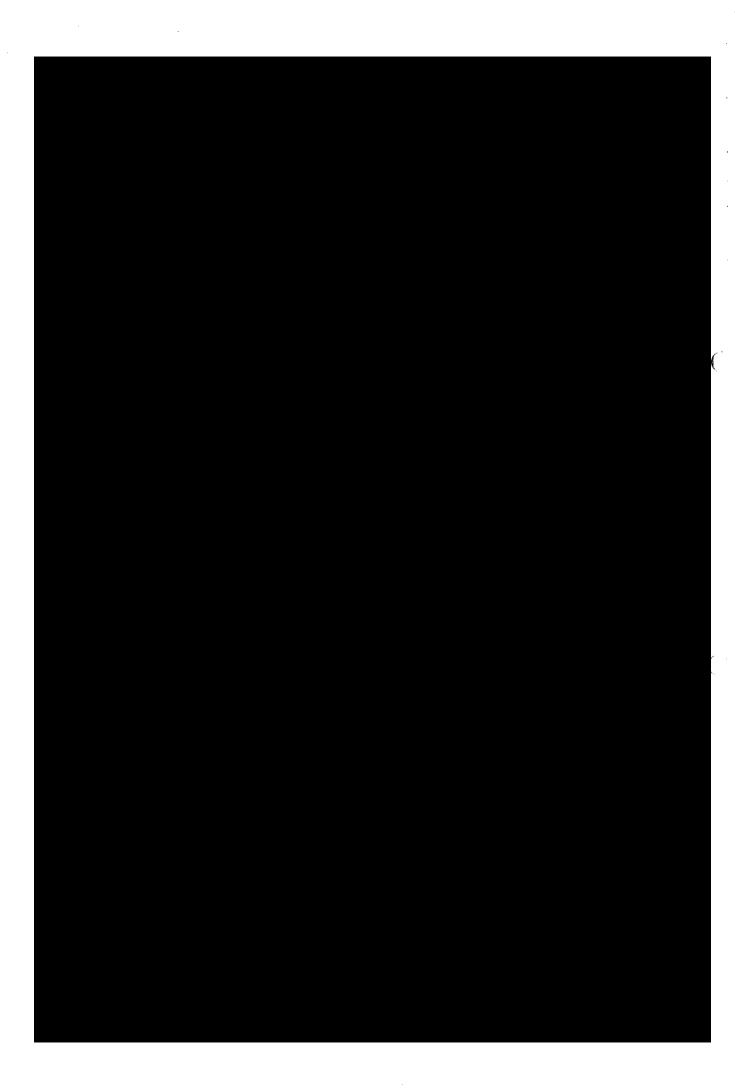


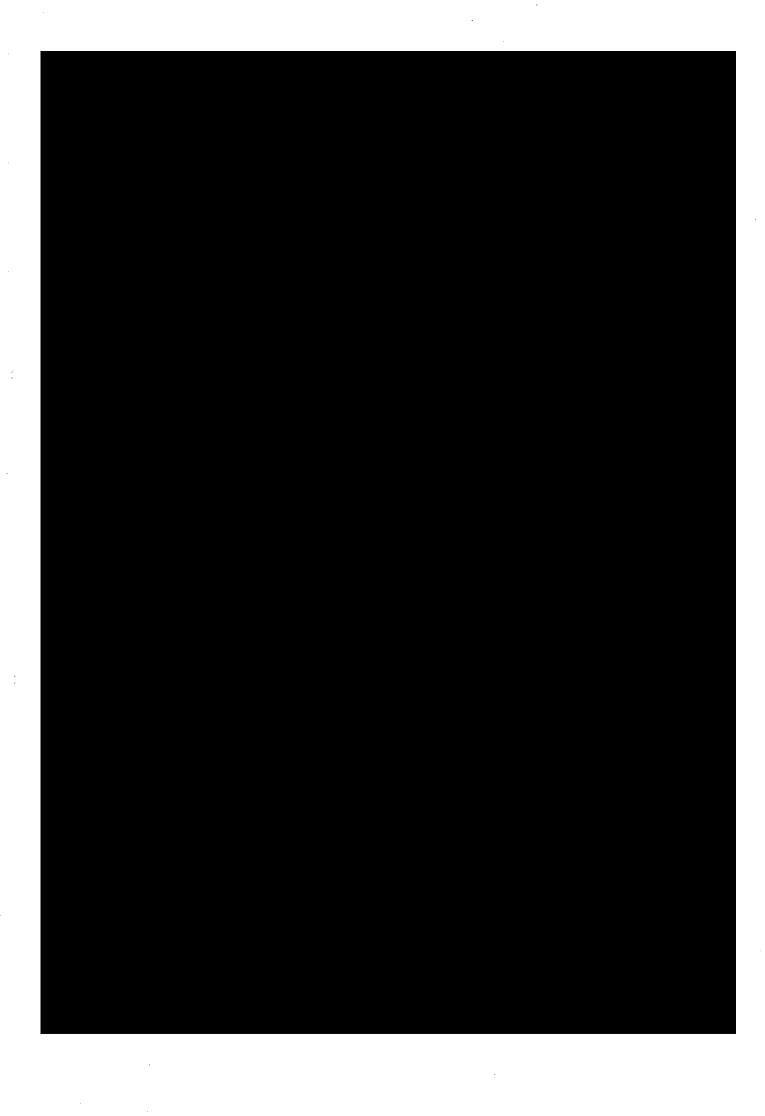






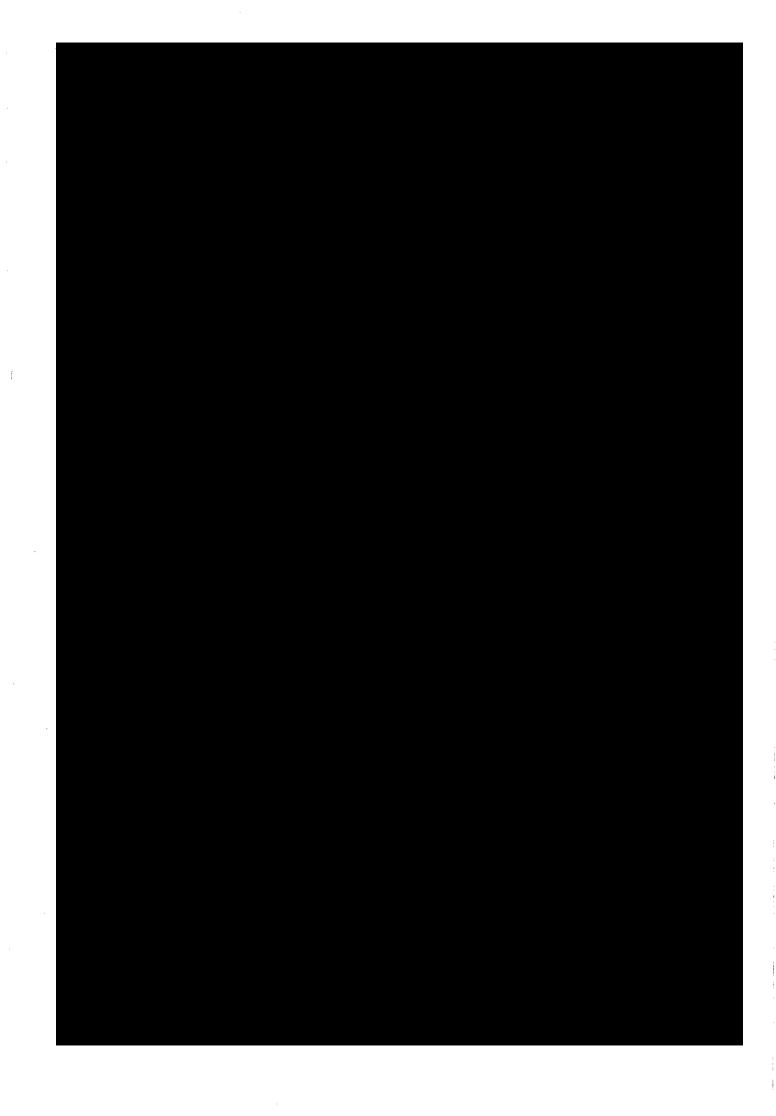






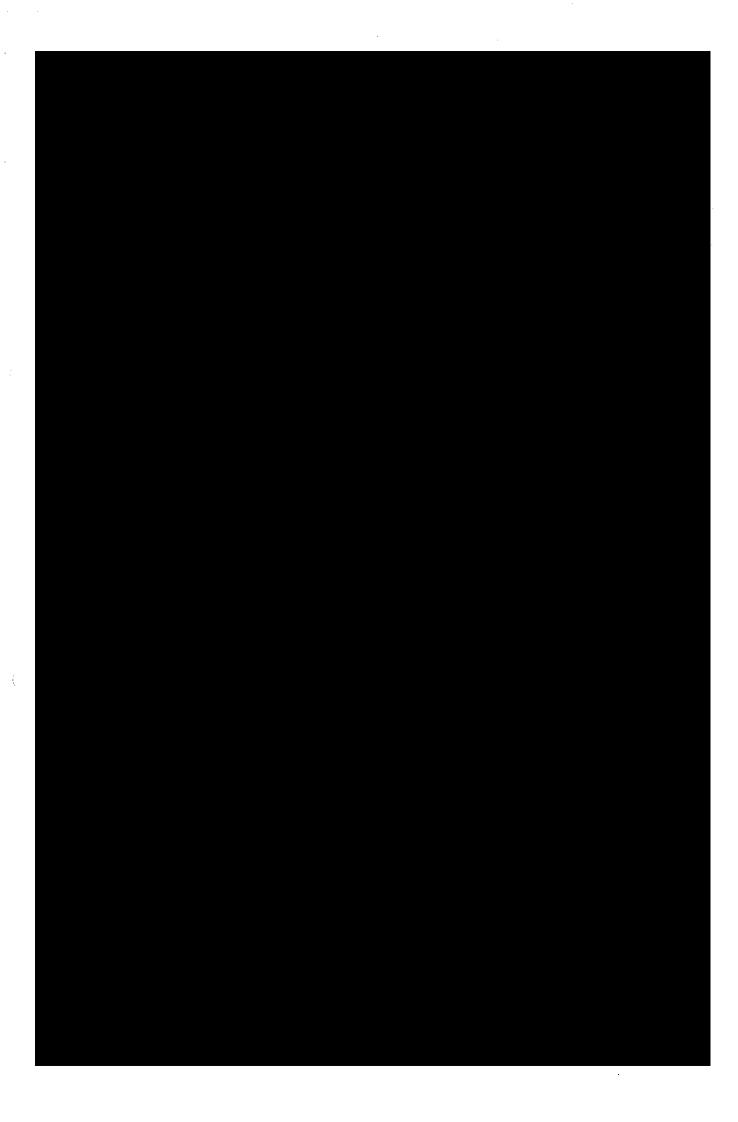
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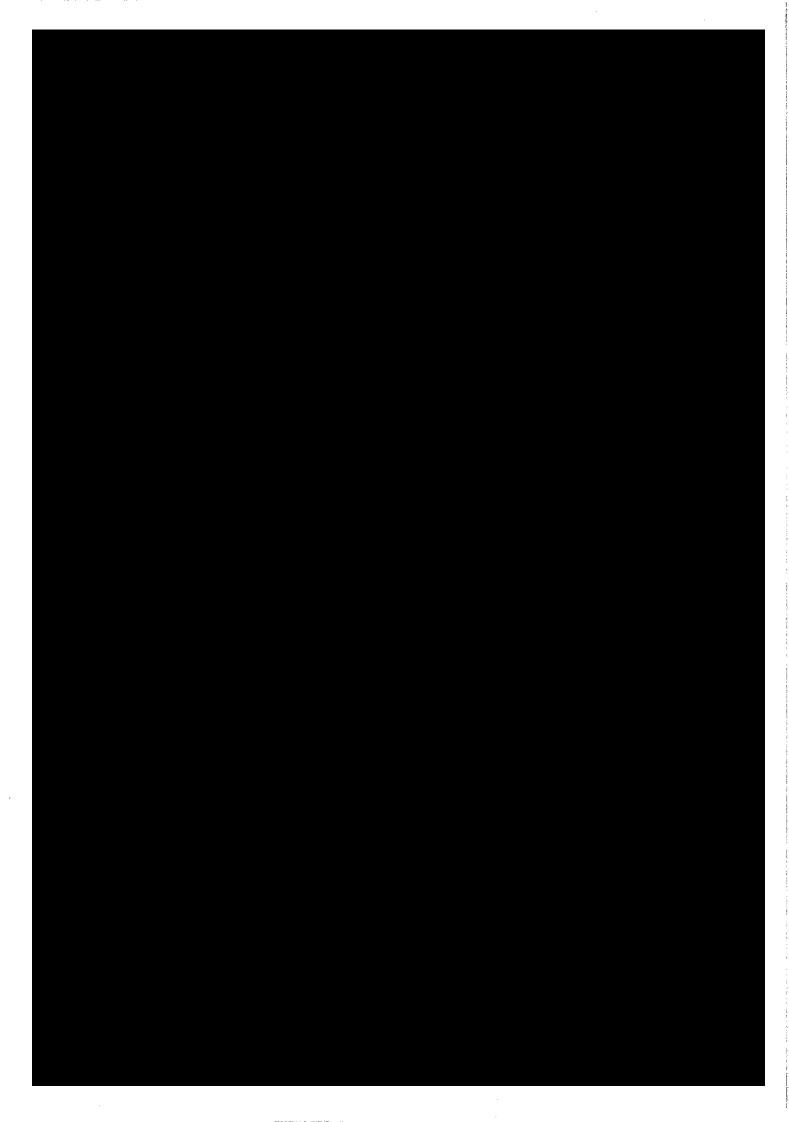
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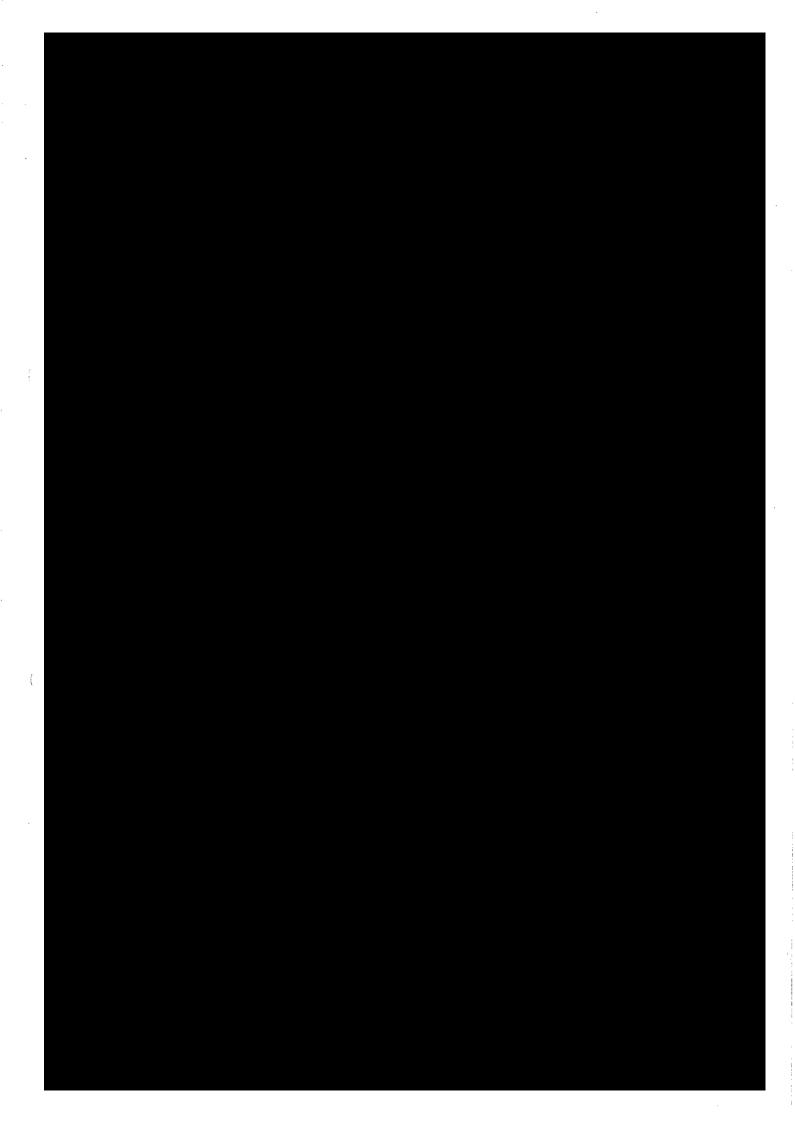


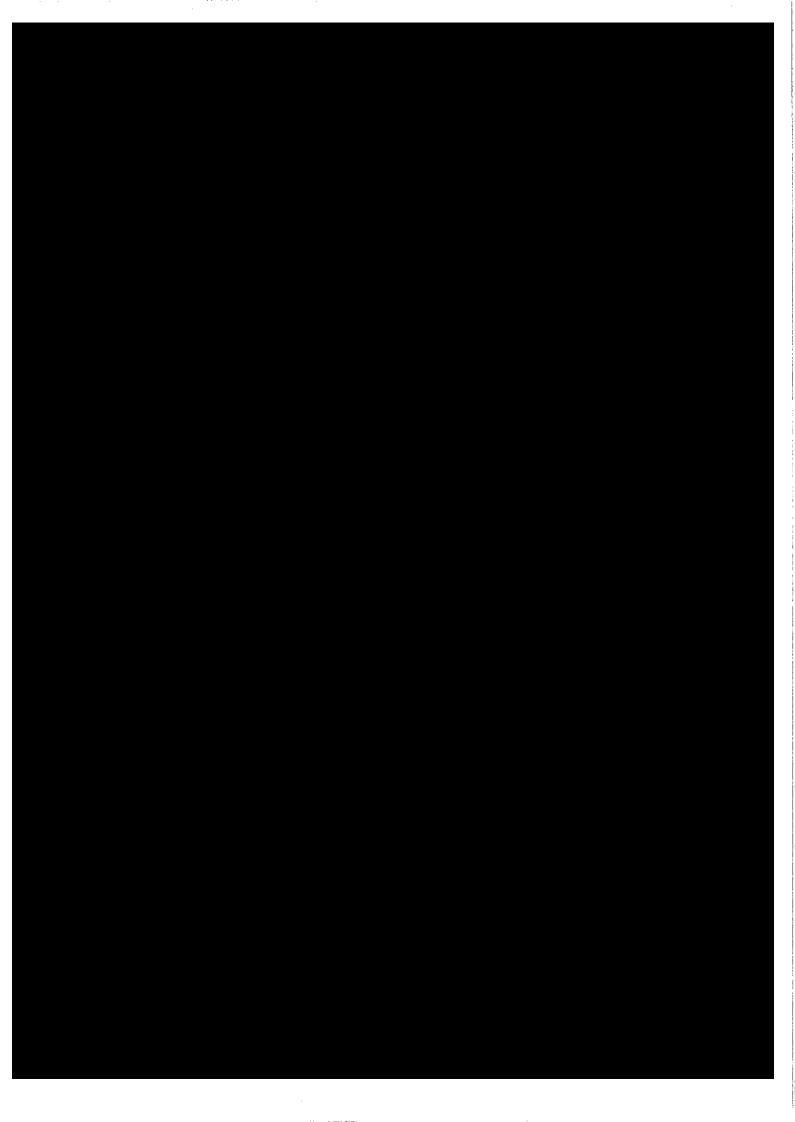


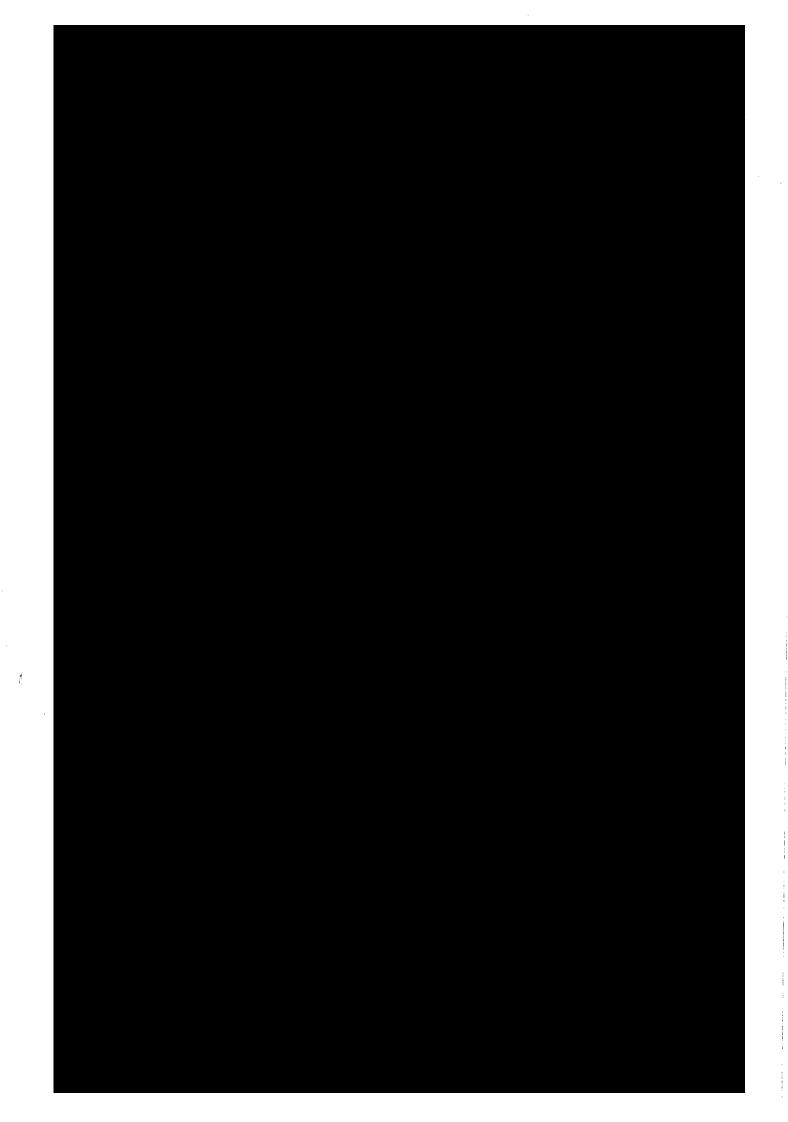












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**LICENCE No:** 

DIR 012/2002

LICENCE HOLDER:

Monsanto Australia Limited

PROJECT SUPERVISOR:

**ACCREDITATION NO:** 

ACCR 034/2002

SUBMISSION:

2005 Annual Report for Bollgard II®

(Commercial Release)

**REPORTING PERIOD:** 

2004/05 Cotton Growing Season

DATE:

22 December 2005

PREPARED BY:

Regulatory Product Manager

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Contact email:

**Accreditation** 

Number:

ACCR 034/2002

## **SCOPE OF THE REPORT**

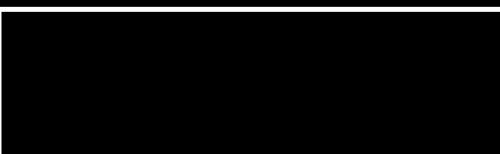
This report addresses the annual reporting condition of the DIR 012 commercial release licence for Bollgard  $II^{\oplus}$  issued to Monsanto Australia Limited by the Office of the Gene Technology Regulator.

This report details compliance with general and specific conditions of Part 3 and 4 of the DIR 012 licence as issued to Monsanto Australia Limited on 23 September 2002, and varied in June, September and December 2003; March, May, October and December 2004; and February, June, July, August, October, November and December 2005.



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## 1. General Conditions

## a. Informing people of their obligations

Monsanto Australia Limited informed all cotton growers and cotton gins covered by the DIR 012 / 2002 licence of the obligations imposed on them as a result of the conditions of these licences. This was achieved primarily through Monsanto Accreditation programs and information courses and mail outs.

Bollgard II[®] cotton Accreditation programs require all persons having management responsibility for Bollgard II crops to undergo training and pass a test on the content of the training. Growers were only required to attend these courses and pass the accreditation test once.

Gins known to transport cotton seed into the restricted zone were notified by letter that they were permitted to transport seed north of 22° south provided they adhered to all conditions and obligations associated with the use of cotton seed within the restricted zone.

## b. Reporting

During the reporting period, the licence holder did not become aware of any 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 of any unintended effects of the dealings authorised by the licence.

### c. Material changes in circumstances

During the 2004/05 reporting period, Monsanto Australia Limited did not become aware of any relevant conviction of the licence holder occurring after the commencement of this licence; any revocation or suspension of a licence or permit held by Monsanto Australia Limited; or any event or circumstance that would affect the capacity of Monsanto Australia Limited to meet the conditions of the DIR 012 licence.

## d. Remaining an accredited organisation

At all times, Monsanto Australia Limited remained an accredited organisation and complied with conditions of accreditation as set out in the OGTR Guidelines for Accreditation of Organisations.

## e. Changes to details

During the 2004/05 reporting period, there were no changes to contact details of the Project Supervisor.

## f. Testing methodology

Under conditions of the licence, Monsanto Australia Limited was required to provide the Regulator with a method capable of reliably detecting the presence of the GMO. This advice was emailed to Deborah Maguire and Neil Ellis of the OGTR on 15 October 2002.



# 2. Release of Bollgard II[®] south of latitude 22° south (outside *the Restricted Zone*)

The licence holder may conduct dealings with the GMOs south of latitude 22 degrees south.

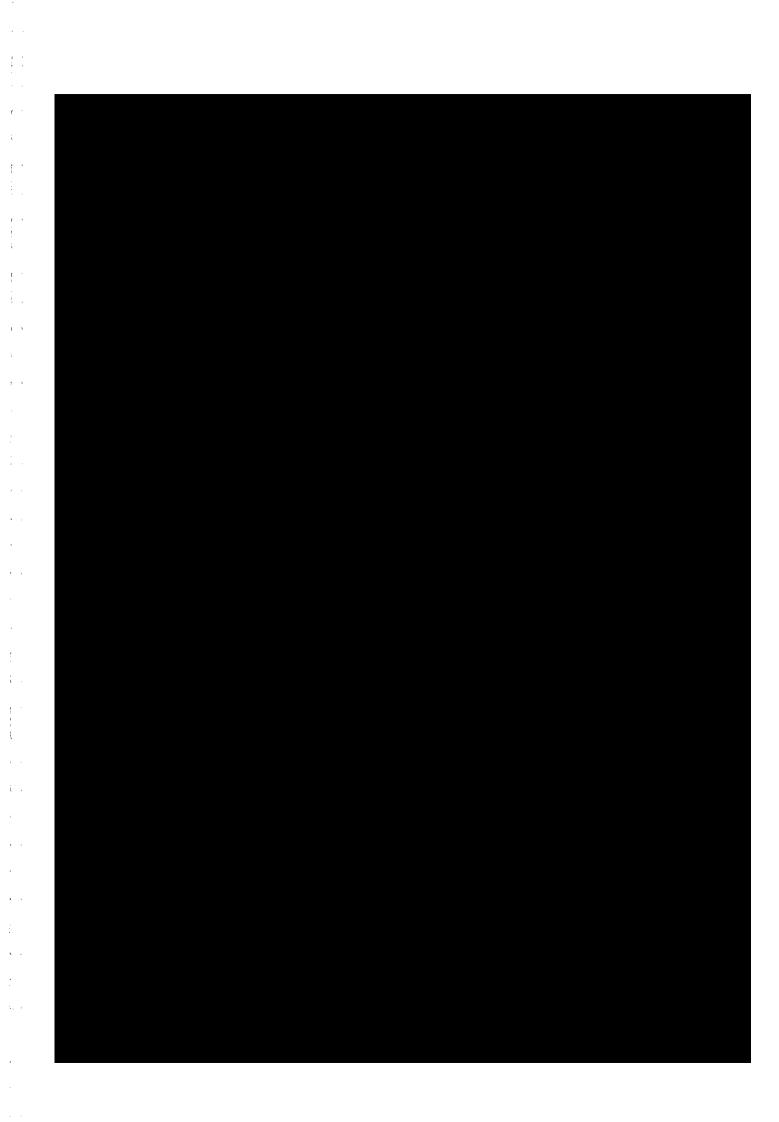
In the 2004/05 reporting period, Bollgard II cotton was grown in the traditional cotton-growing regions south of latitude 22° south in NSW and Queensland. More information on the locations where all Bollgard II cotton crops were grown during the 2004/05 cotton growing season are given in **Part 2a**.

## a. Crop plantings of Bollgard II[®] cotton

## i) Conditions for Growing Crop

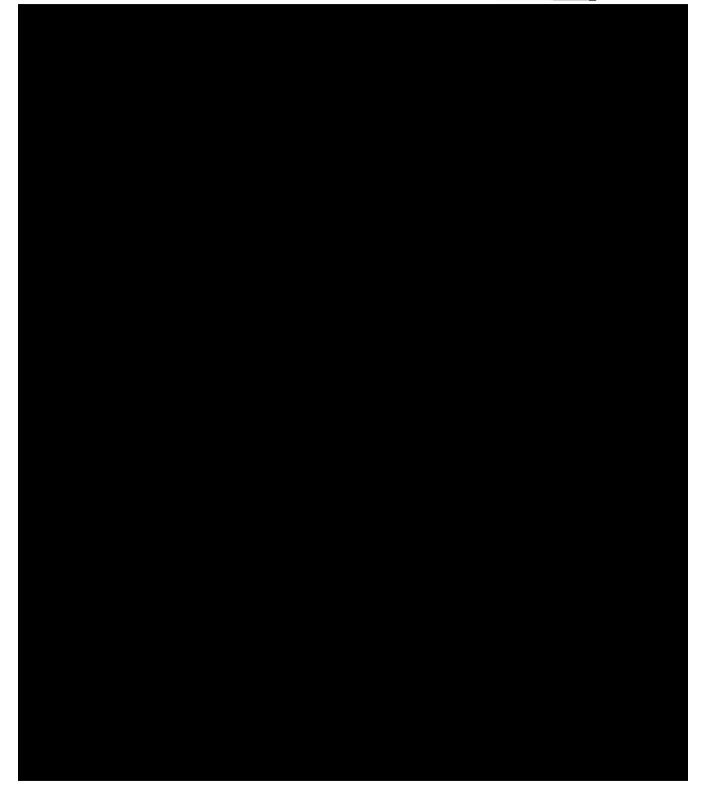
Sales and planting of Bollgard II were undertaken under a Technology User Agreement (TUA), which sets out the conditions for planting and growing a cotton crop containing Bollgard II technology. In order to be eligible to sign such an agreement, a grower was required to attend a Bollgard II accreditation program, and pass a test based on the material covered in the accreditation program.

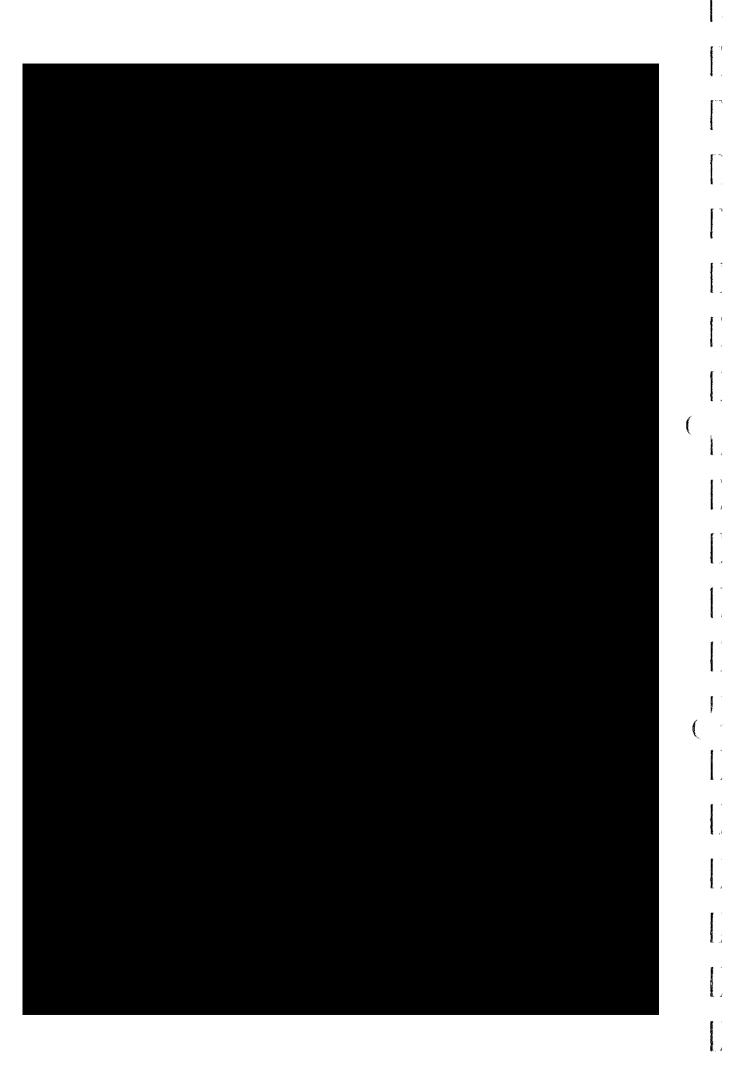






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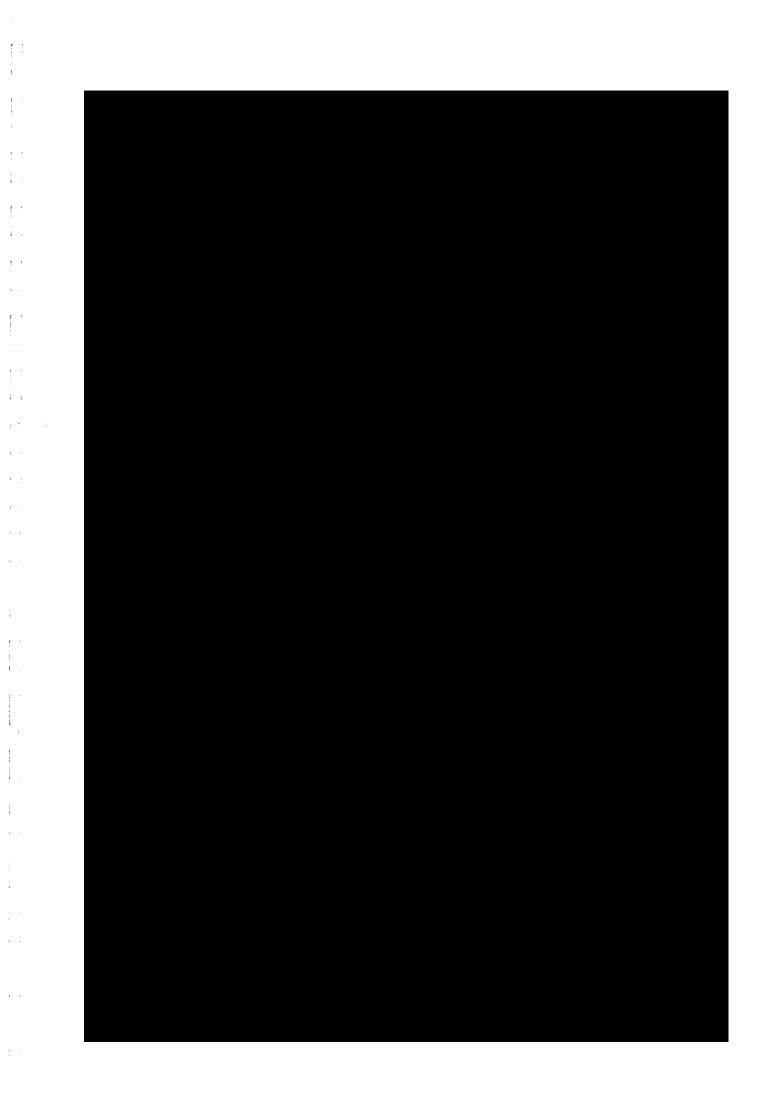
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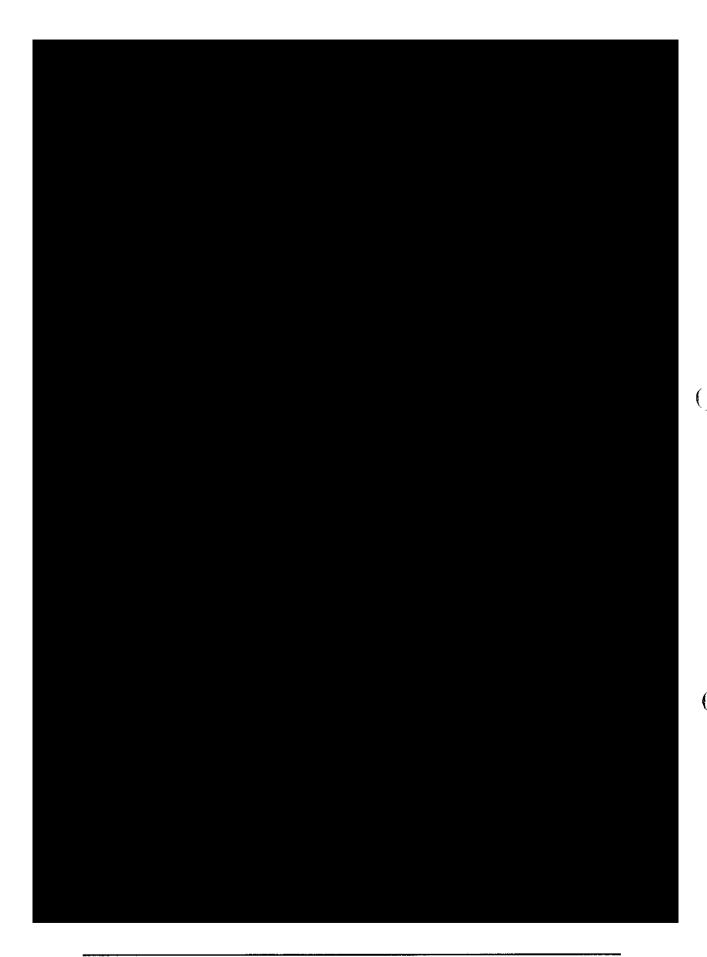
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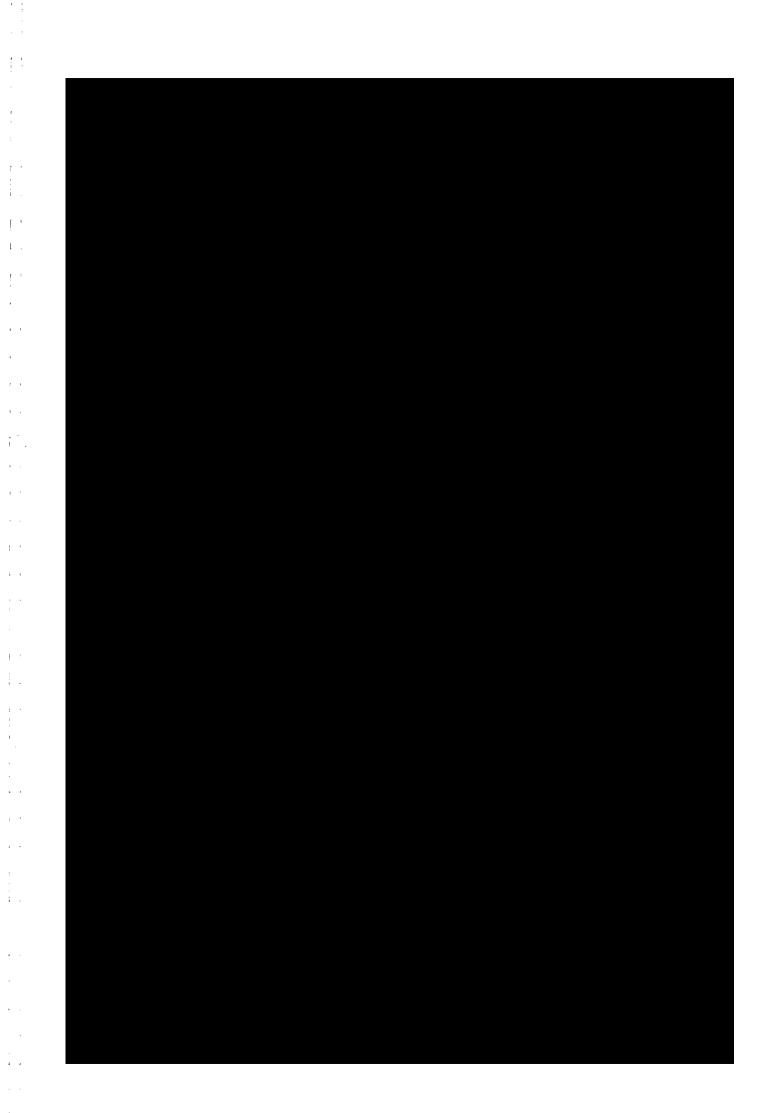
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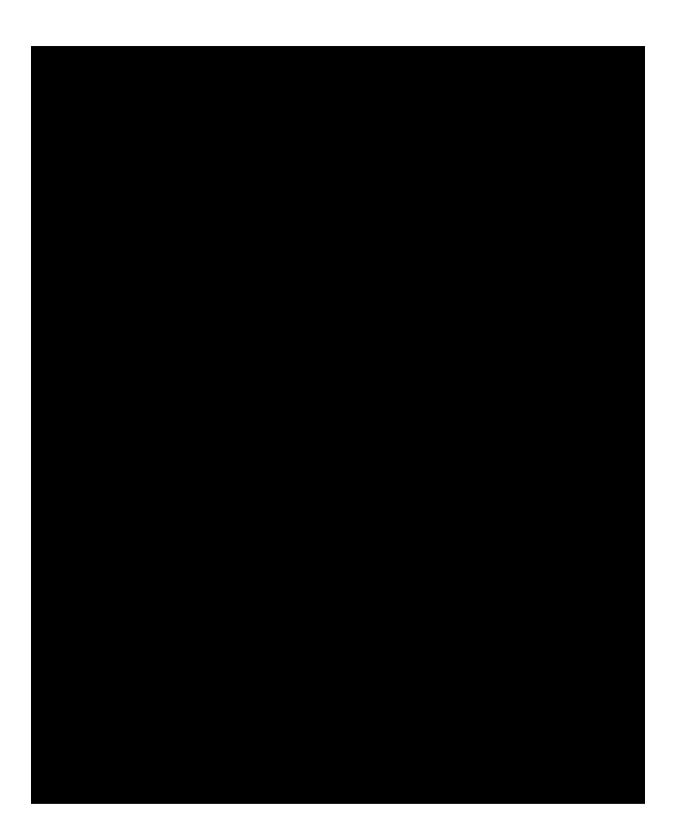
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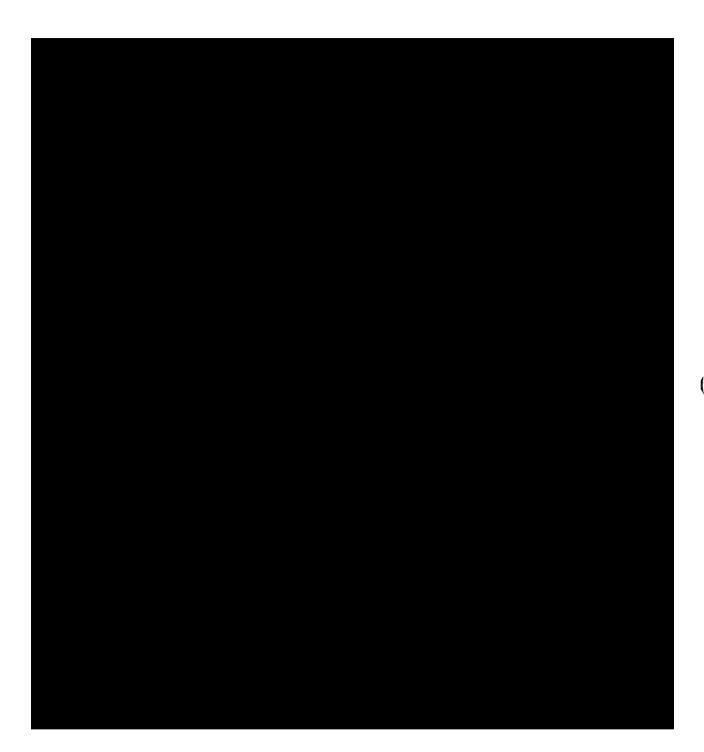
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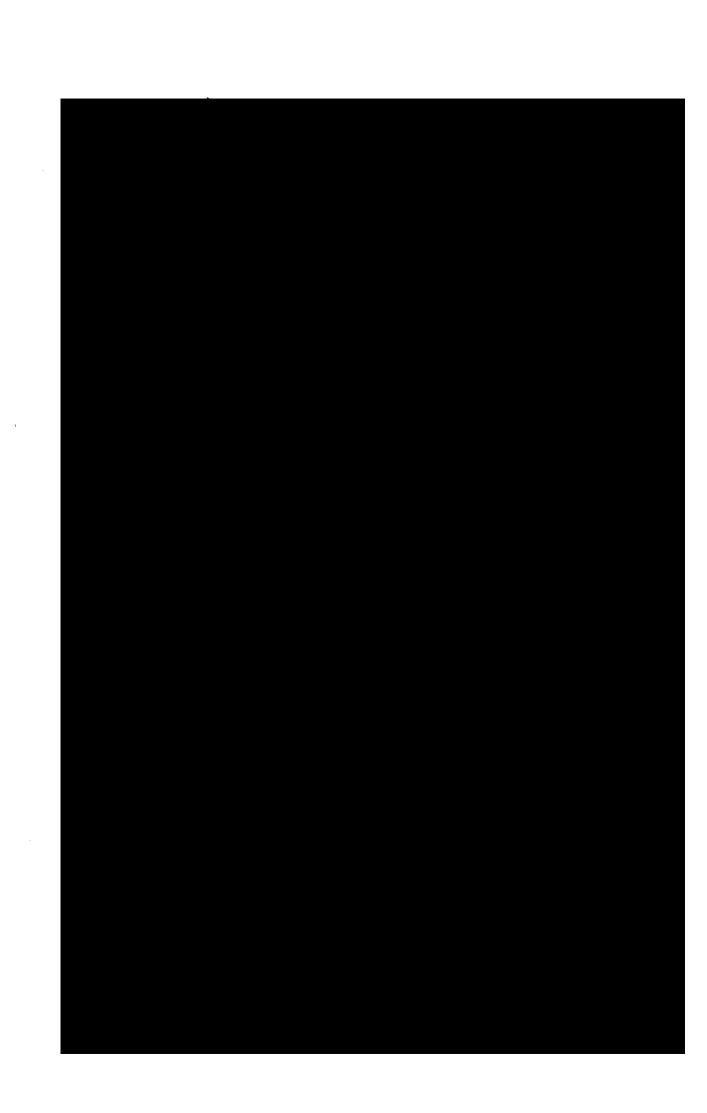
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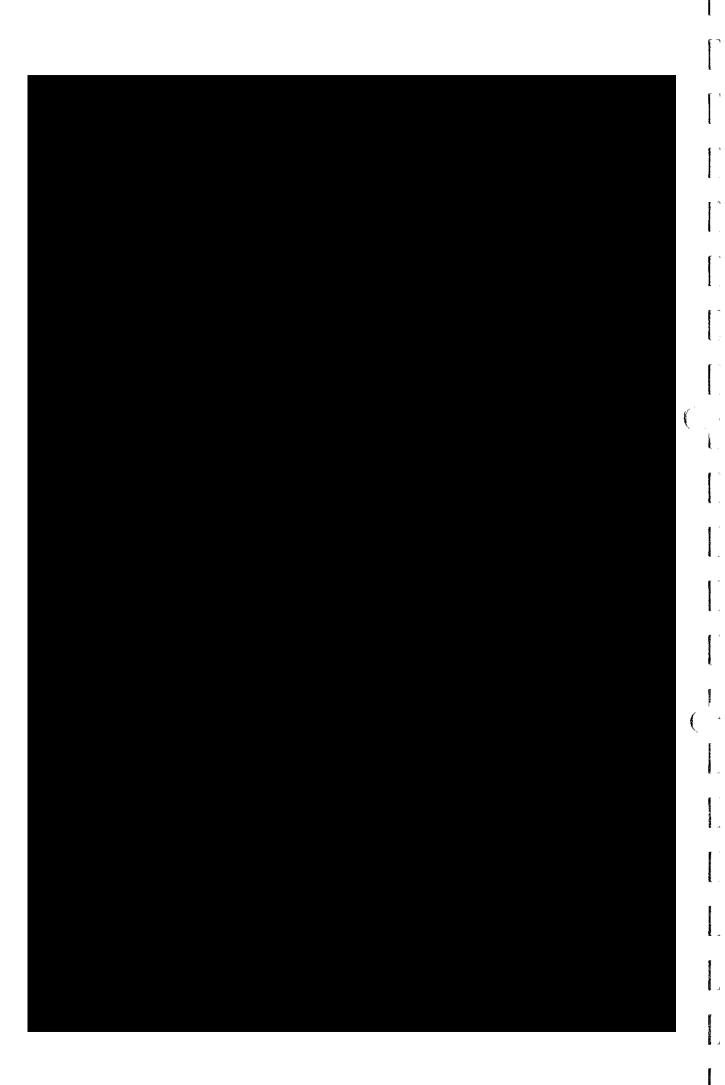
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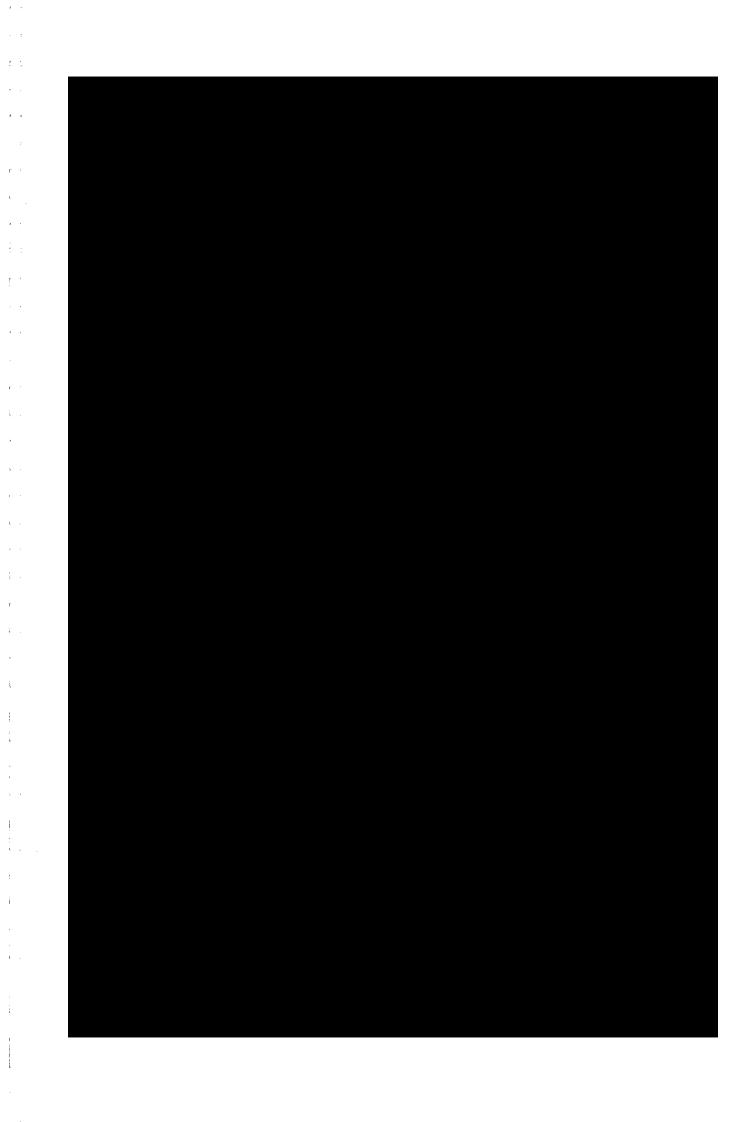




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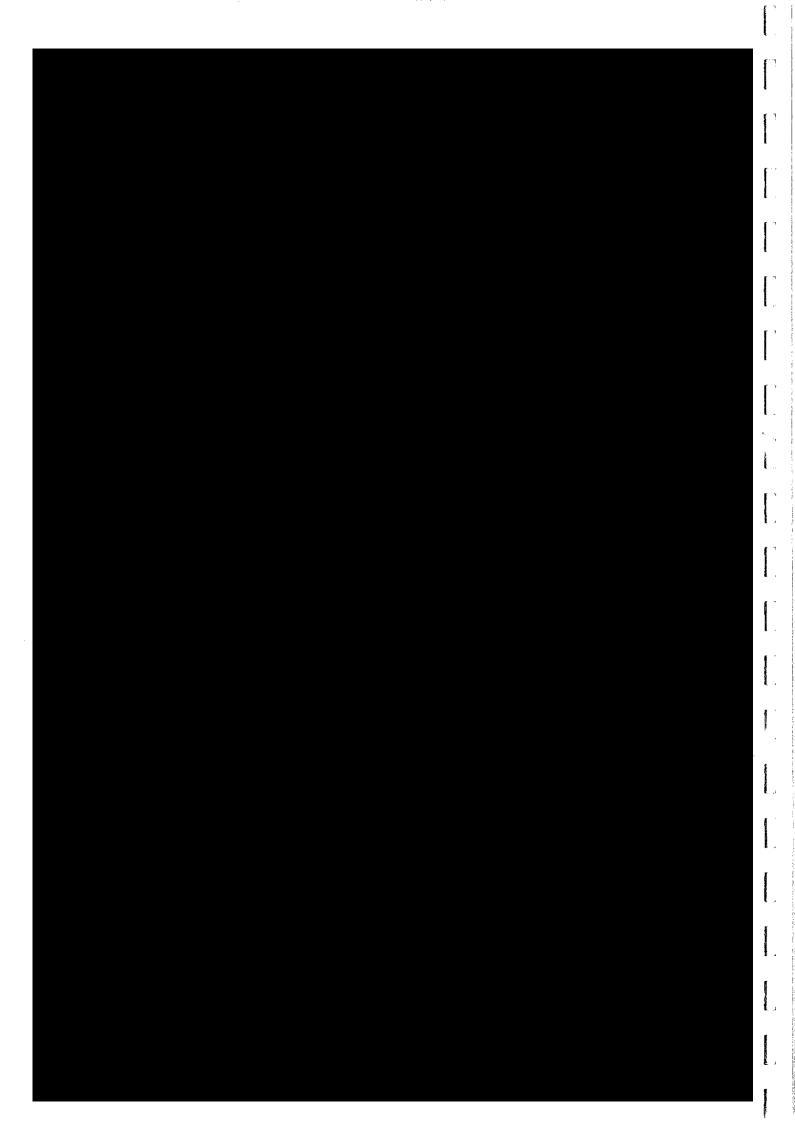
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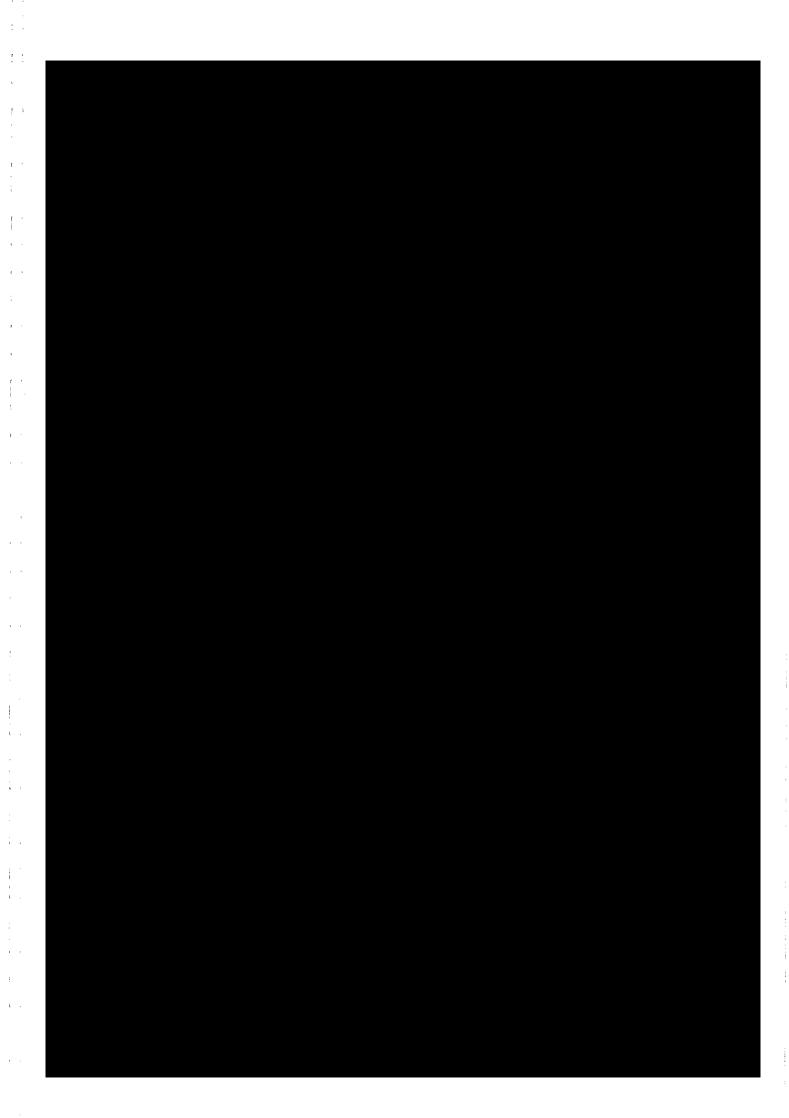


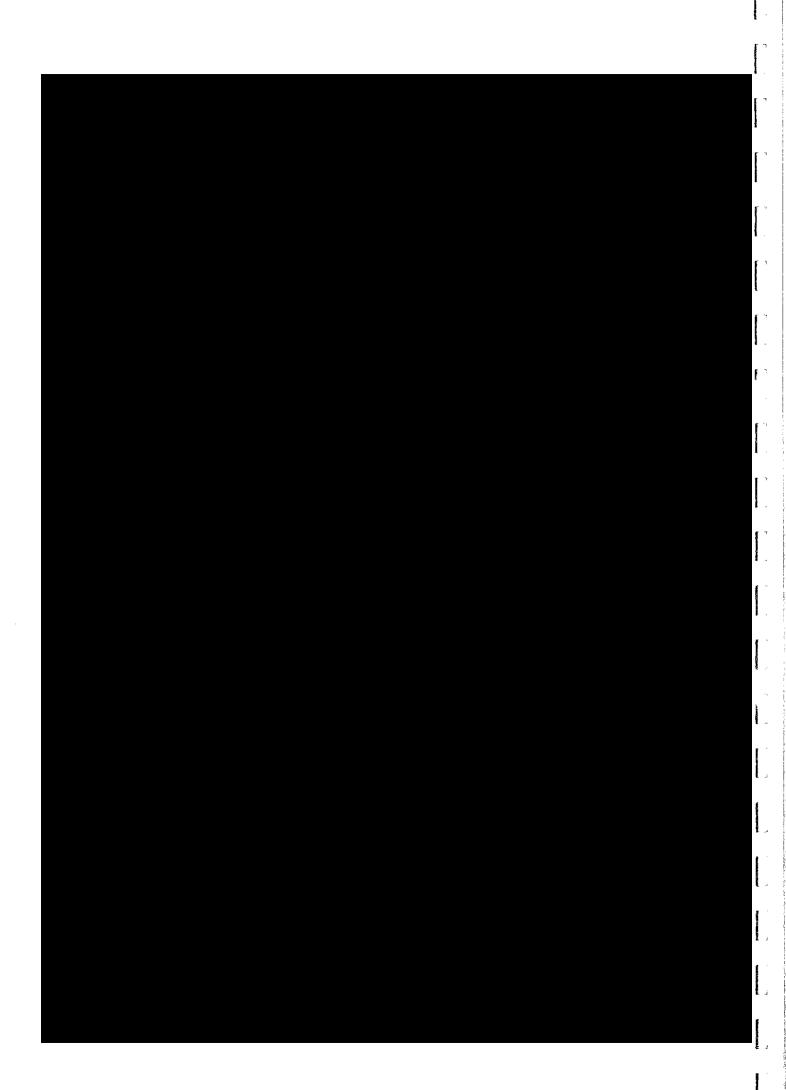


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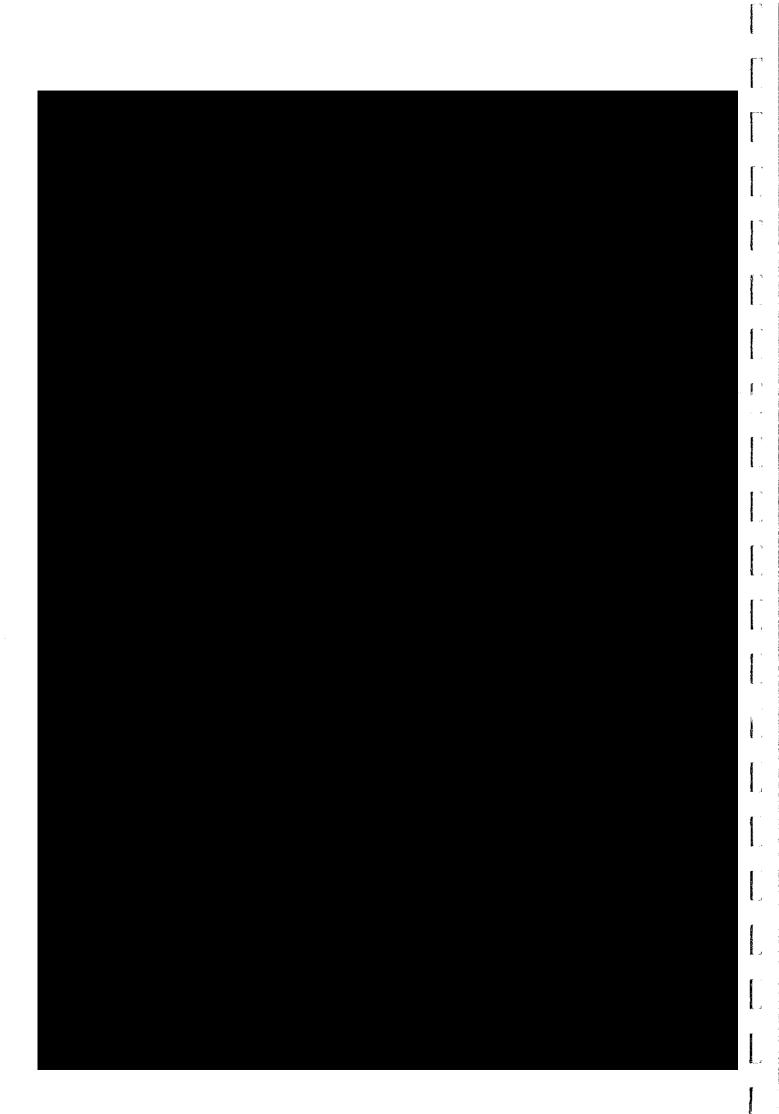


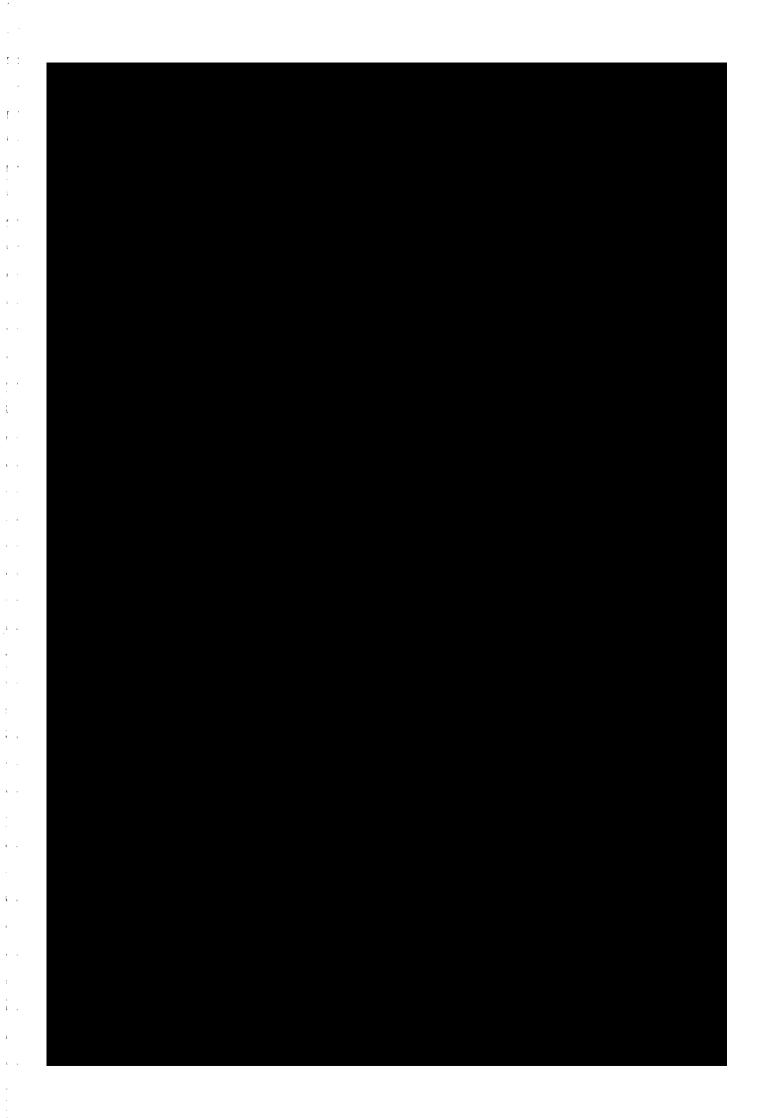


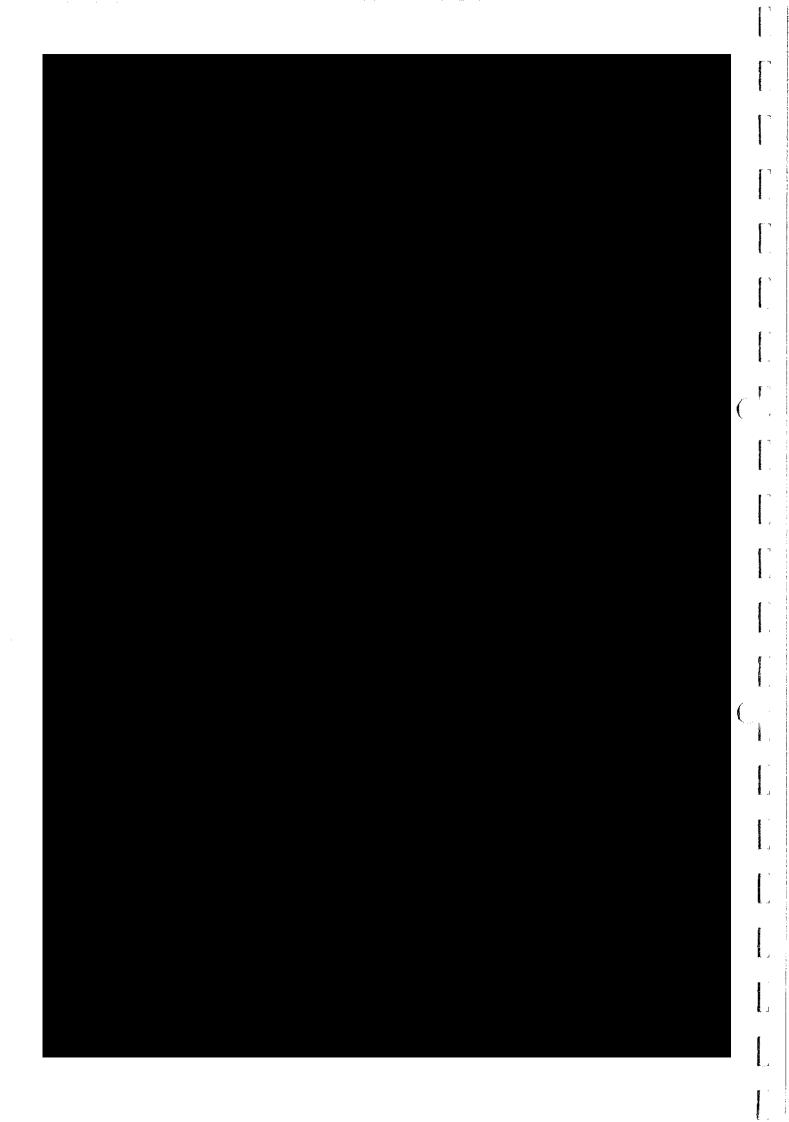


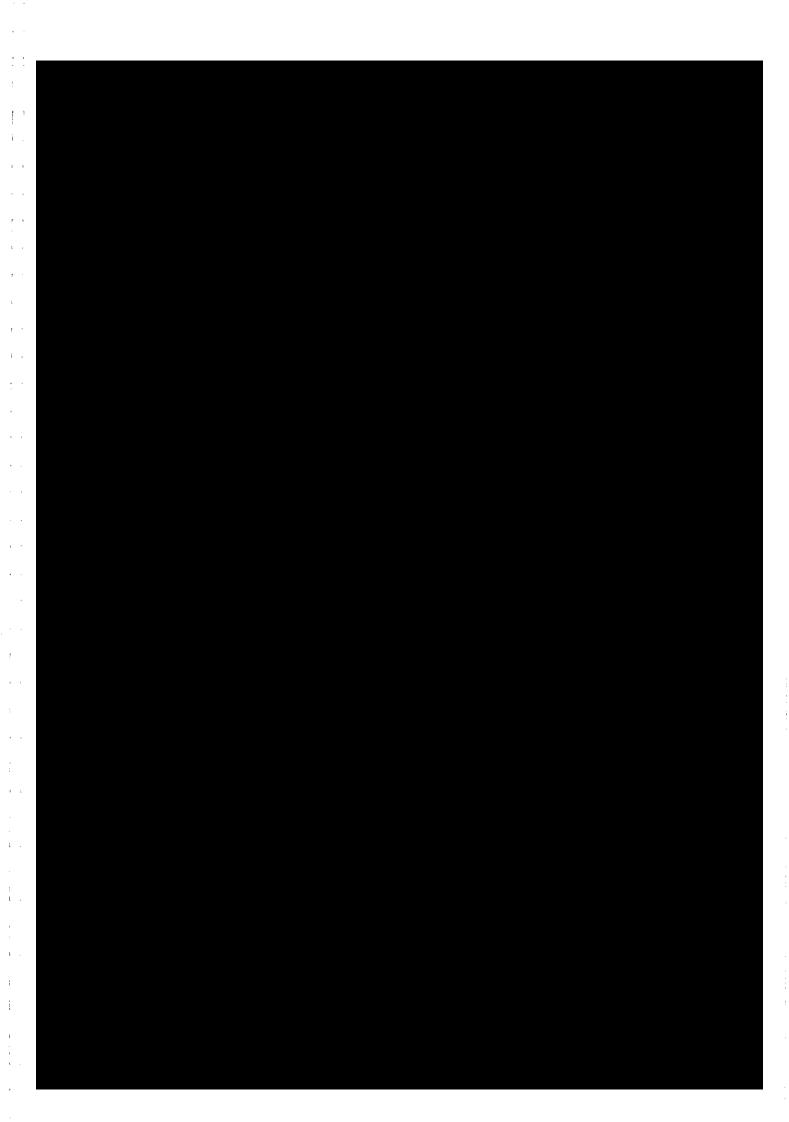


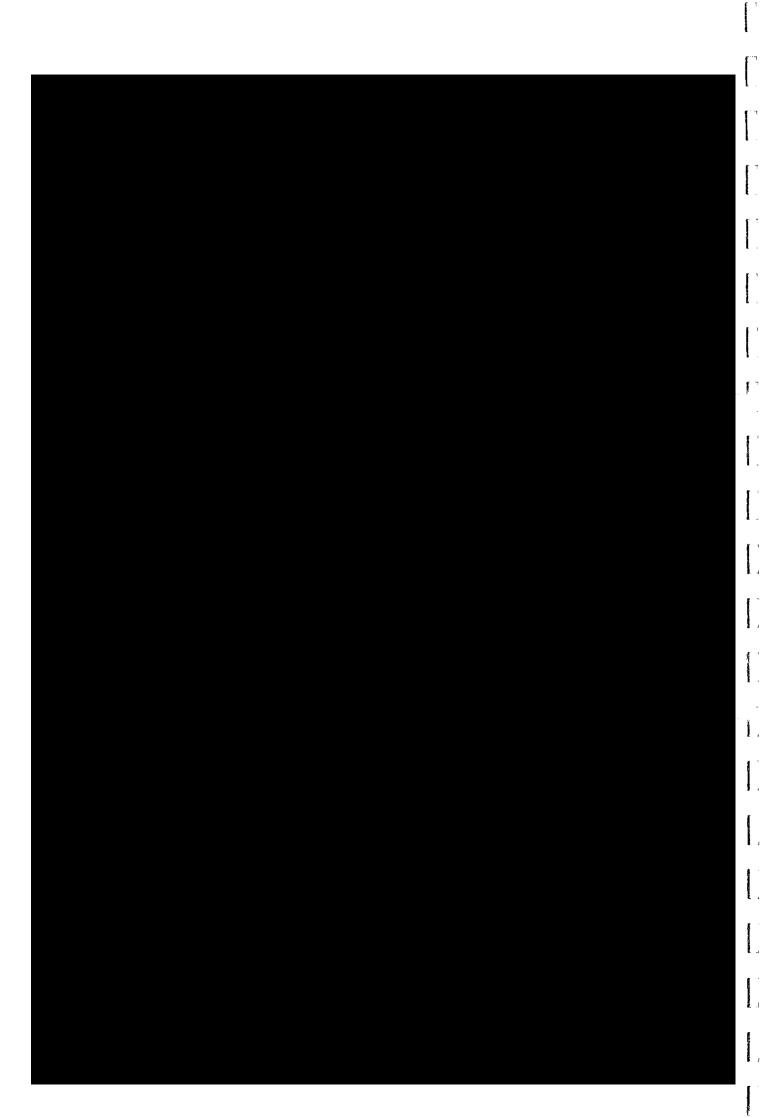


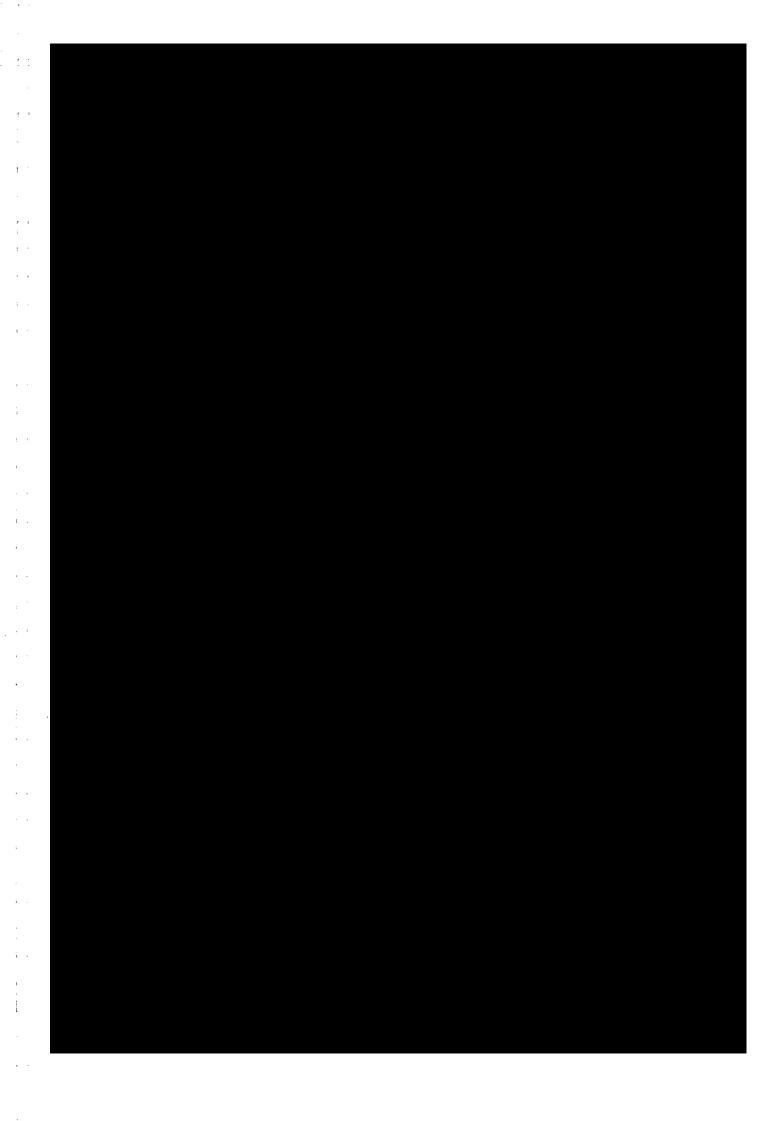


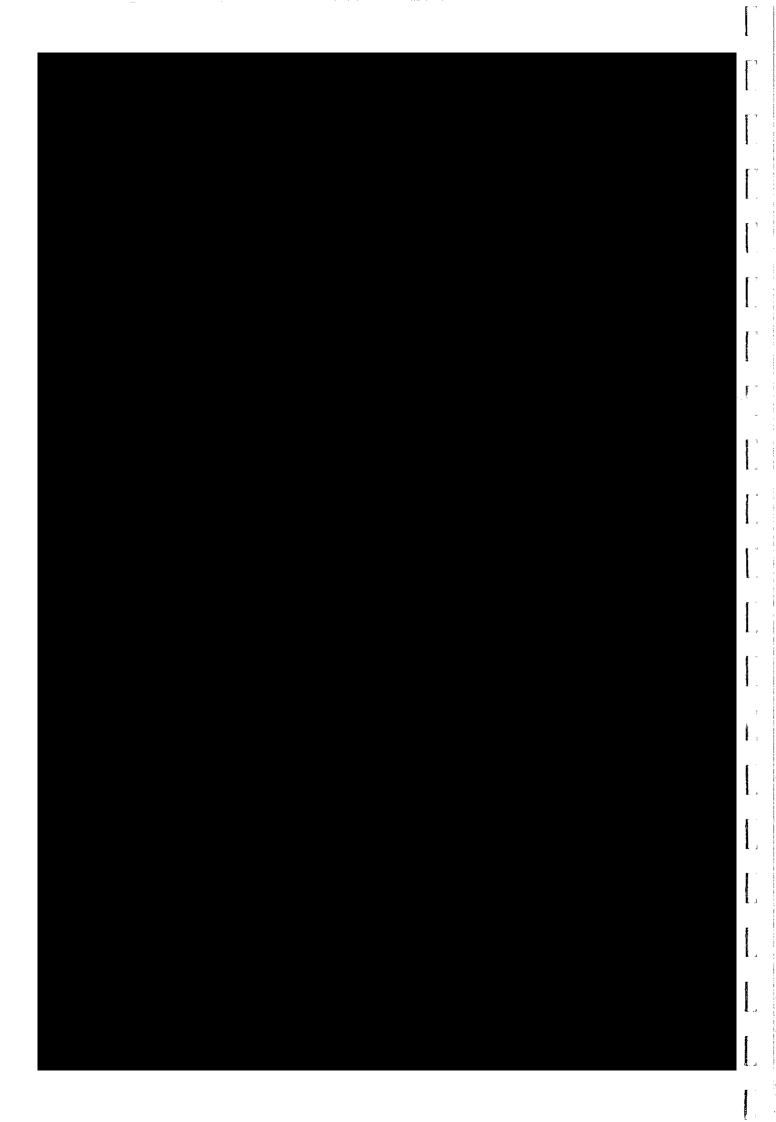




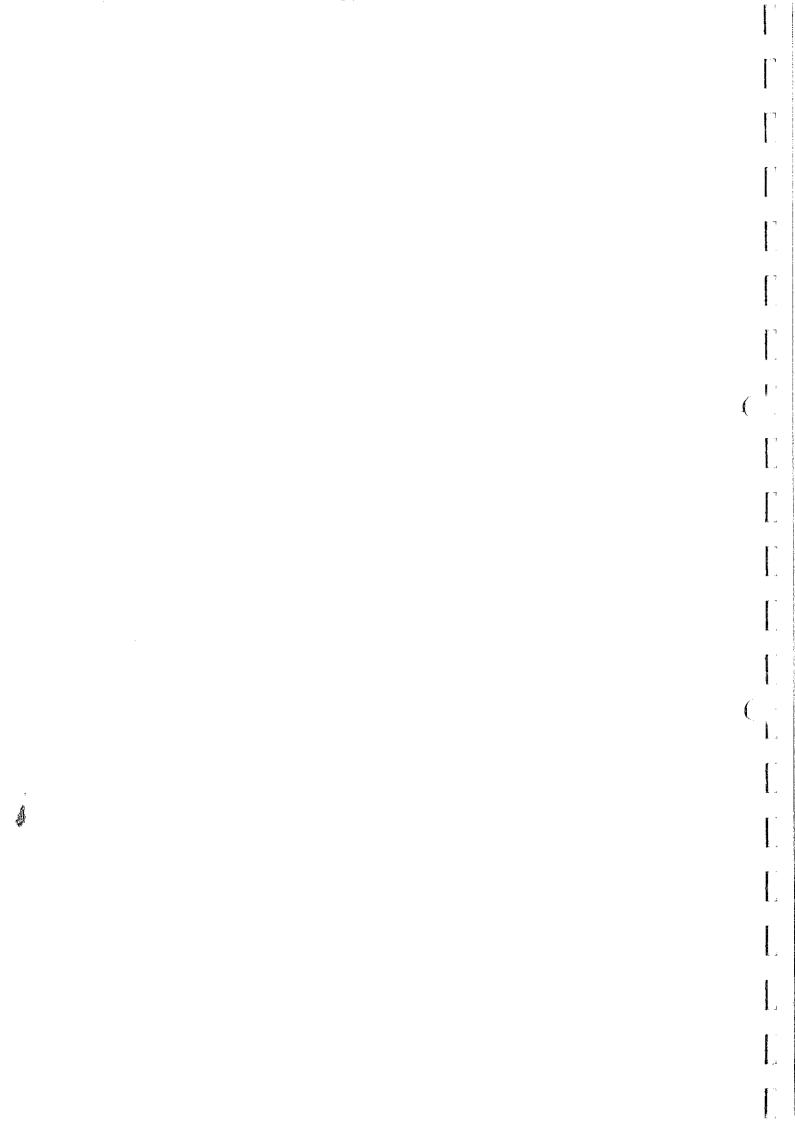


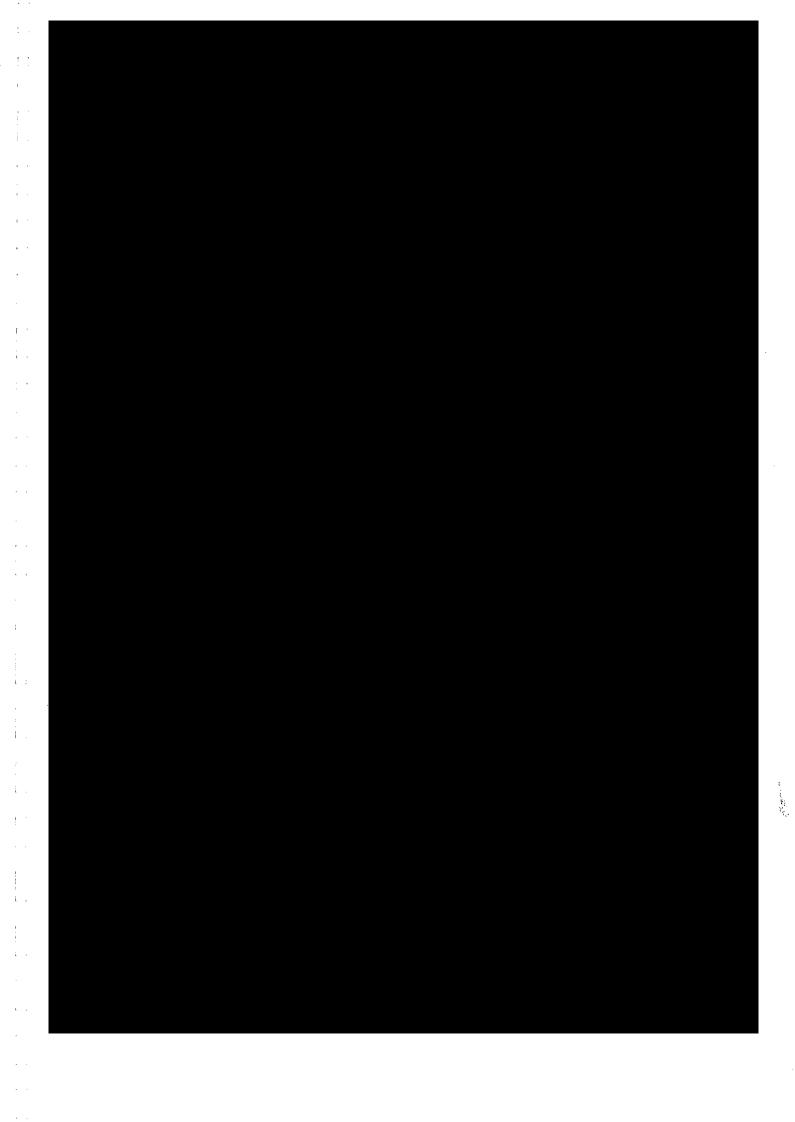


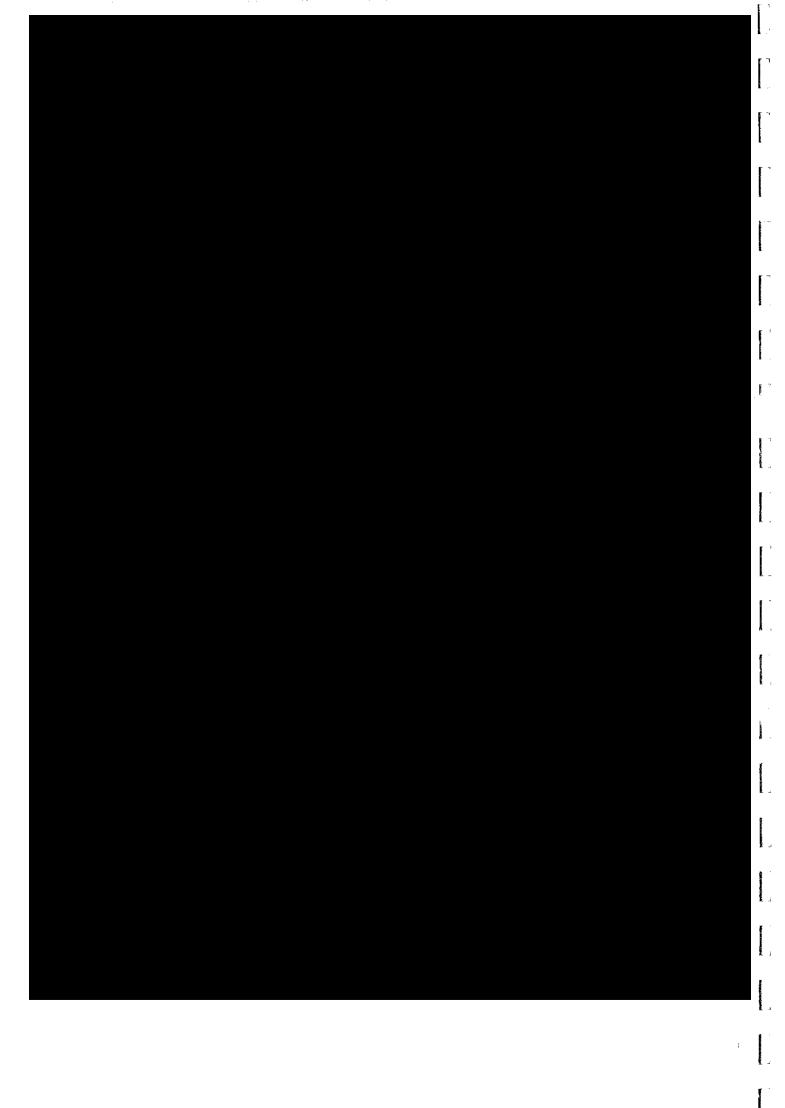


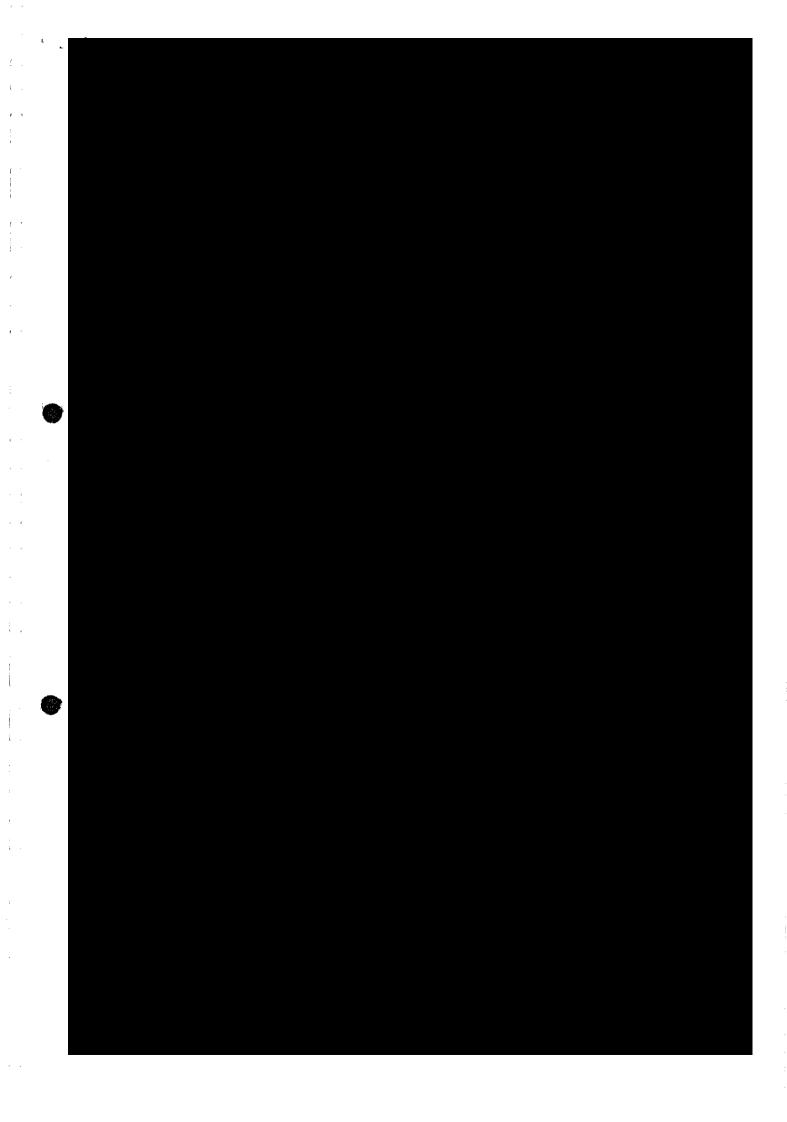


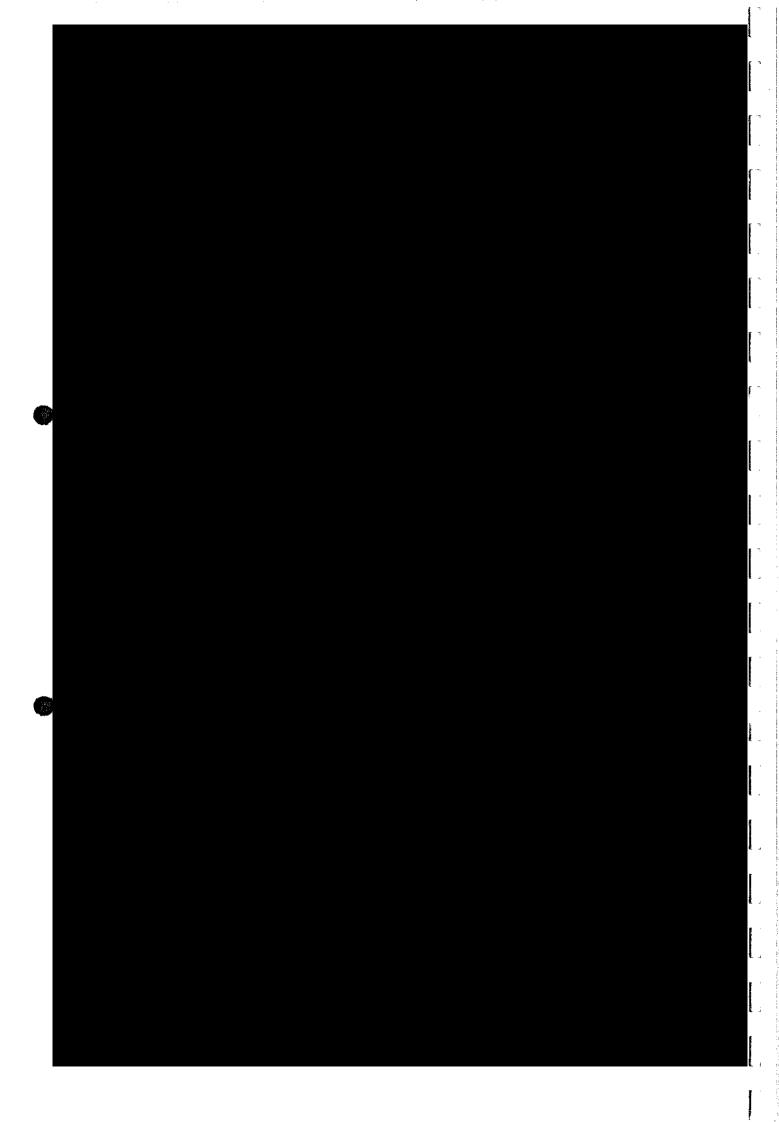


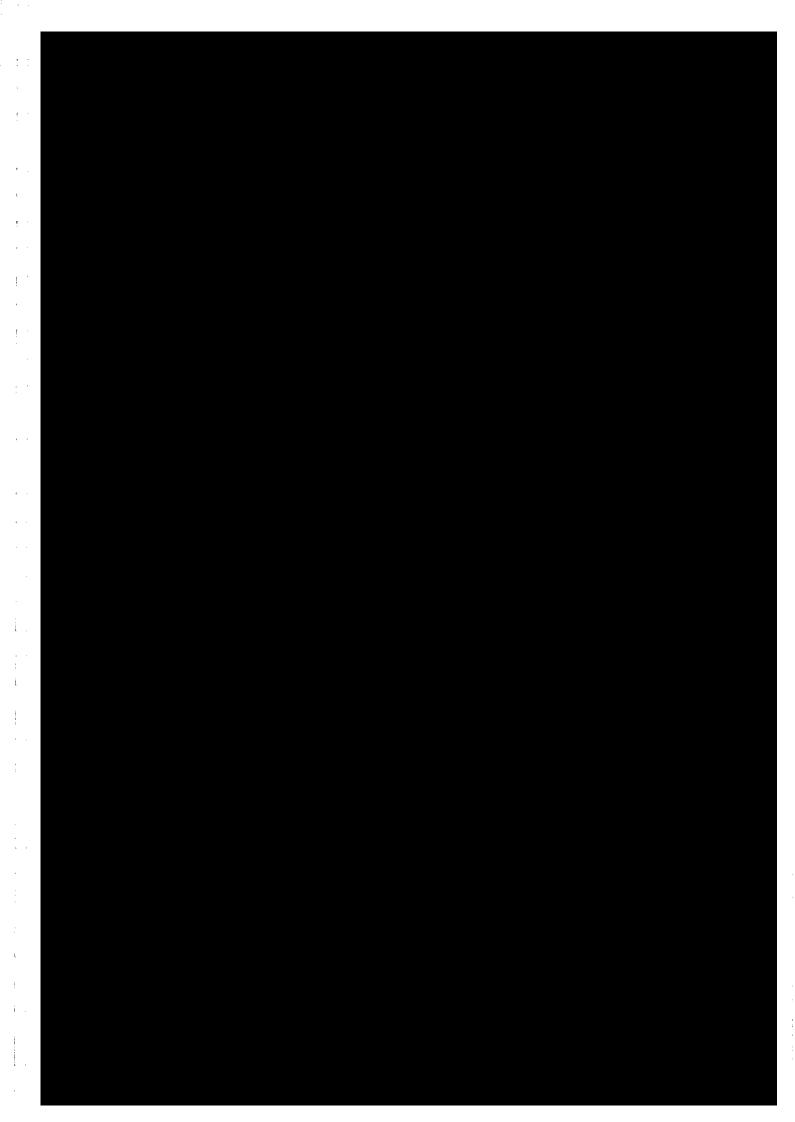


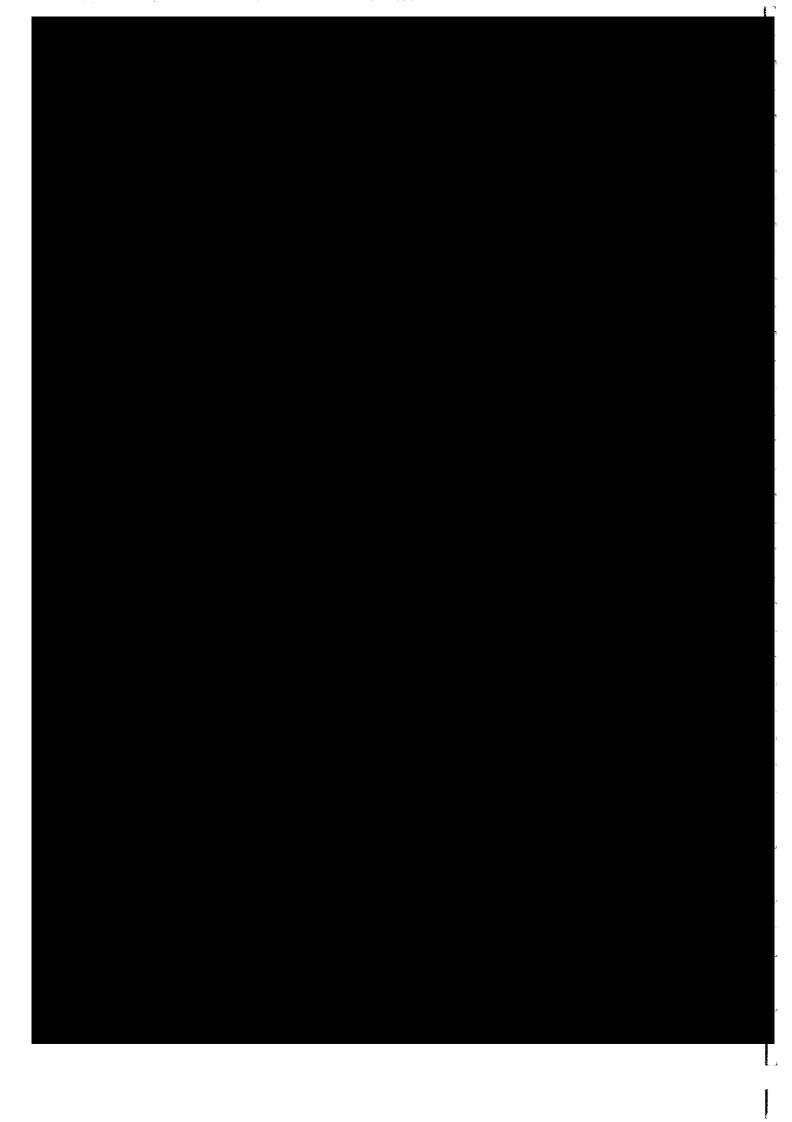


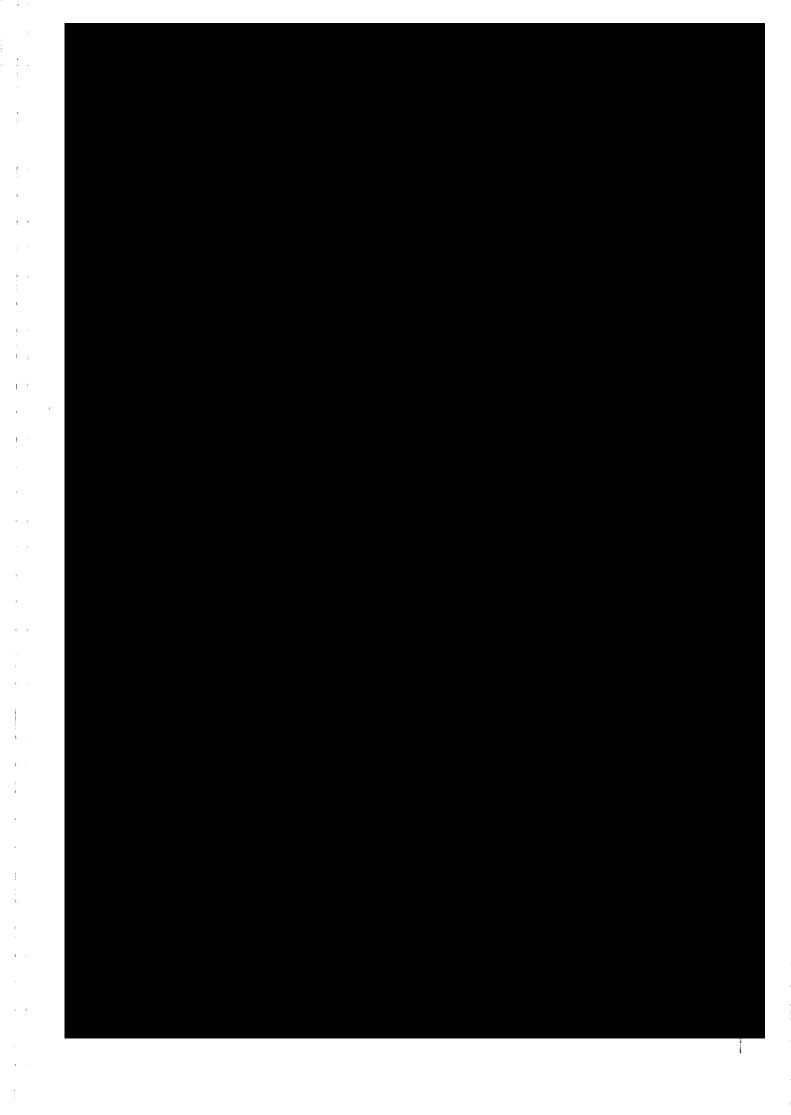






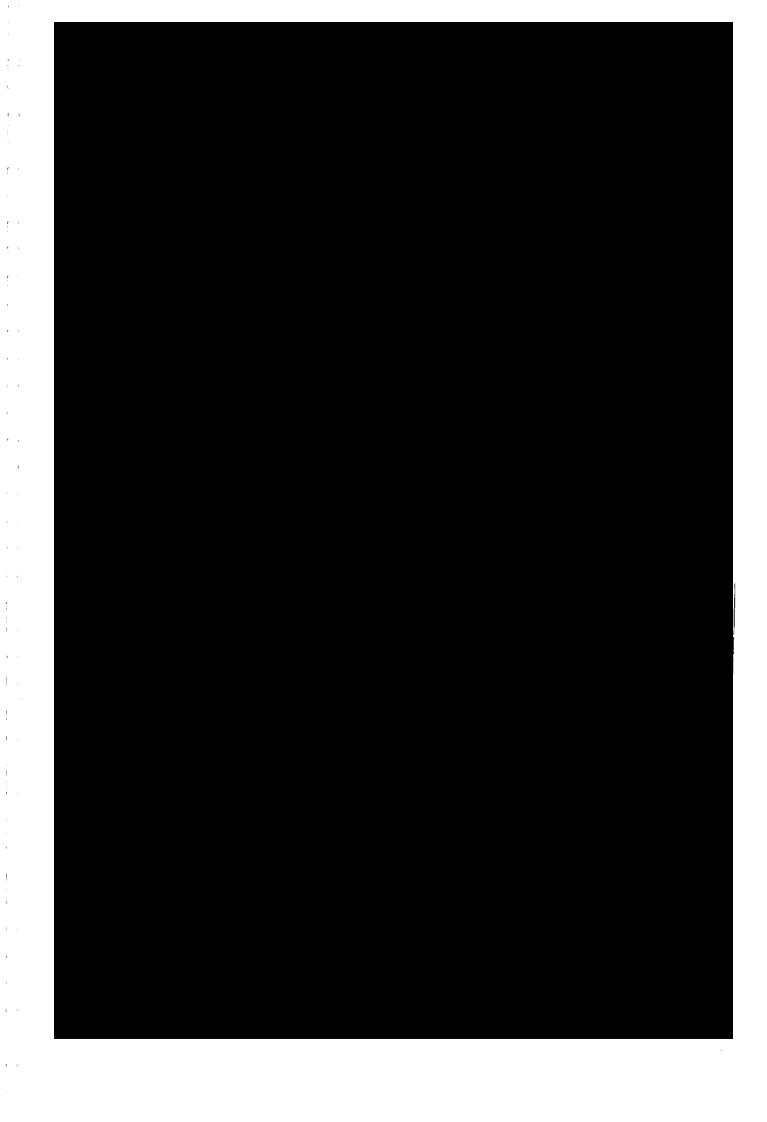


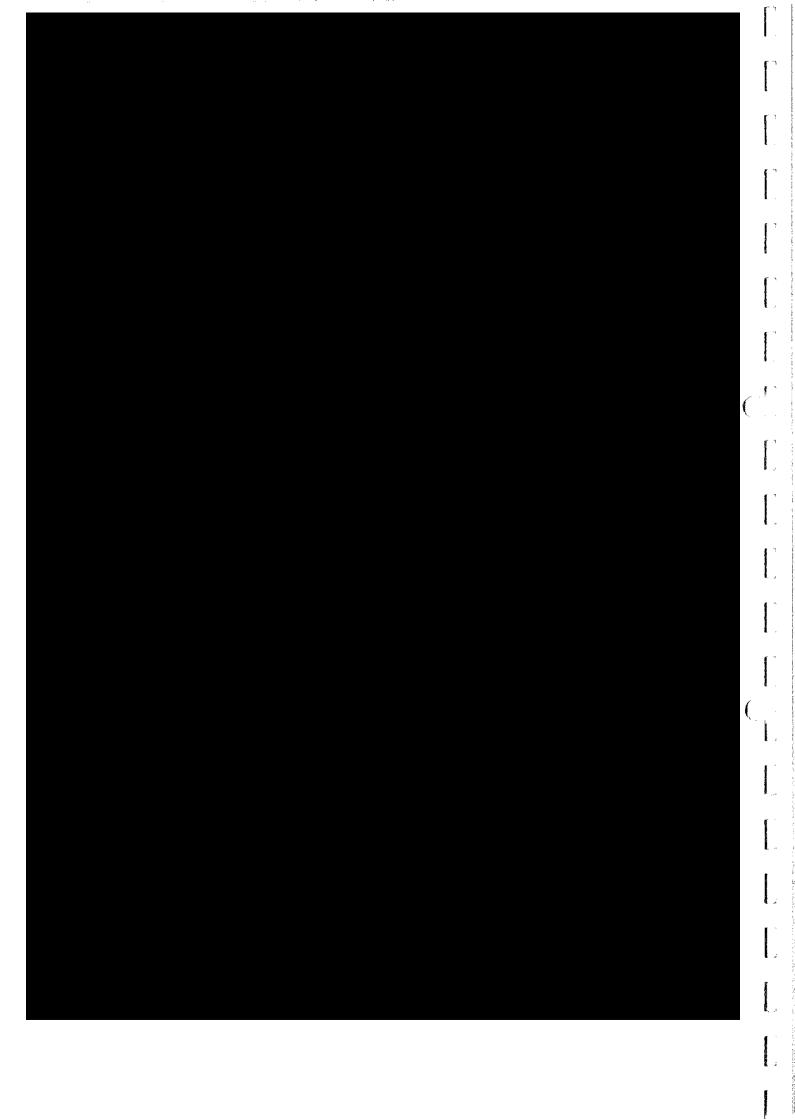




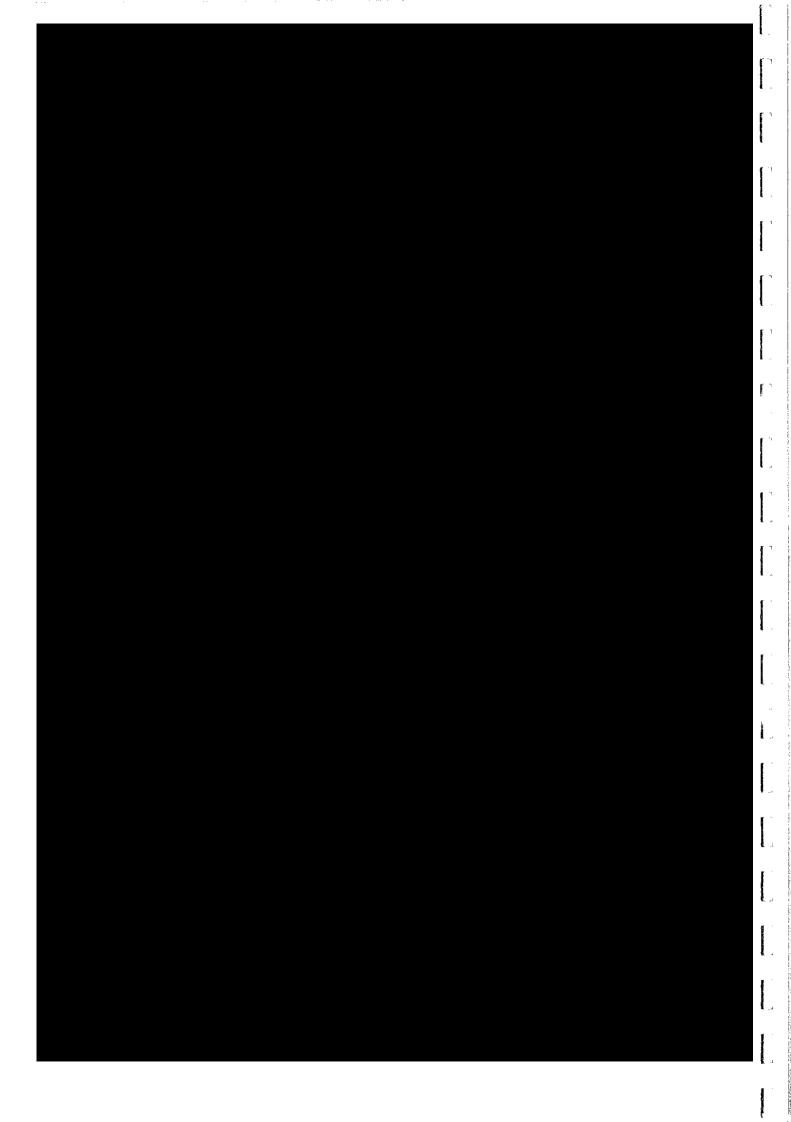
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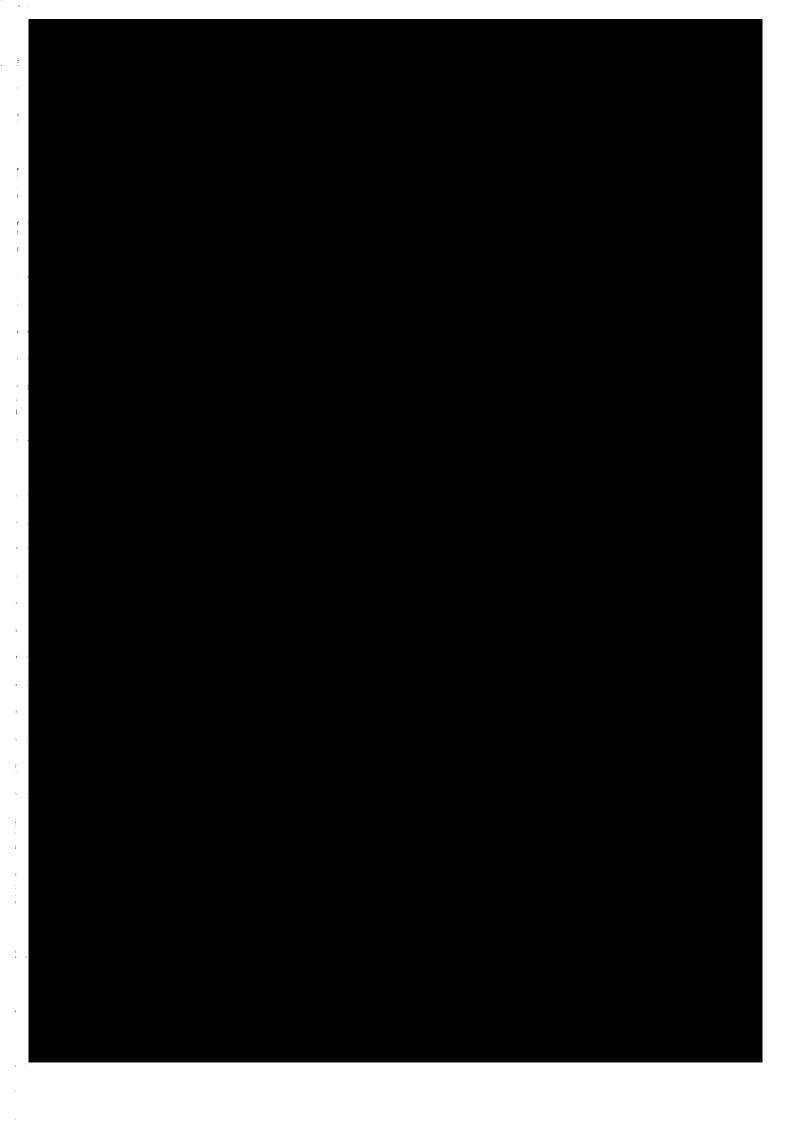
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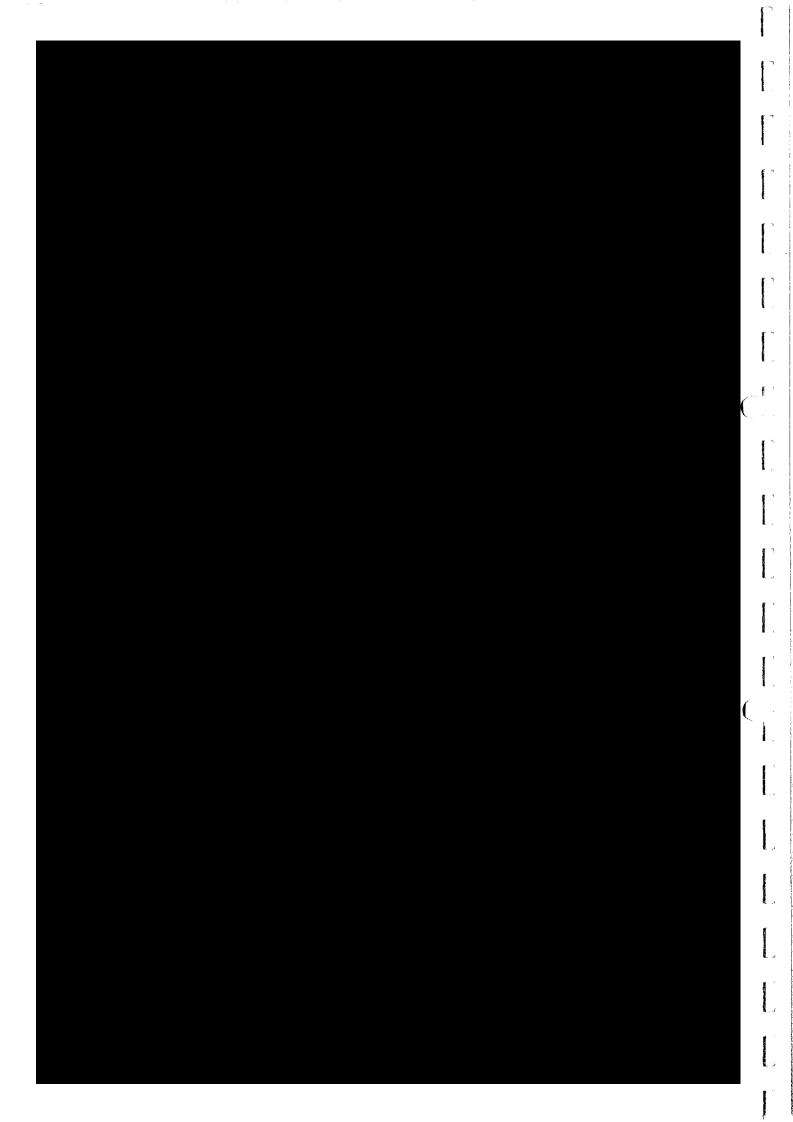


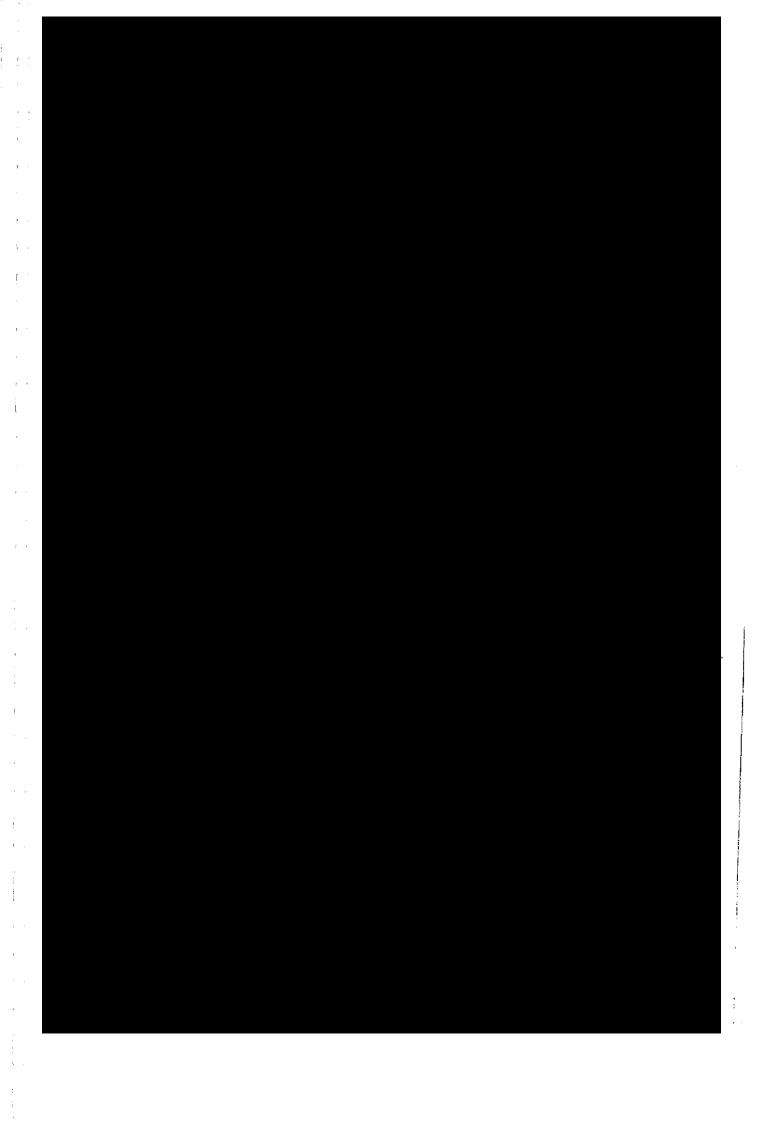


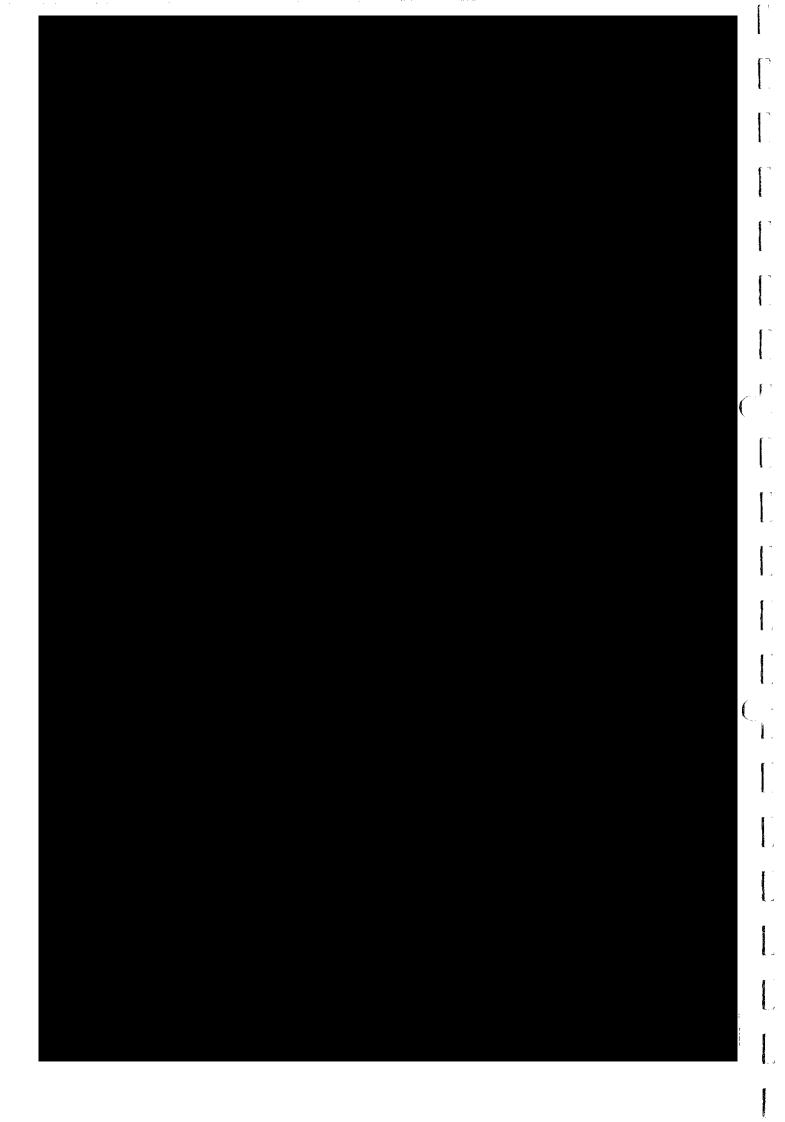




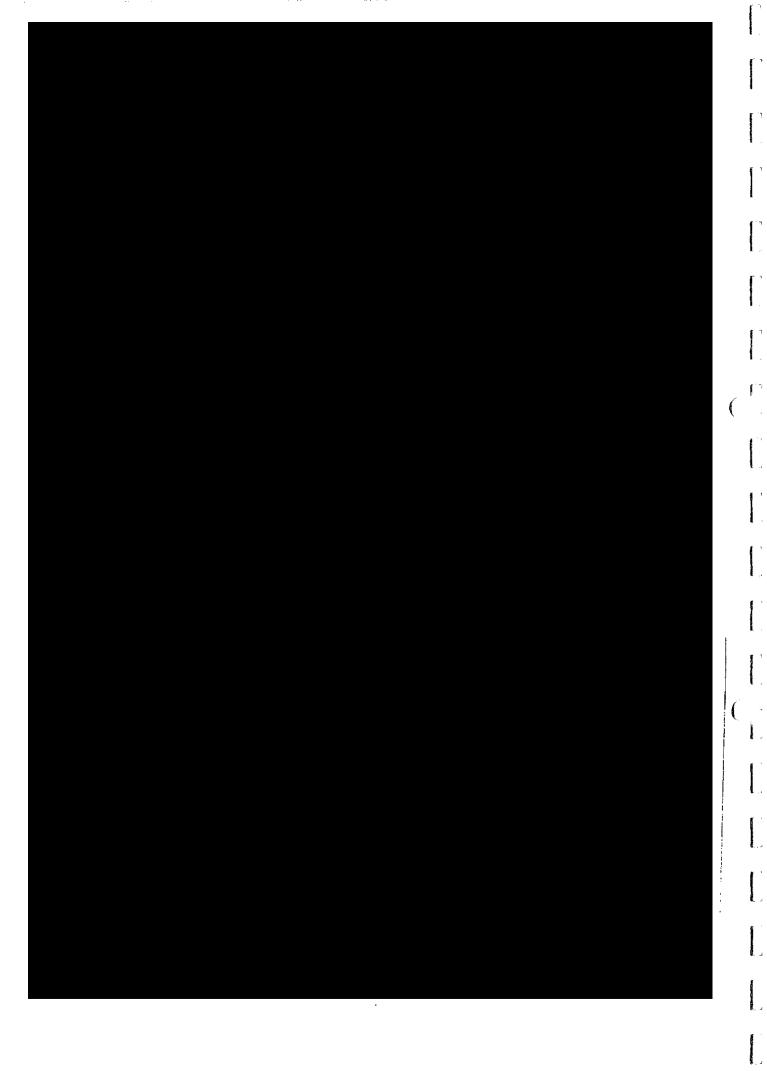




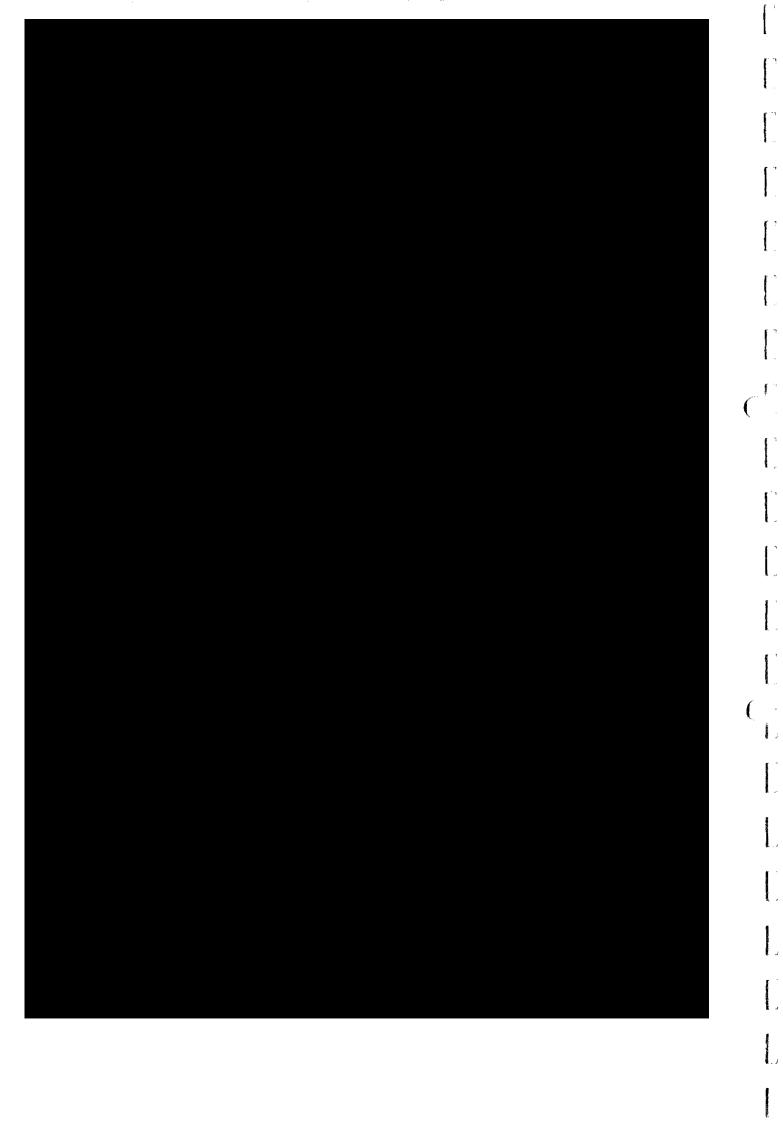


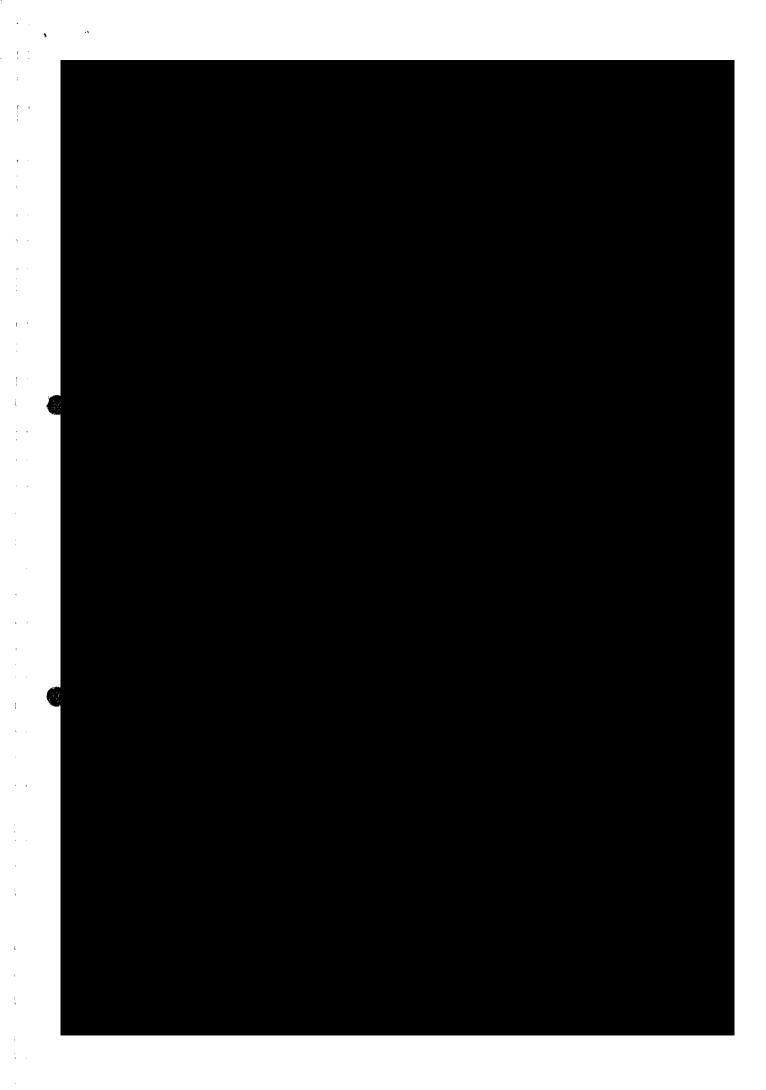






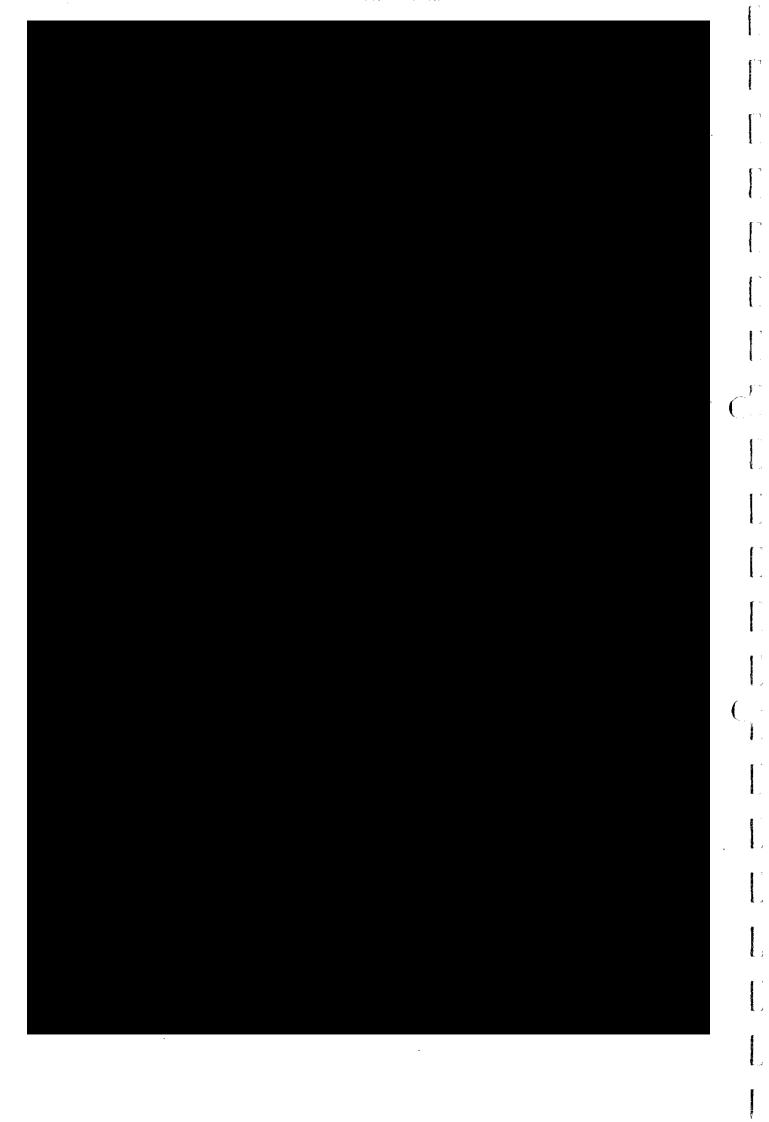


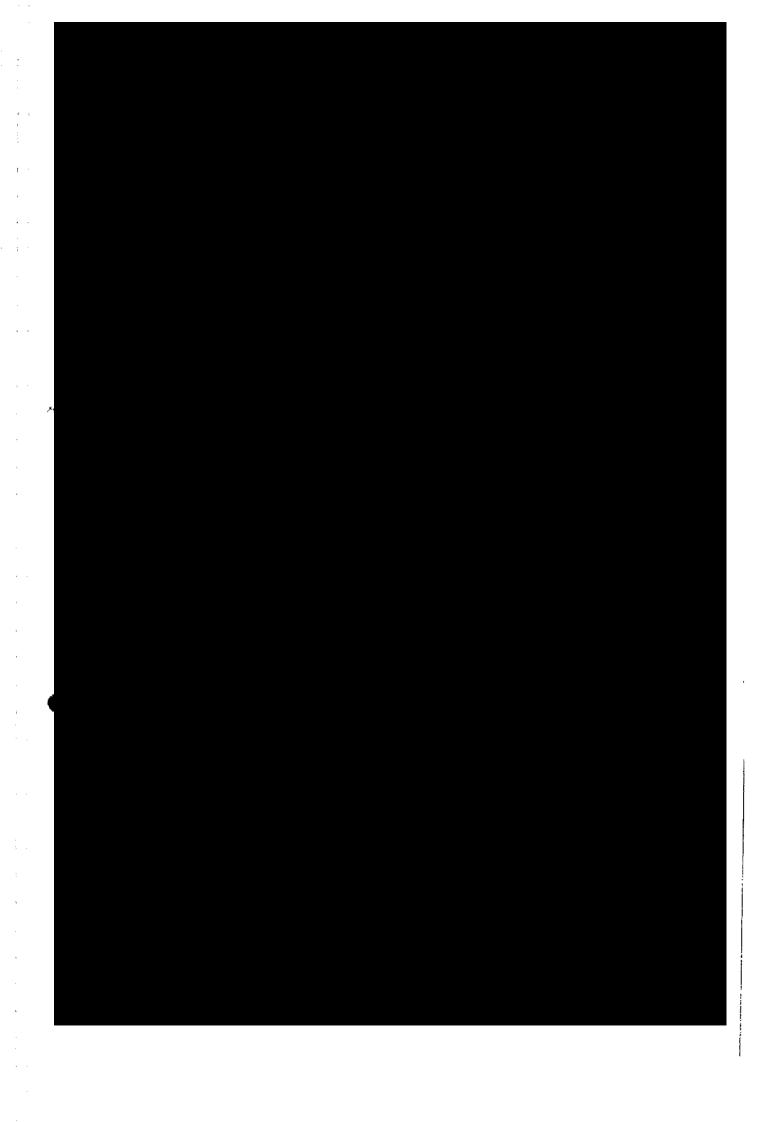


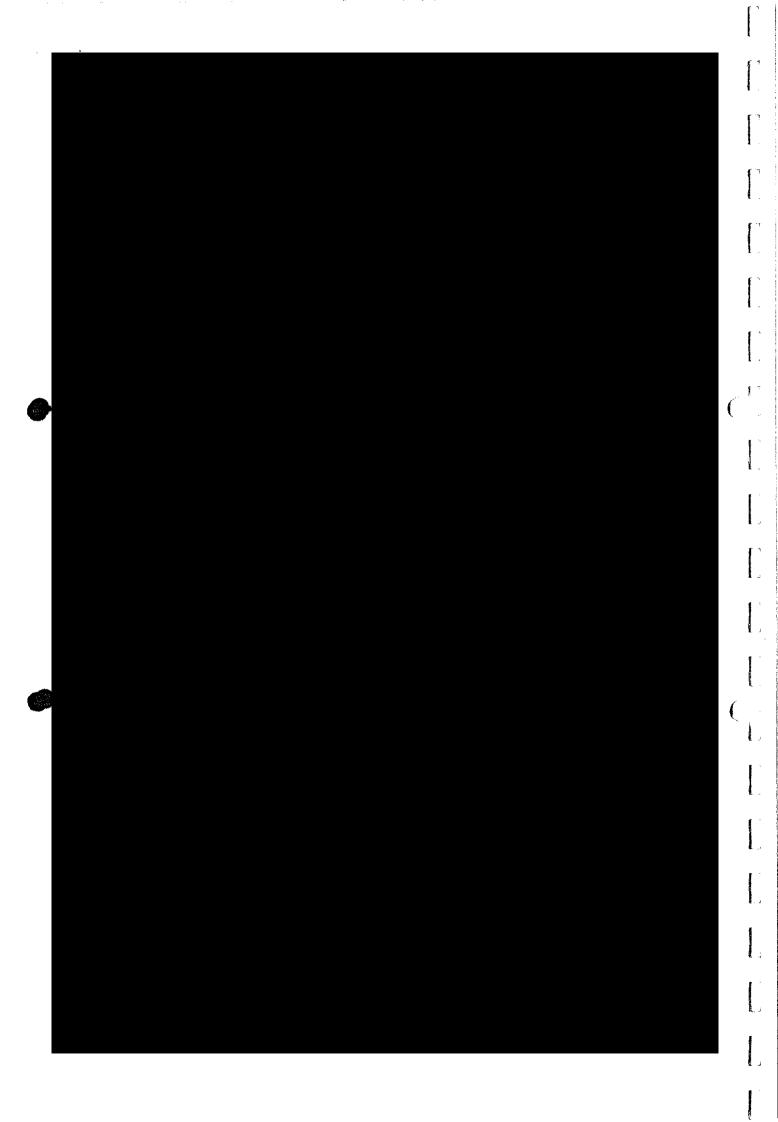


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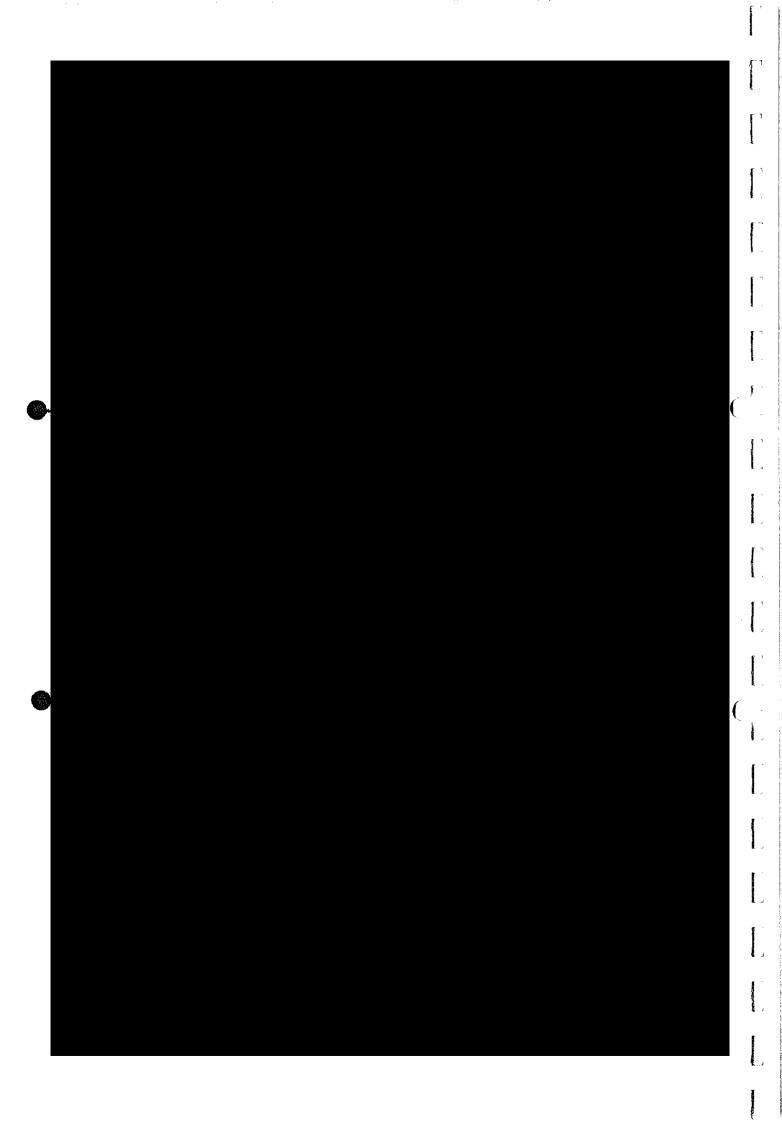


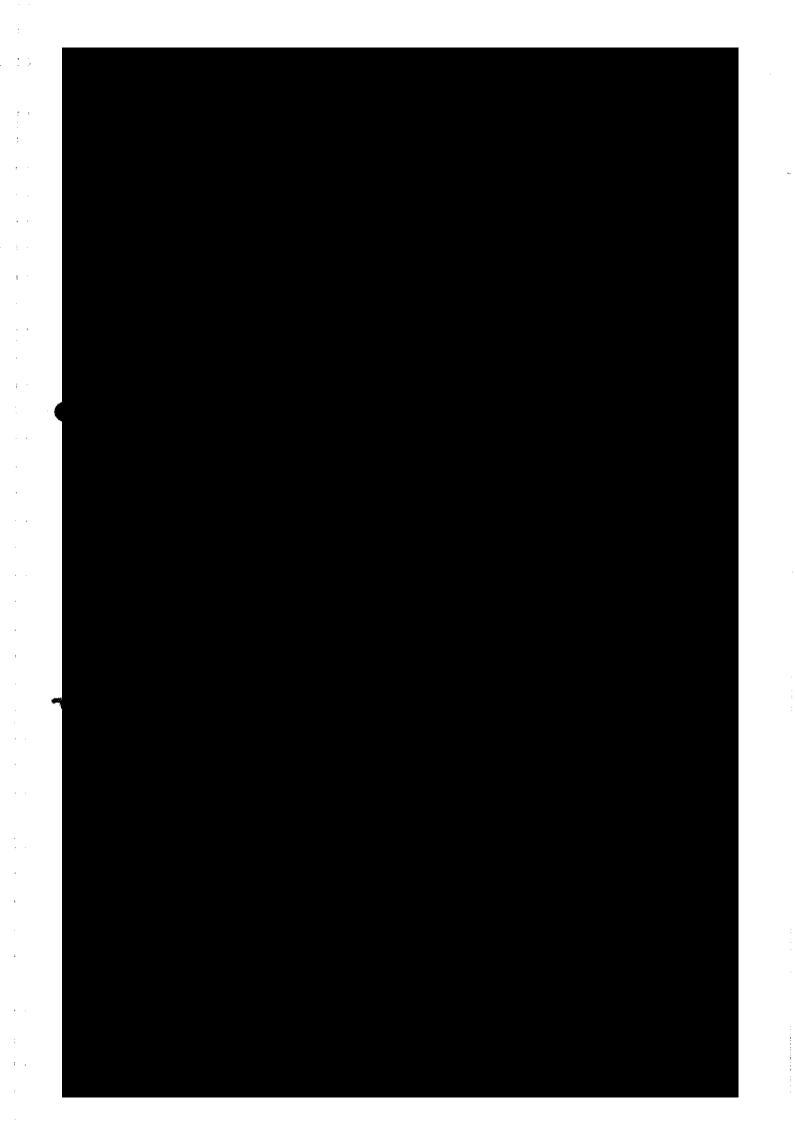


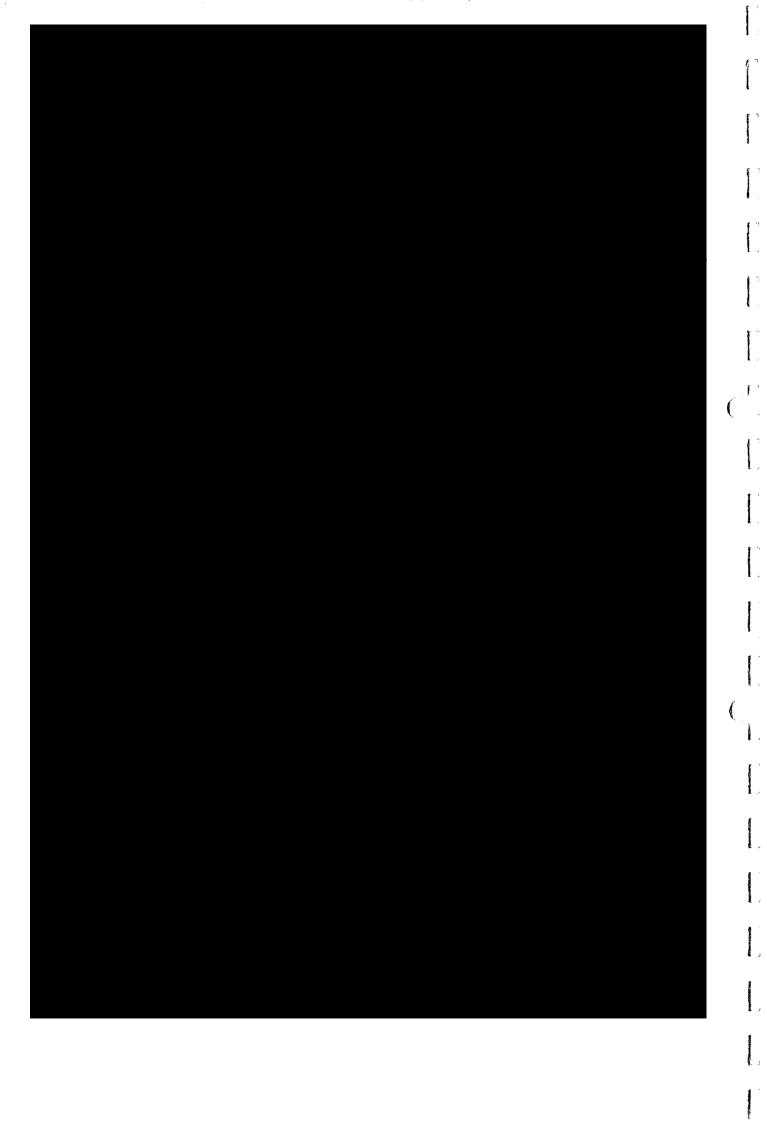


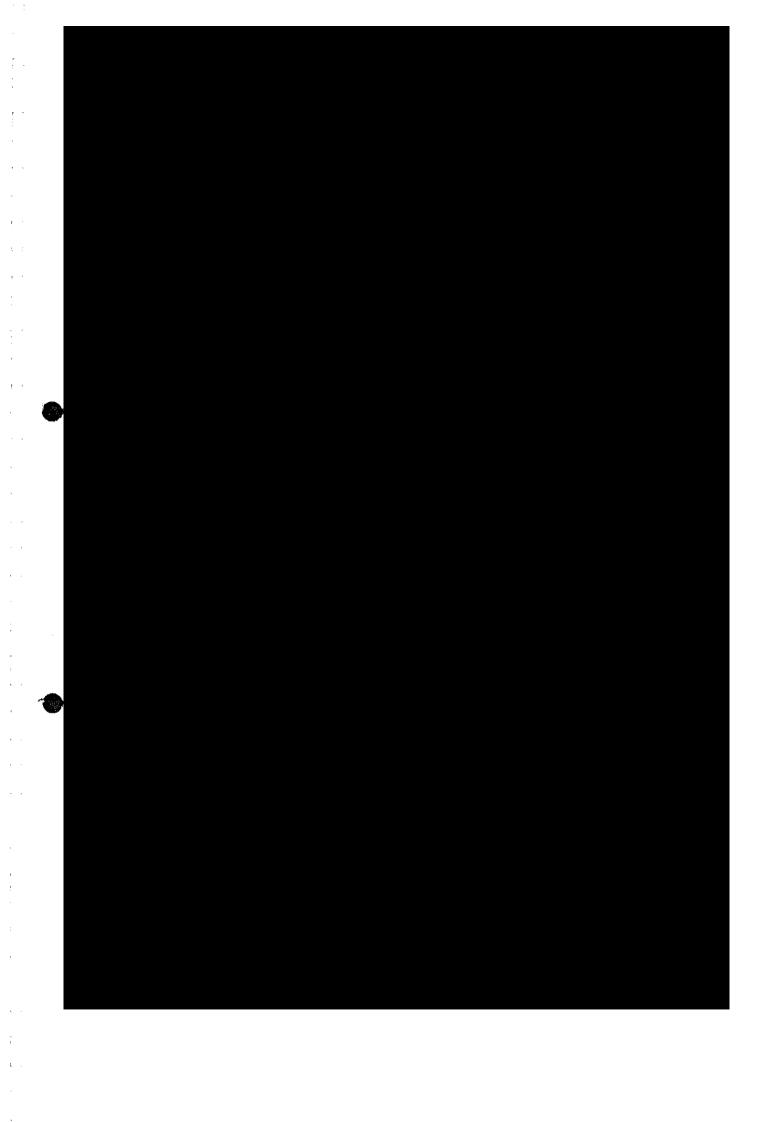
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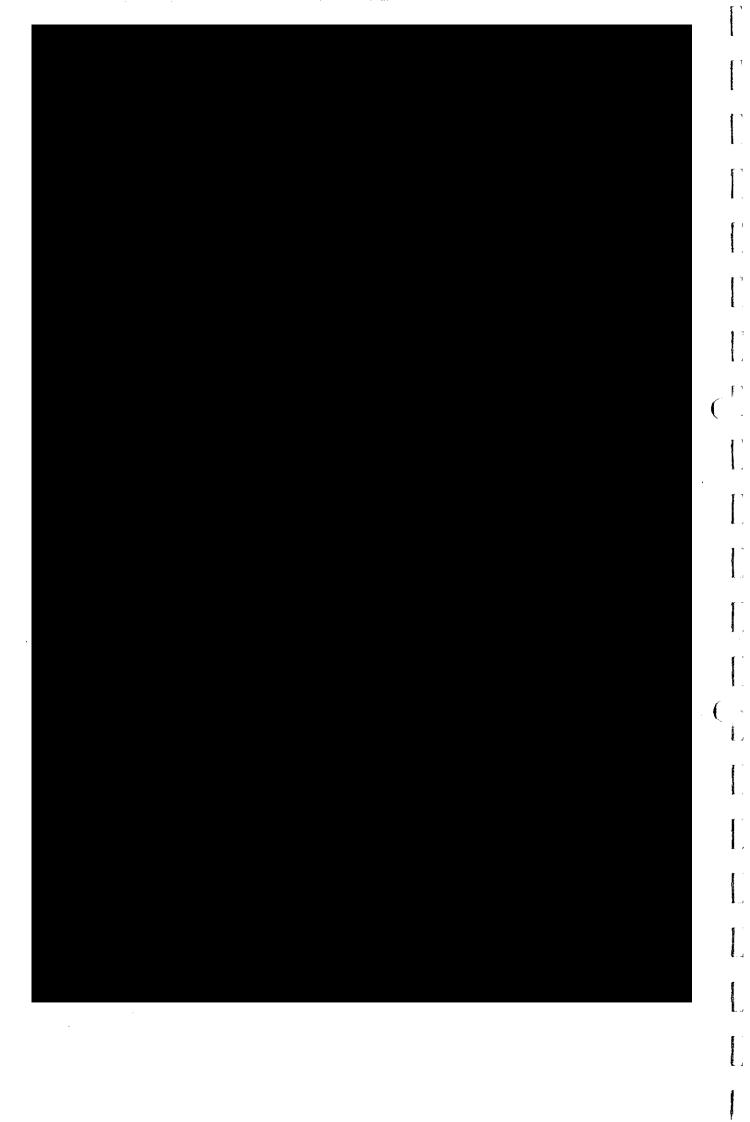
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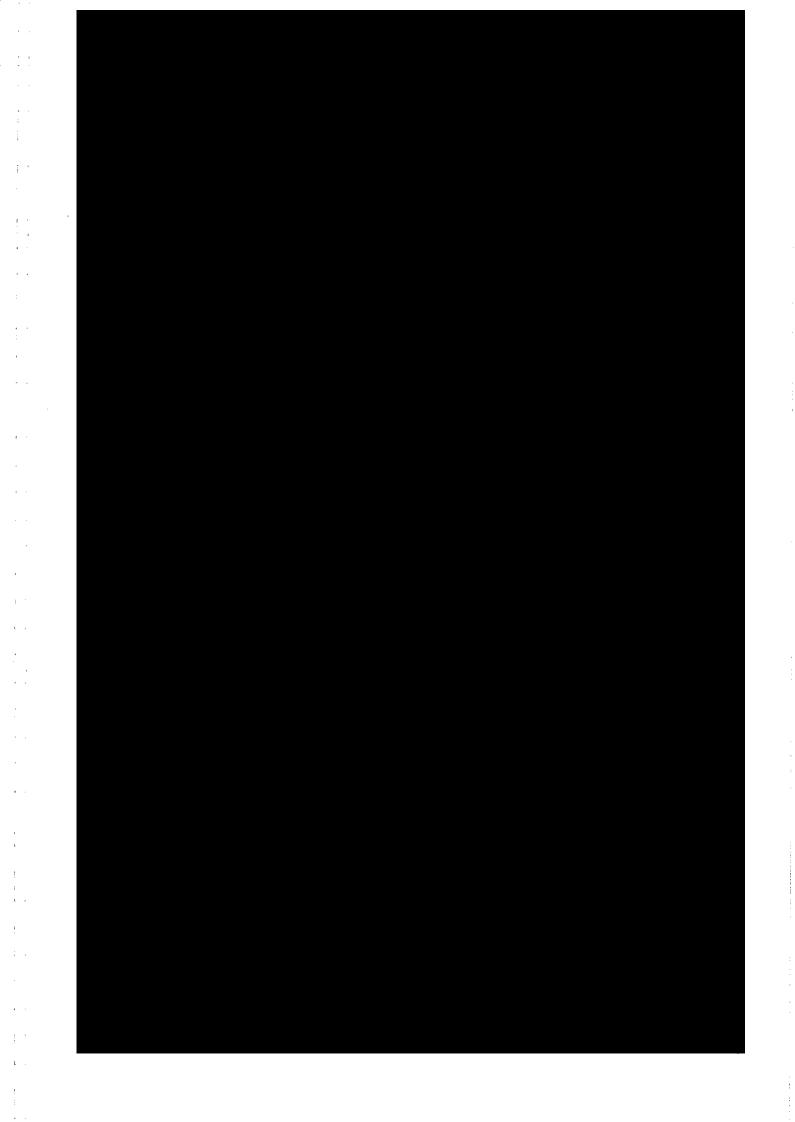
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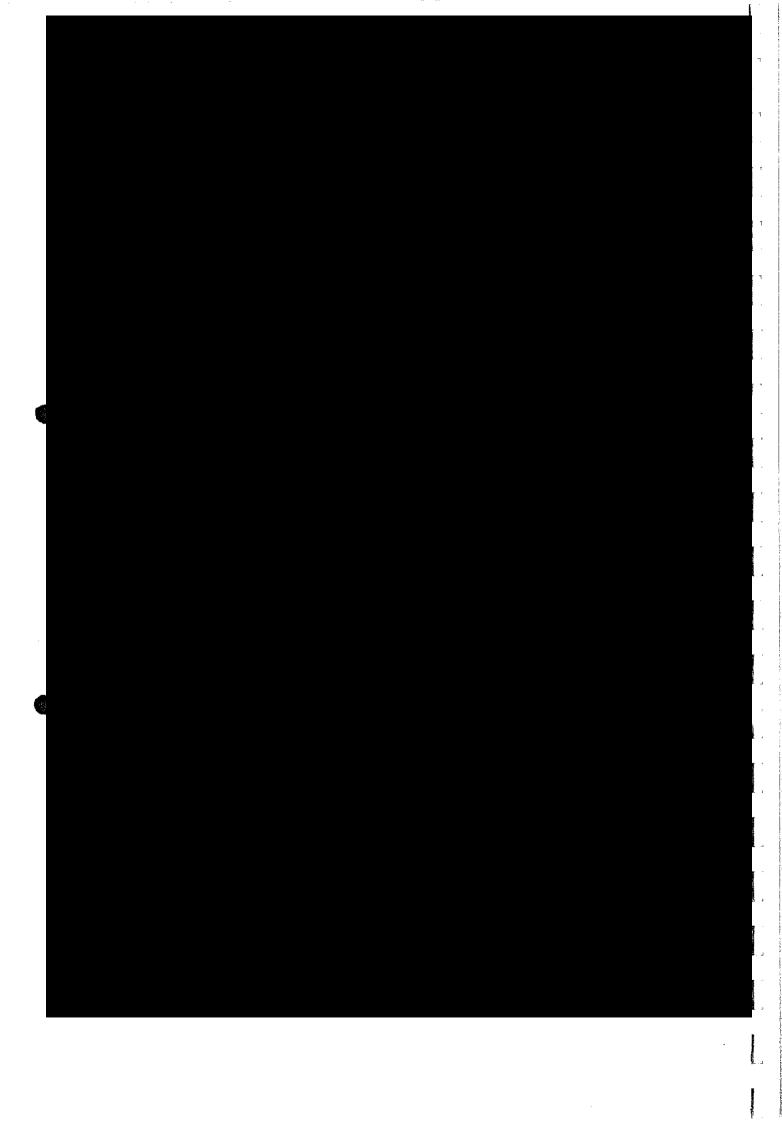
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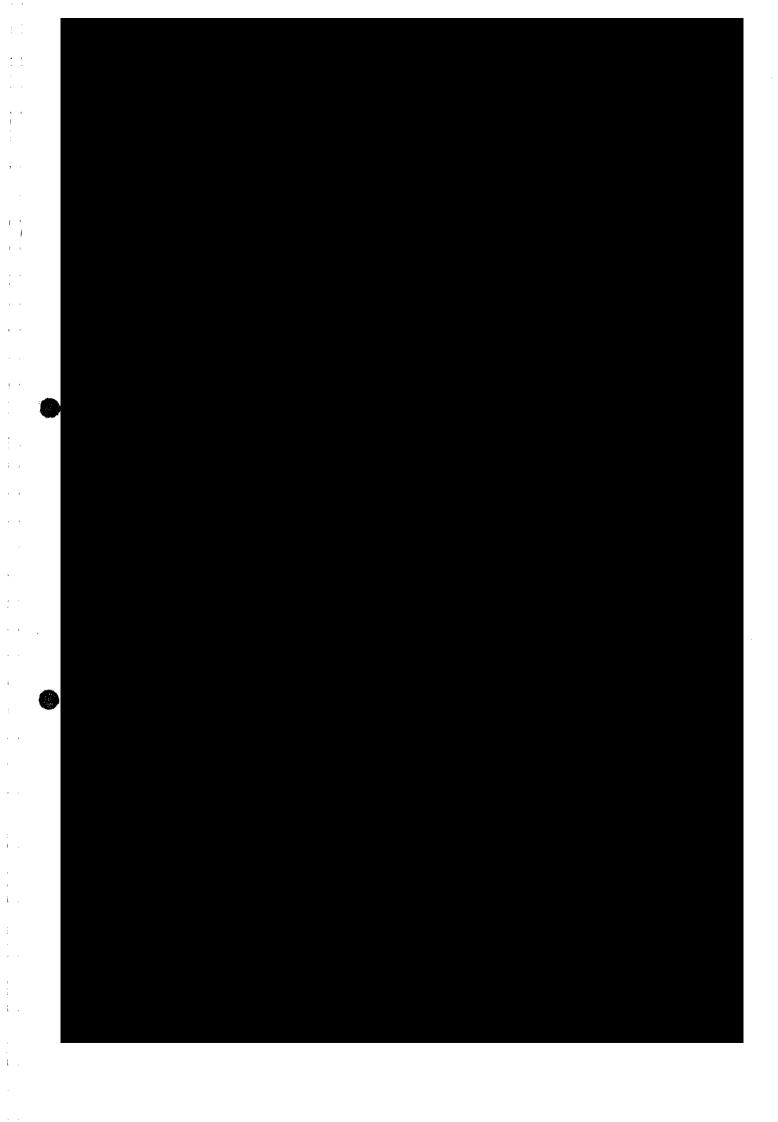
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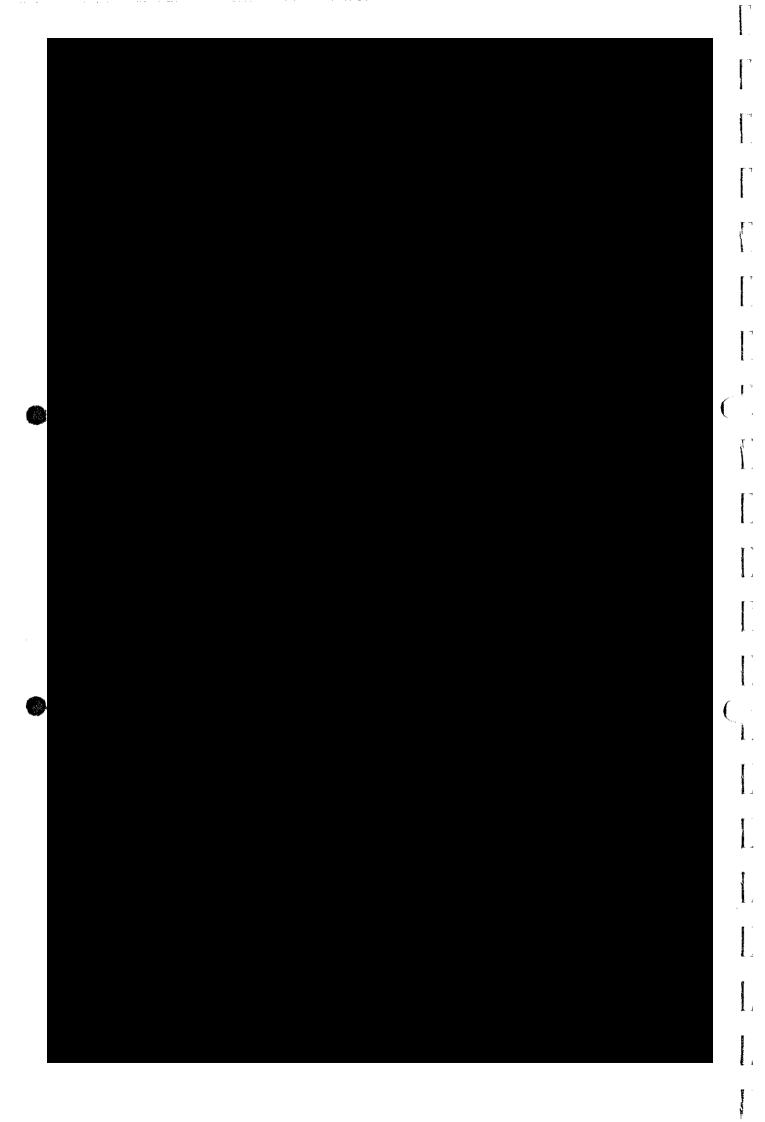
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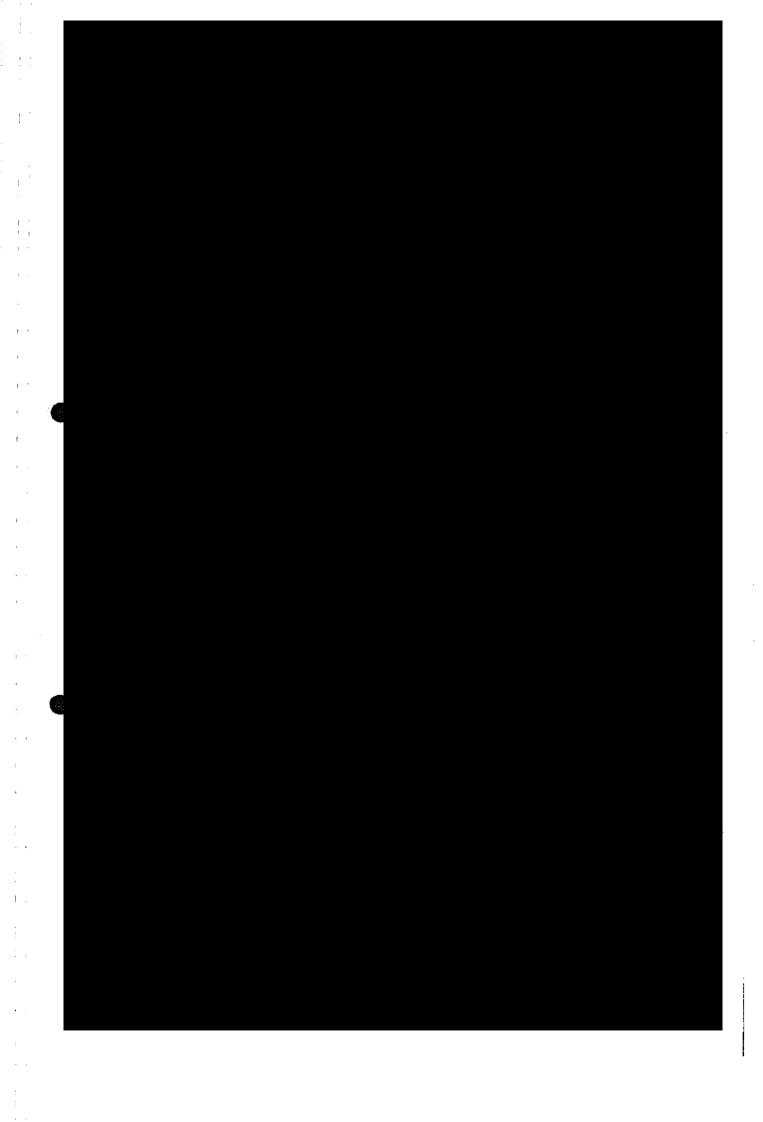






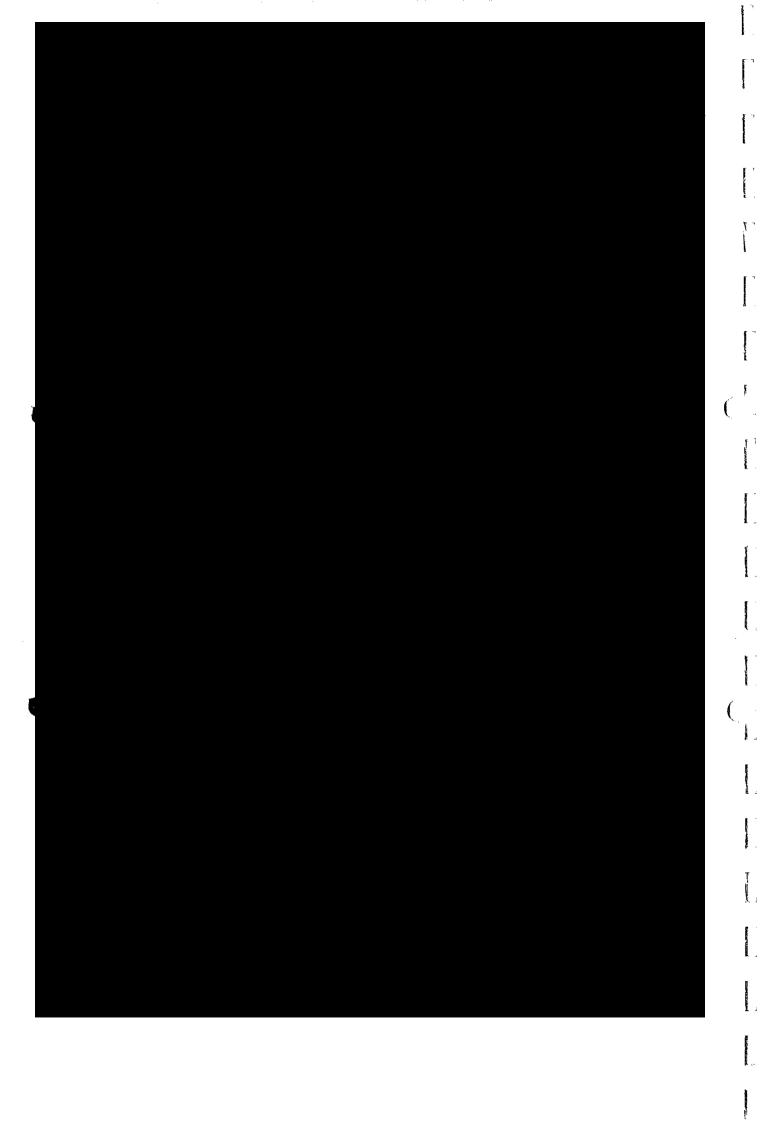




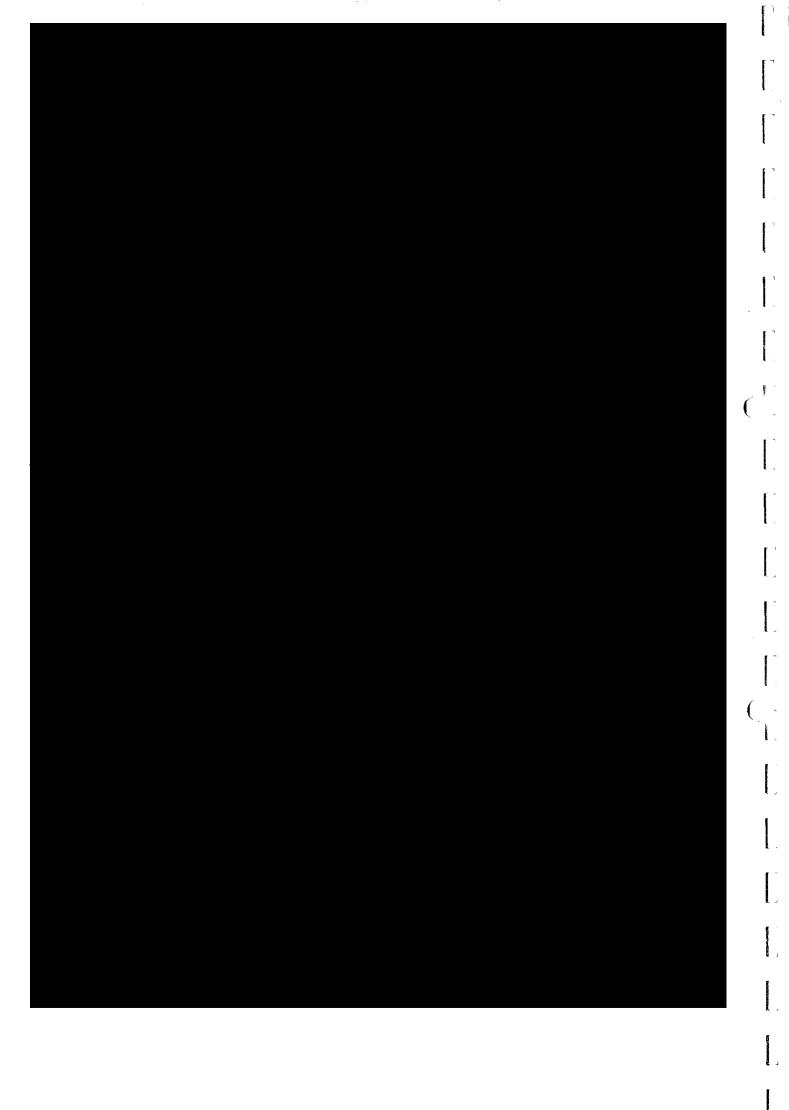


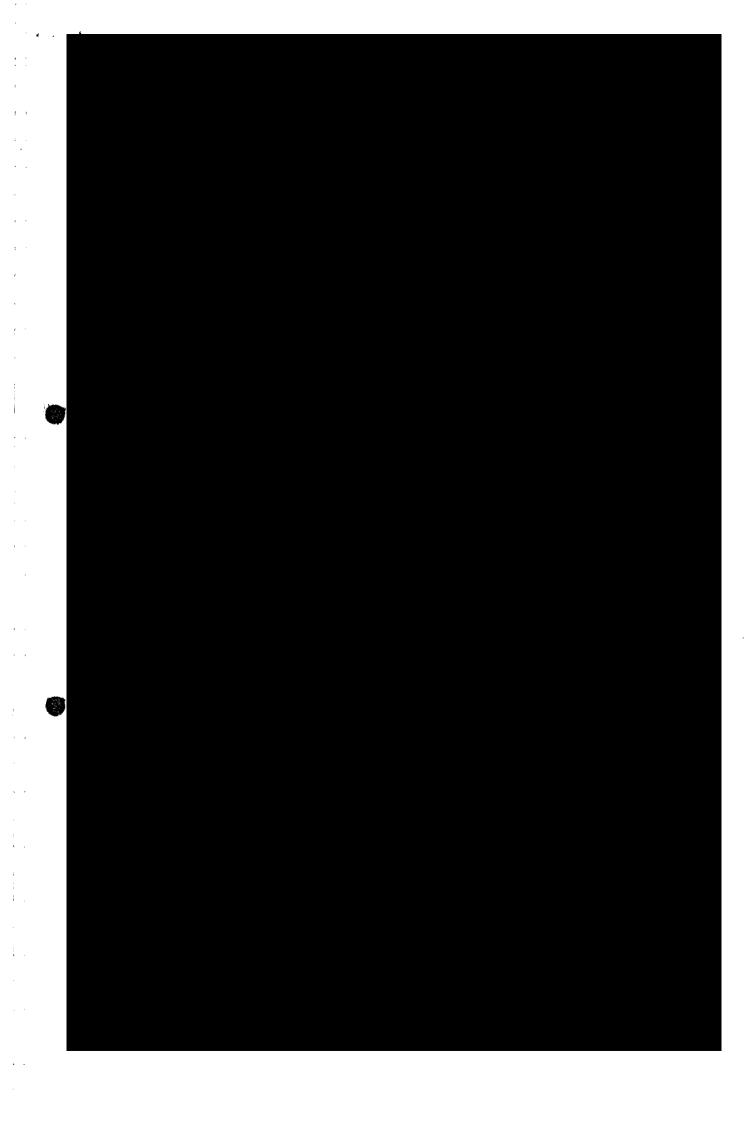
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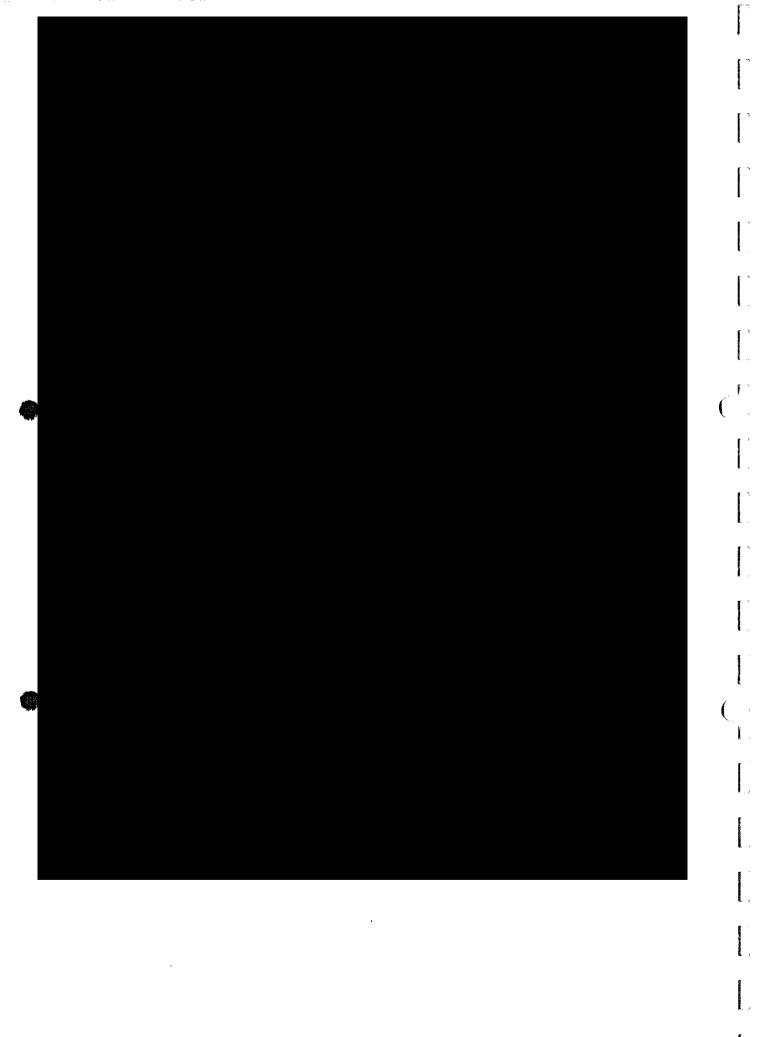




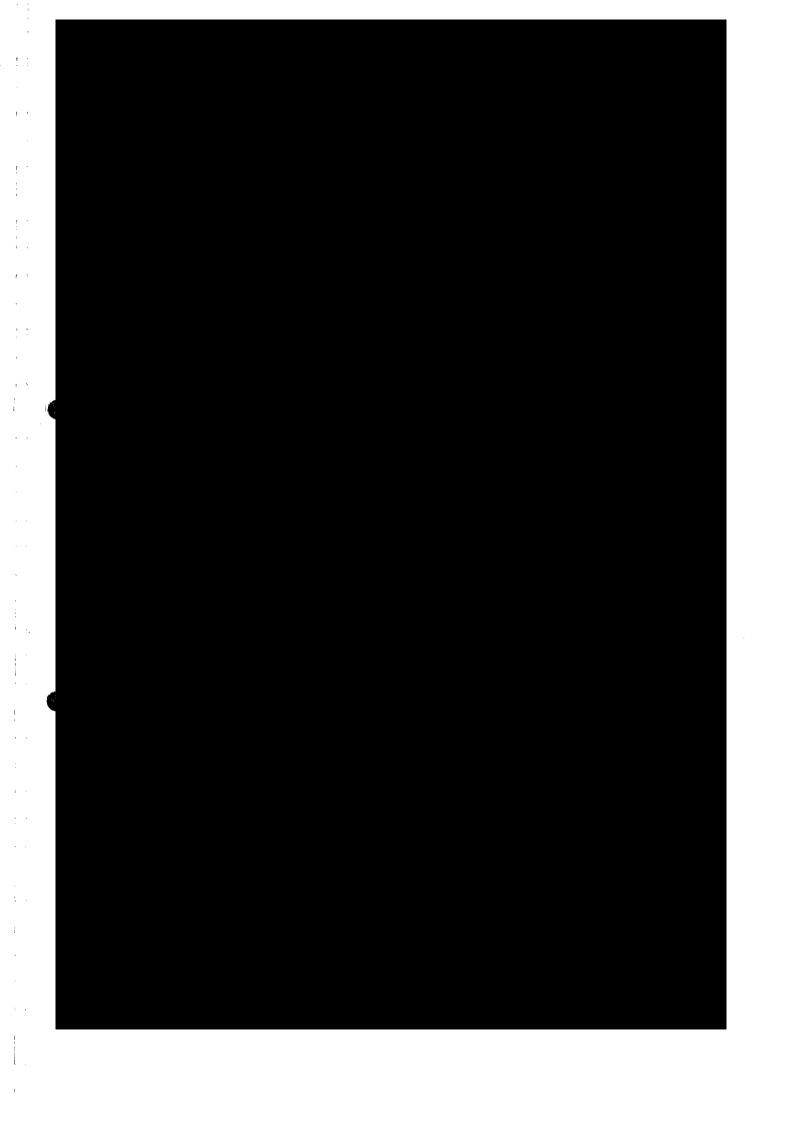


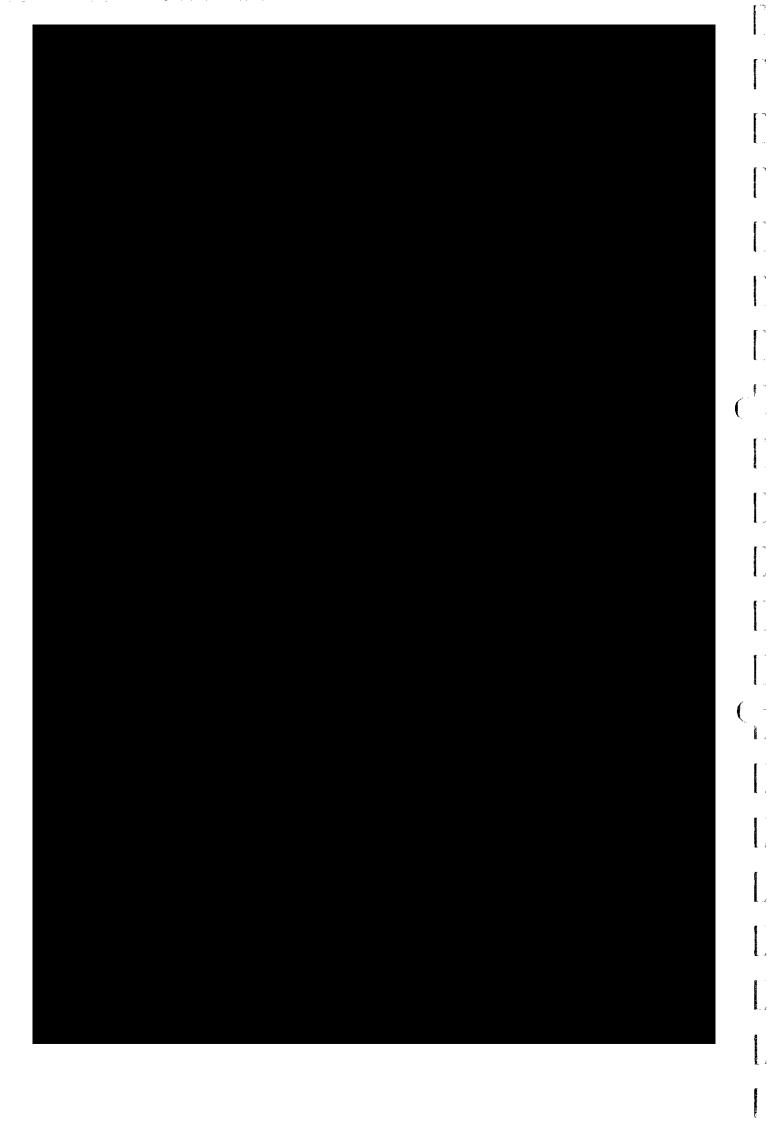


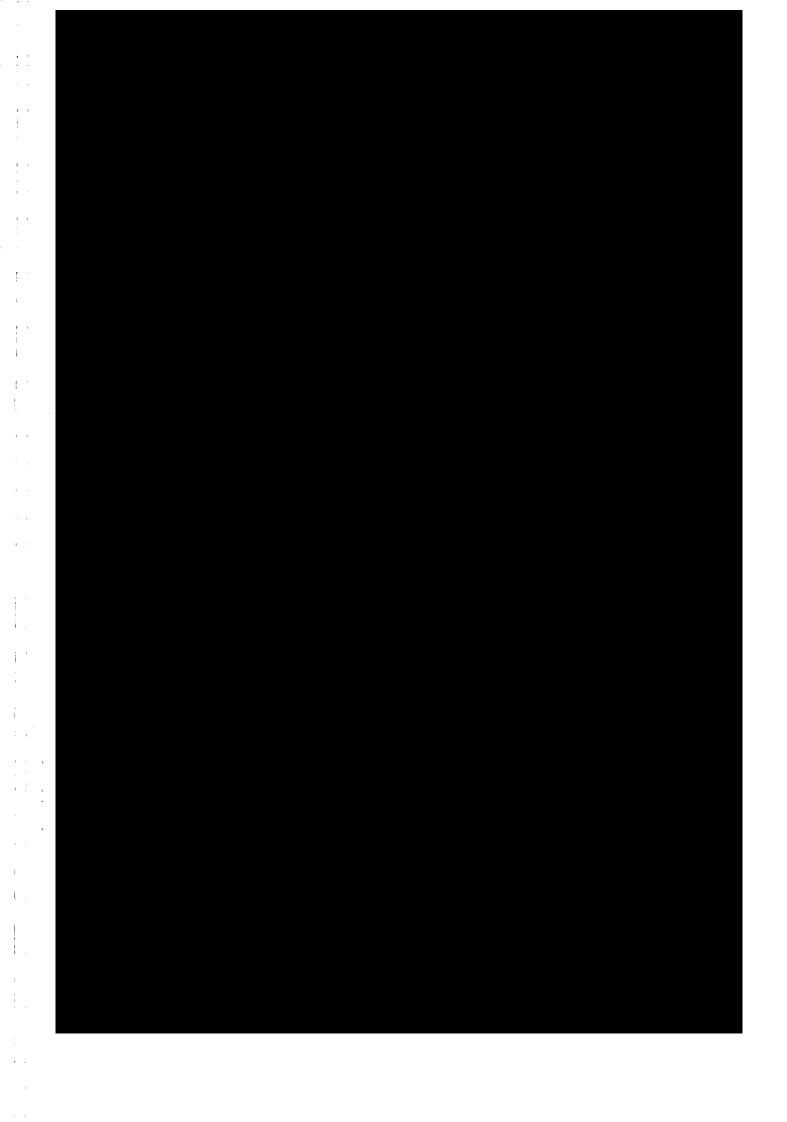
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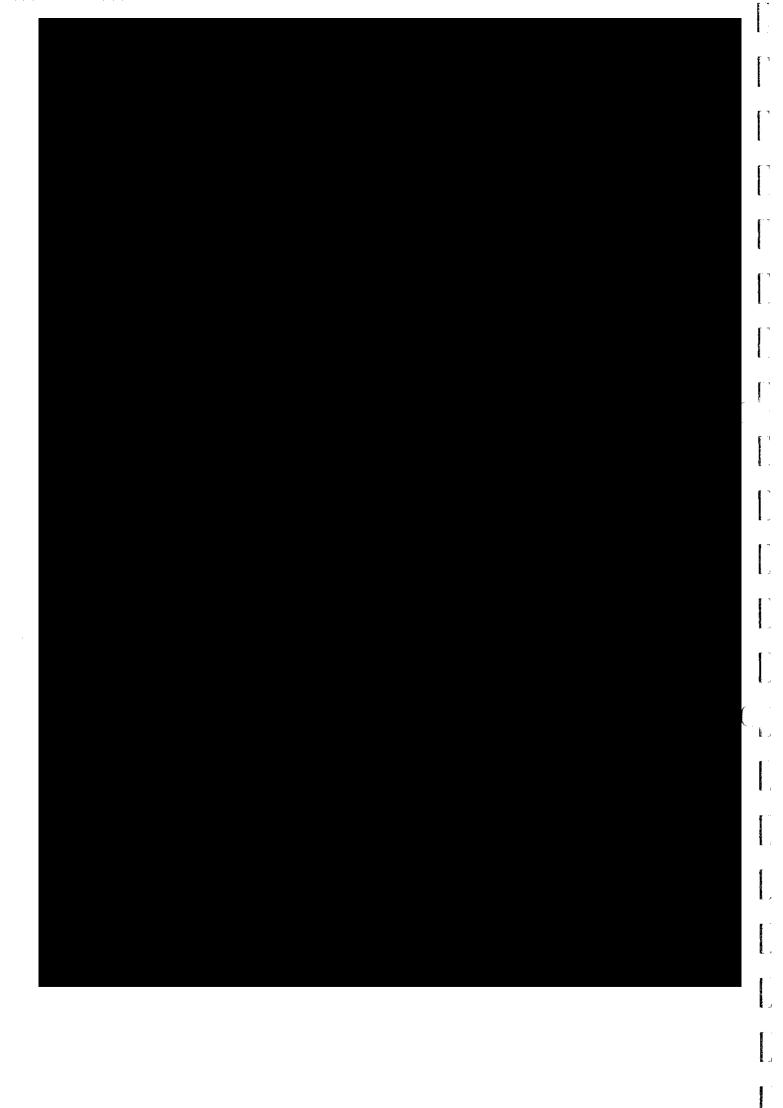


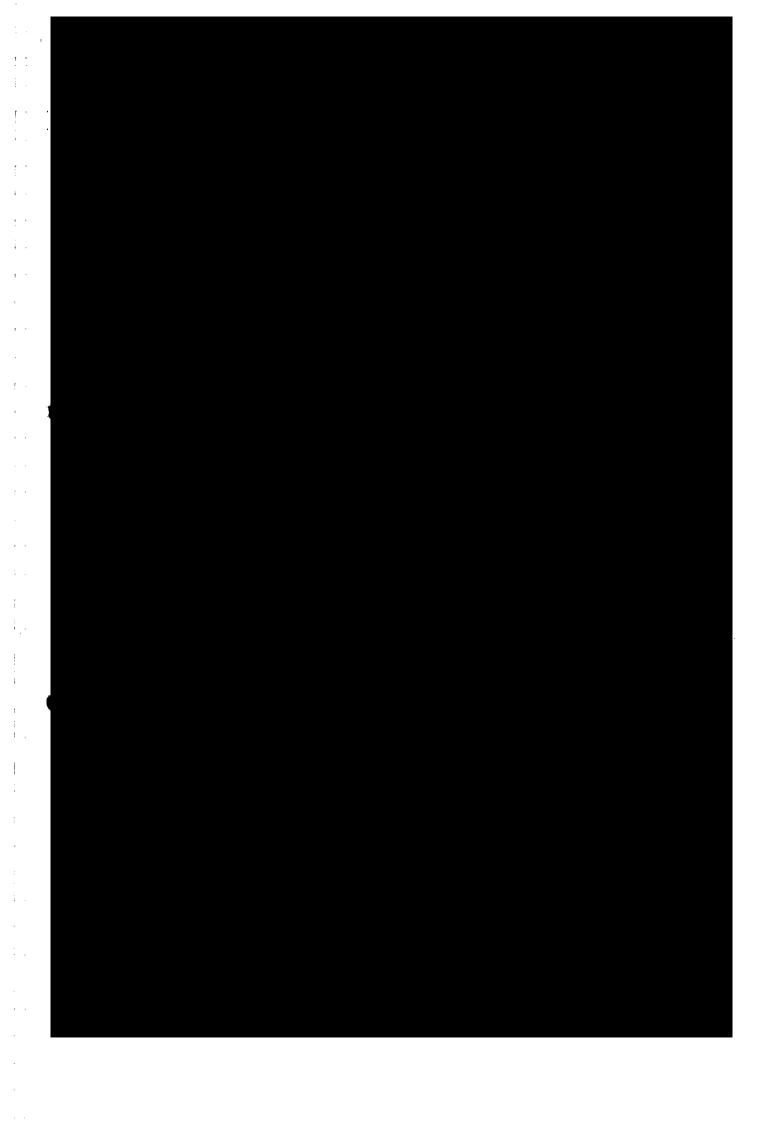
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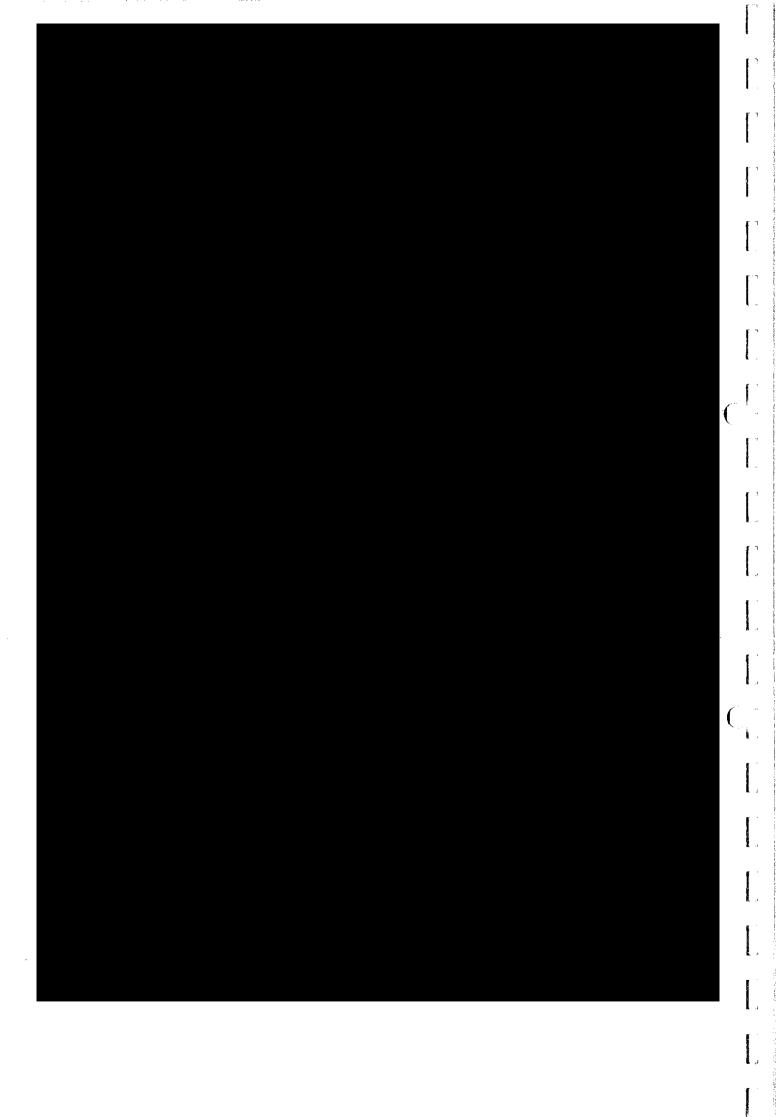




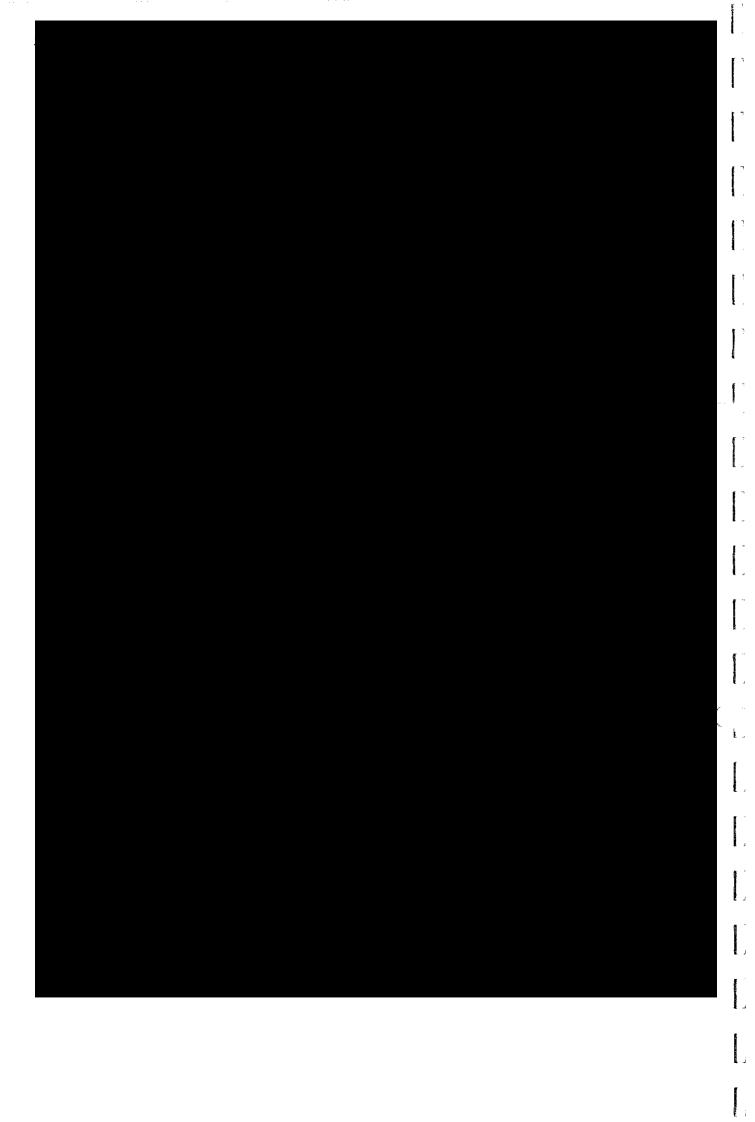




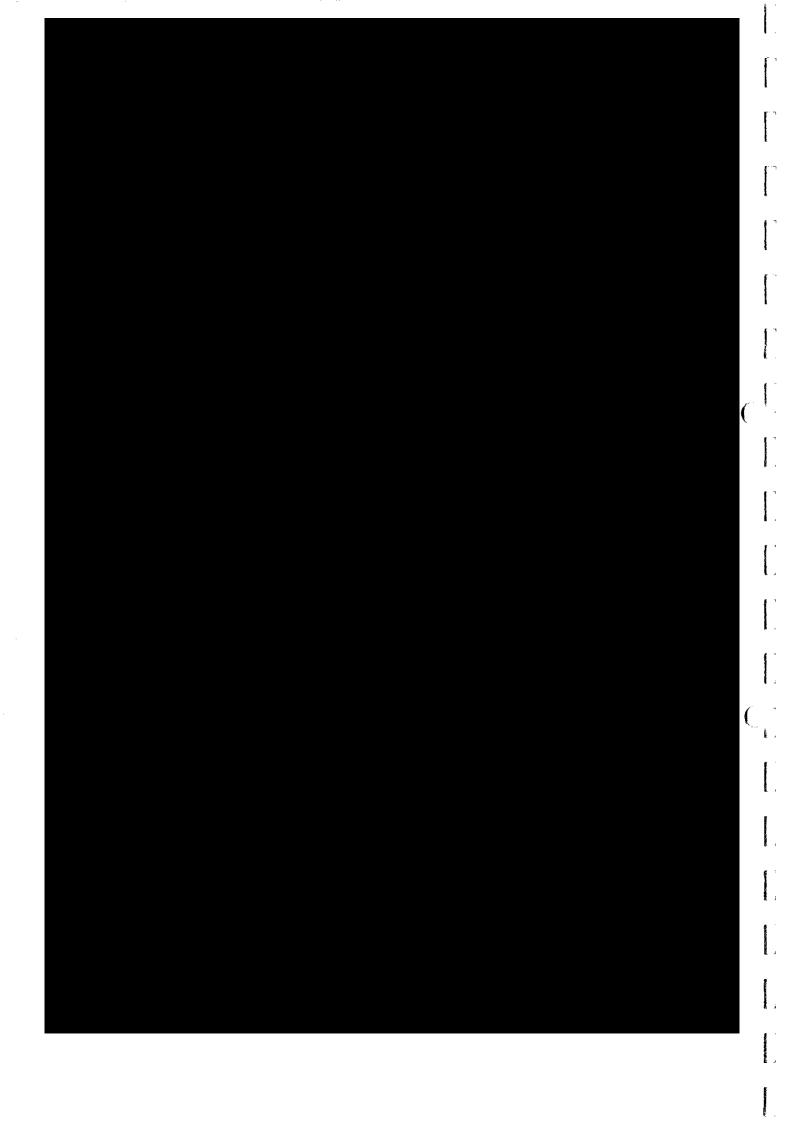


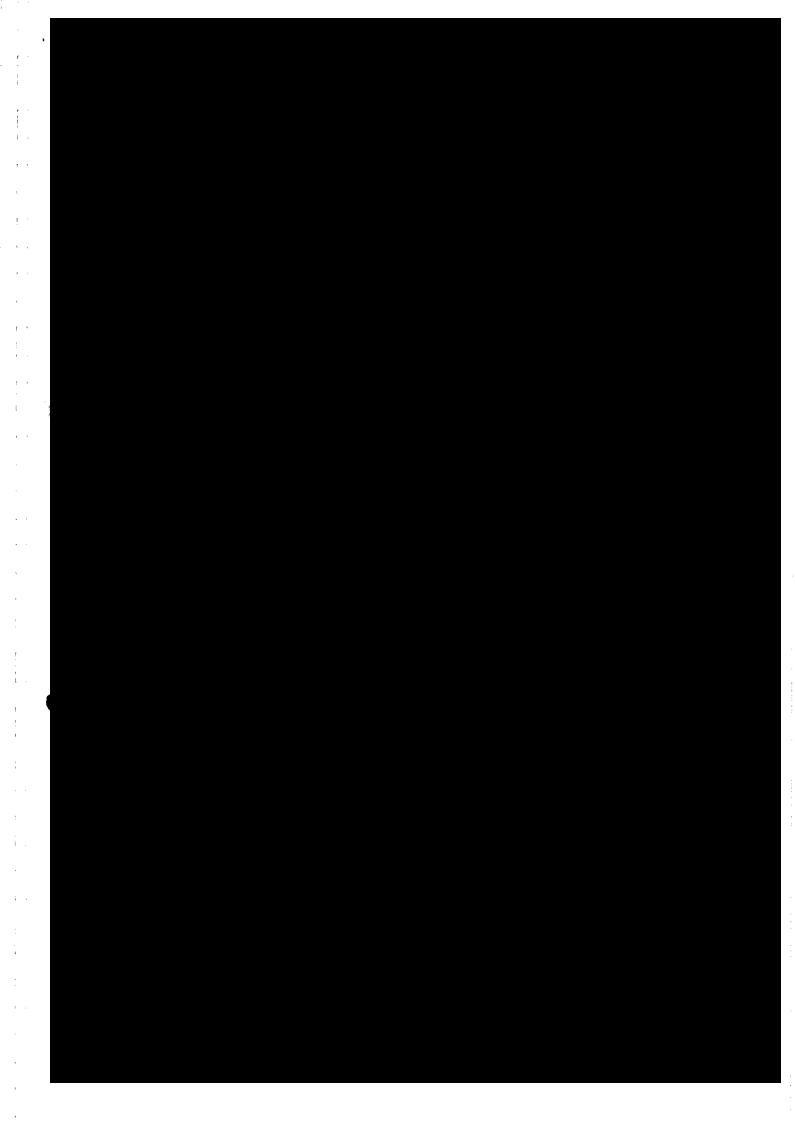


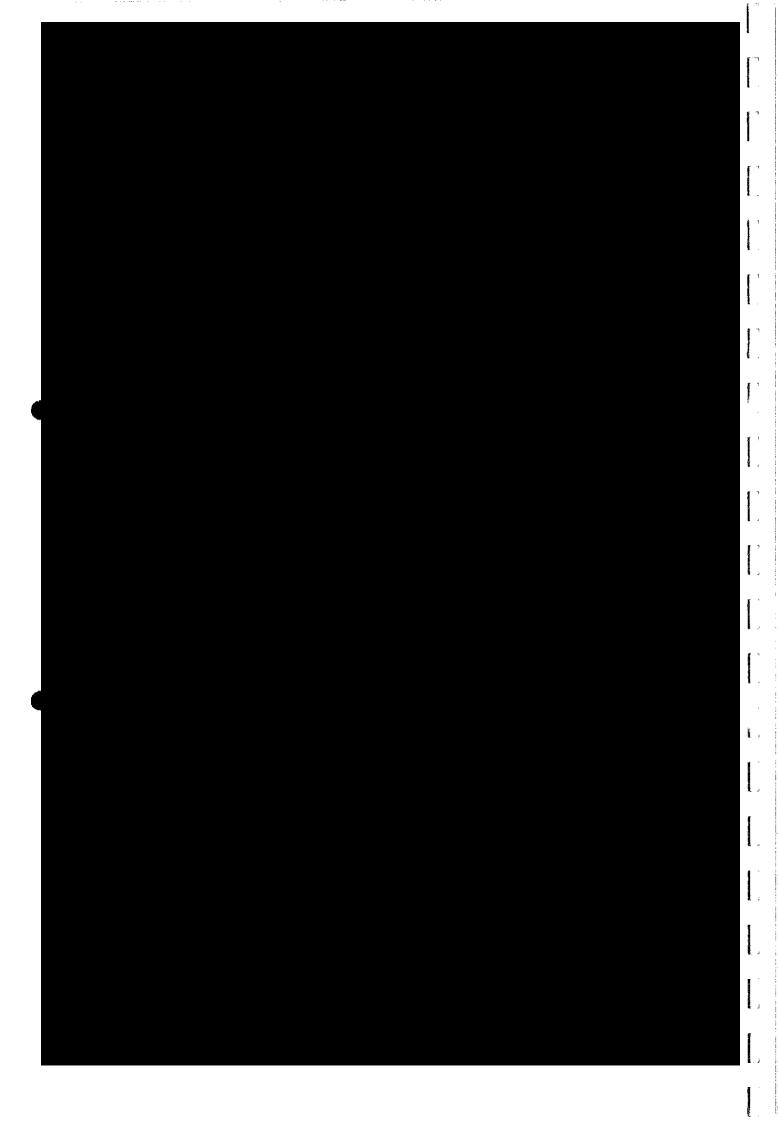


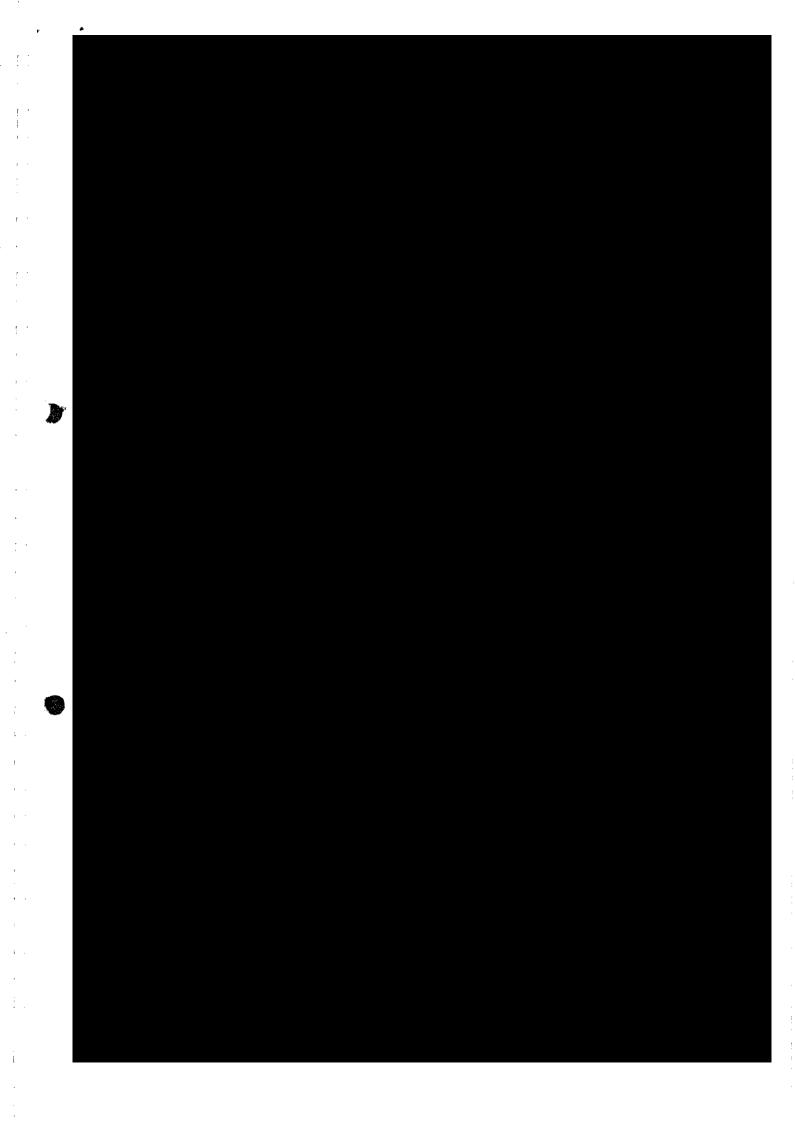


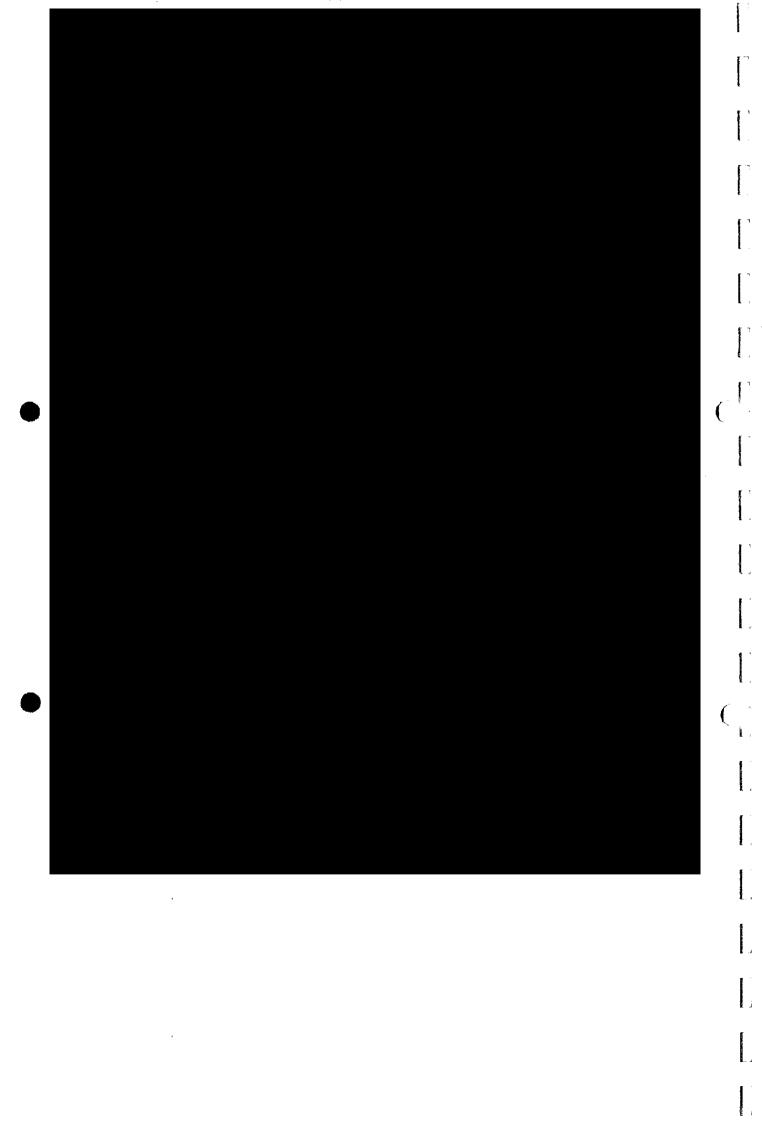


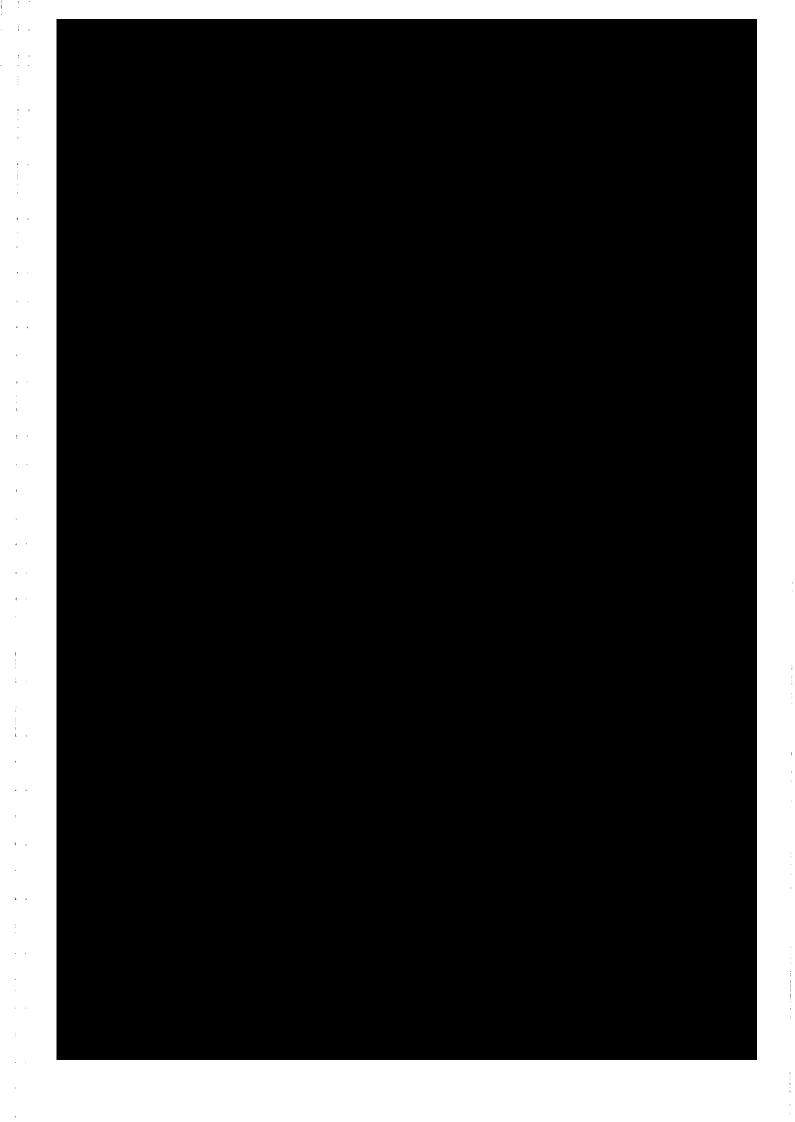


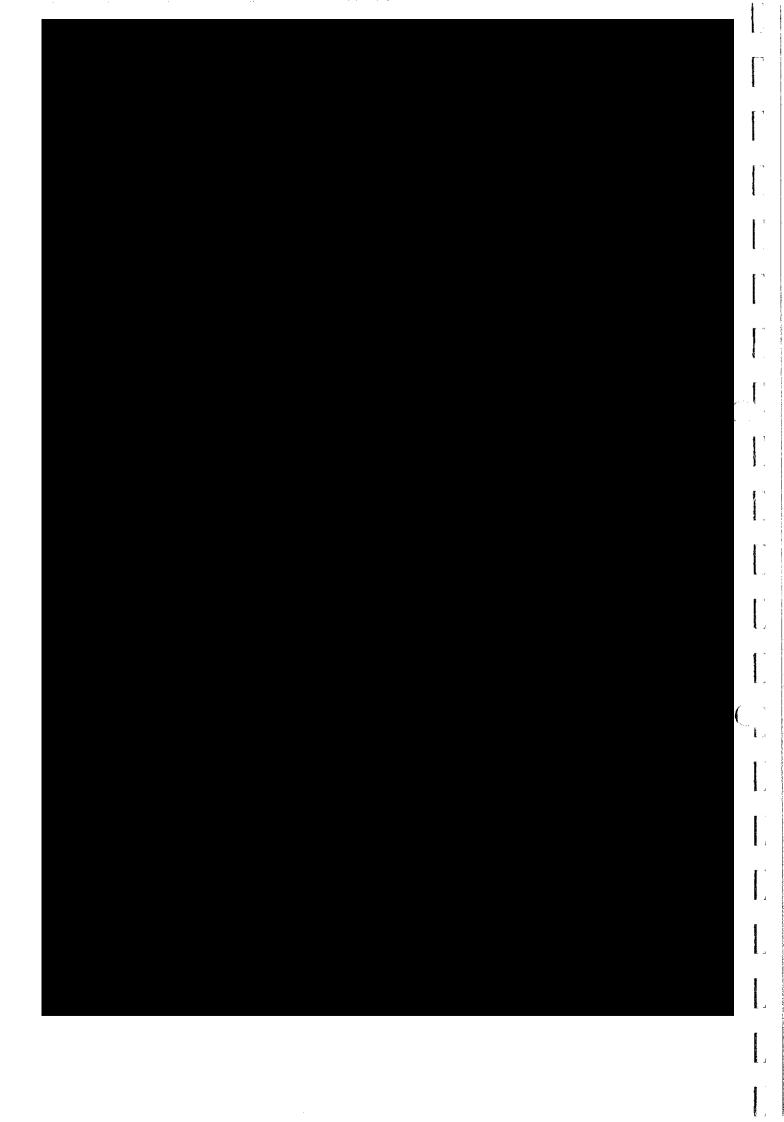


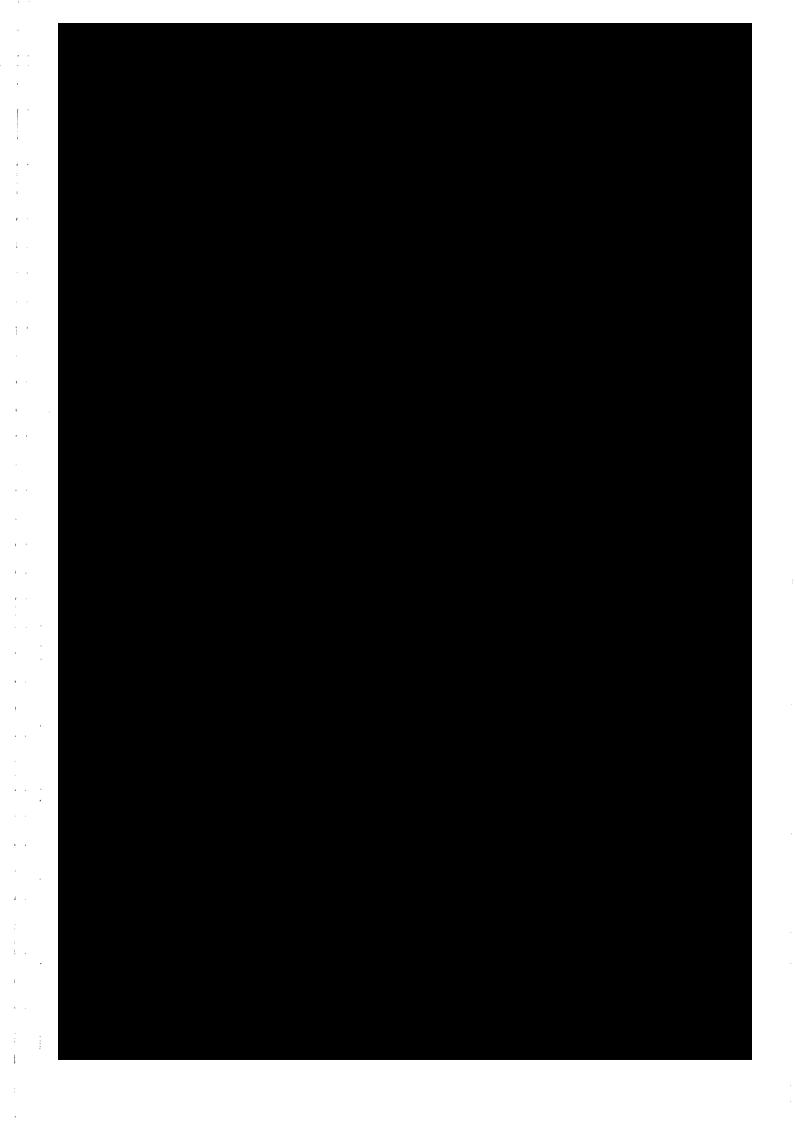


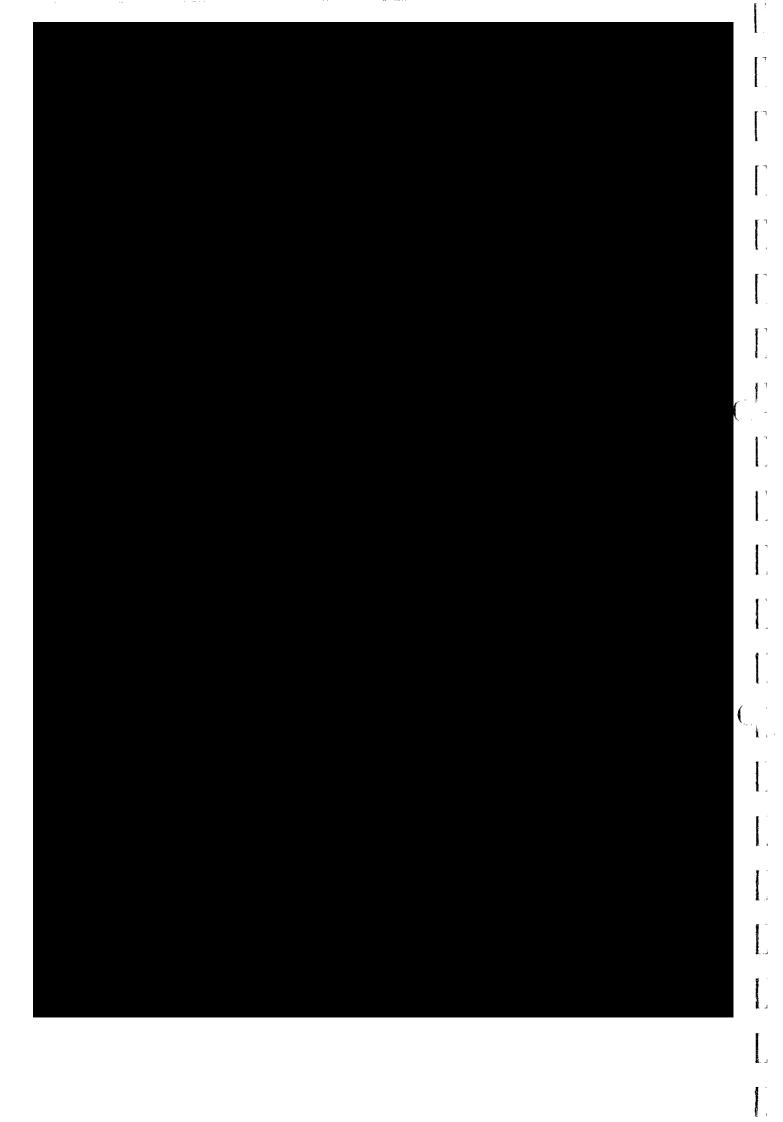


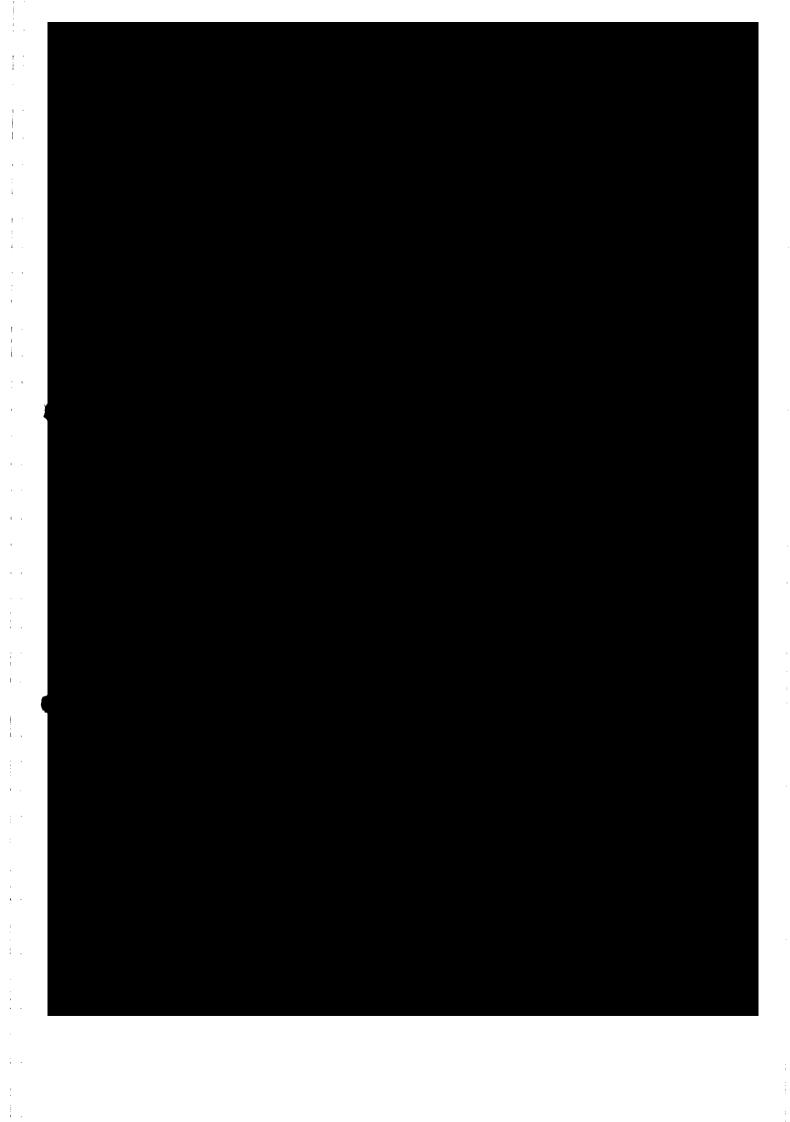


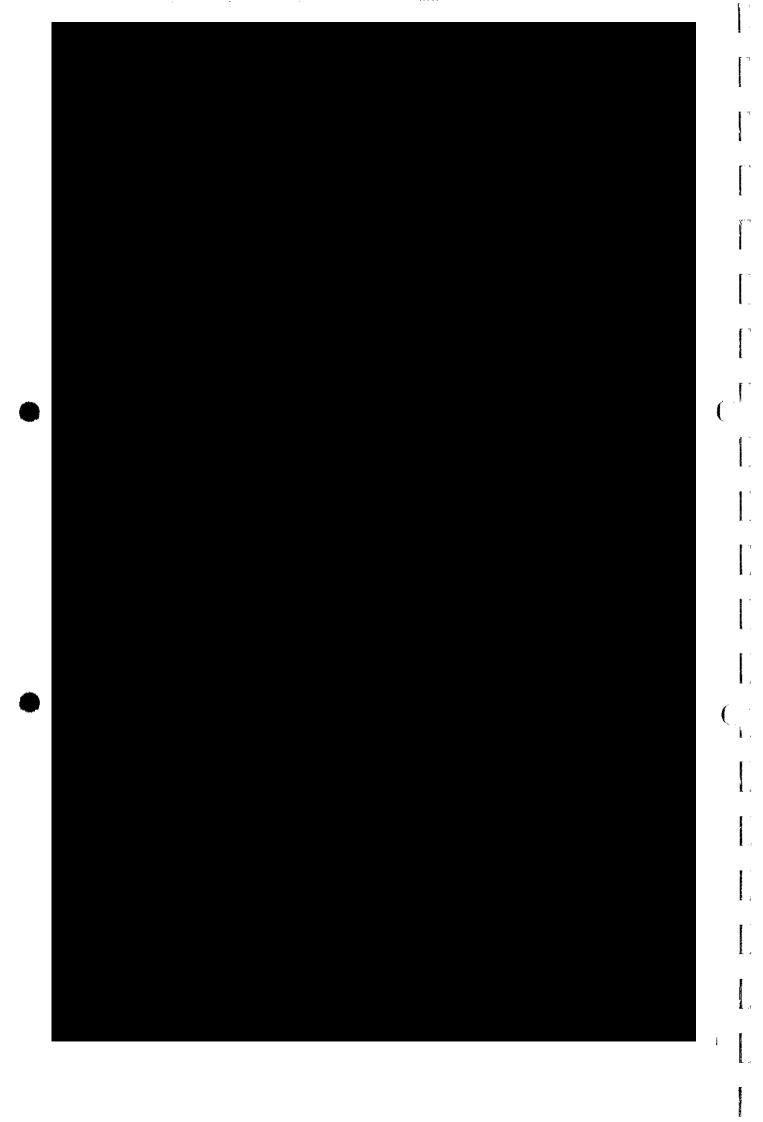


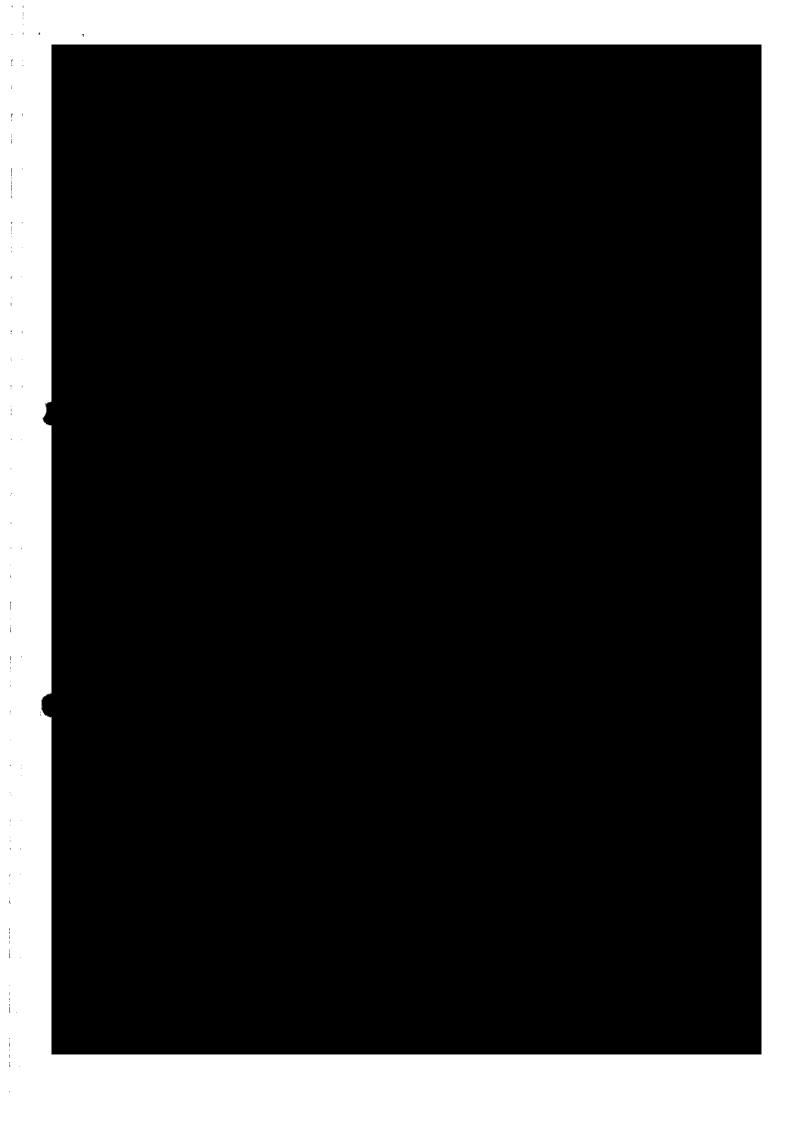


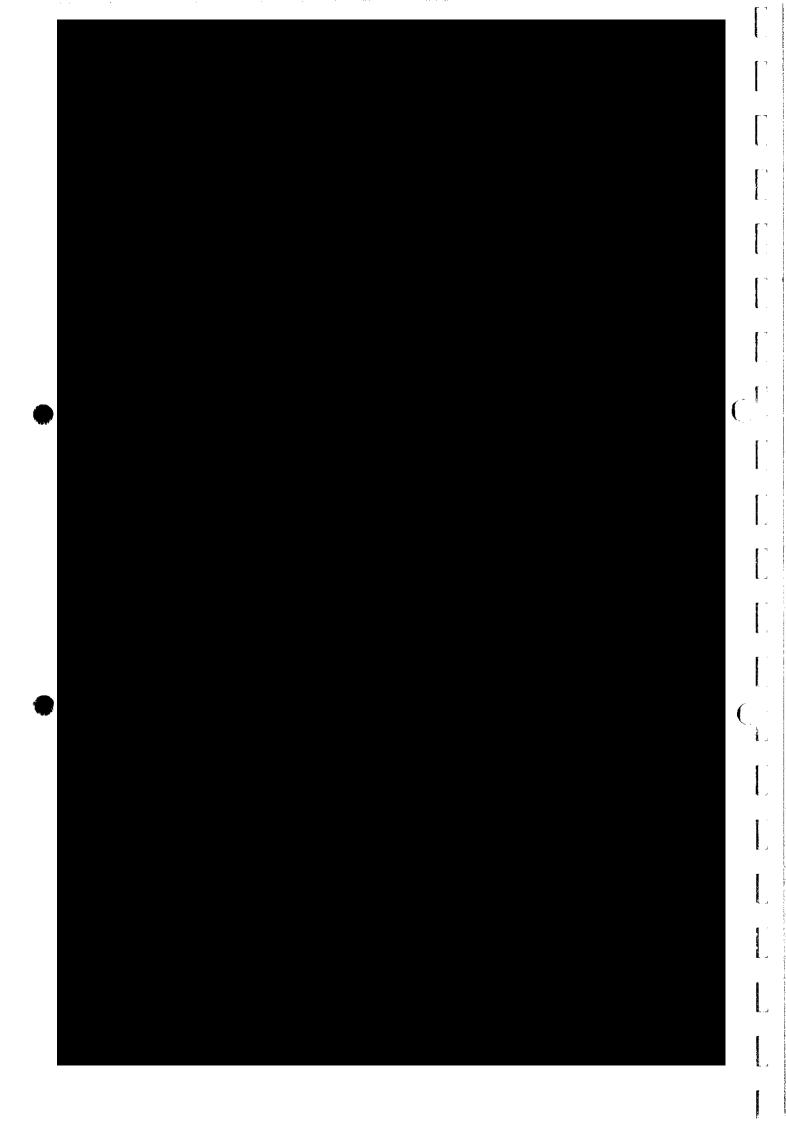


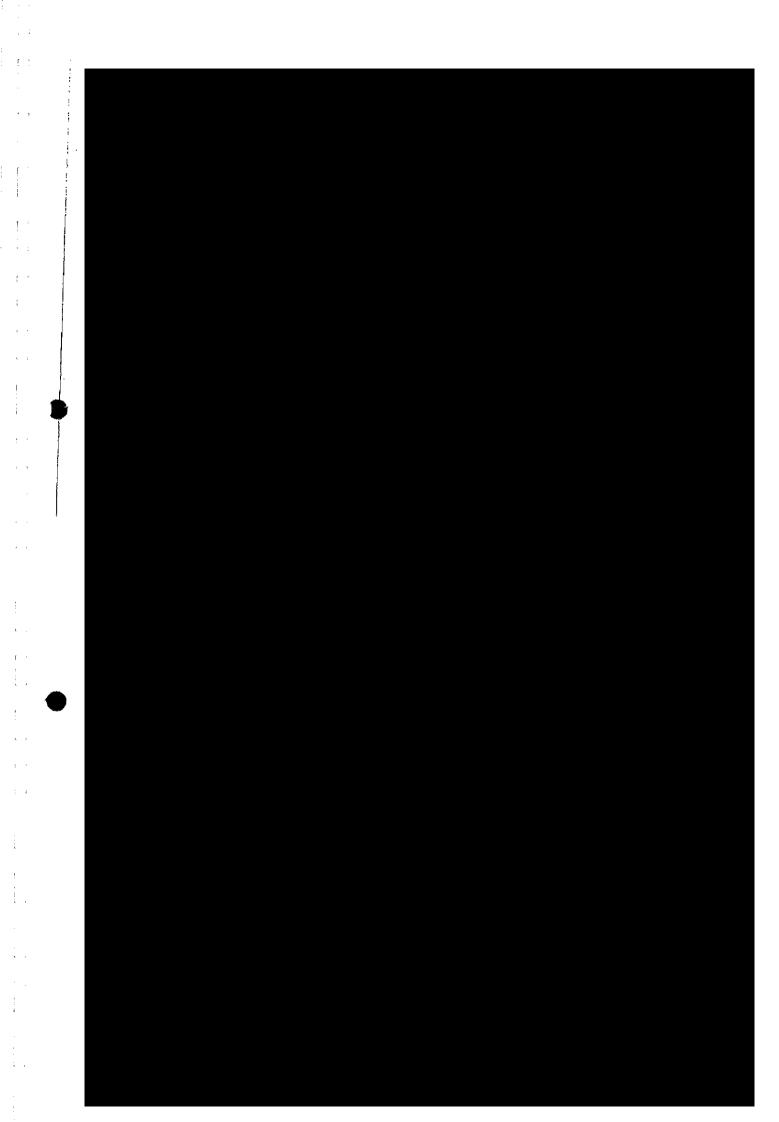






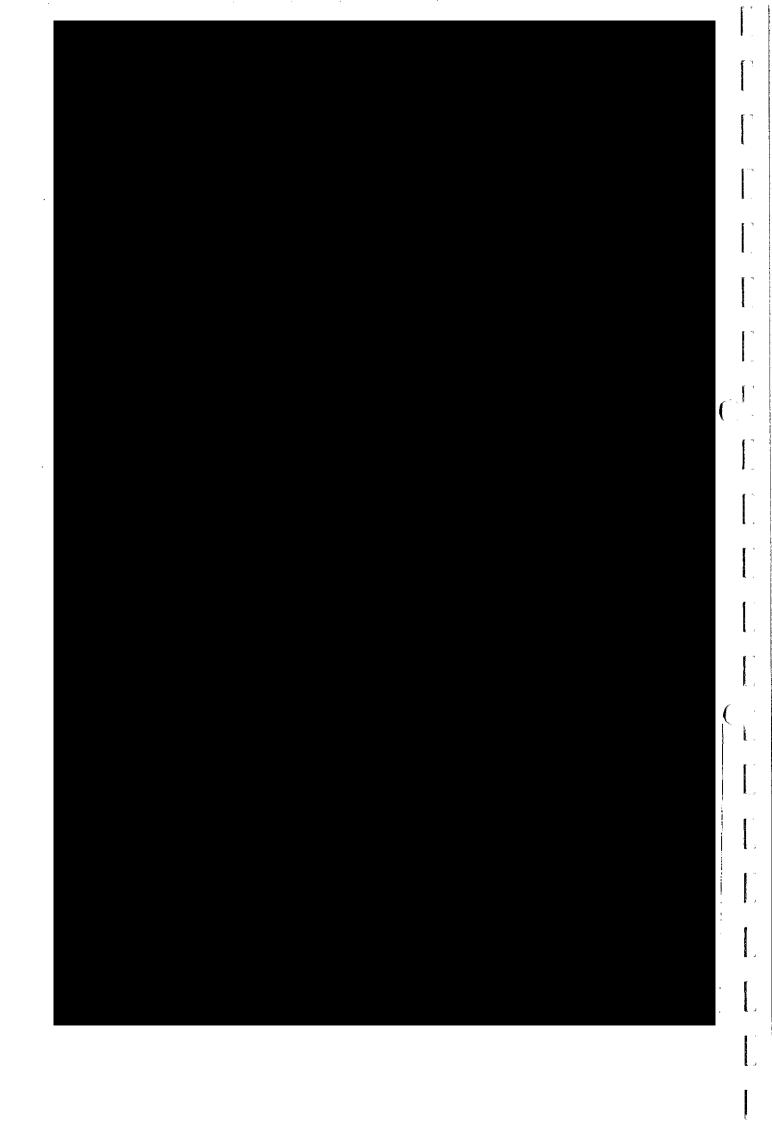




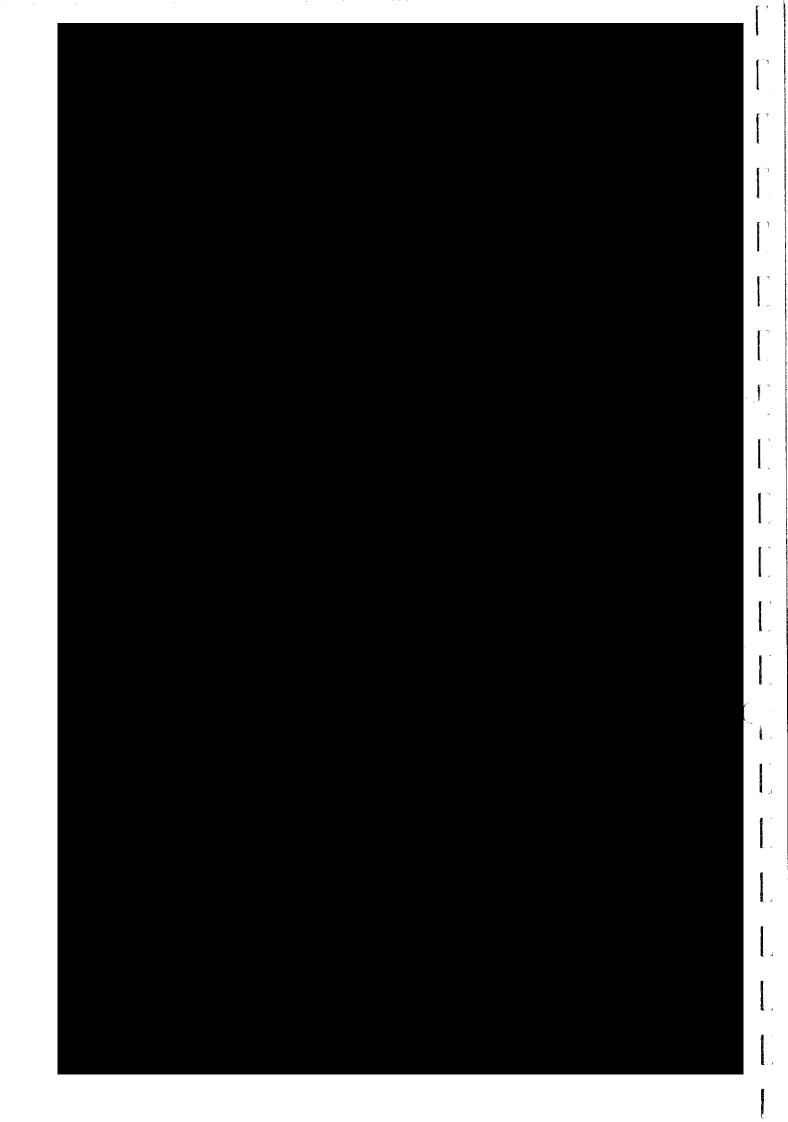


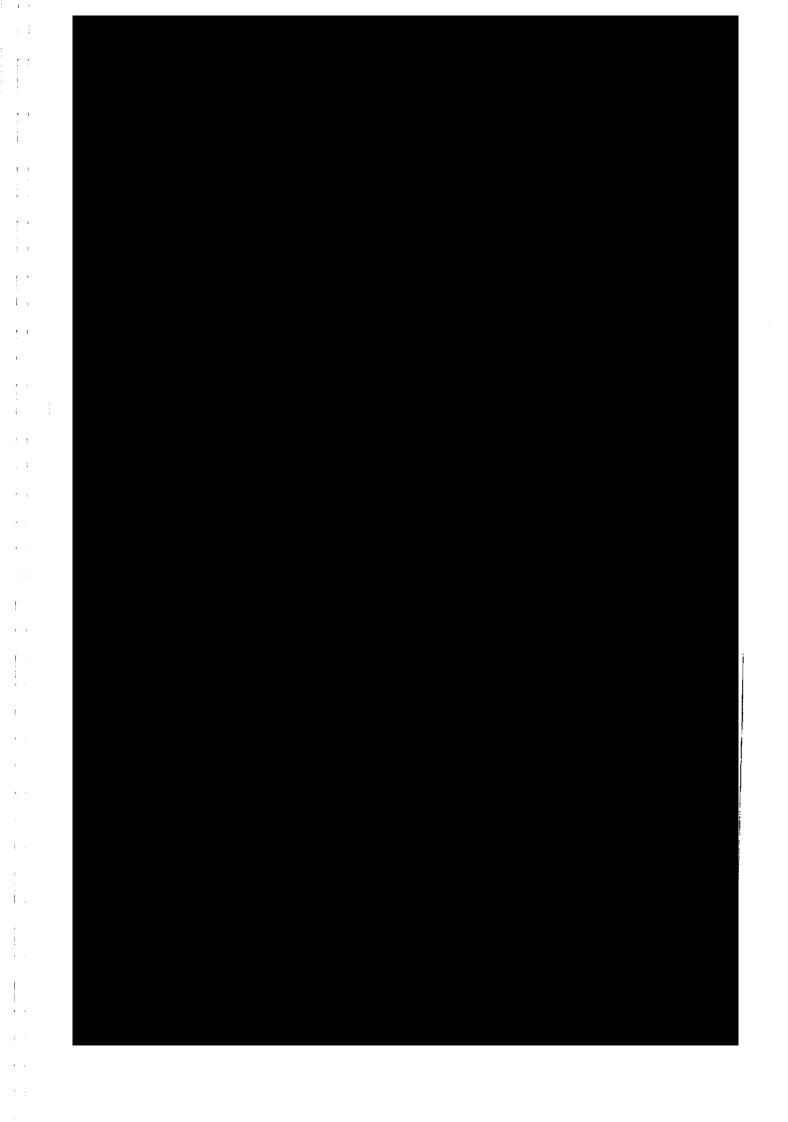
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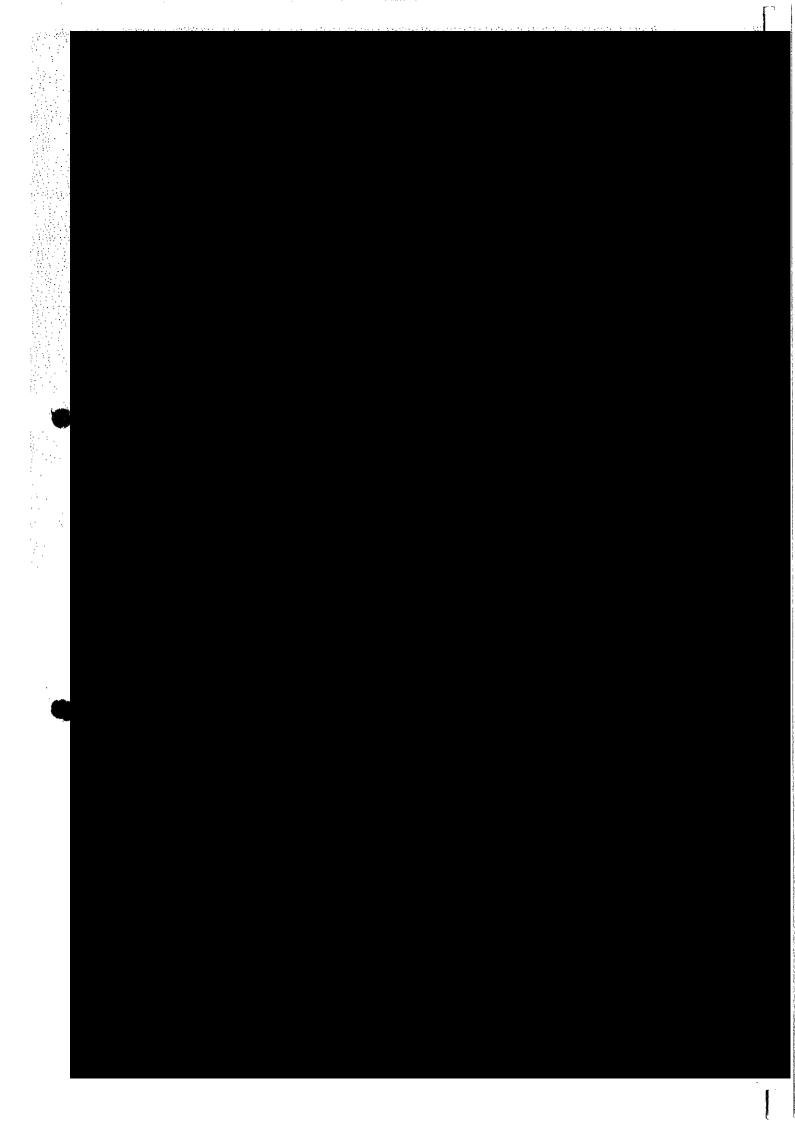
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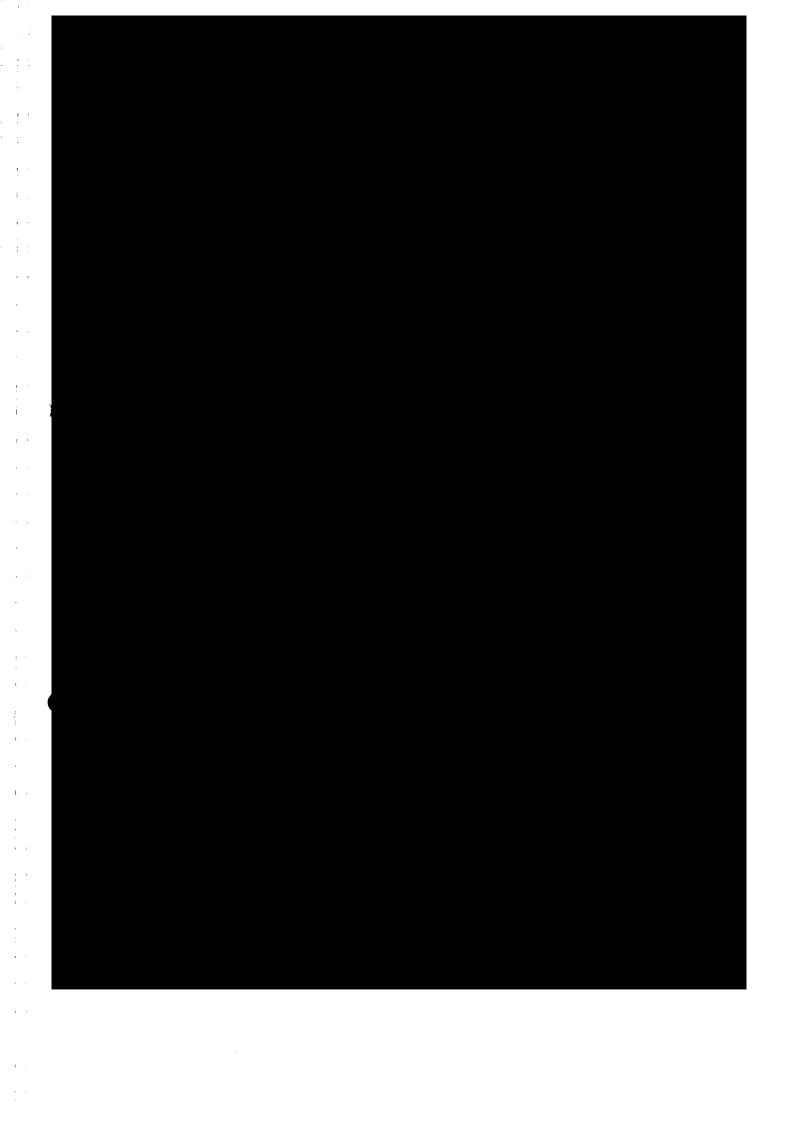


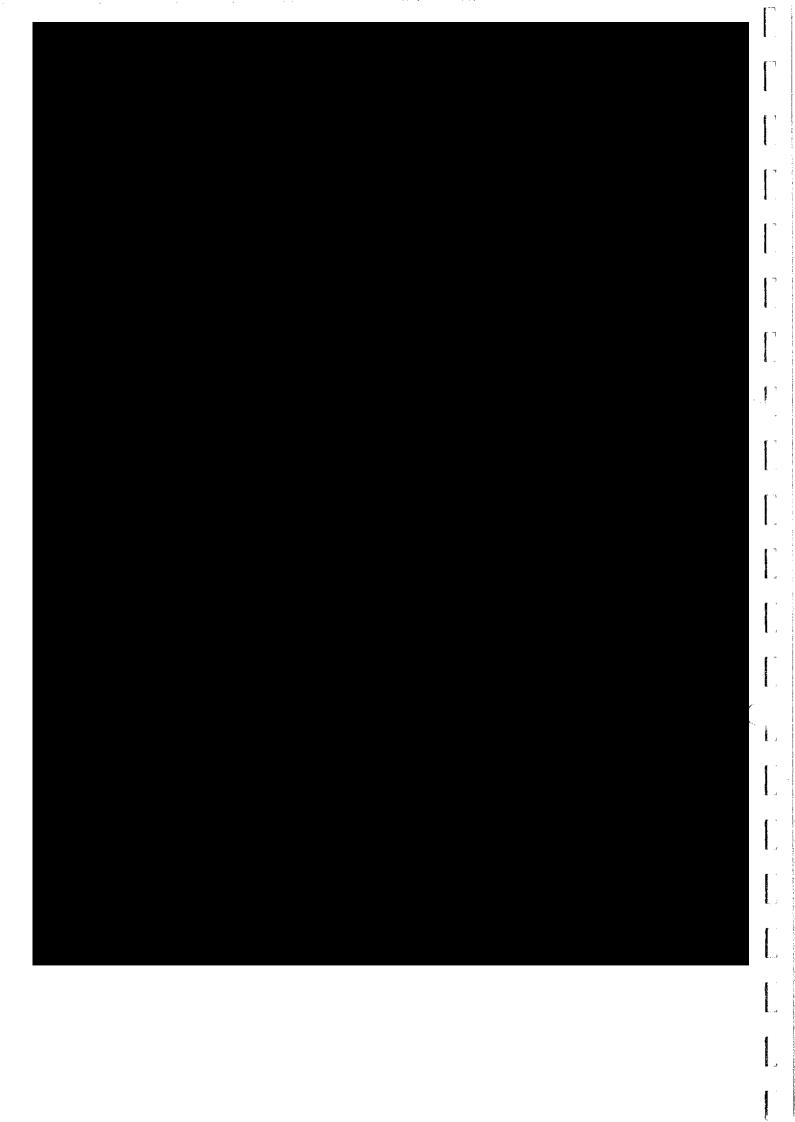


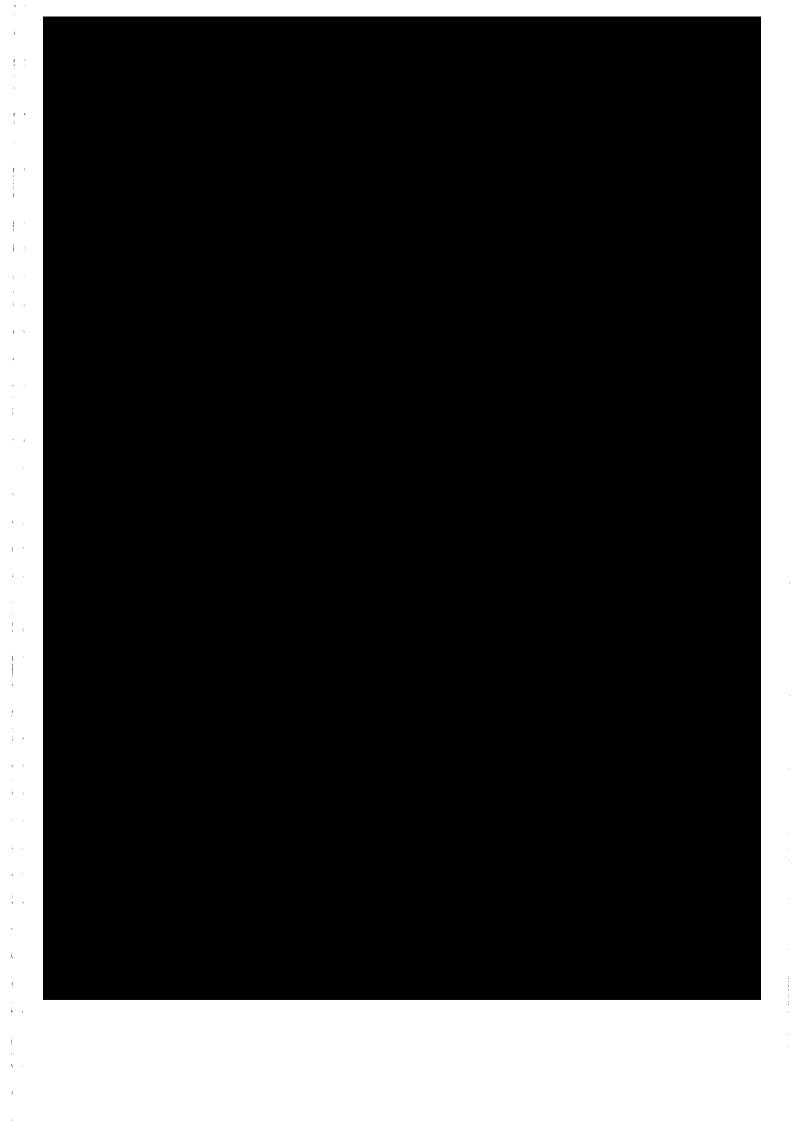


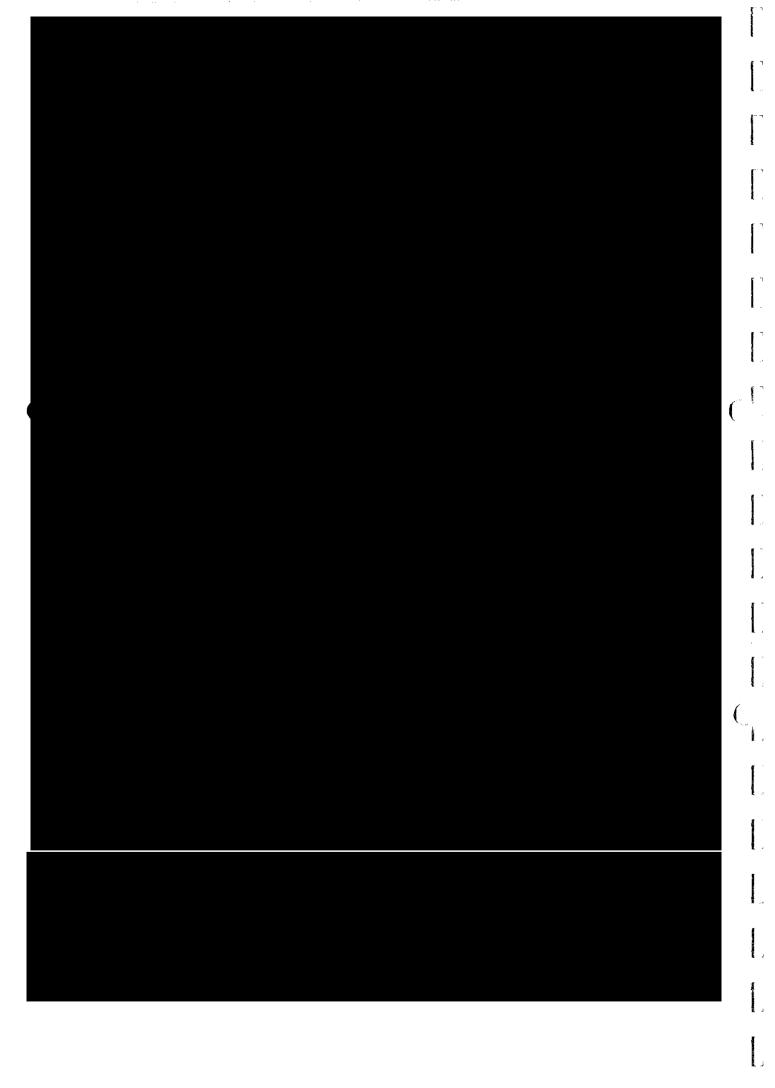




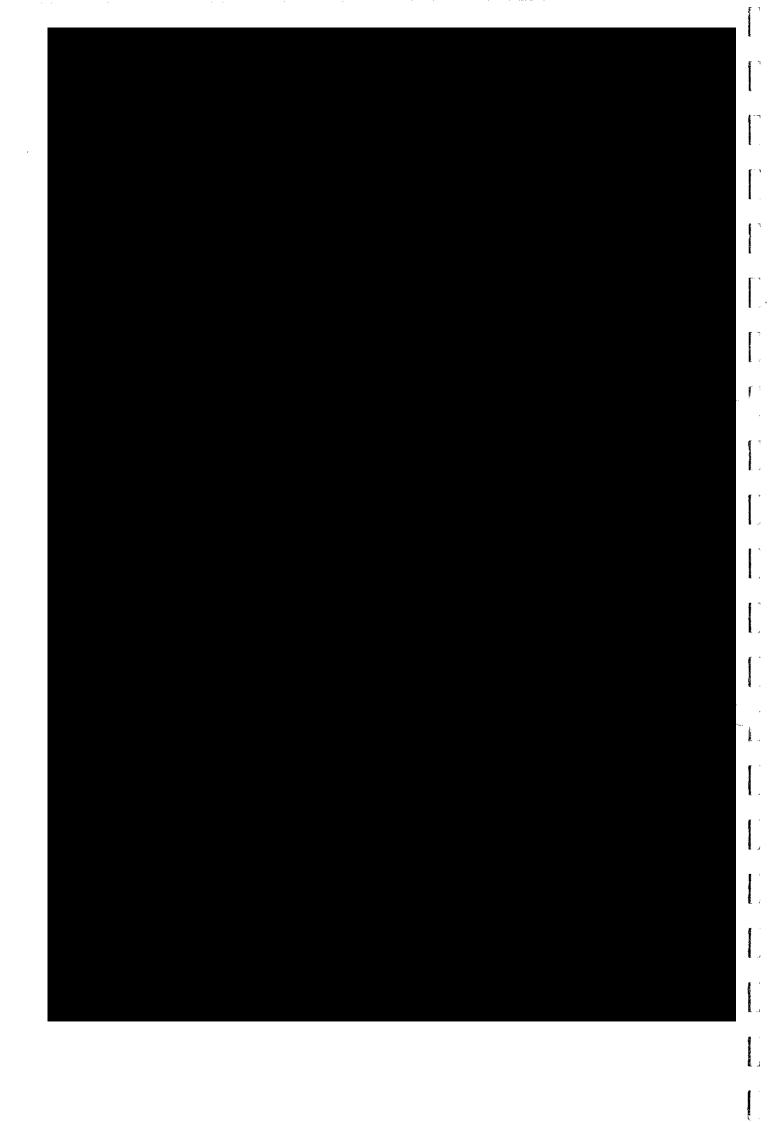


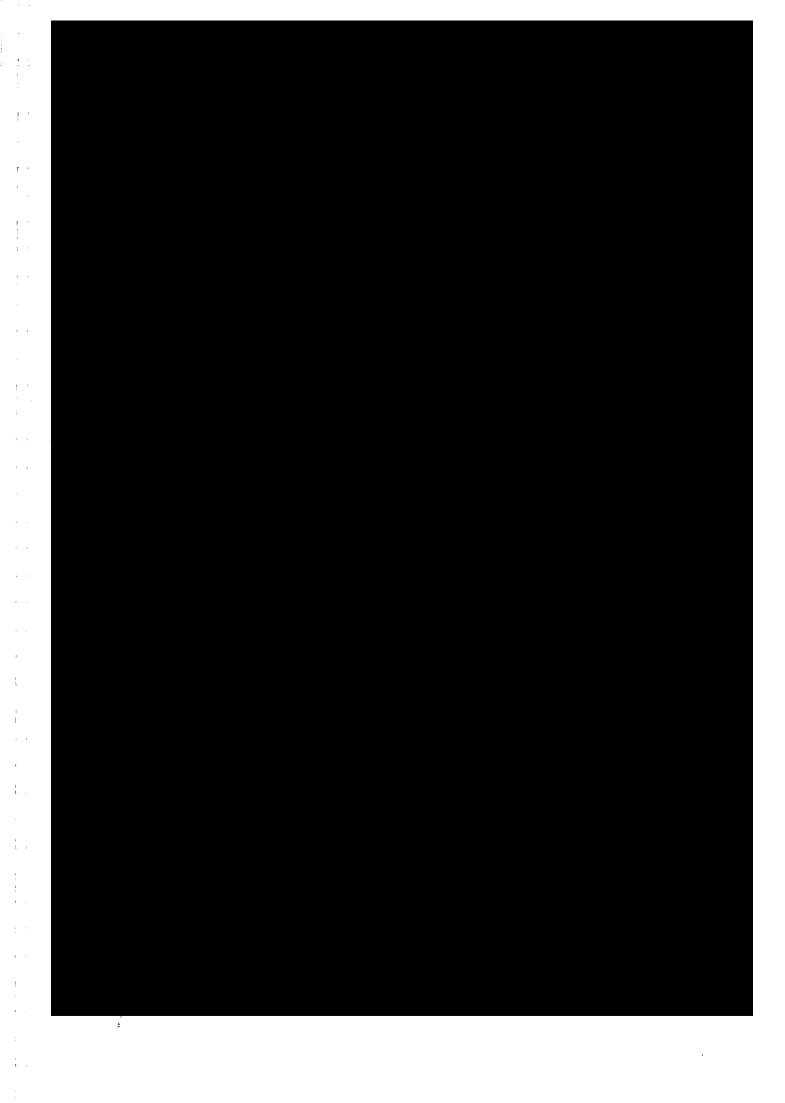


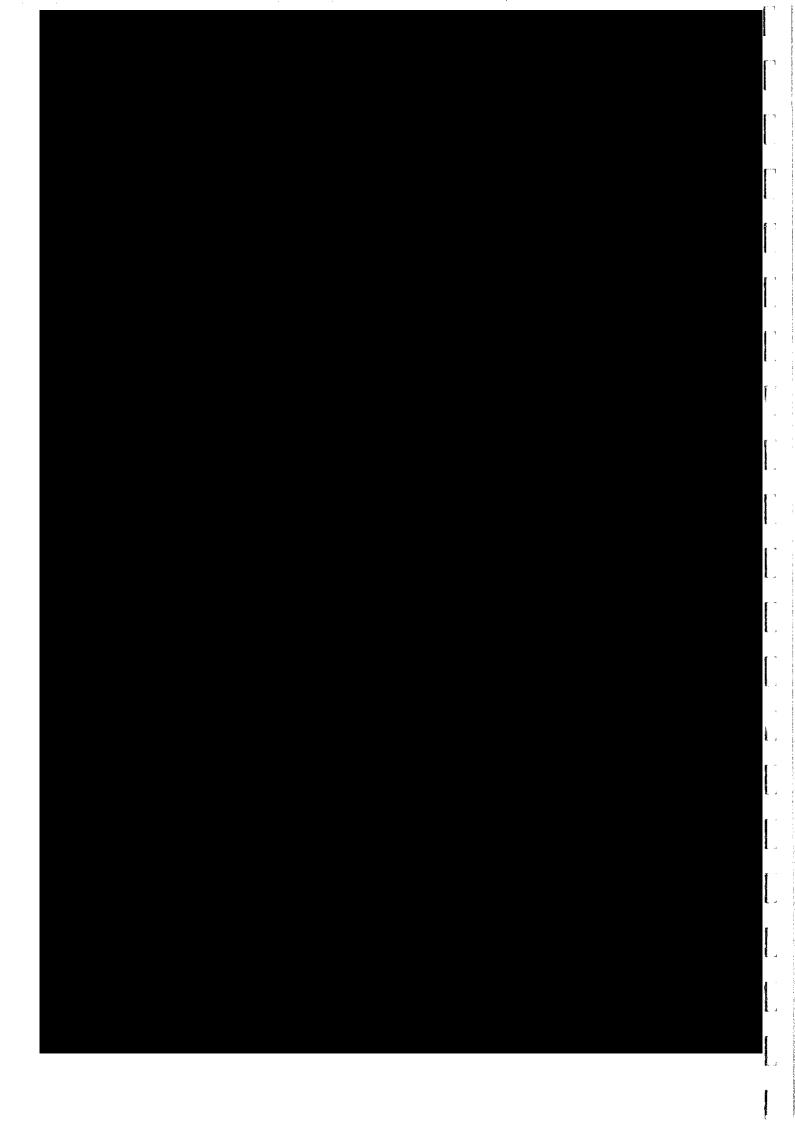


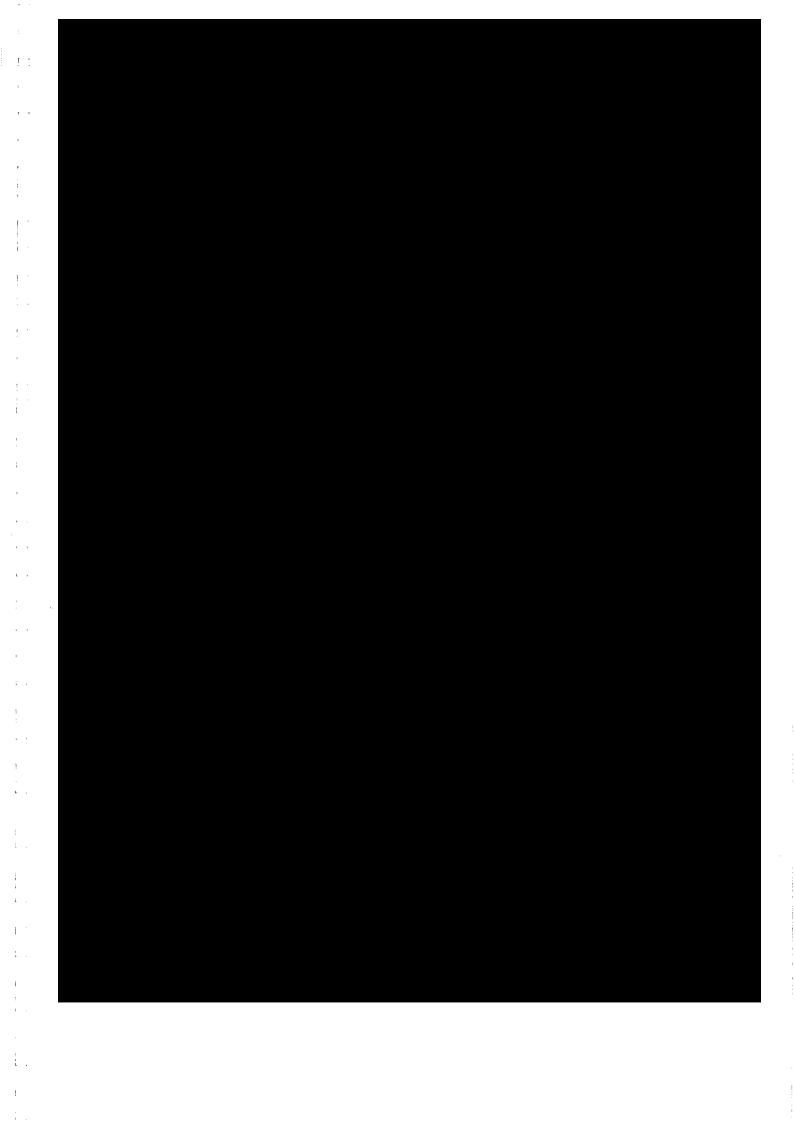


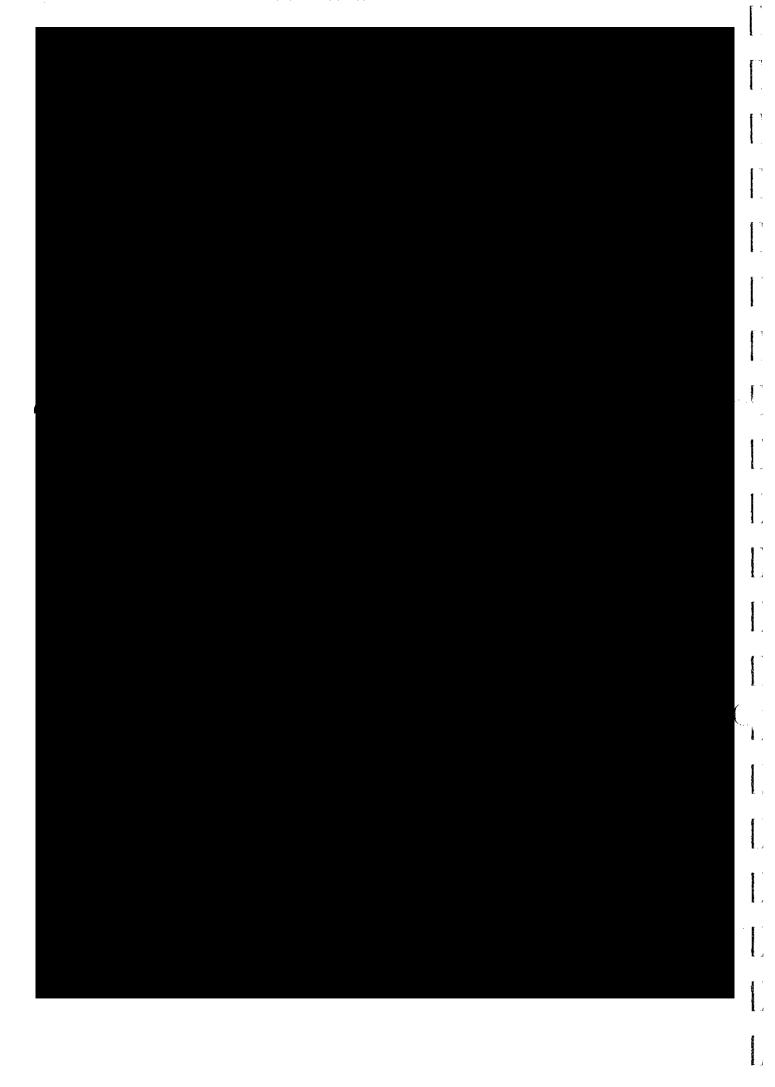


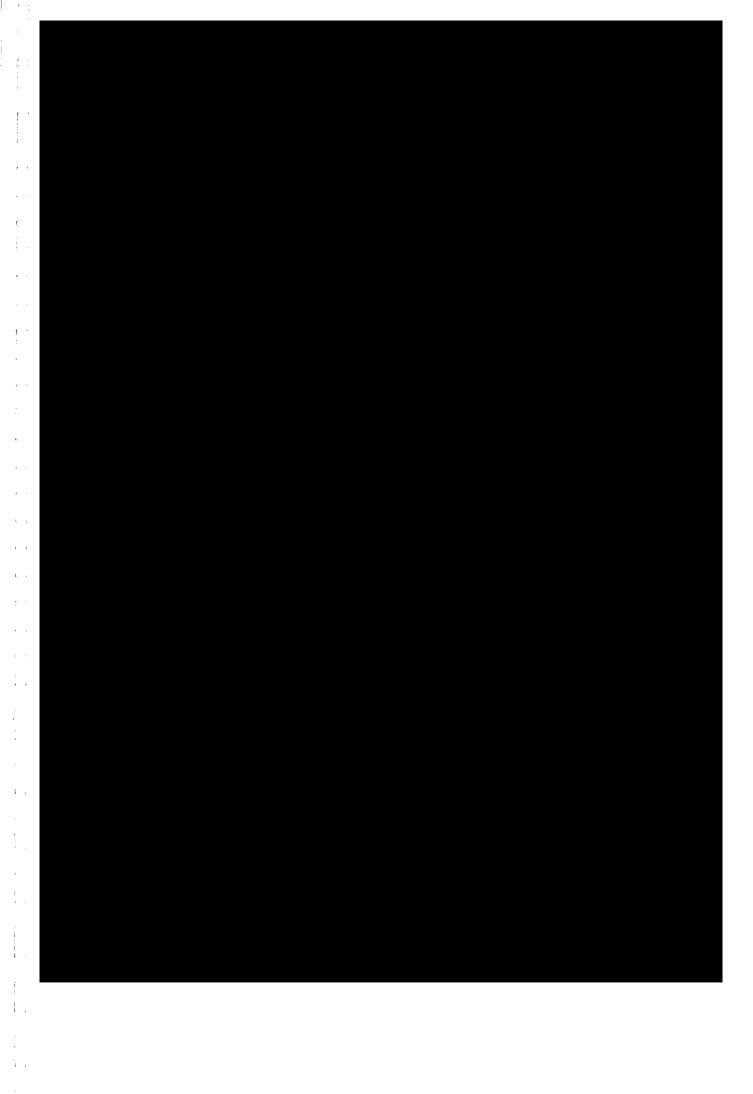


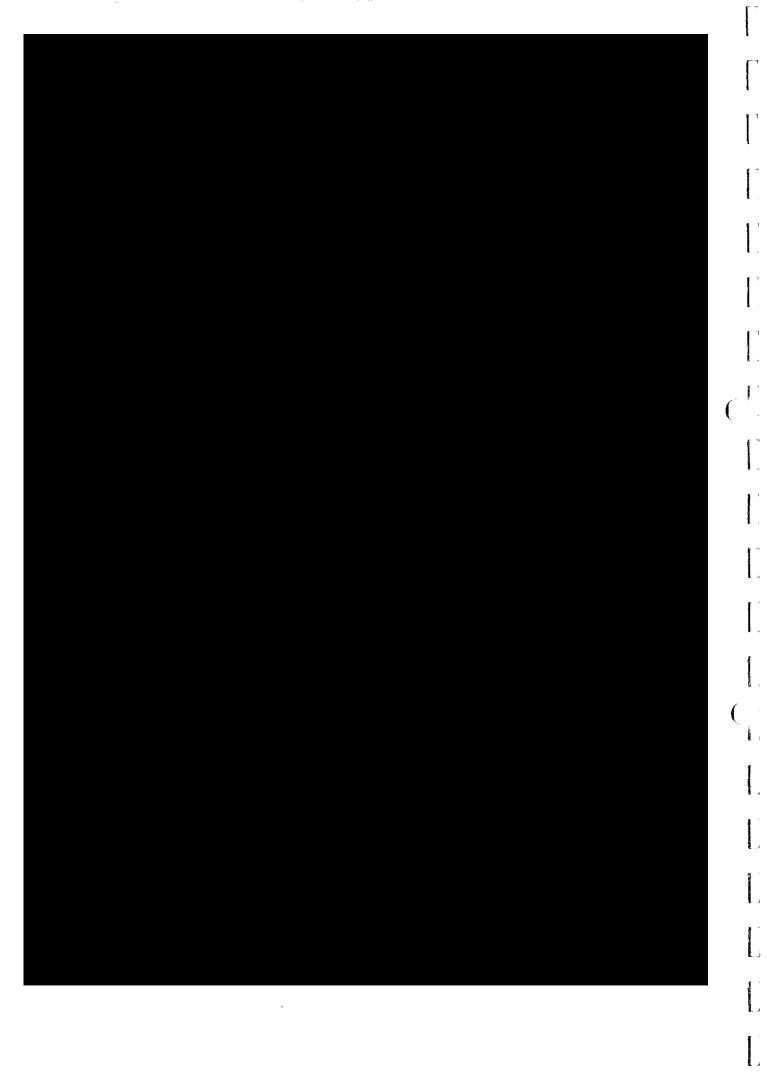


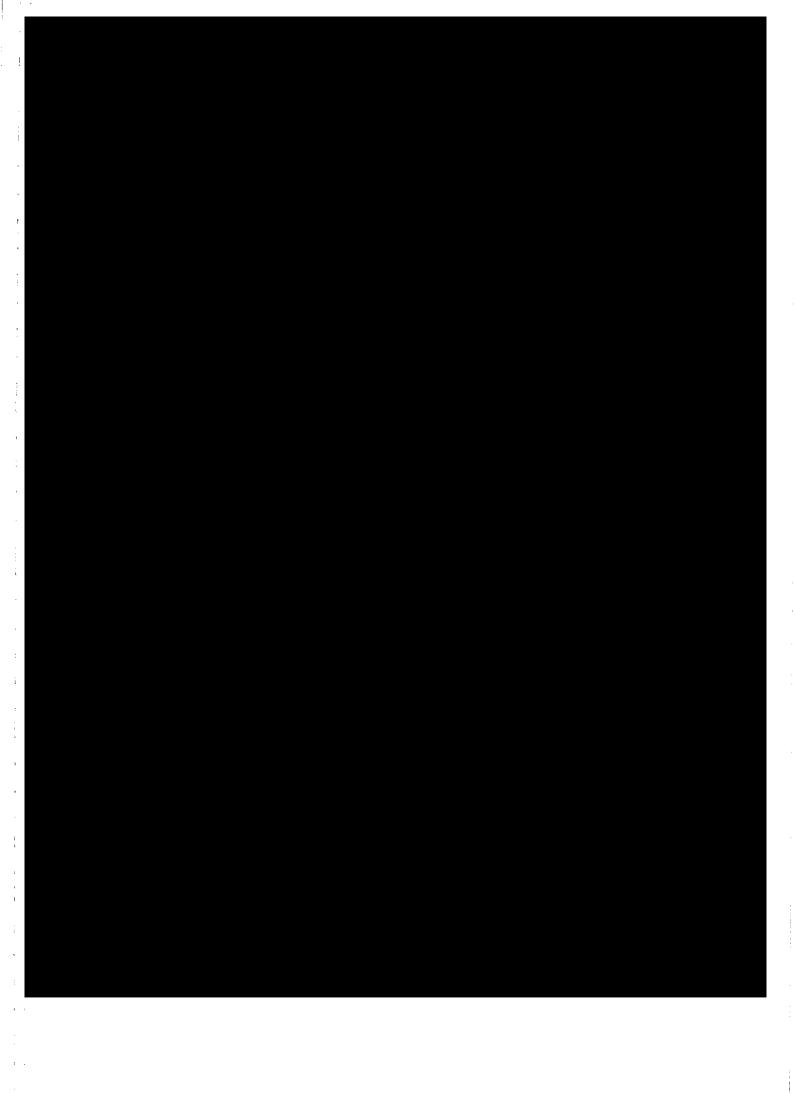


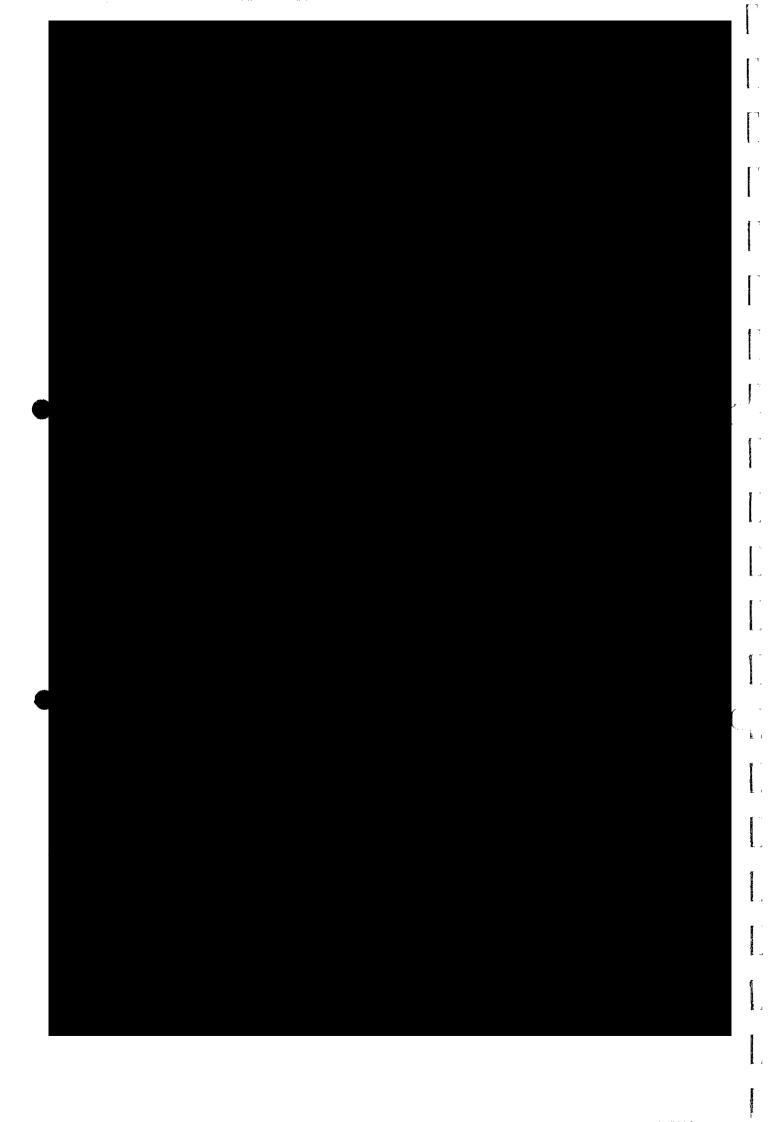


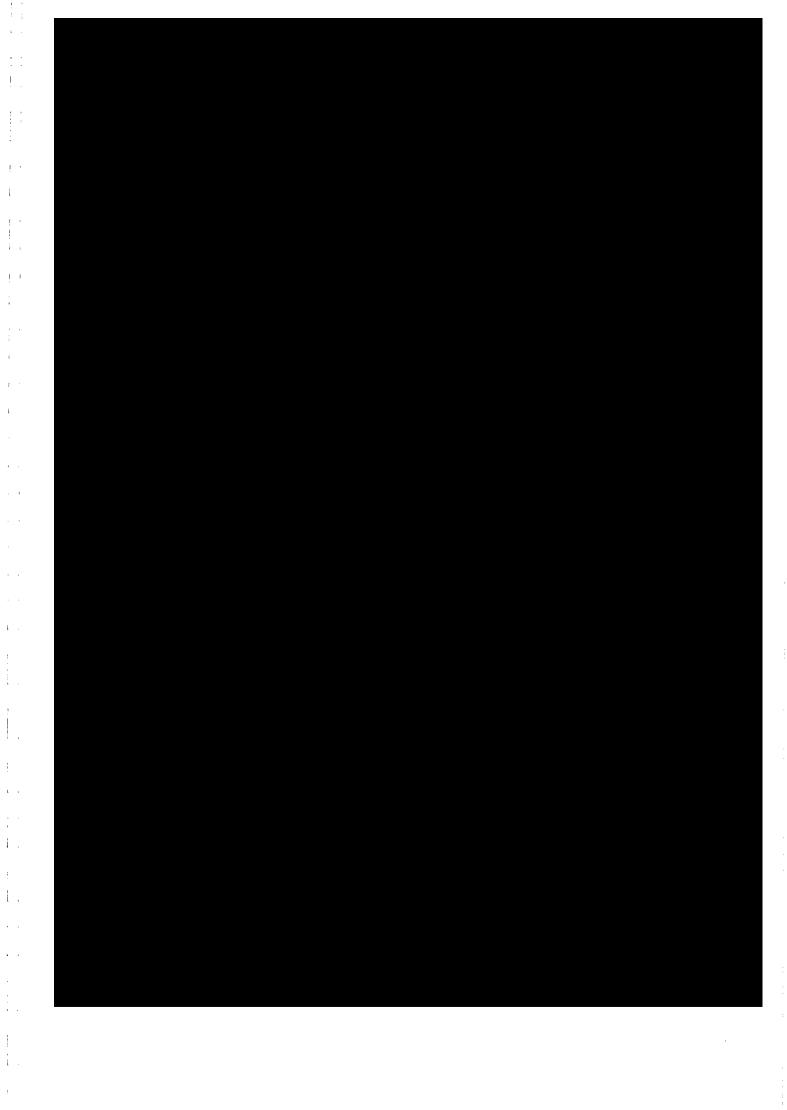






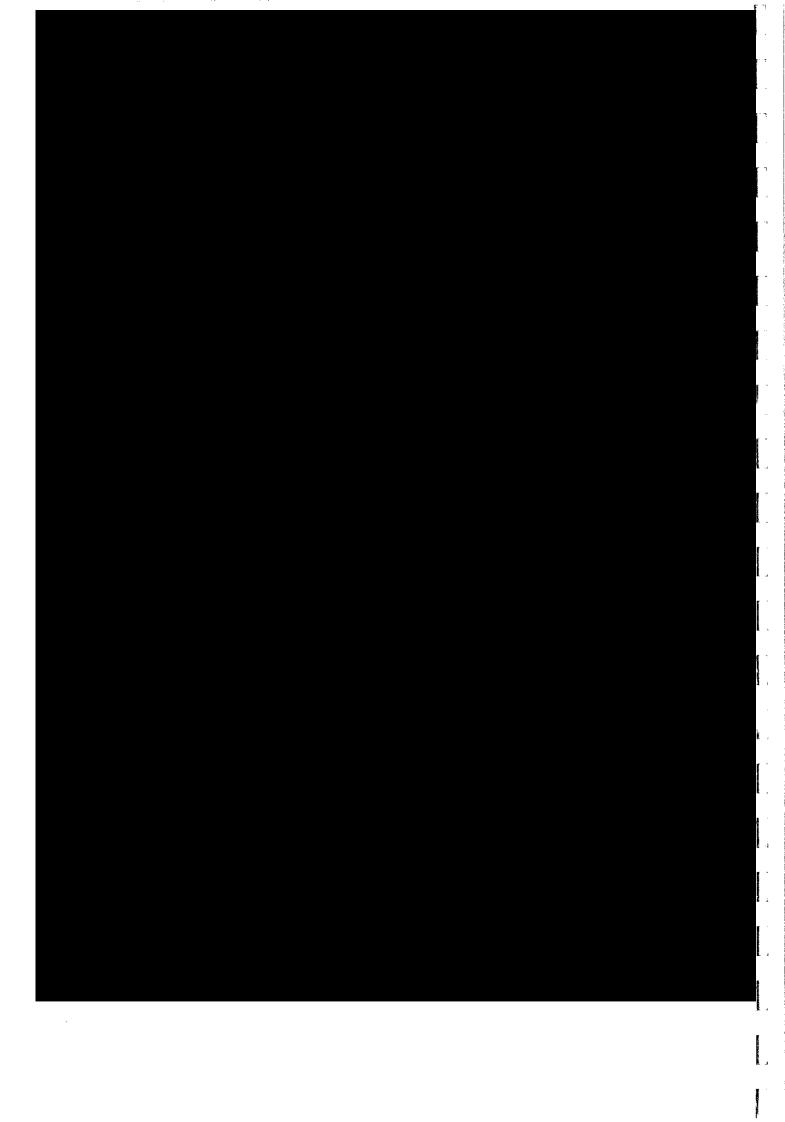




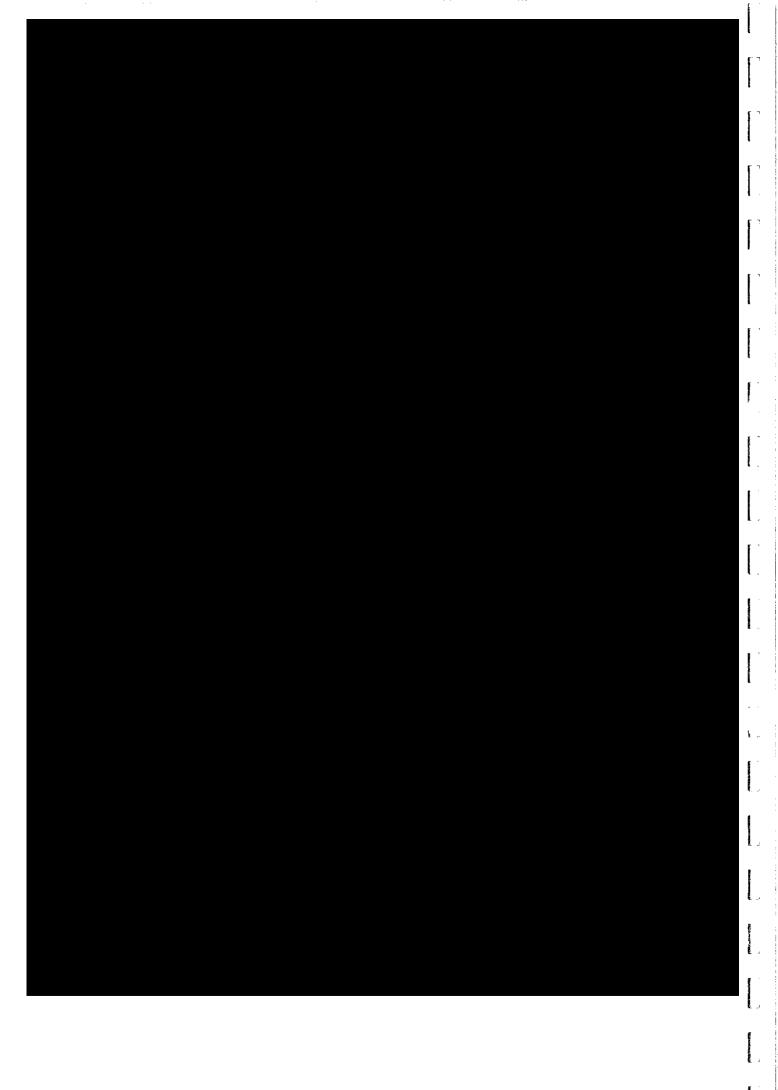


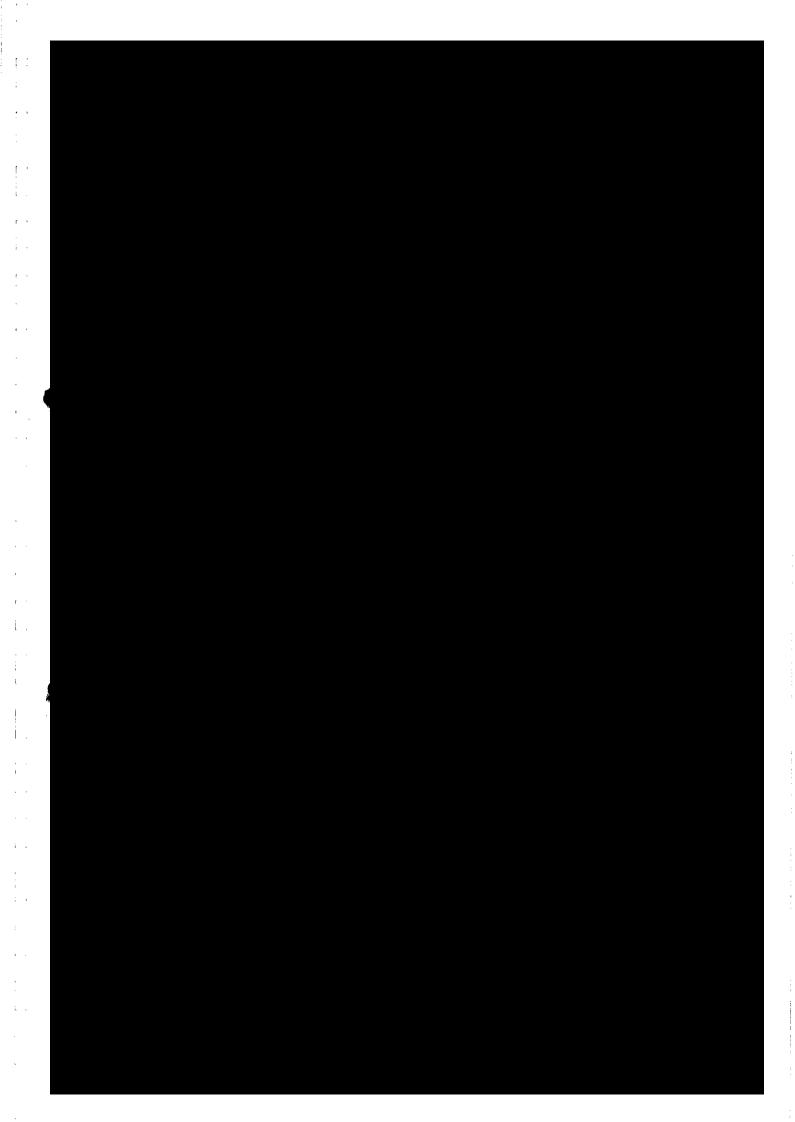
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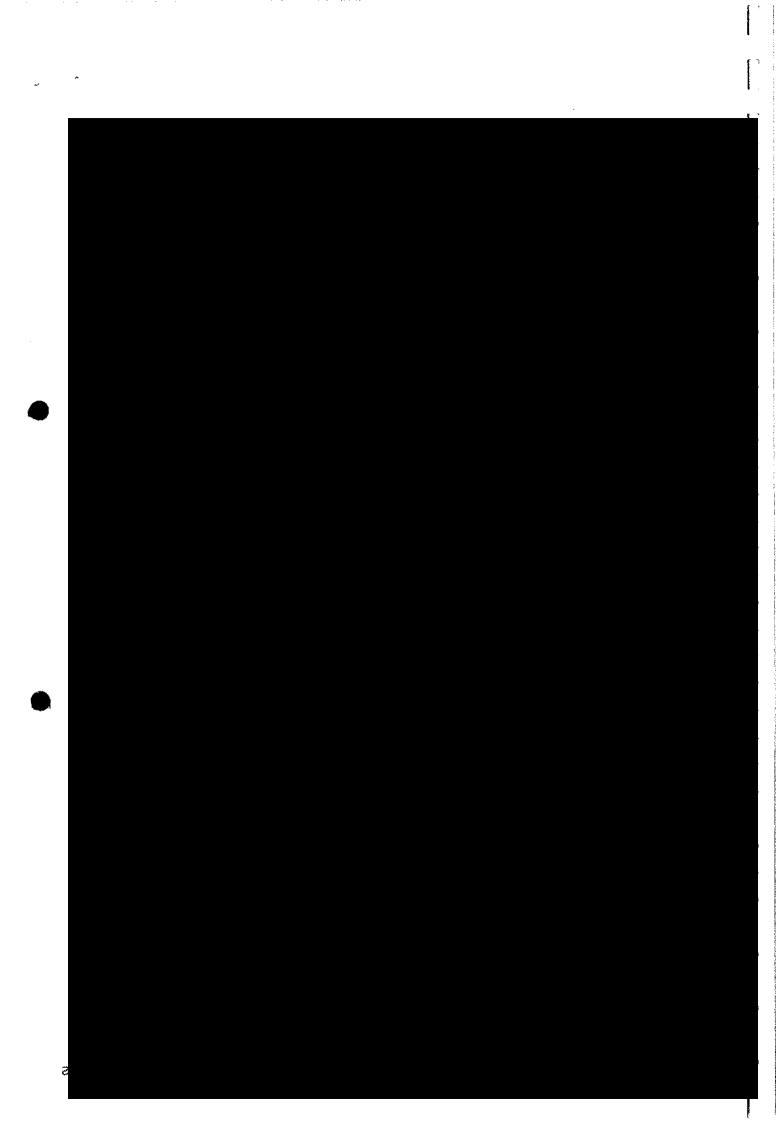
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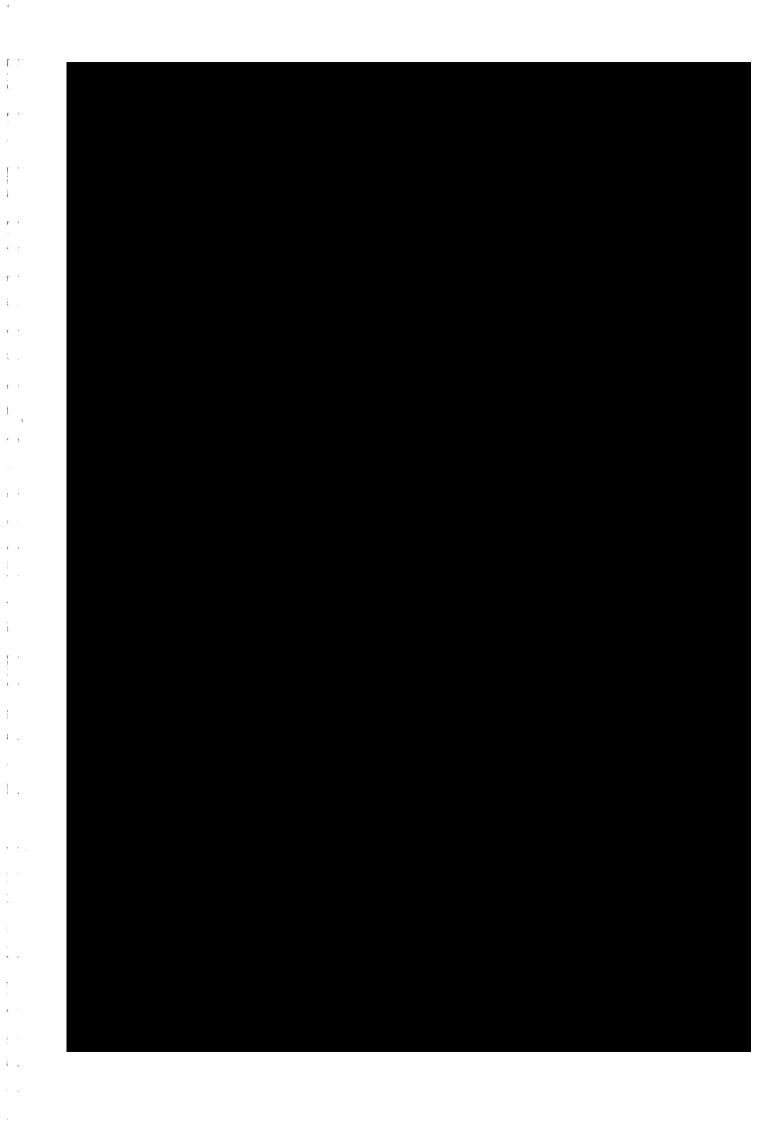






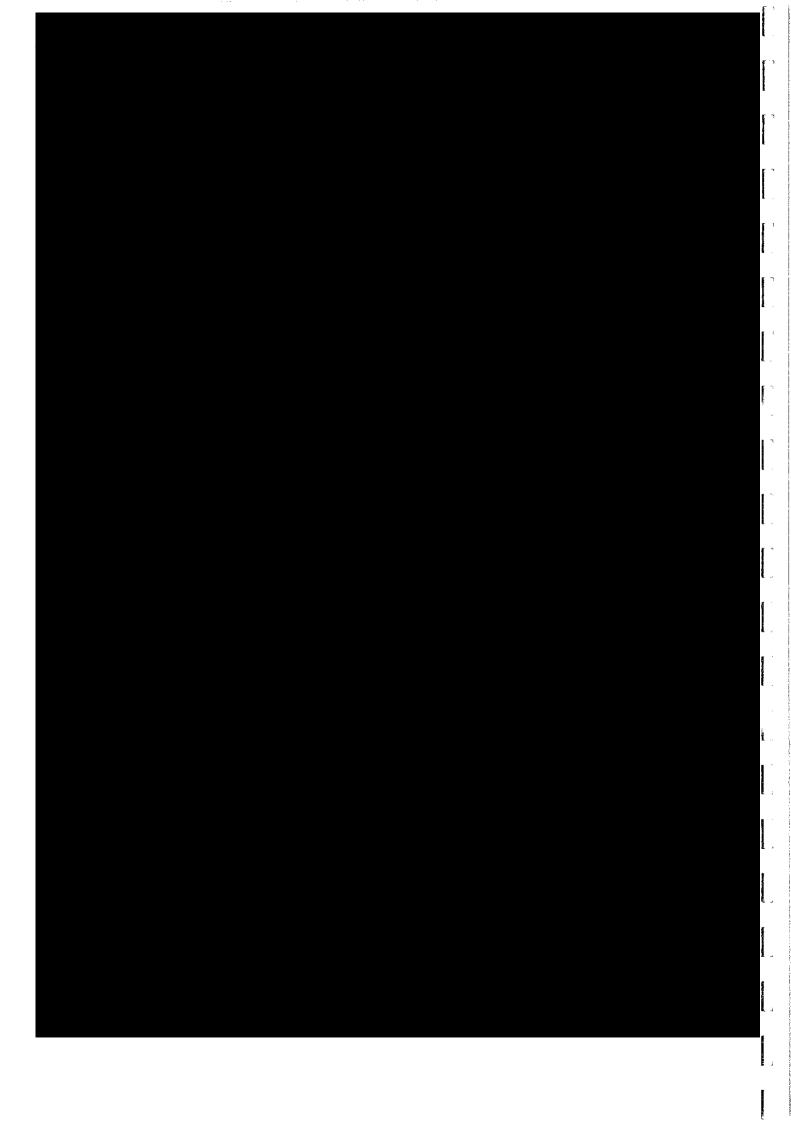


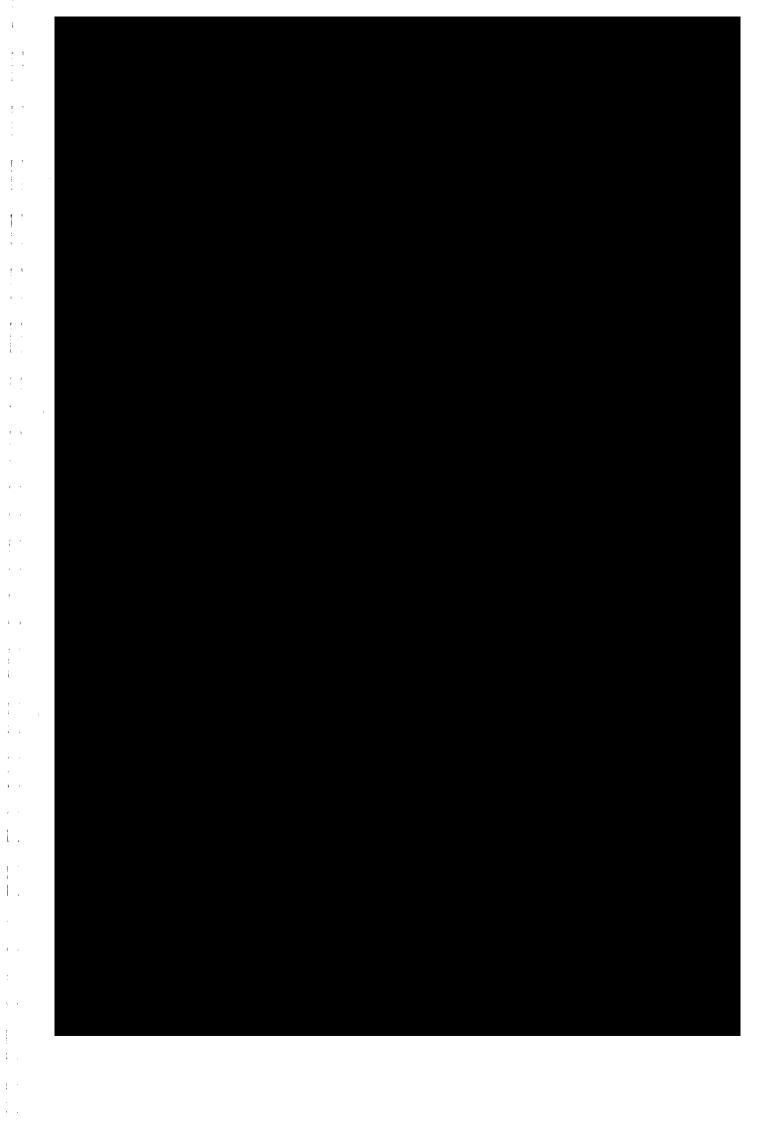




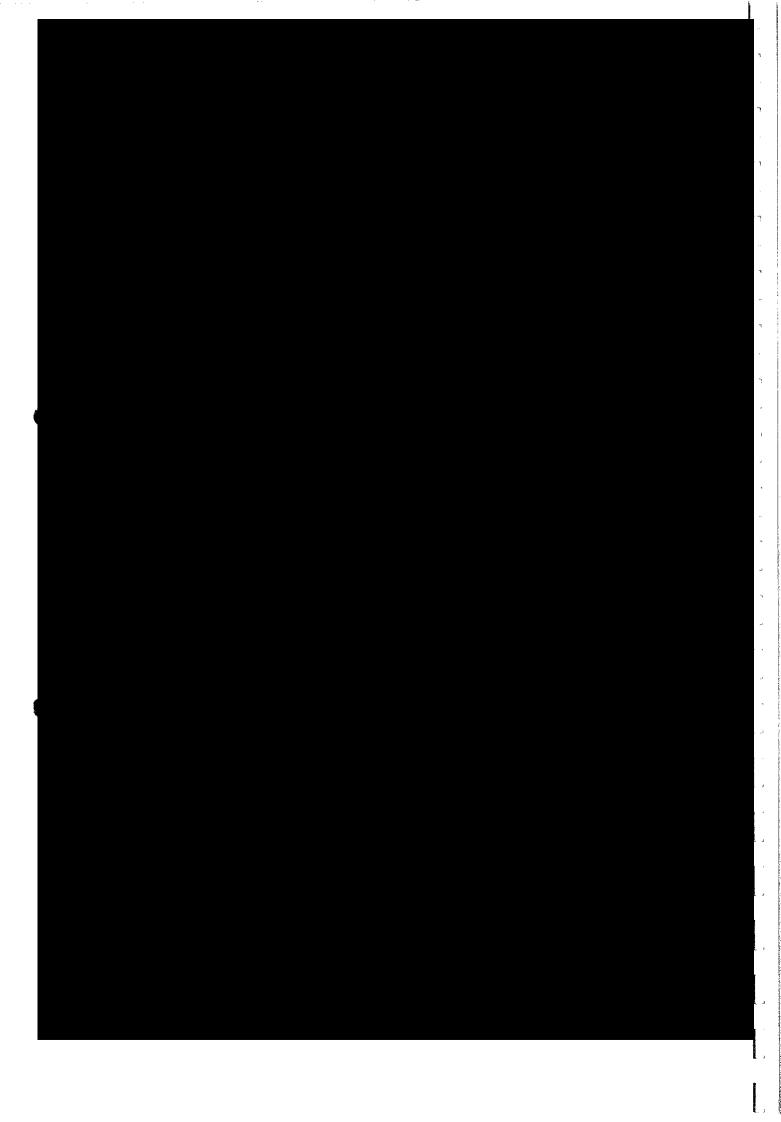
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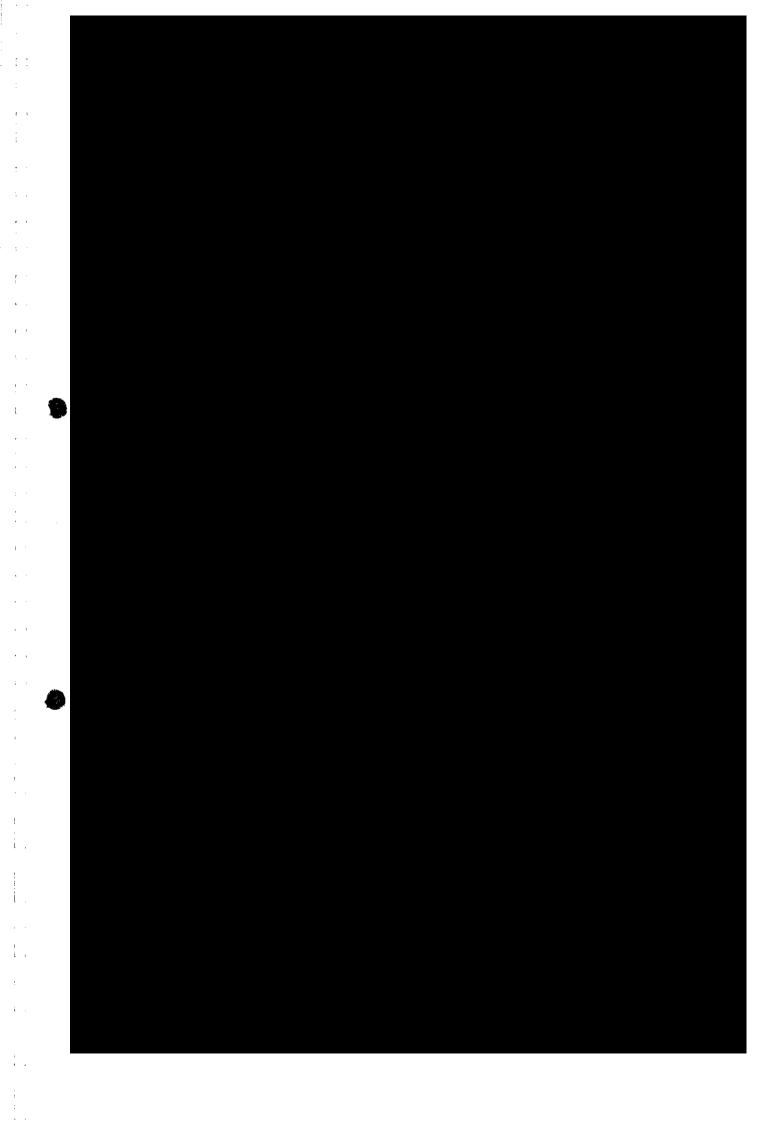
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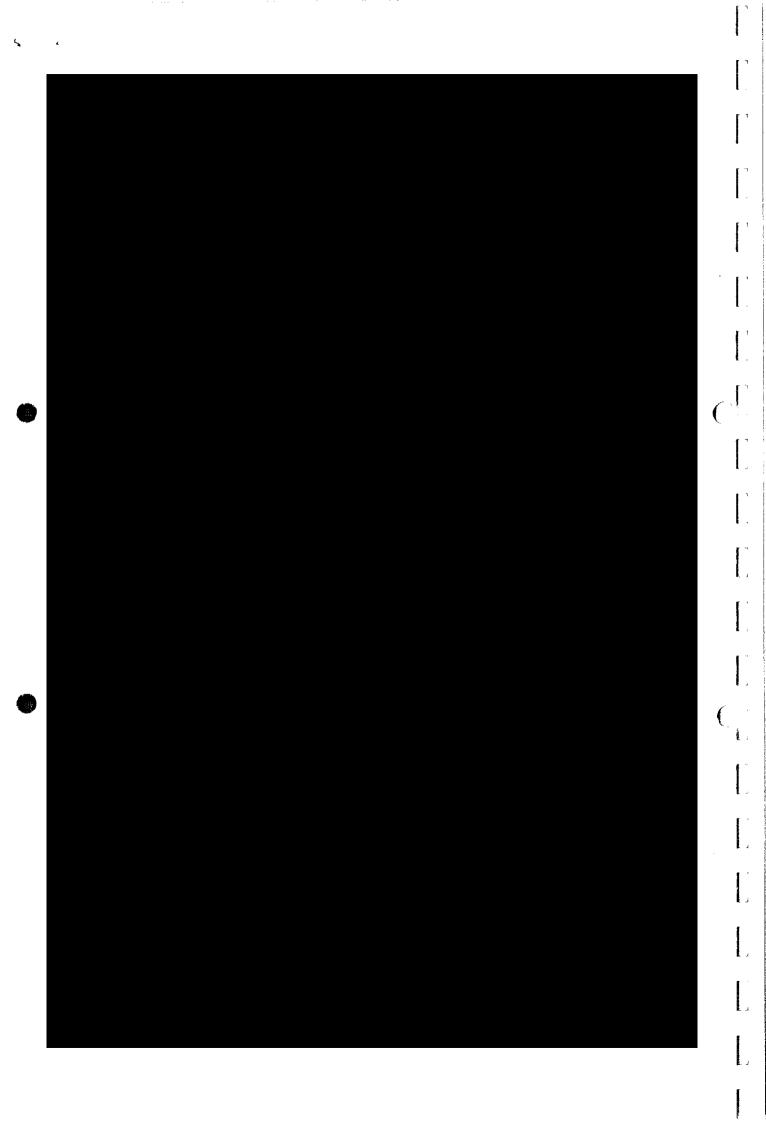


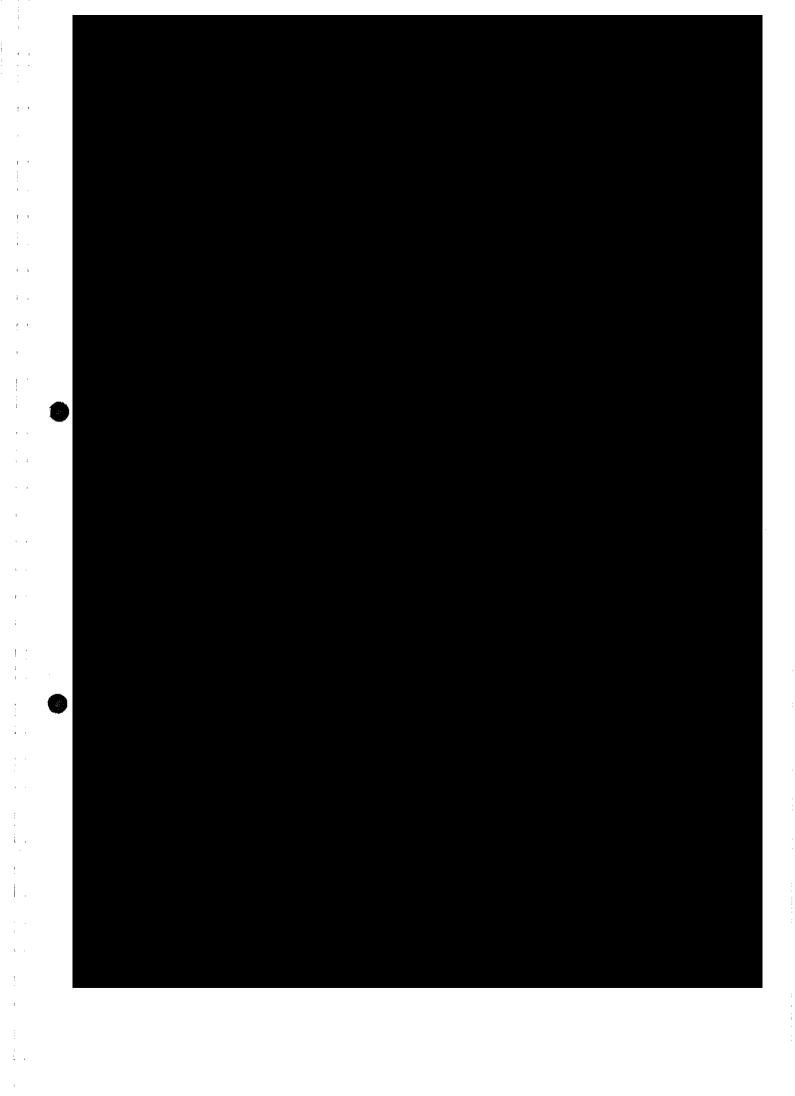


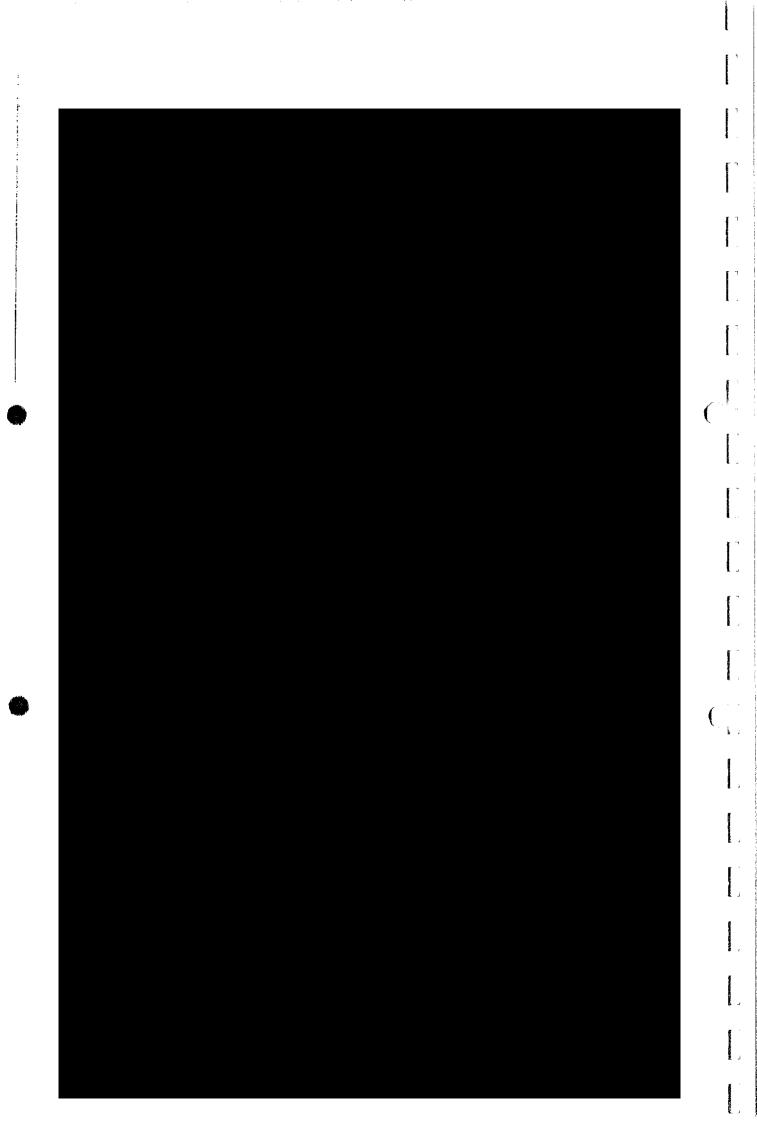
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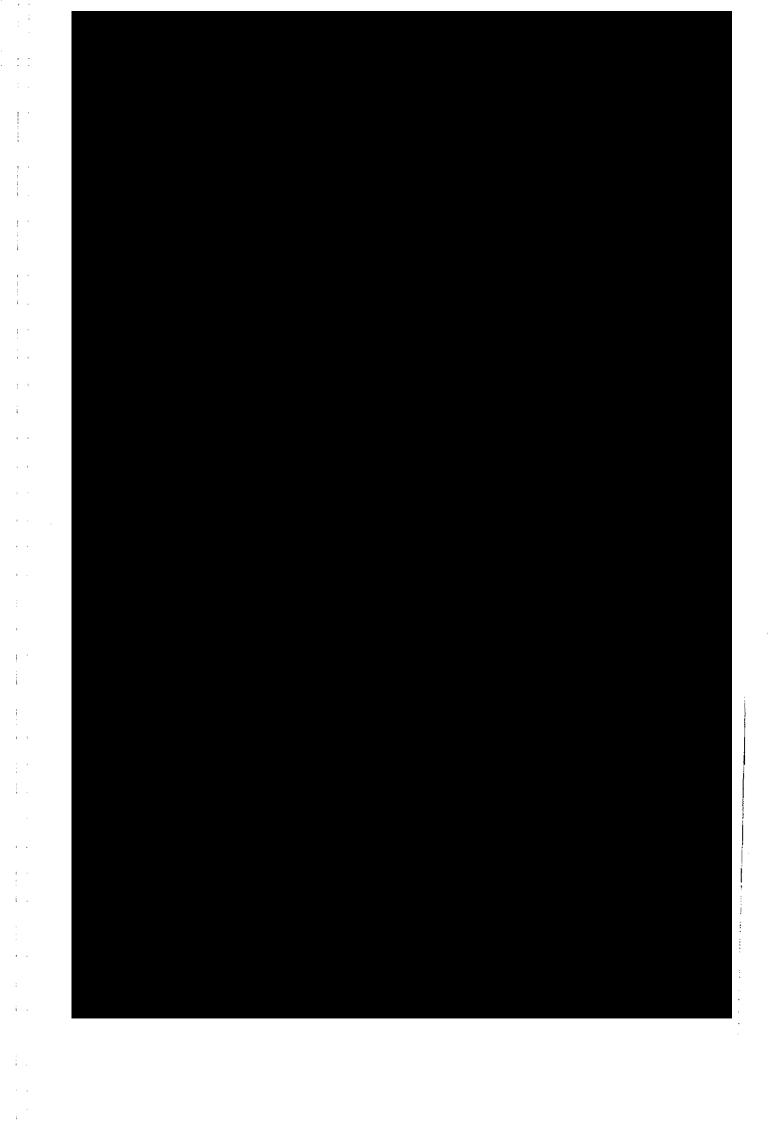


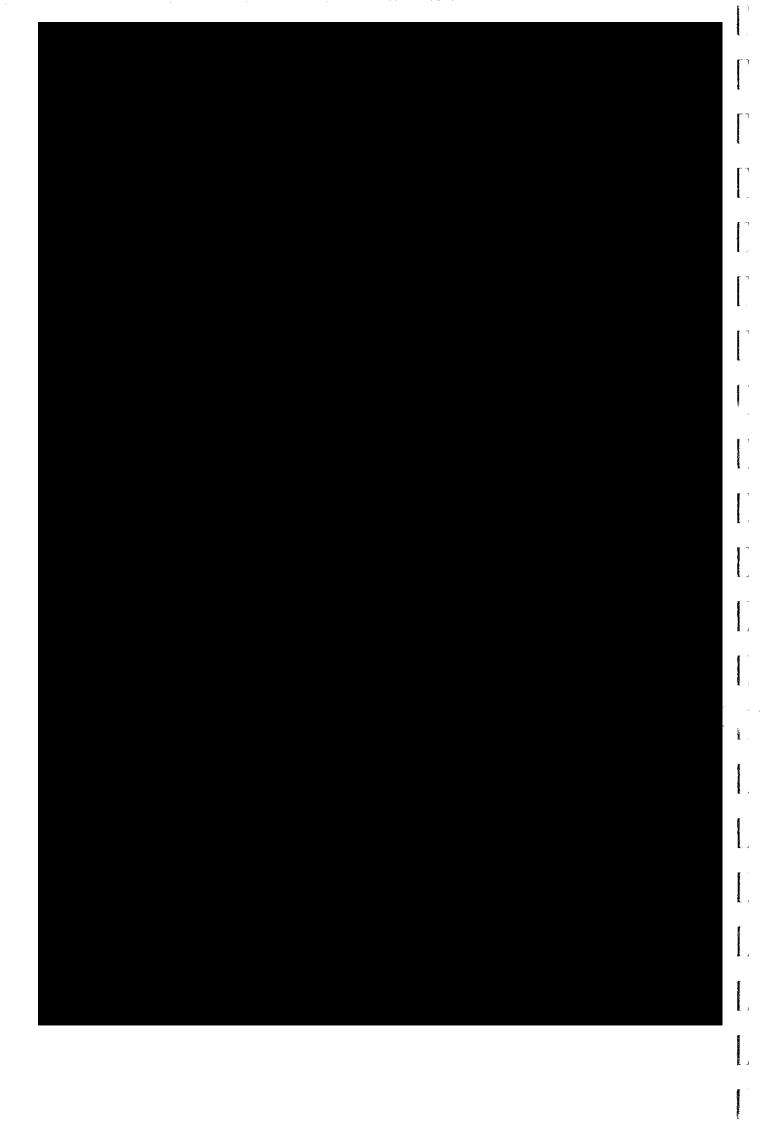














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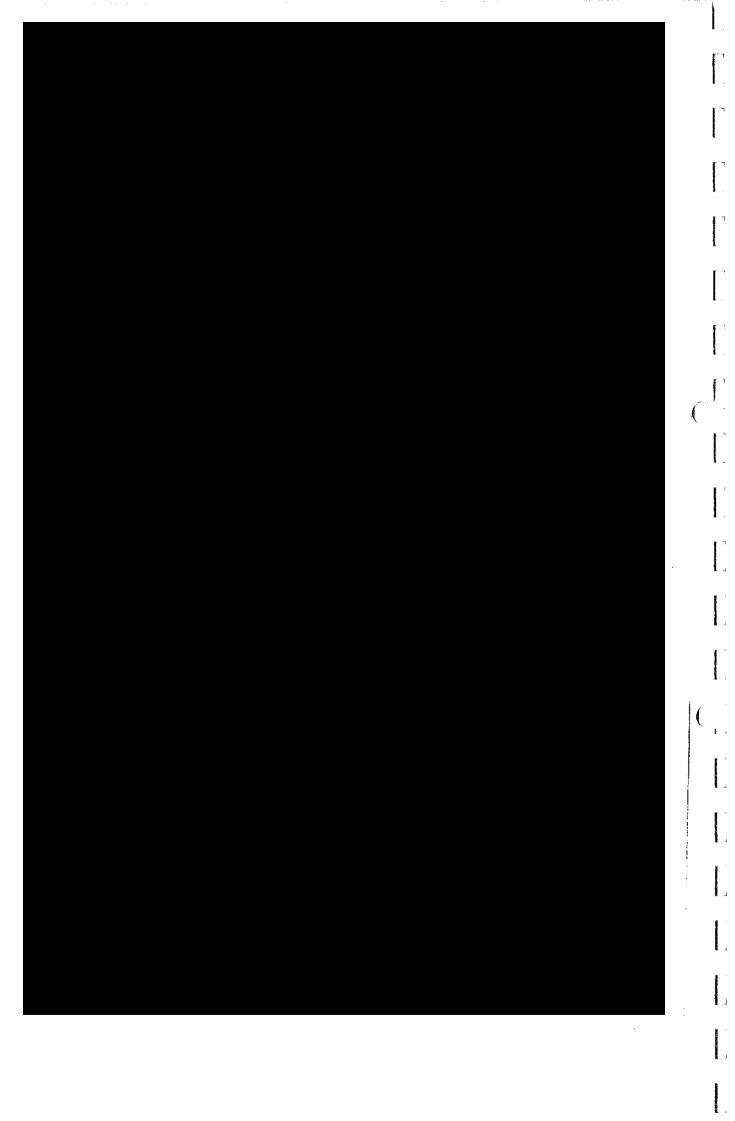
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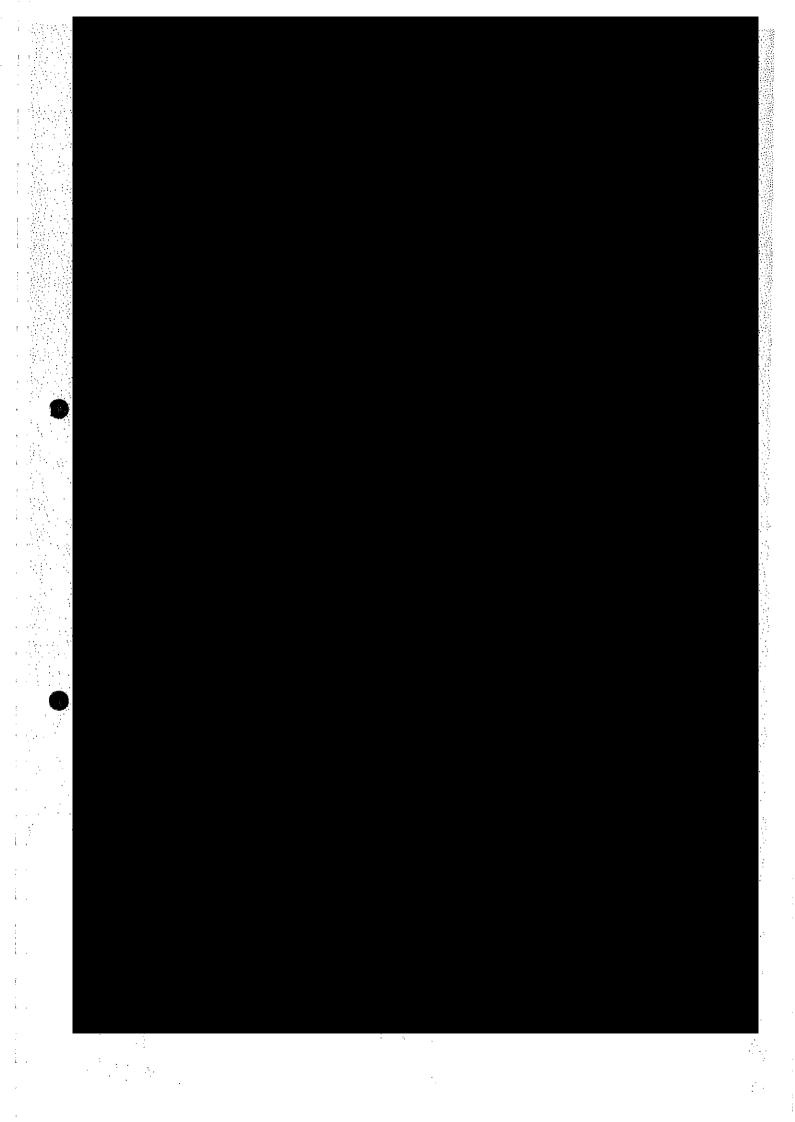
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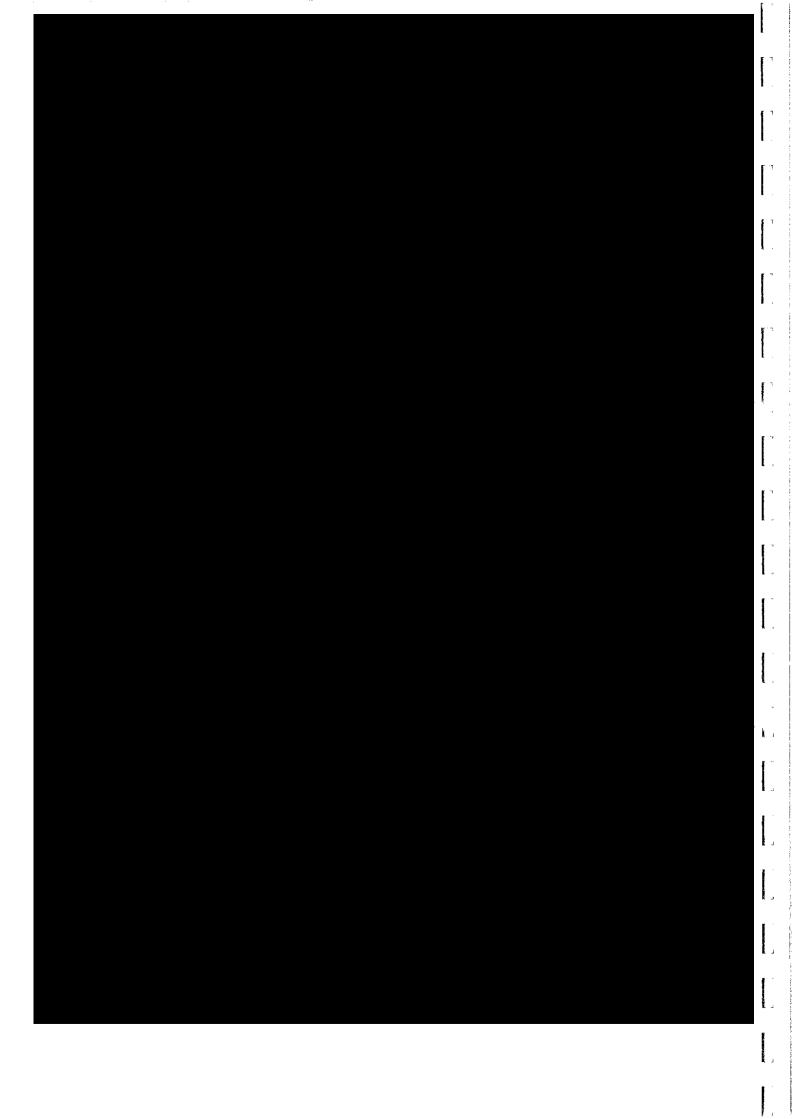
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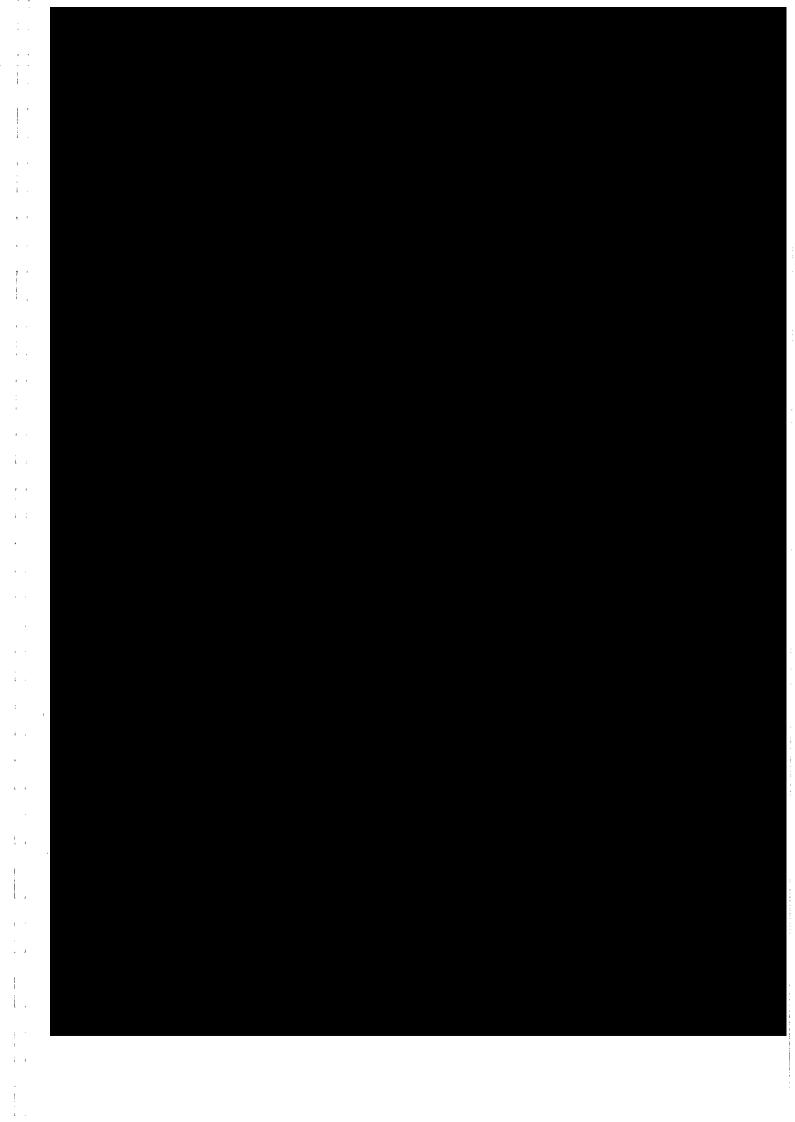
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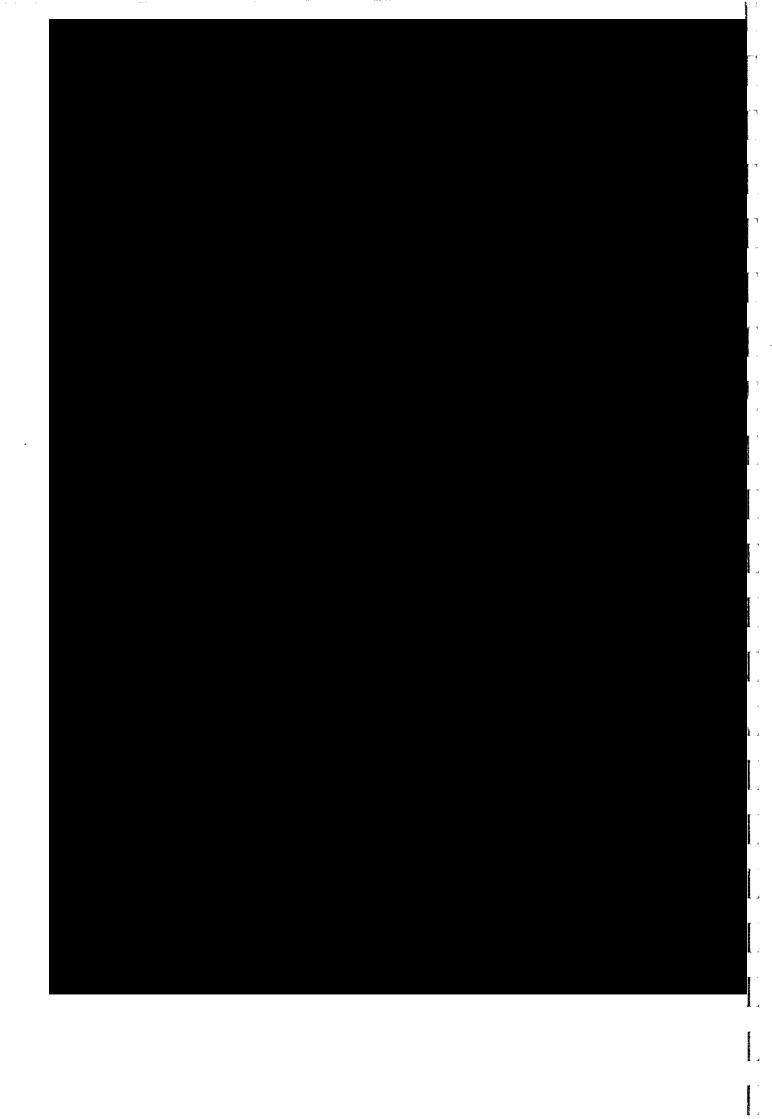
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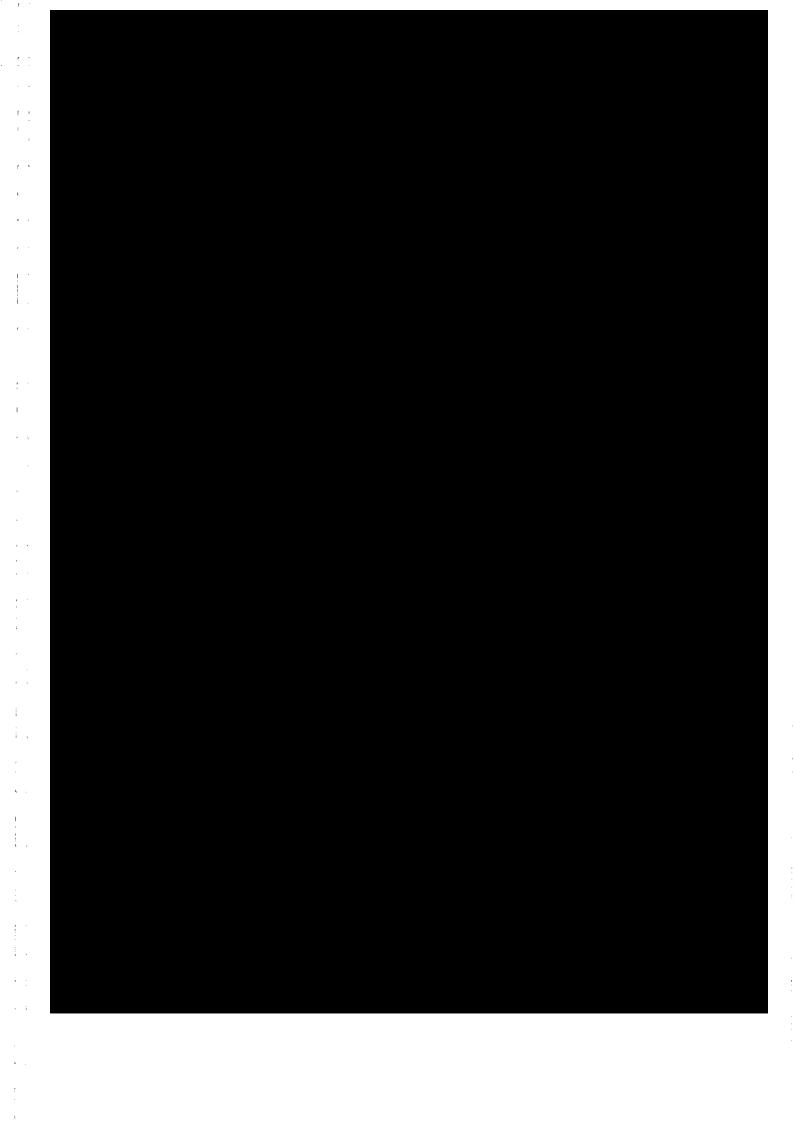






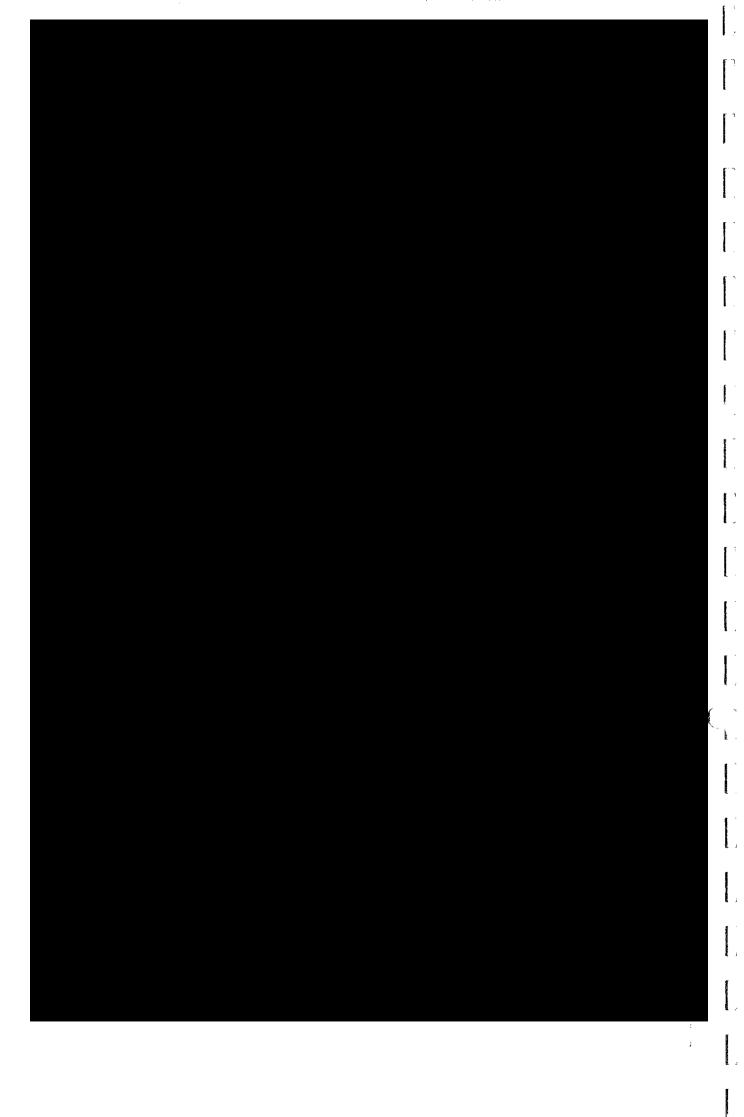


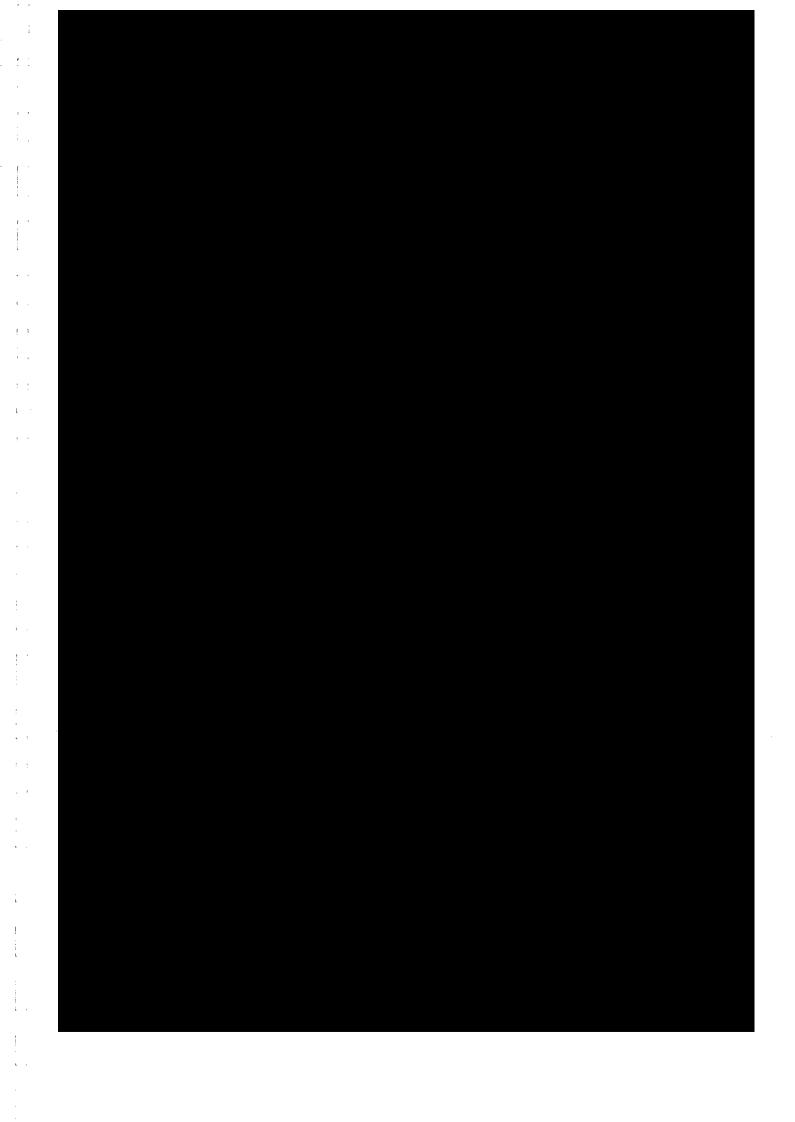


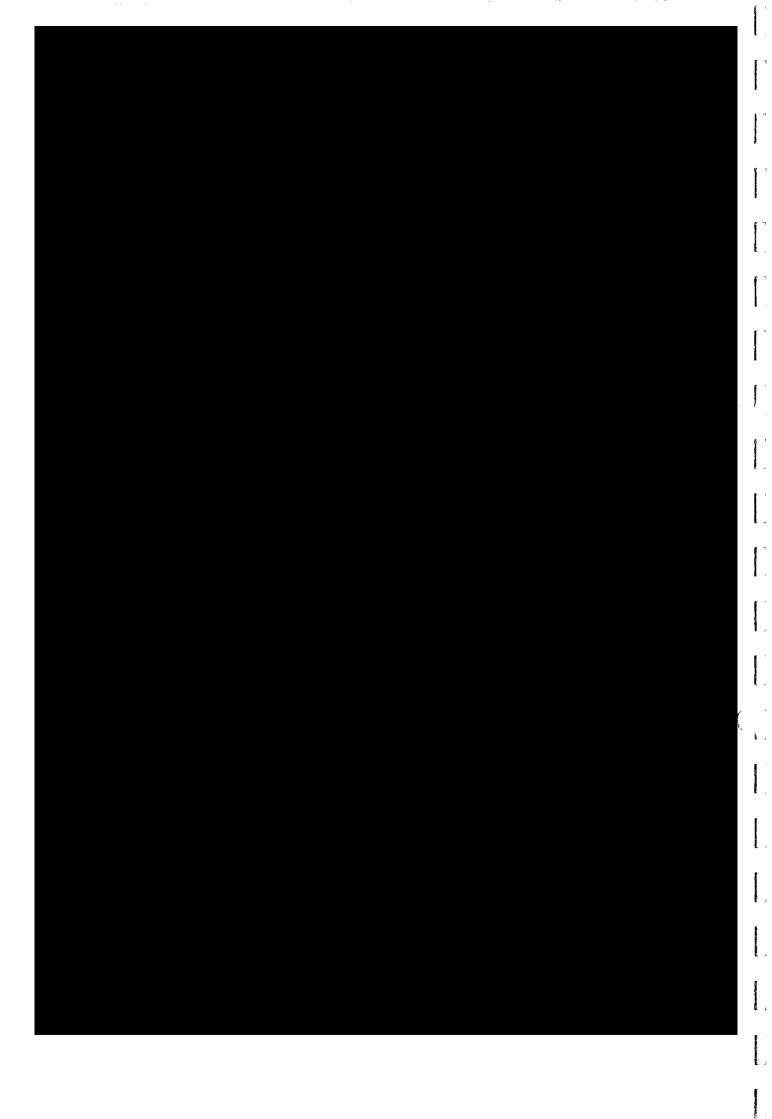






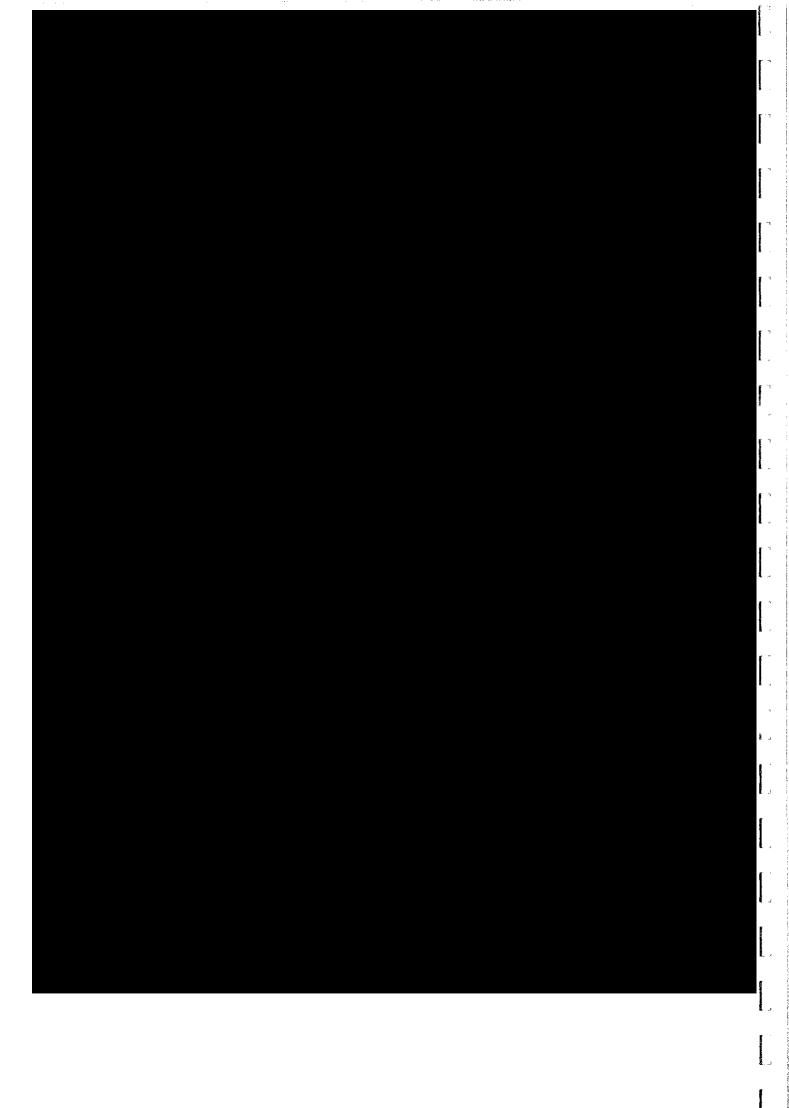


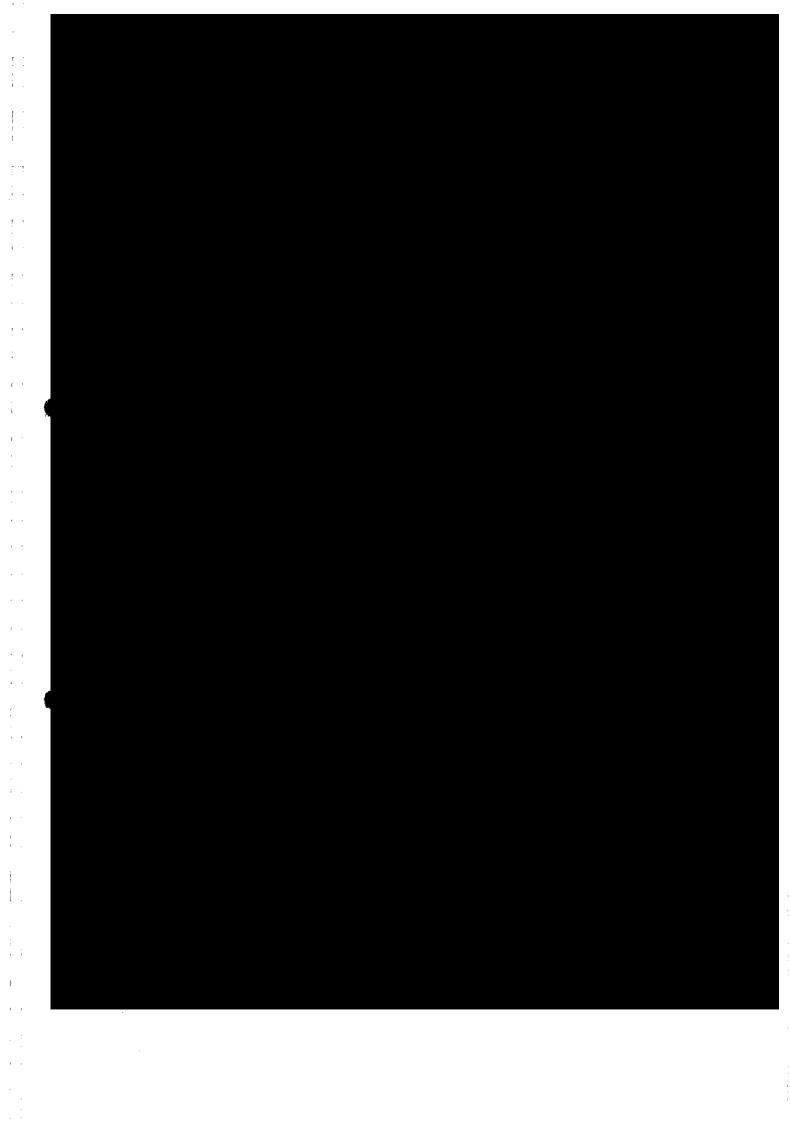


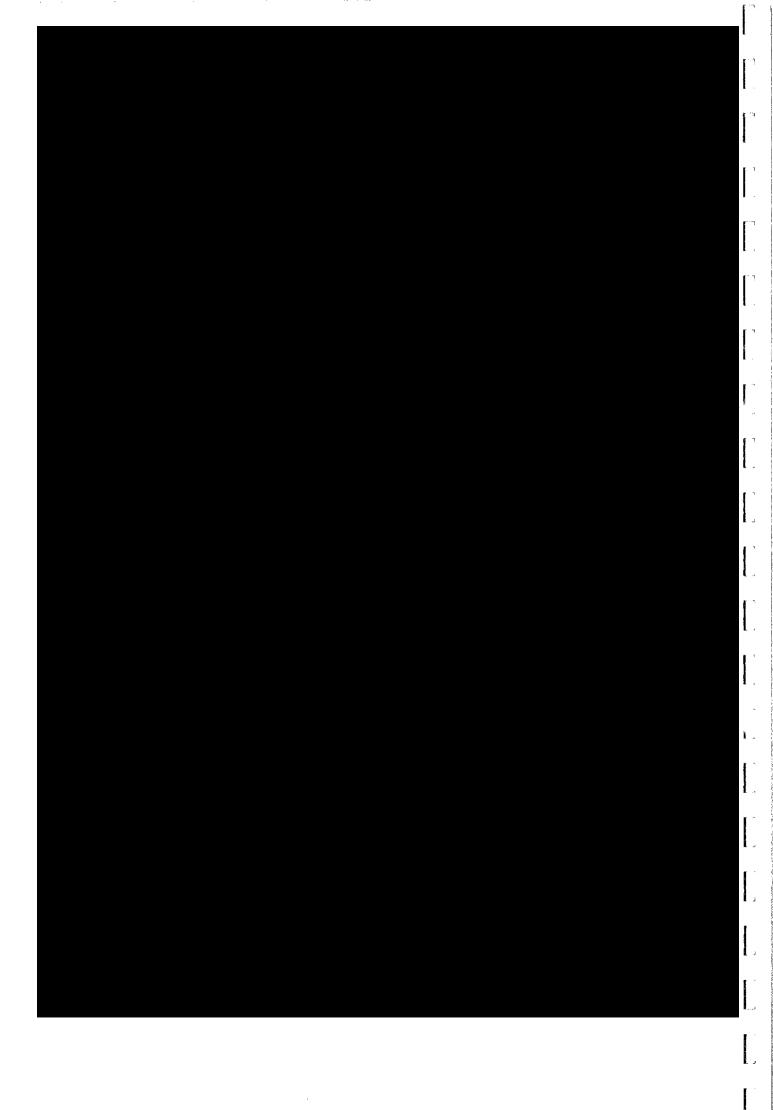


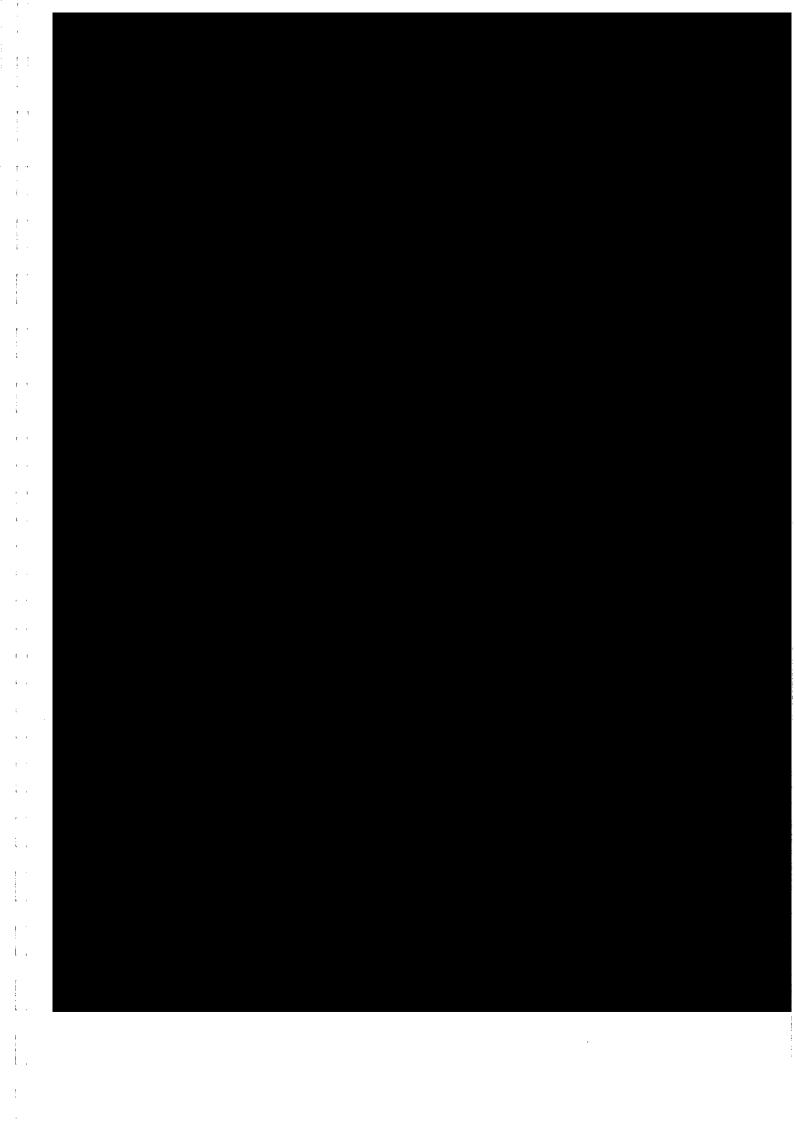


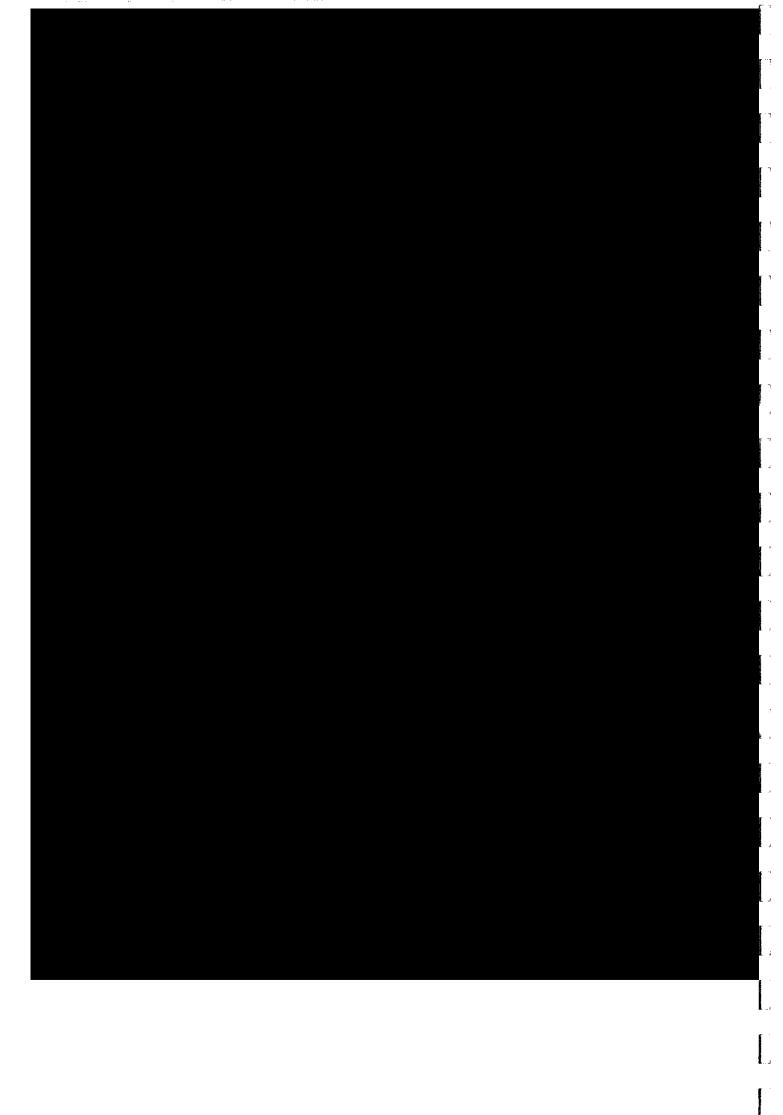
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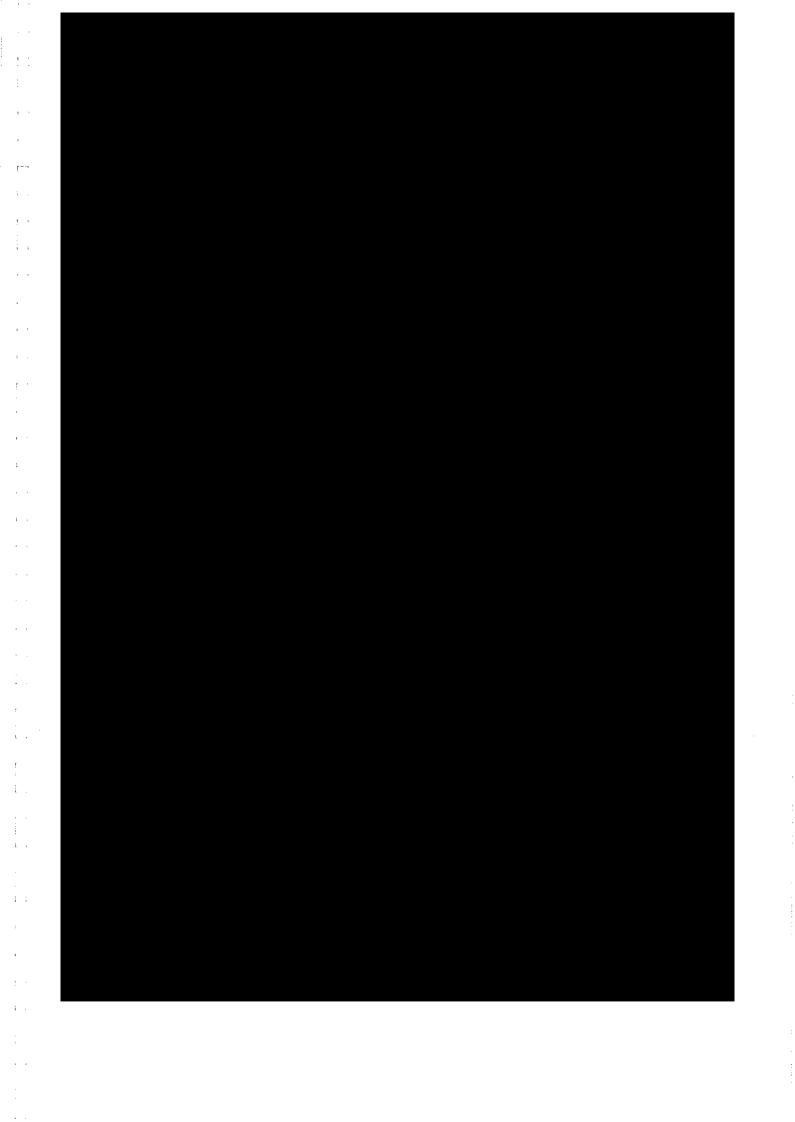


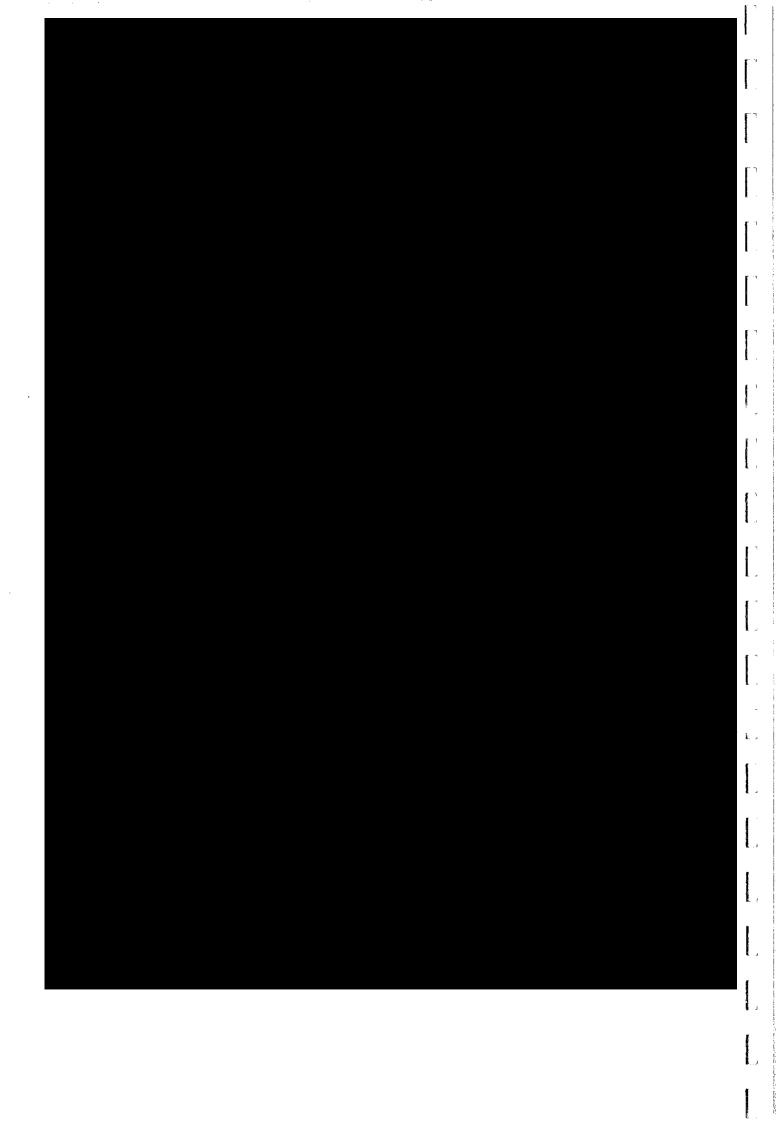


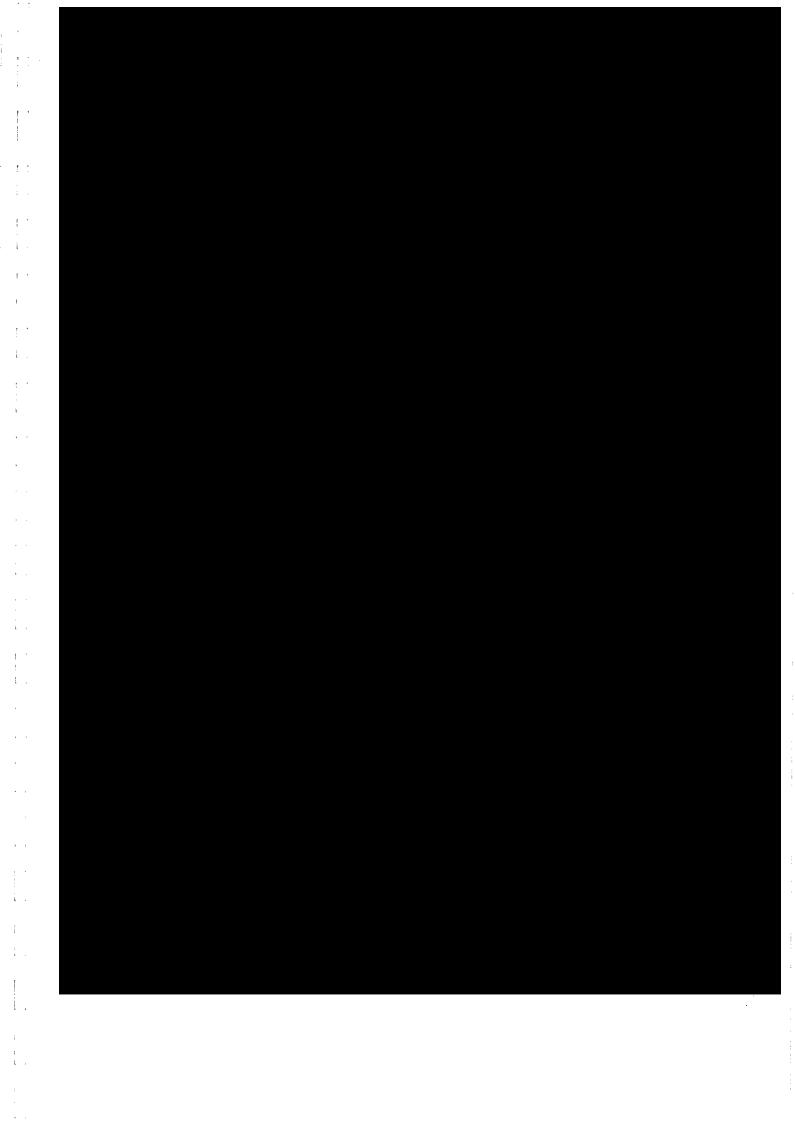


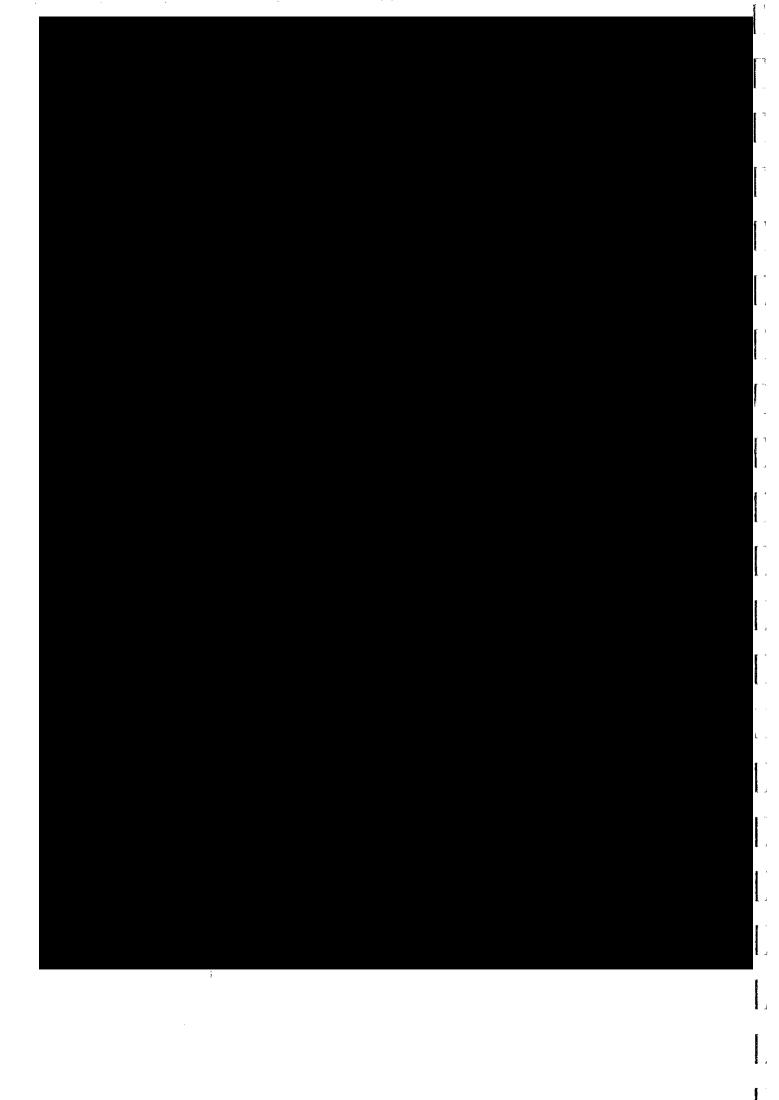


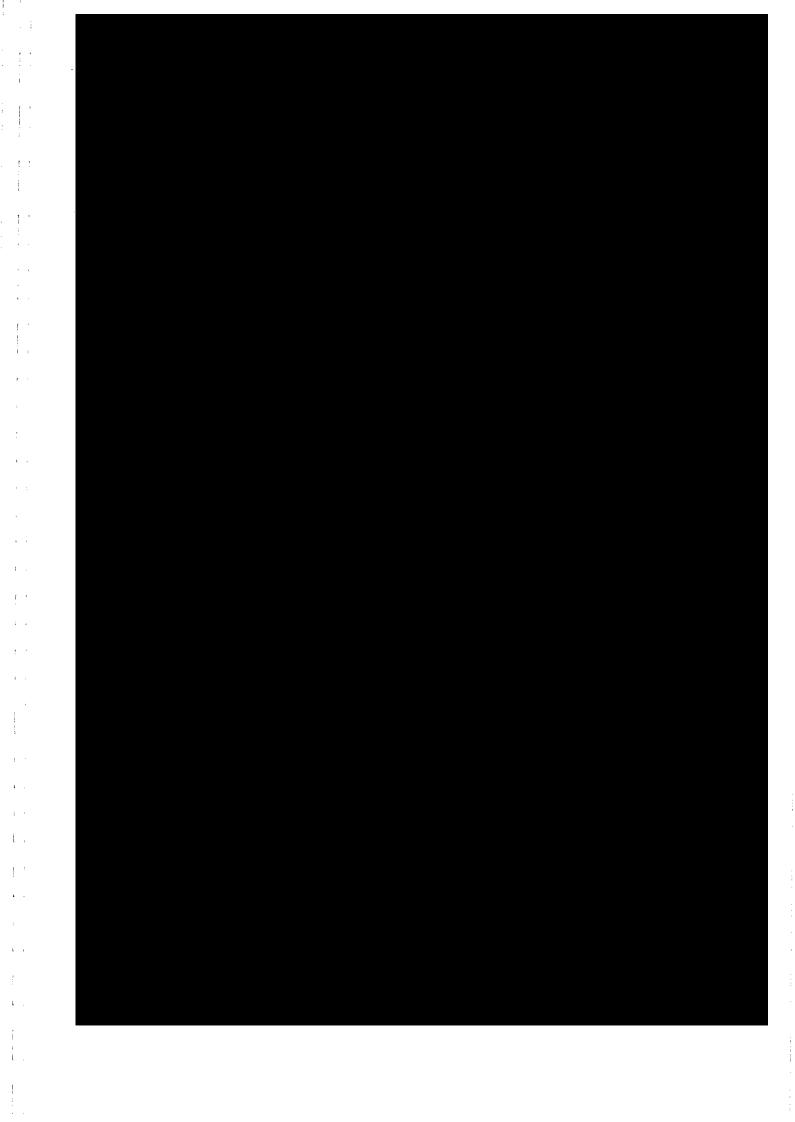












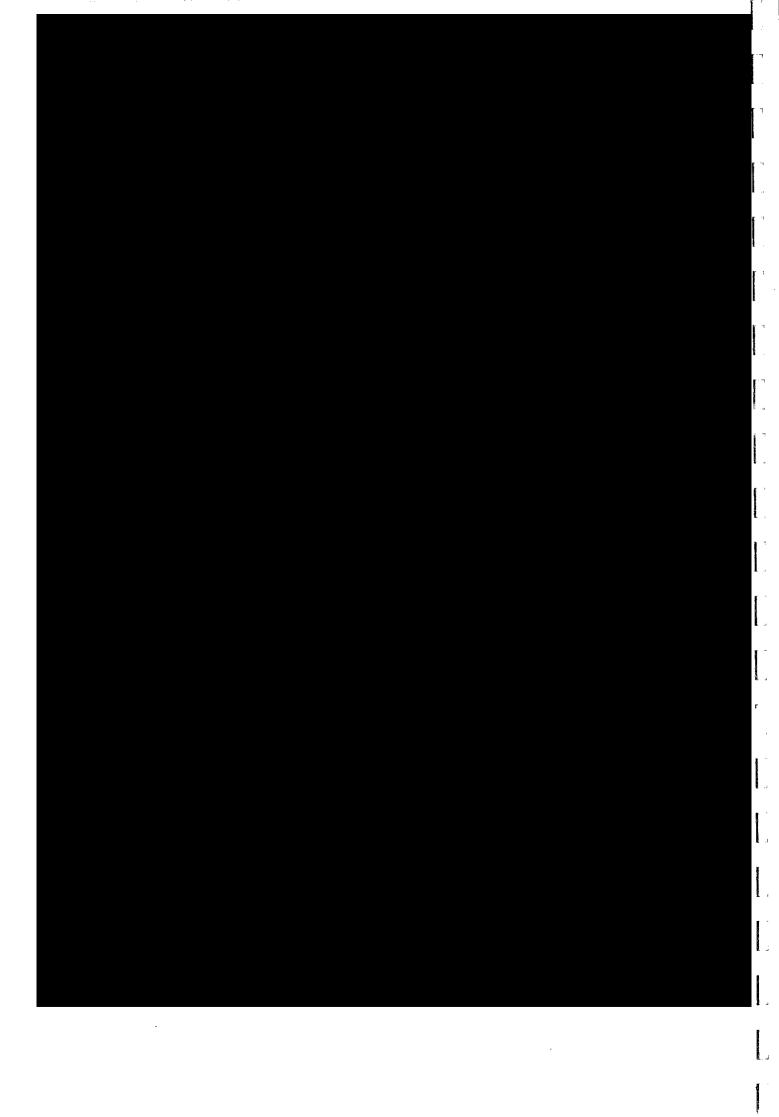
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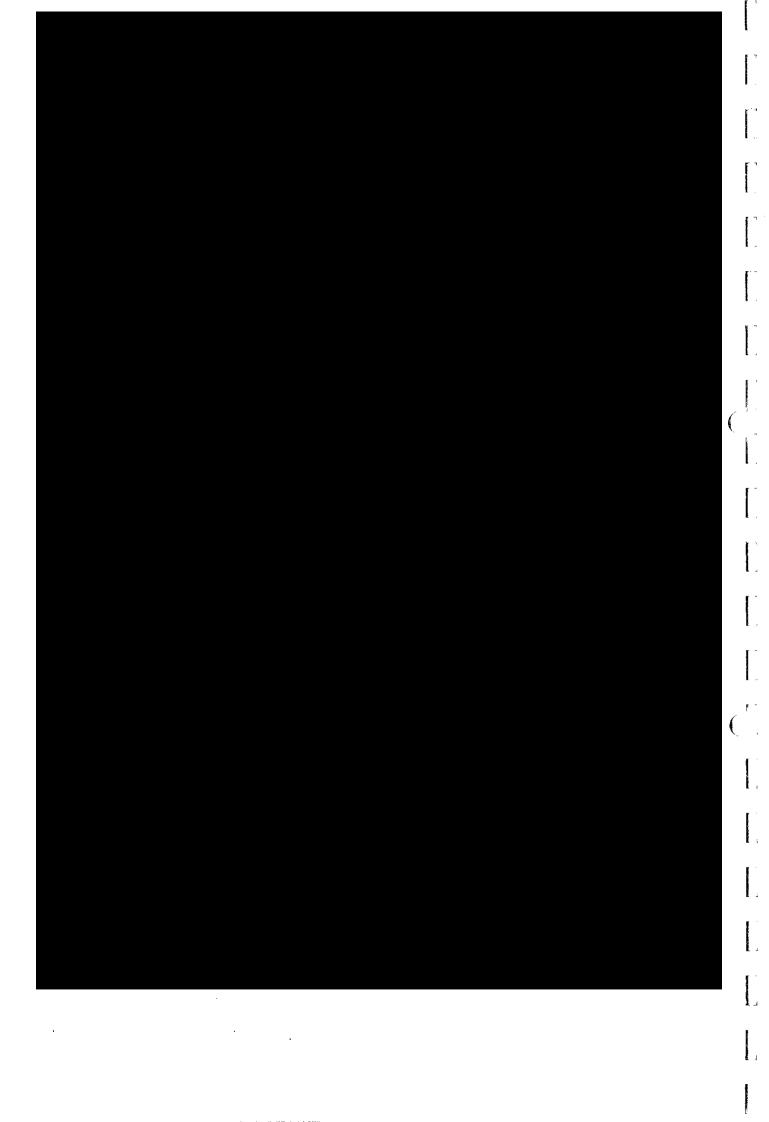
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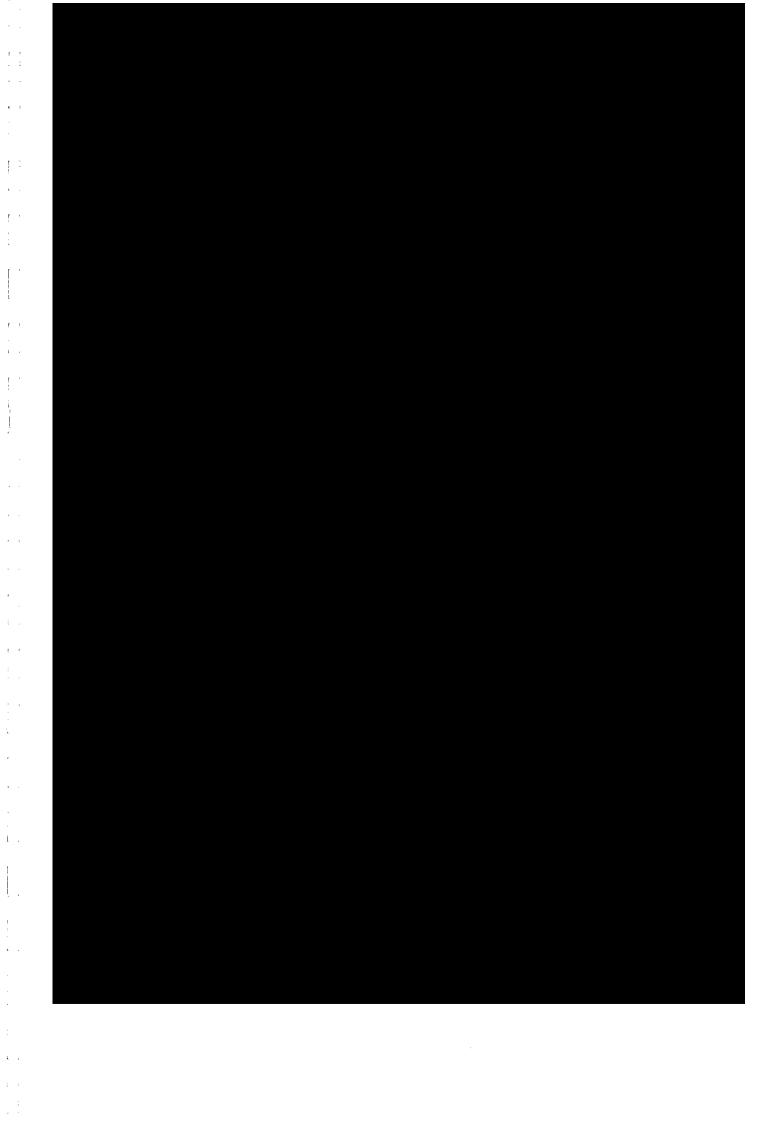
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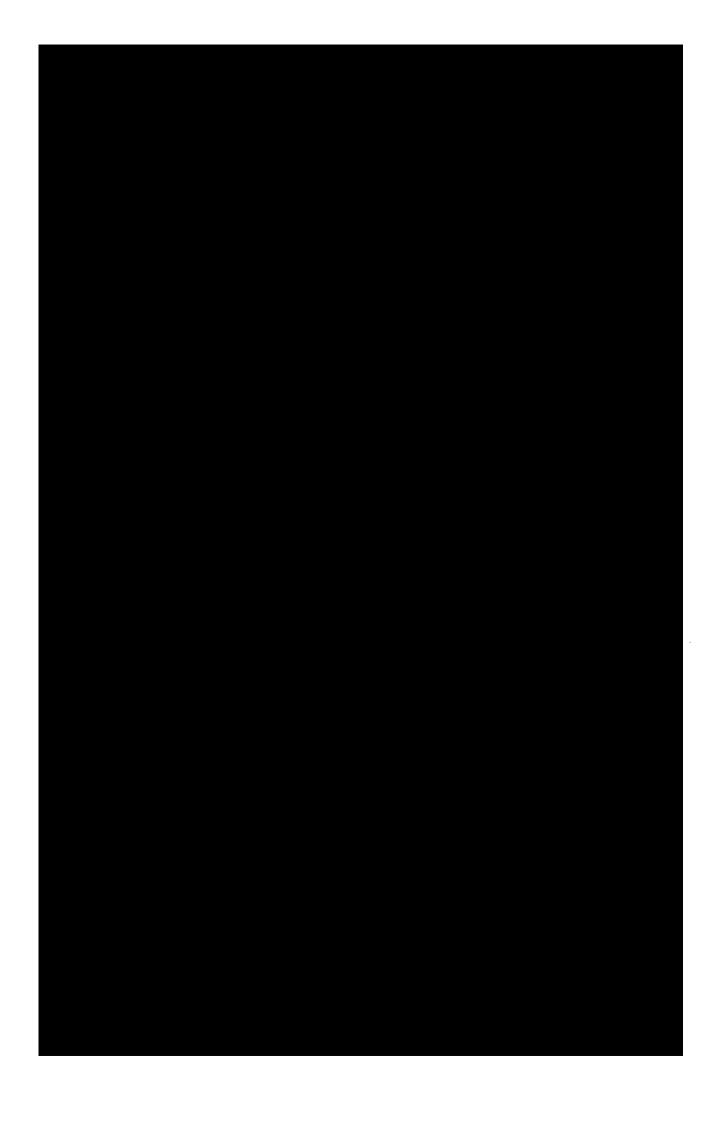












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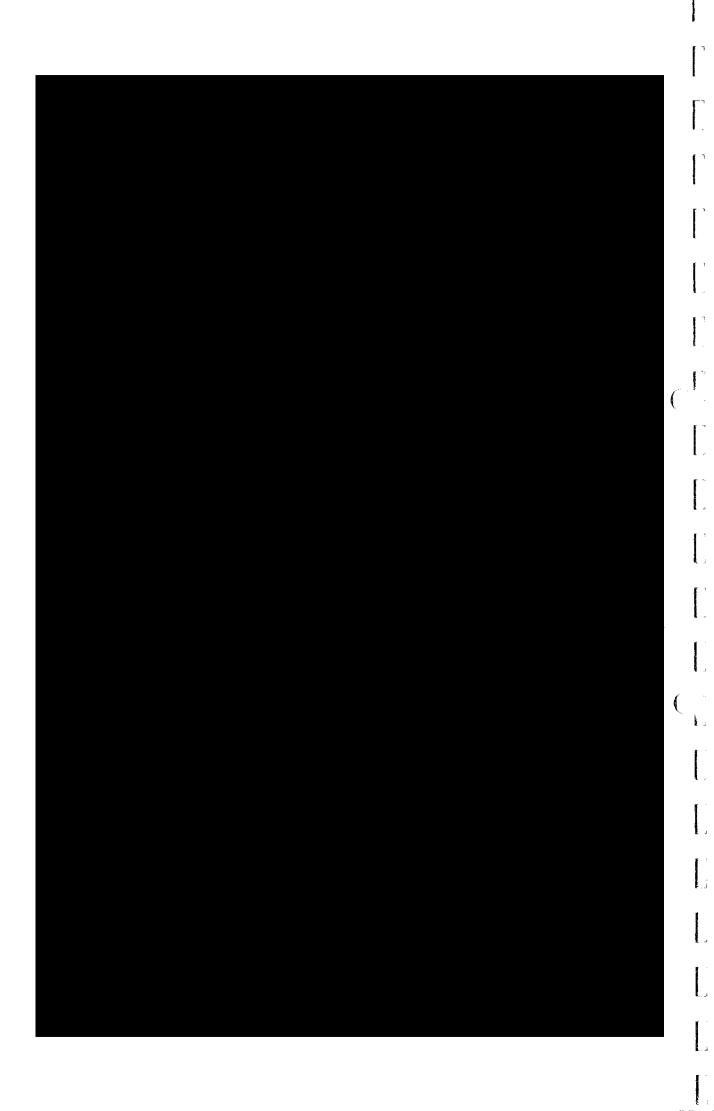
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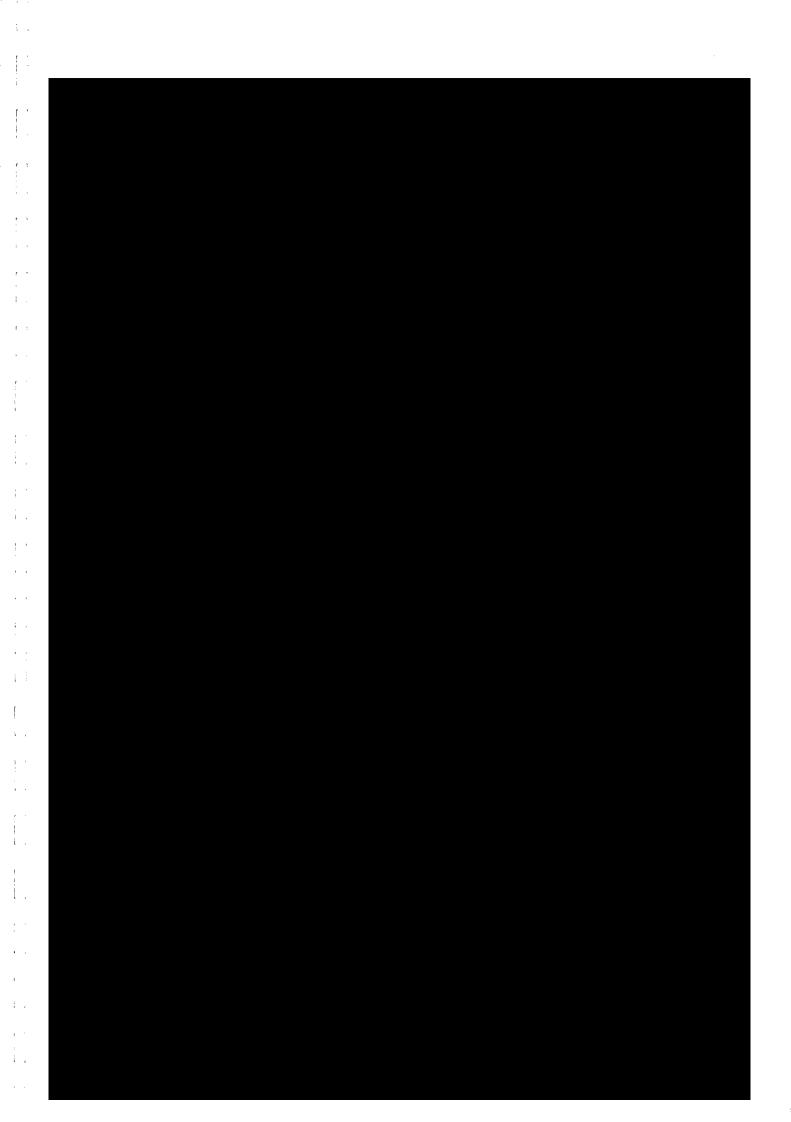
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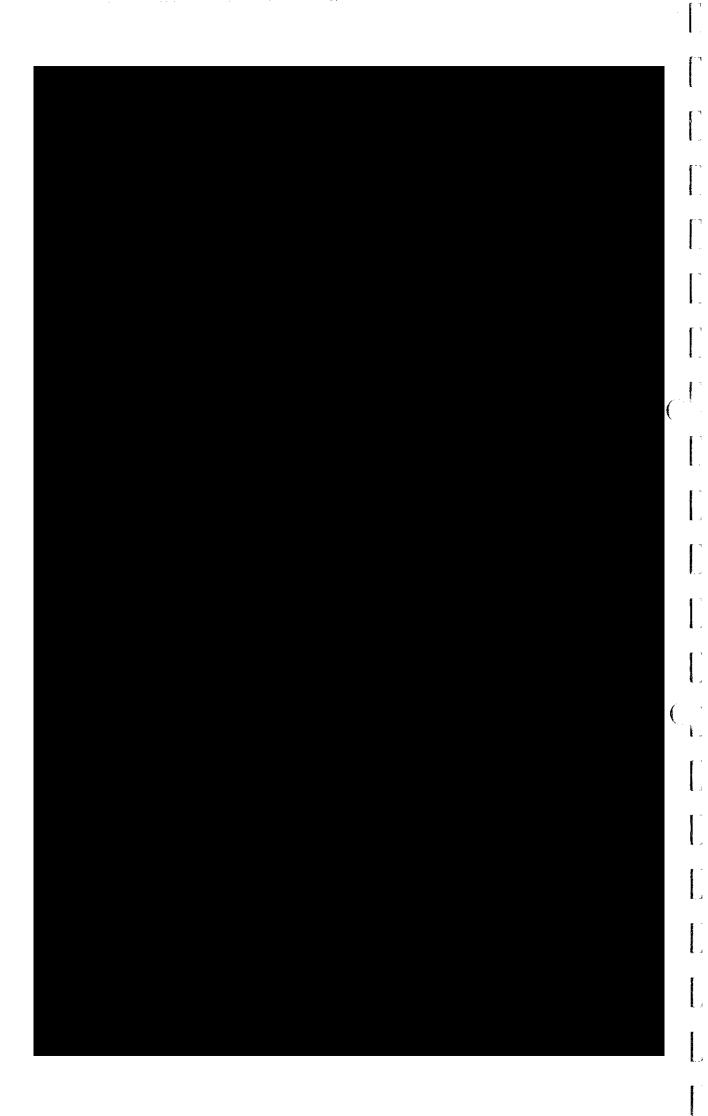
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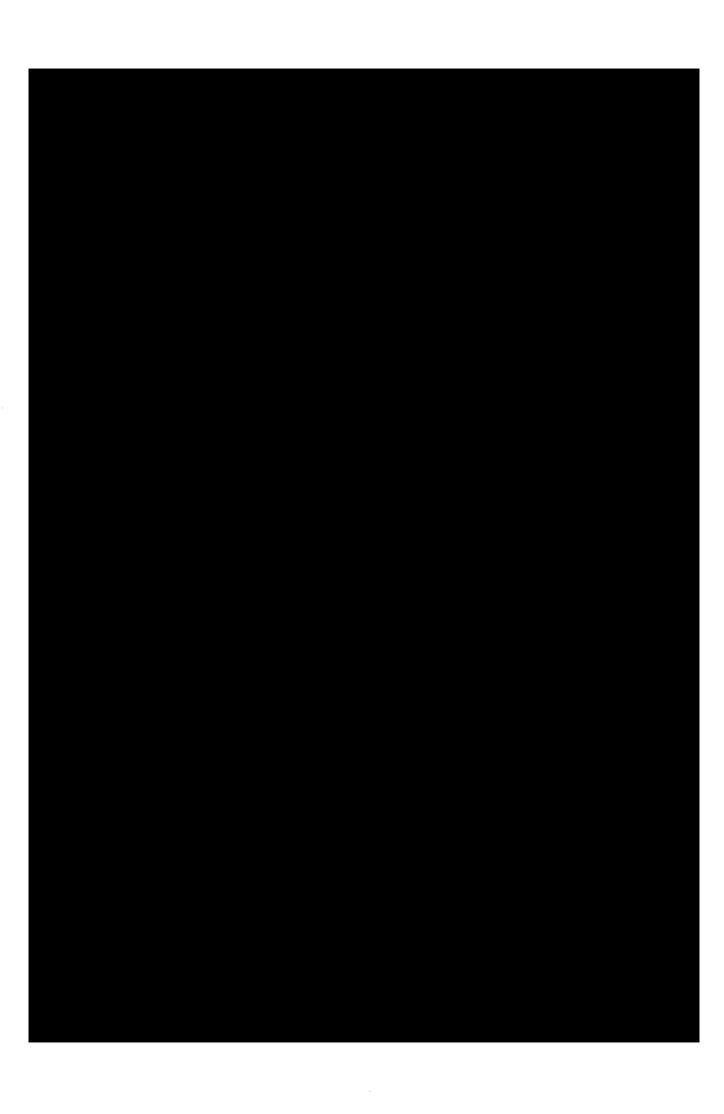
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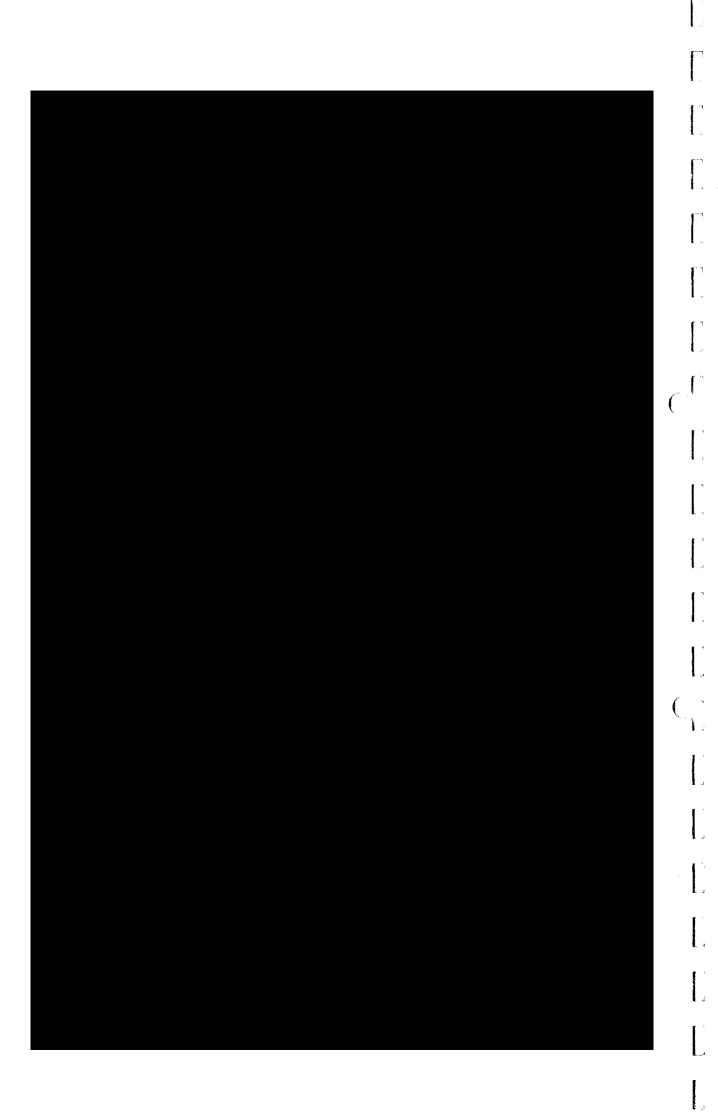


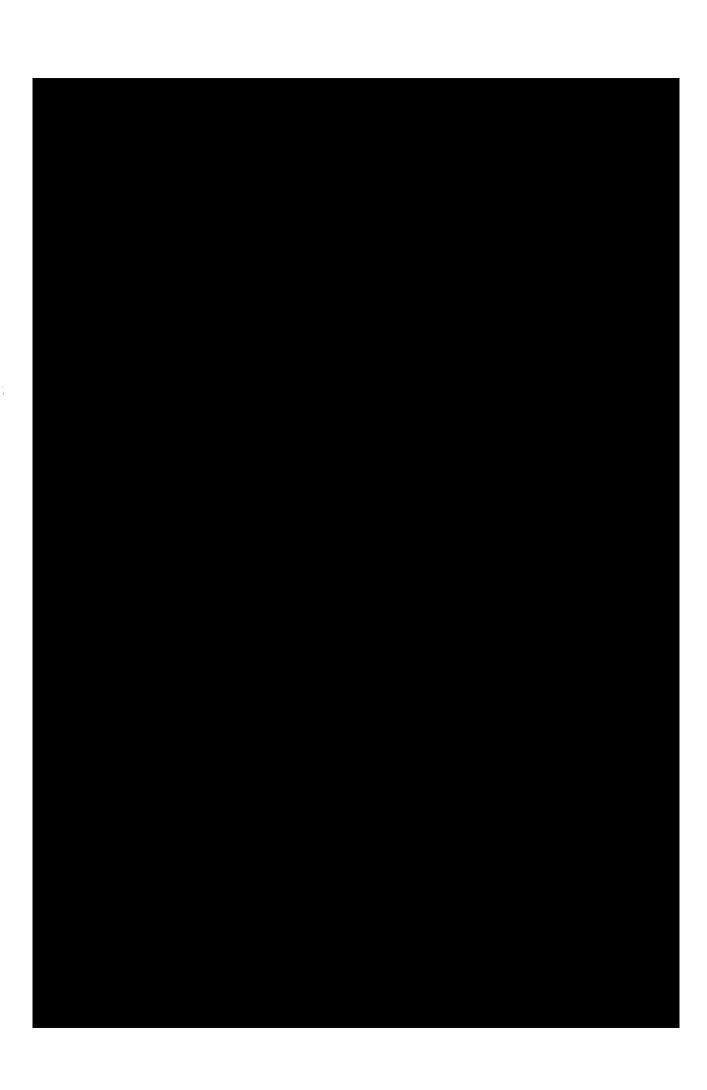
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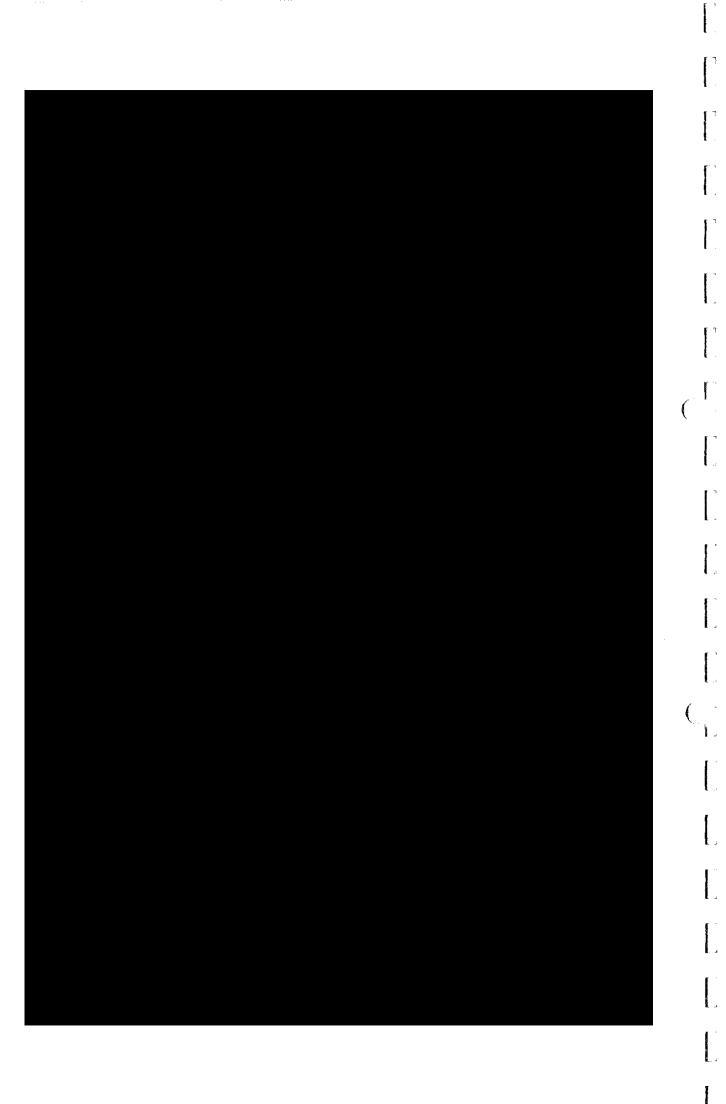
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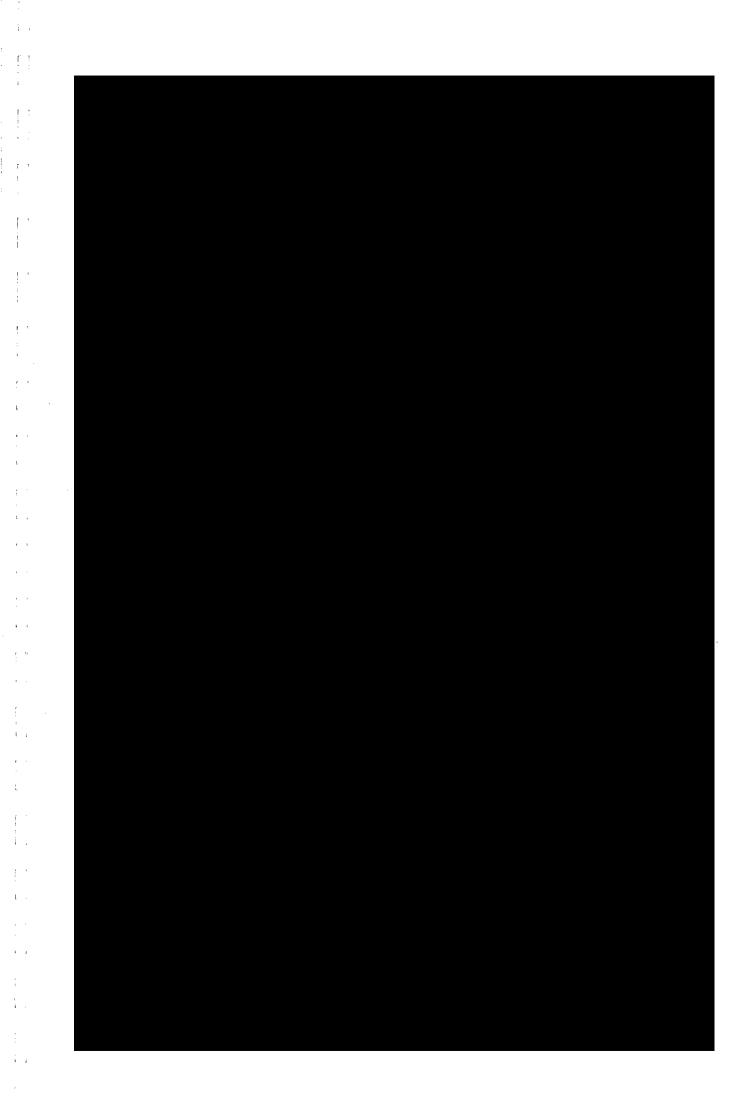
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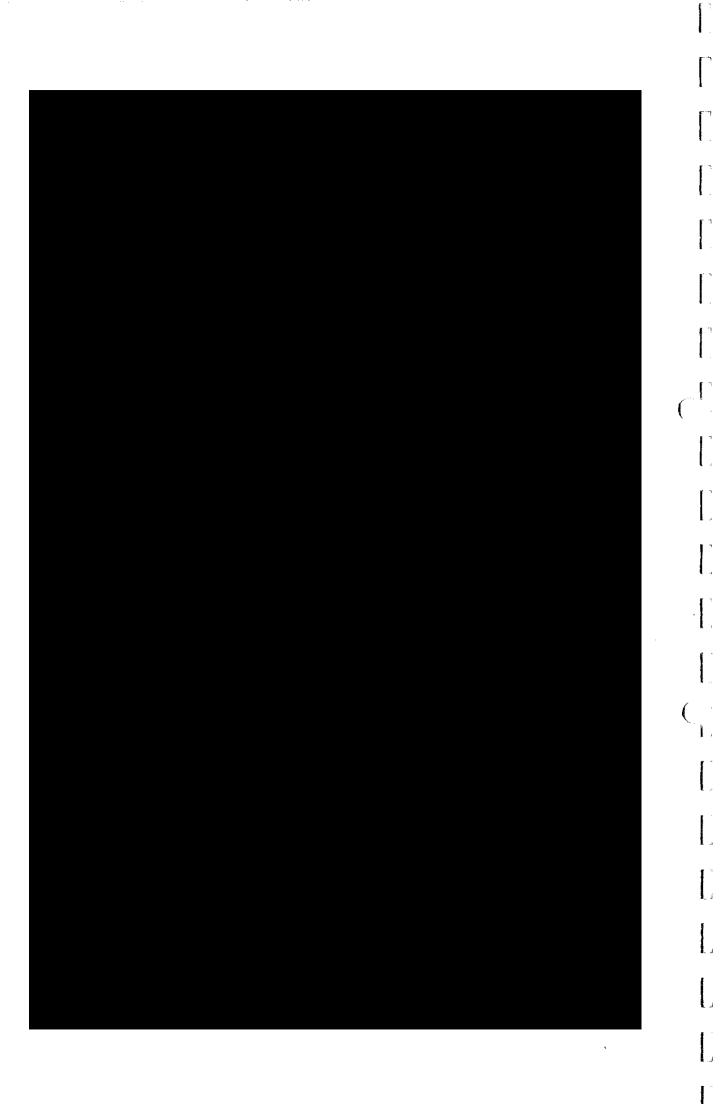
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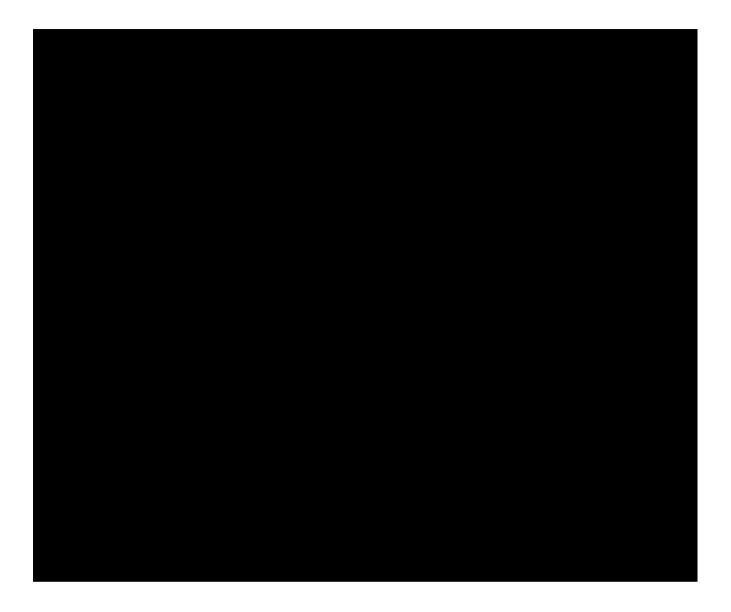
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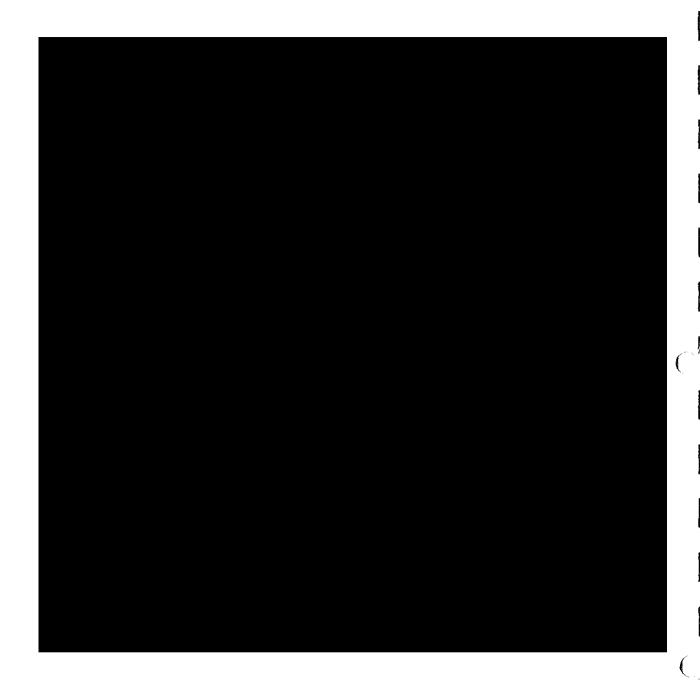
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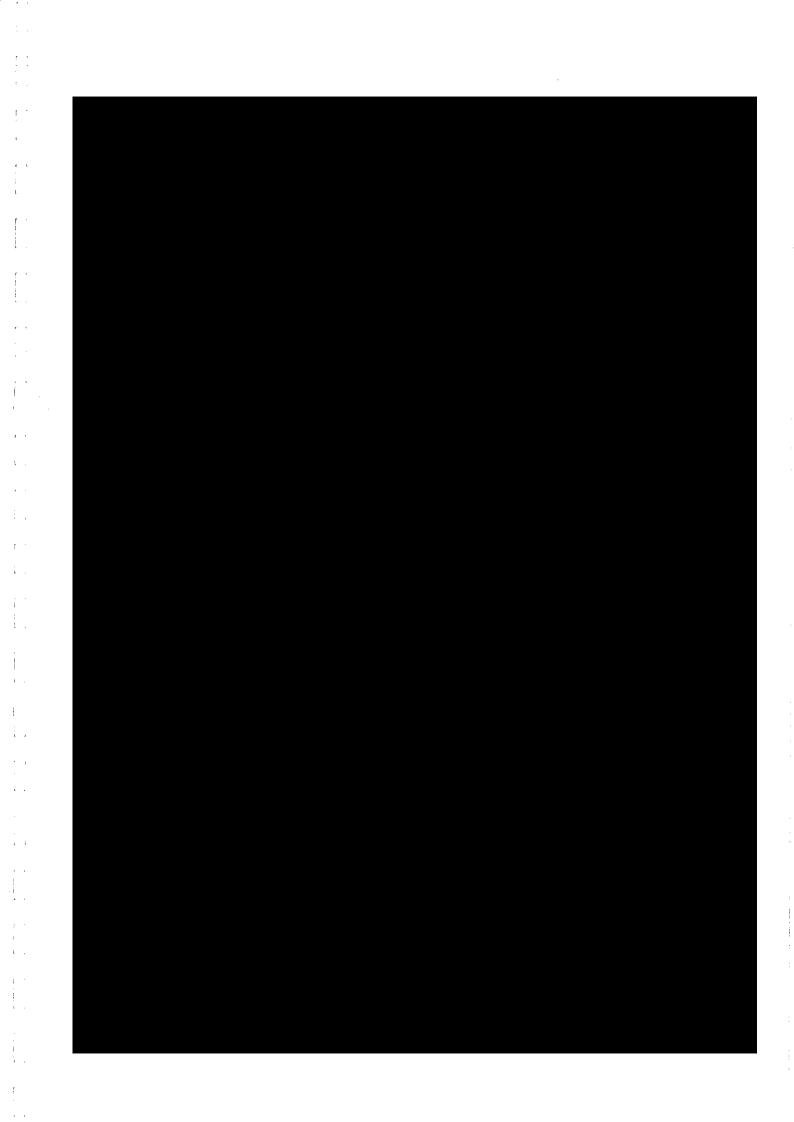
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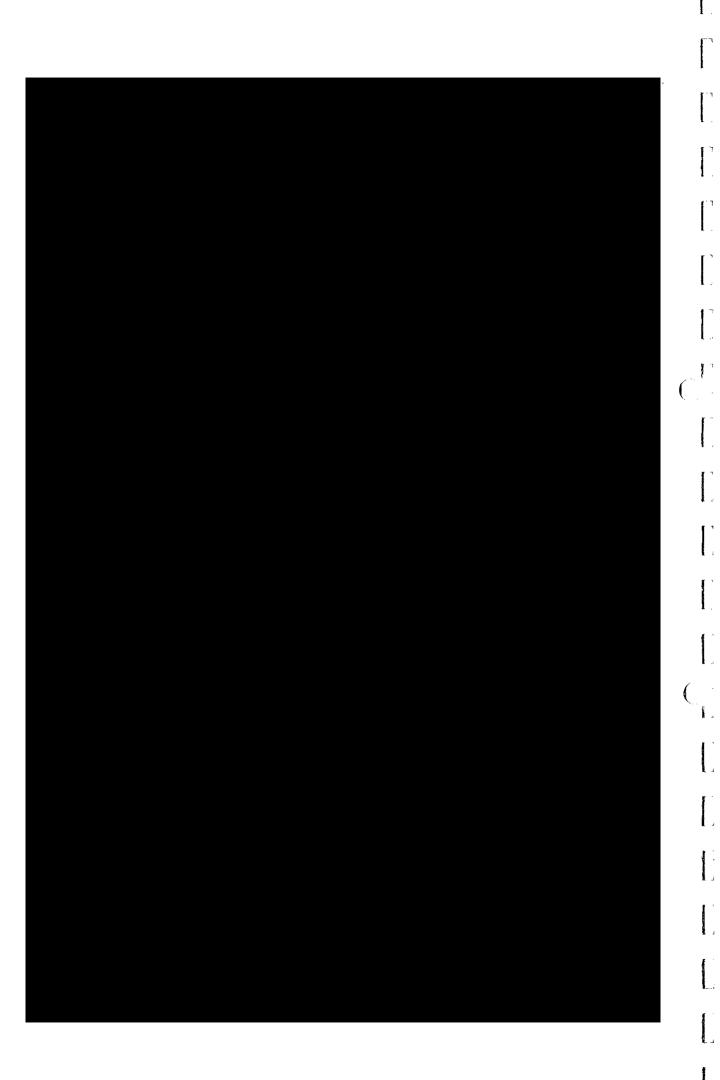
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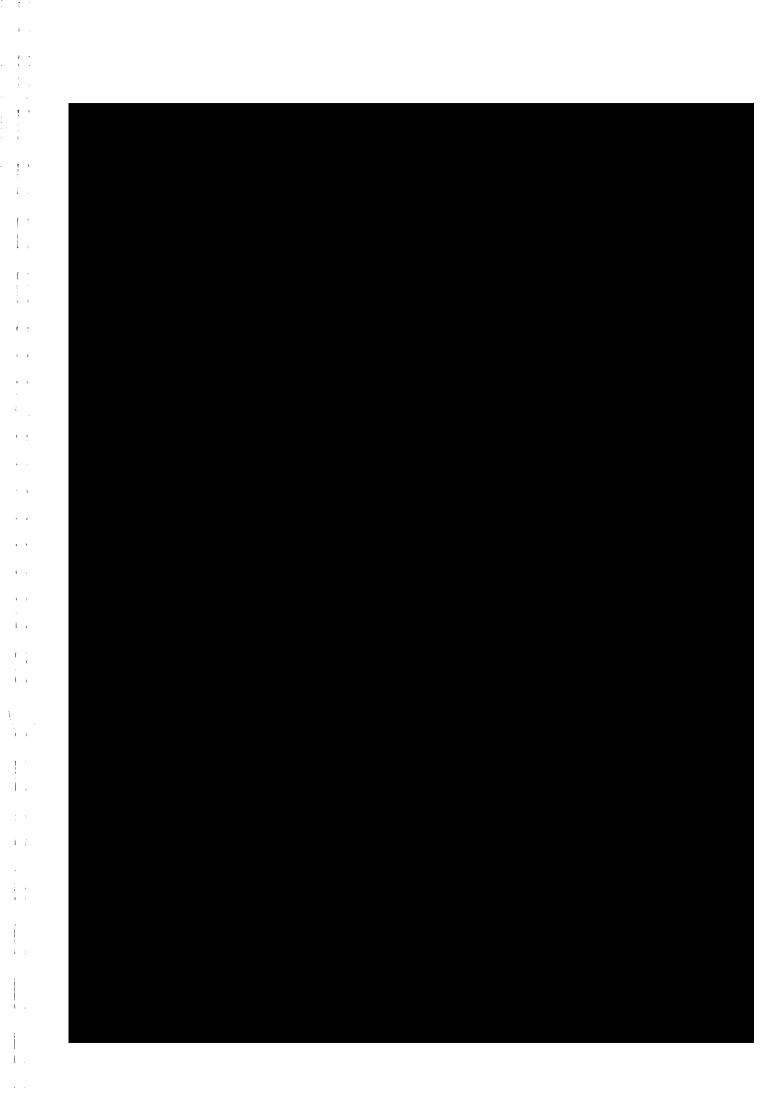
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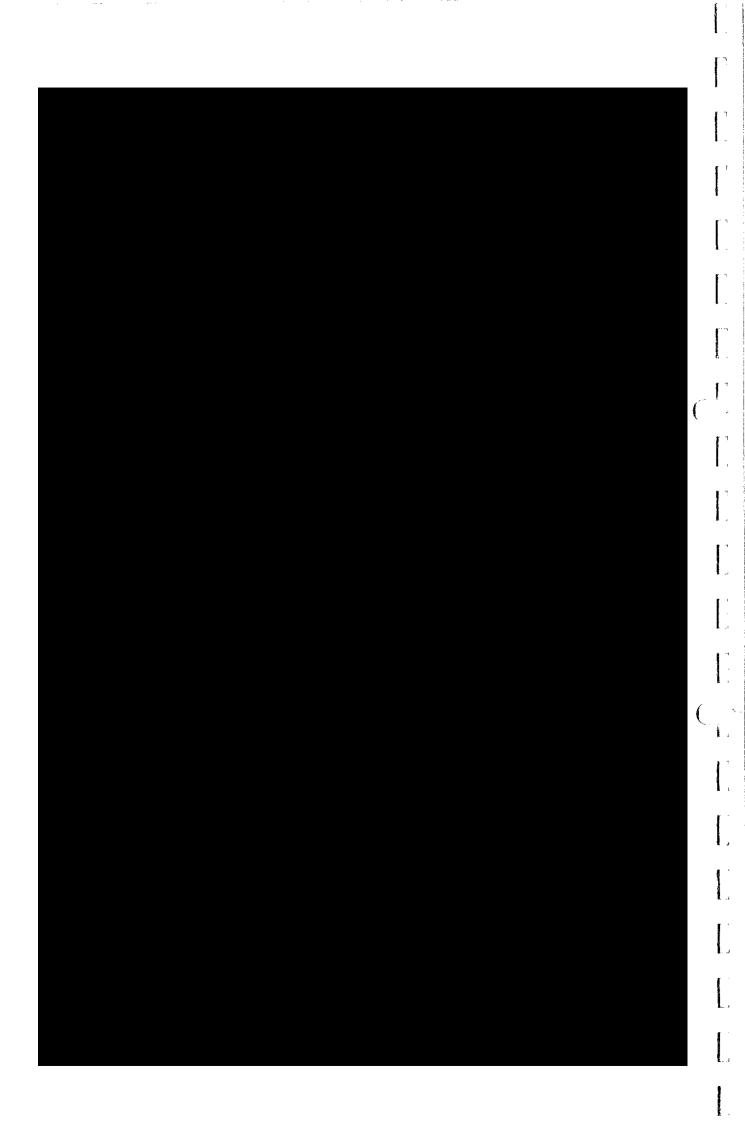
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LICENCE No:

DIR 012/2002

LICENCE HOLDER:

Monsanto Australia Limited

PROJECT SUPERVISOR:

**ACCREDITATION NO:** 

ACCR 034/2002

SUBMISSION:

2007 Annual Report for Bollgard II®

(Commercial Release)

**REPORTING PERIOD:** 

2006/07 Cotton Growing Season

DATE:

22 December 2007

PREPARED BY:

Compliance & Stewardship Manager

Information and data submitted herein contains trade secrets, or privileged or confidential information the property of Monsanto Australia Limited and no government agency or representative thereof is authorised to disclose such data and information without written permission from Monsanto Australia Limited.



#### LICENCE HOLDER DETAILS

Name:

Monsanto Australia Limited

Address:

600 St Kilda Road, Melbourne 3004

PO Box 6051

St Kilda Road Central, Melbourne Victoria 8008

Telephone:

03 9522 7102

Facsimile:

03 9522 6102

Contact email:

**Accreditation** 

Number:

ACCR 034/2002

#### SCOPE OF THE REPORT

This report addresses the annual reporting condition of the DIR 012 commercial release licence for Bollgard II® issued to Monsanto Australia Limited by the Office of the Gene Technology Regulator.

This report details compliance with general and specific conditions of Part 3 and 4 of the DIR 012 licence as issued to Monsanto Australia Limited on 23 September 2002, and varied in June, September and December 2003; March, May, October and December 2004; and February, June, July, August, October, November and December 2005.



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#### 1. General Conditions

## a. Informing people of their obligations

Monsanto Australia Limited informed all cotton growers and cotton gins covered by the DIR 012 / 2002 licence of the obligations imposed on them as a result of the conditions of these licences. This was achieved primarily through Monsanto Accreditation programs and information courses and mail outs.

Bollgard II[®] cotton Accreditation programs require all persons having management responsibility for Bollgard II crops to undergo training and pass a test on the content of the training. Growers were only required to attend these courses and pass the accreditation test once.

# b. Reporting

During the reporting period, the licence holder did not become aware of any 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 of any unintended effects of the dealings authorised by the licence.

# c. Material changes in circumstances

During the 2006/07 reporting period, Monsanto Australia Limited did not become aware of any relevant conviction of the licence holder occurring after the commencement of this licence; any revocation or suspension of a licence or

permit held by Monsanto Australia Limited; or any event or circumstance that would affect the capacity of Monsanto Australia Limited to meet the conditions of the DIR 012 licence.

# d. Remaining an accredited organisation

At all times, Monsanto Australia Limited remained an accredited organisation and complied with conditions of accreditation as set out in the OGTR Guidelines for Accreditation of Organisations.

### e. Changes to details

During the 2006/07 reporting period, there were no changes to contact details of the Project Supervisor.

## f. Testing methodology

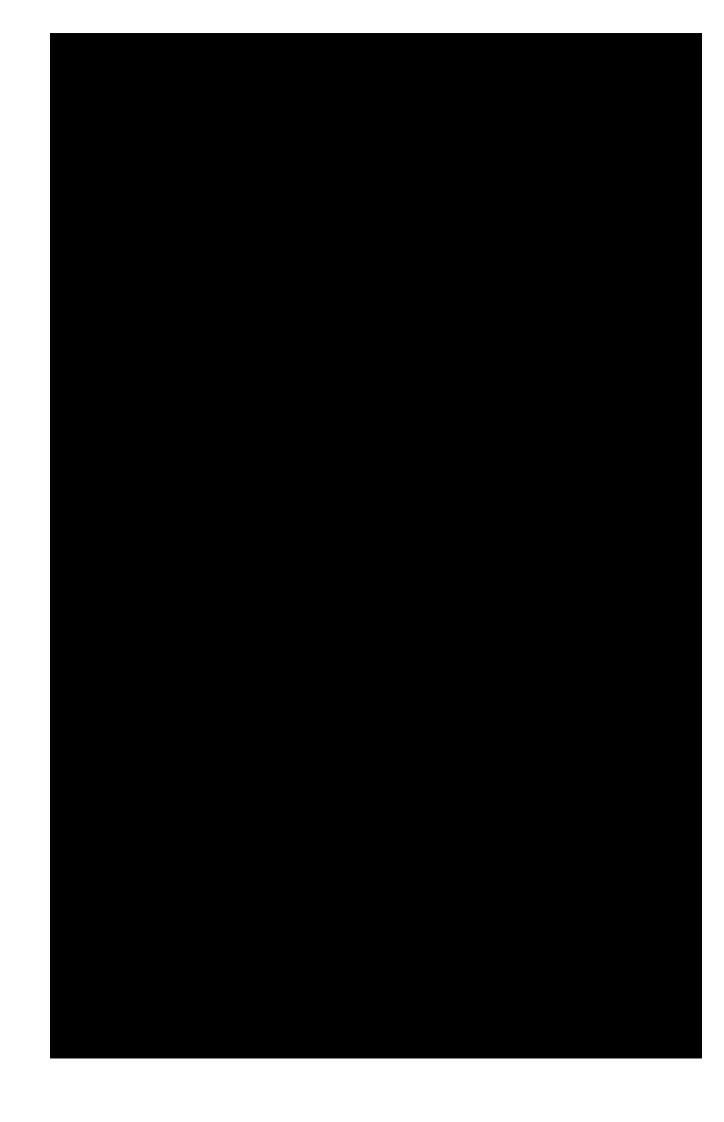
Under conditions of the licence, Monsanto Australia Limited was required to provide the Regulator with a method capable of reliably detecting the presence of the GMO. This advice was emailed to Deborah Maguire and Neil Ellis of the OGTR on 15 October 2002.

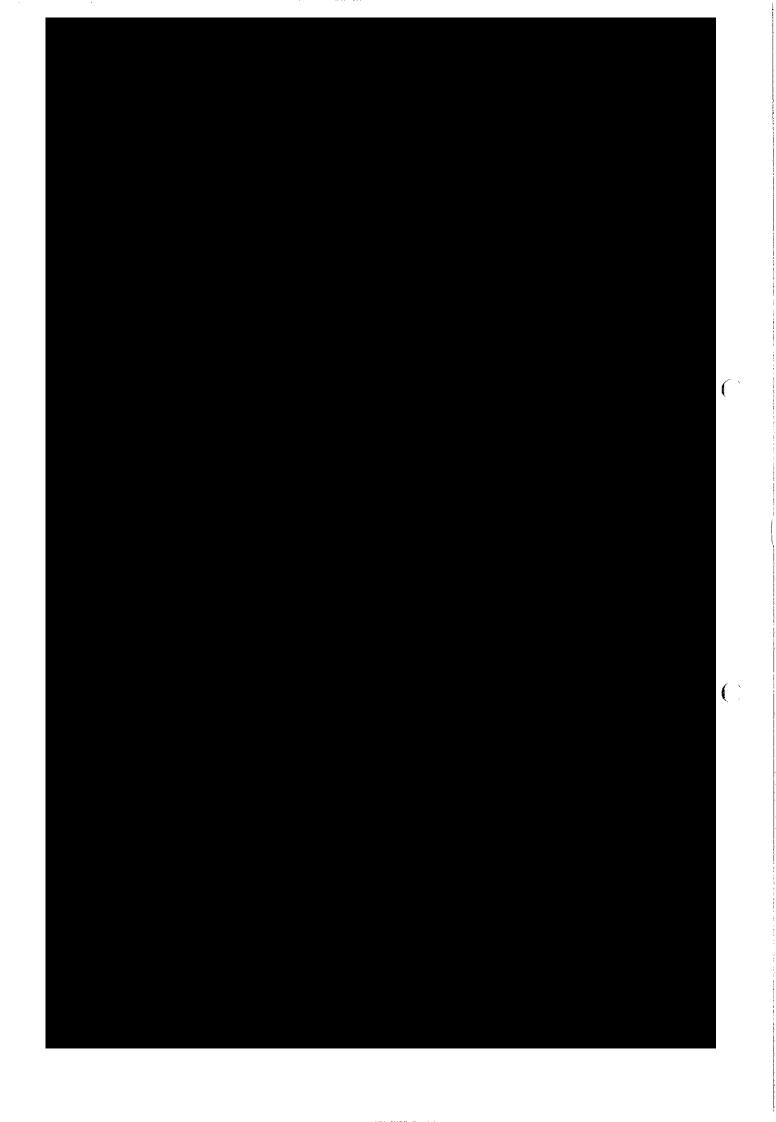
# 2. Release of Bollgard II[®] south of latitude 22° south (outside *the Restricted Zone*)

The licence holder may conduct dealings with the GMOs south of latitude 22 degrees south.

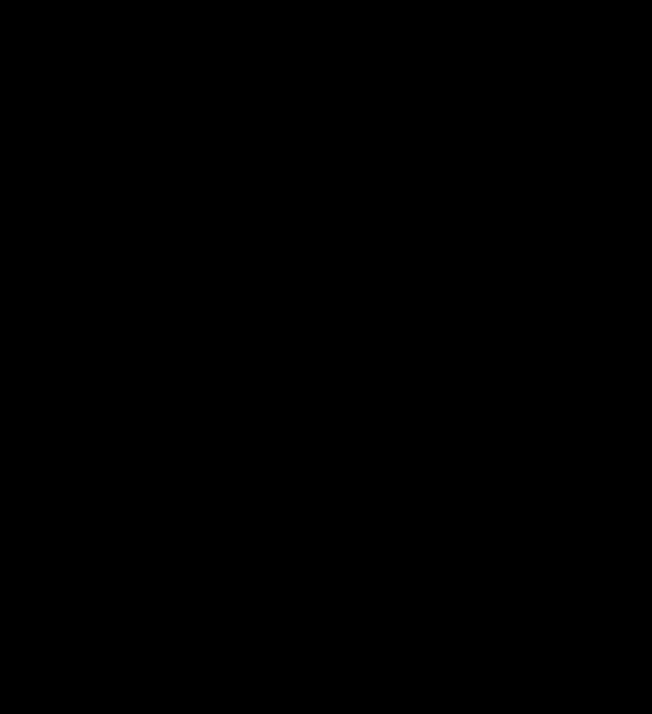
In the 2006/07 reporting period, Bollgard II cotton was grown in the traditional cotton-growing regions south of latitude 22° south in NSW and Queensland. More information on the locations where all Bollgard II cotton crops were grown during the 2006/07 cotton growing season are given in **Part 2a**.



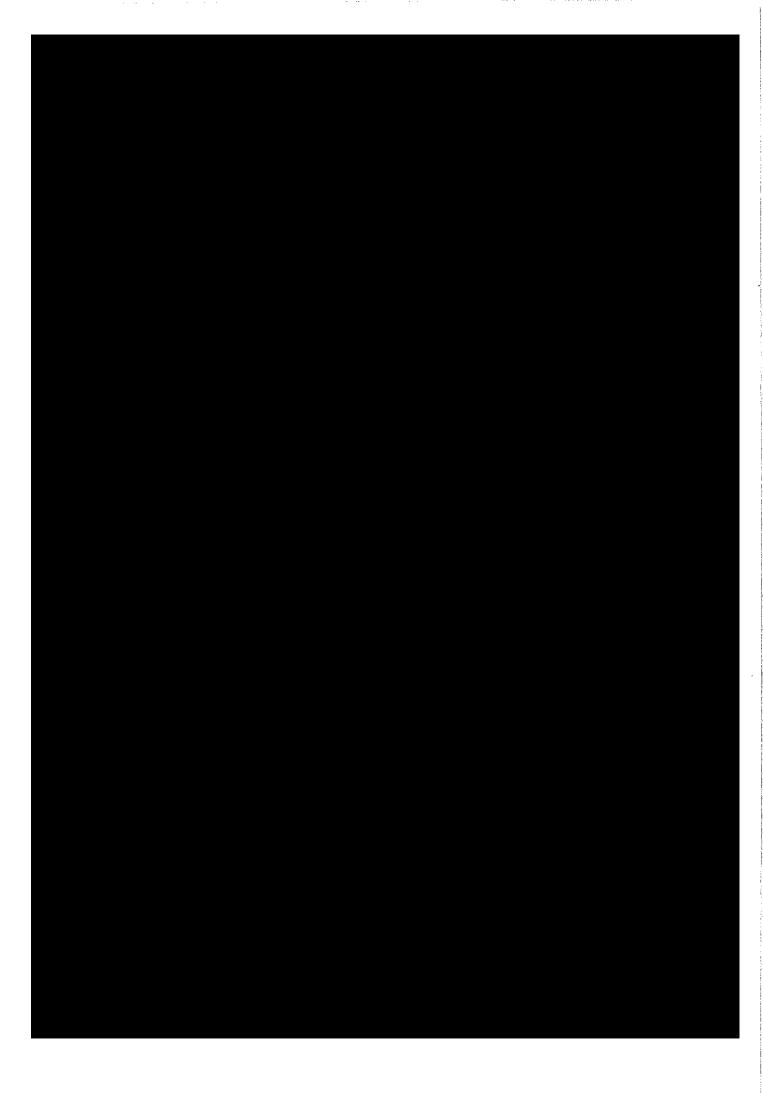








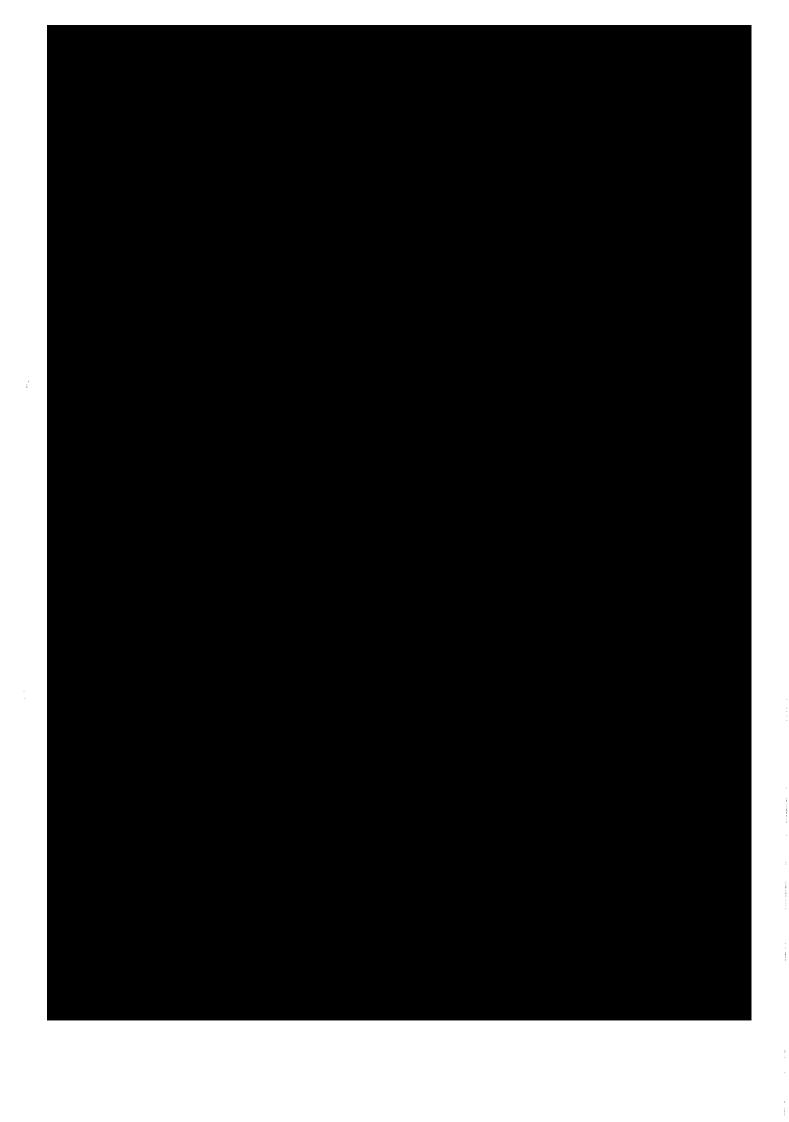
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Dow AgroSciences Australia Ltd.
ABN 24 003 771 659
Level 5, 20 Rodborough Road

Frenchs Forest NSW 2086

12/01/12

Telephone General Office (02) 9776 3400 Fax (02) 9776 3199 Toll Free 1 800 700 096 Postal Address Locked Bag 502

MDP54 GPO Box 9848 Canberra ACT 2601

Frenchs Forest NSW 2086 www.dowagrosciences.com.au

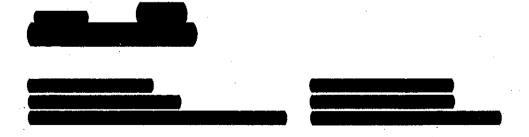
#### **DIR091 ANNUAL REPORT 2011**

Office of the Gene Technology Regulator

Since the Issuing of Licence No.: DIR 091 by the OGTR on the 25 November 2009, Dow AgroSciences Australia Ltd has had nil dealings with WideStrike™ Insect Protection Cotton in Australia.

As per licence condition 32, the following statements are made:

- (a) No adverse impacts, unintended effects or new information relating to risks to human health and safety or the environment have been caused by or found in relation to WideStrike™ Insect Protection Cotton
- (b) WideStrike™ Insect Protection Cotton has not been produced commercially in any state or territory in Australia since the issuing of Licence No.: DIR 091 by the OGTR on the 25th November 2009.
- (c) WideStrike™ Insect Protection Cotton has not been produced for experimental purposes in any state or territory in Australia since the Issuing of Licence No.: DIR 091 by the OGTR on the 25th November 2009.
- (d) Nil WideStrike™ Insect Protection Cotton has been fed to livestock north of latitude 22° South in Australia.
- (e) No research of the effects of WideStrike™ Insect Protection Cotton on non-target insect(s) has been conducted.
- (f) No research on volunteer incidence of WideStrike™ Insect Protection Cotton in areas north of latitude 22° South after livestock feeding has been conducted.



LICENCE No:

DIR 012/2002

LICENCE HOLDER:

Monsanto Australia Limited

**PROJECT SUPERVISOR:** 

**ACCREDITATION NO:** 

ACCR 034/2002

SUBMISSION:

2006 Annual Report for Bollgard II® (Commercial Release)

**REPORTING PERIOD:** 

2005/06 Cotton Growing Season

DATE:

22 December 2006

PREPARED BY:

Compliance & Stewardship Manager

Information and data submitted herein contains trade secrets, or privileged or confidential information the property of Monsanto Australia Limited and no government agency or representative thereof is authorised to disclose such data and information without written permission from Monsanto Australia Limited.

( (



#### LICENCE HOLDER DETAILS

Name:

Monsanto Australia Limited

Address:

600 St Kilda Road, Melbourne 3004

PO Box 6051

St Kilda Road Central, Melbourne Victoria 8008

Telephone:

03 9522 7102

Facsimile:

03 9522 6102

Contact email:

**Accreditation** 

Number:

ACCR 034/2002

#### **SCOPE OF THE REPORT**

This report addresses the annual reporting condition of the DIR 012 commercial release licence for Bollgard II® issued to Monsanto Australia Limited by the Office of the Gene Technology Regulator.

This report details compliance with general and specific conditions of Part 3 and 4 of the DIR 012 licence as issued to Monsanto Australia Limited on 23 September 2002, and varied in June, September and December 2003; March, May, October and December 2004; and February, June, July, August, October, November and December 2005.



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b Use of GM whole cotton seed within the Restricted  a Annual Survey  Reserach	Zone 12 12 14

**(** ) 



DIR012 ANNUAL REPORT 2006

## General Conditions

# Informing people of their obligations

Monsanto Australia Limited informed all cotton growers and cotton gins covered by the DIR 012 / 2002 licence of the obligations imposed on them as a result of the conditions of these licences. This was achieved primarily through Monsanto Accreditation programs and information courses and mail outs.

Bollgard II[®] cotton Accreditation programs require all persons having management responsibility for Bollgard II crops to undergo training and pass a test on the content of the training. Growers were only required to attend these courses and pass the accreditation test once.

Gins known to transport cotton seed into the restricted zone were notified by letter that they were permitted to transport seed north of 22° south provided they adhered to all conditions and obligations associated with the use of cotton seed within the restricted zone.

### Reporting

During the reporting period, the licence holder did not become aware of any 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 of any unintended effects of the dealings authorised by the licence.

## Material changes in circumstances

During the 2005/06 reporting period, Monsanto Australia Limited did not become aware of any relevant conviction of the licence holder occurring after the commencement of this licence; any revocation or suspension of a licence or permit held by Monsanto Australia Limited; or any event or circumstance that would affect the capacity of Monsanto Australia Limited to meet the conditions of

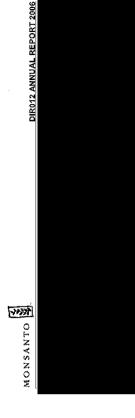
# Remaining an accredited organisation

At all times, Monsanto Australia Lirnited remained an accredited organisation and complied with conditions of accreditation as set out in the OGTR Guidelines for Accreditation of Organisations.

## Changes to details

During the 2005/06 reporting period, there were no changes to contact details of the Project Supervisor.

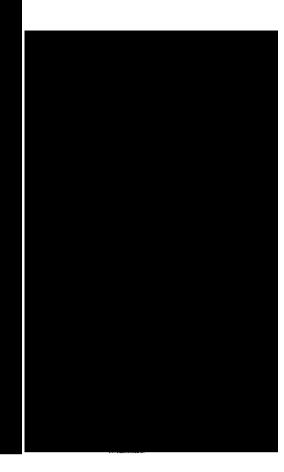
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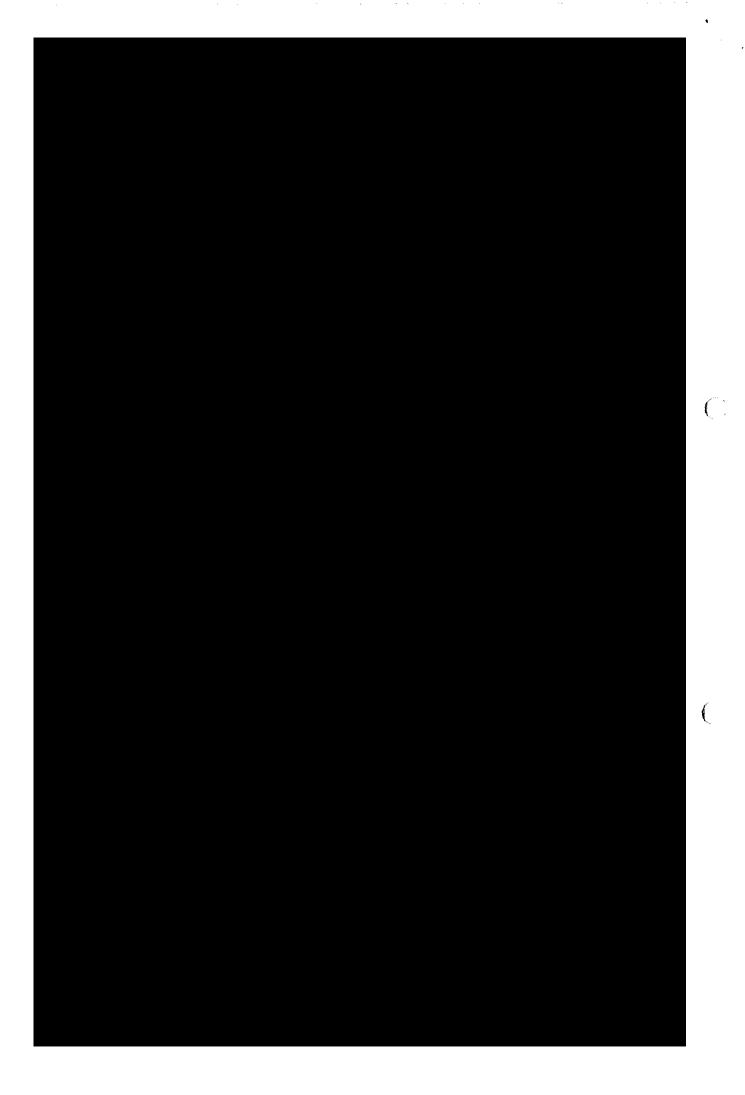


## Release of Bollgard II[®] south of latitude 22° south (outside the Restricted Zone)

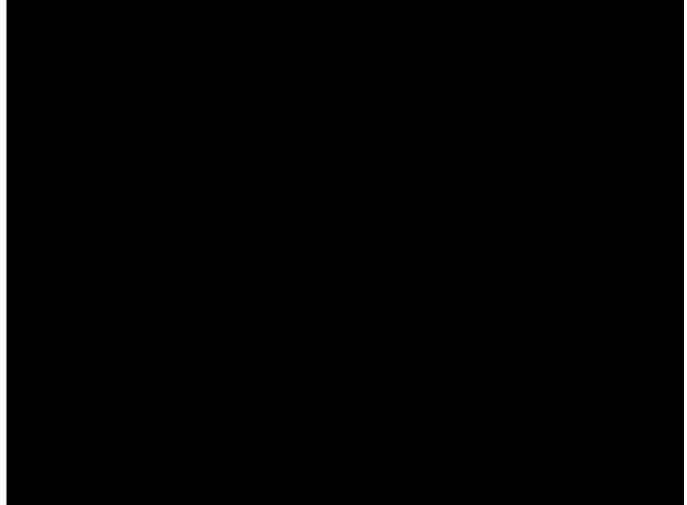
The licence holder may conduct dealings with the GMOs south of latitude 22 degrees south.

In the 2005/06 reporting period, Bollgard II cotton was grown in the traditional cotton-growing regions south of latitude 22° south in NSW and Queensland. More information on the locations where all Bollgard II cotton crops were grown during the 2005/06 cotton growing season are given in Part 2a.

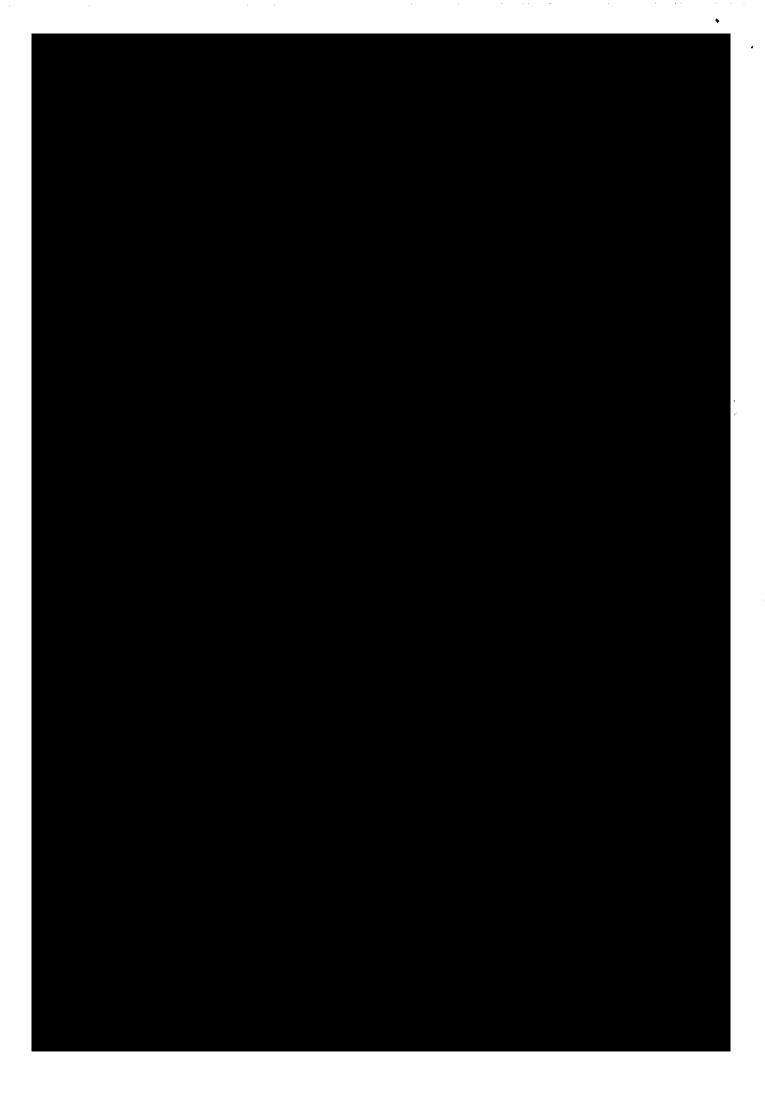


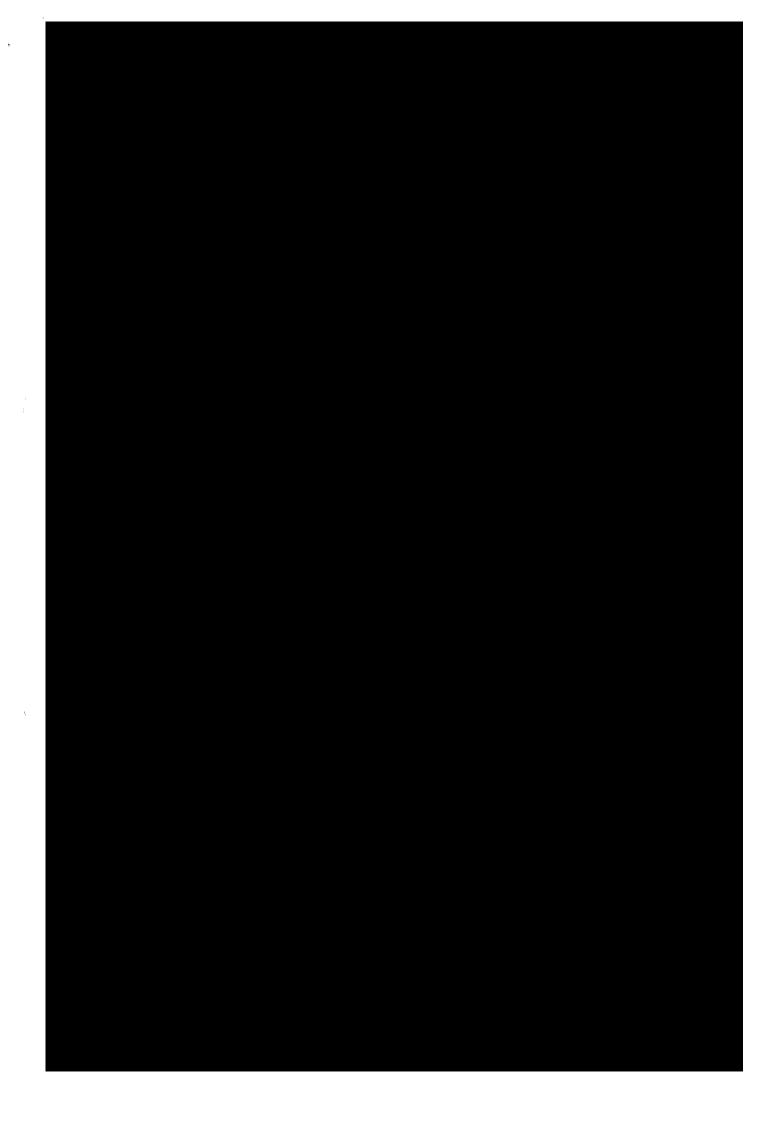


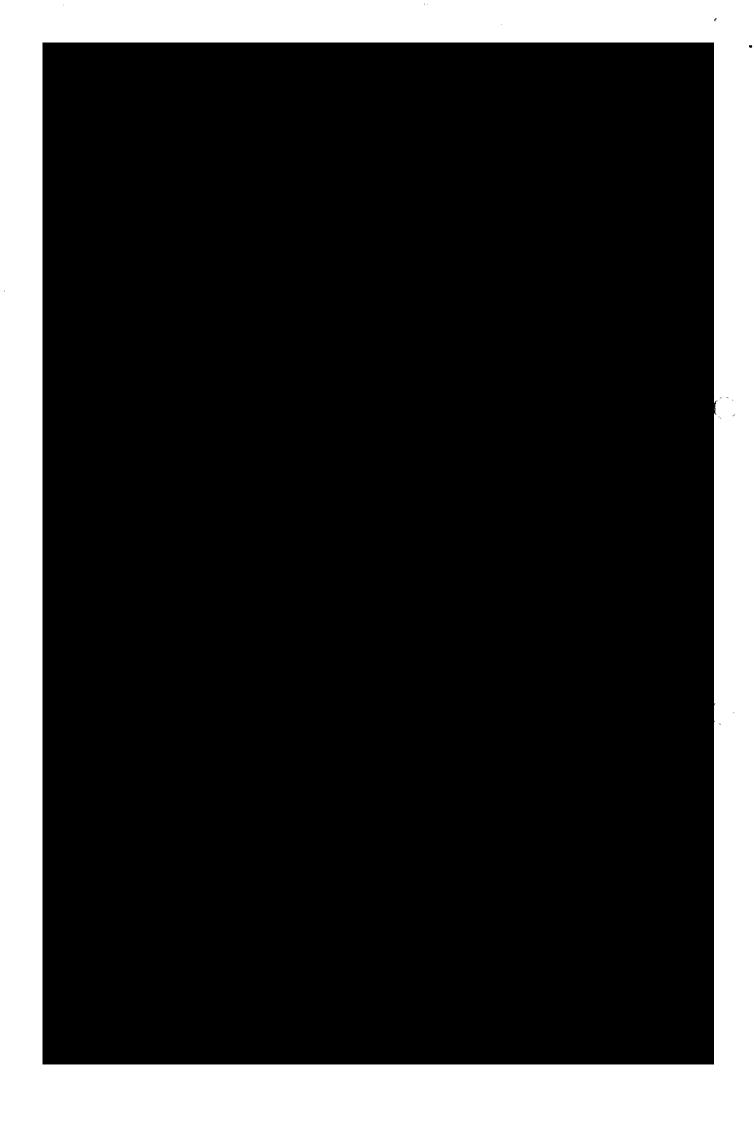


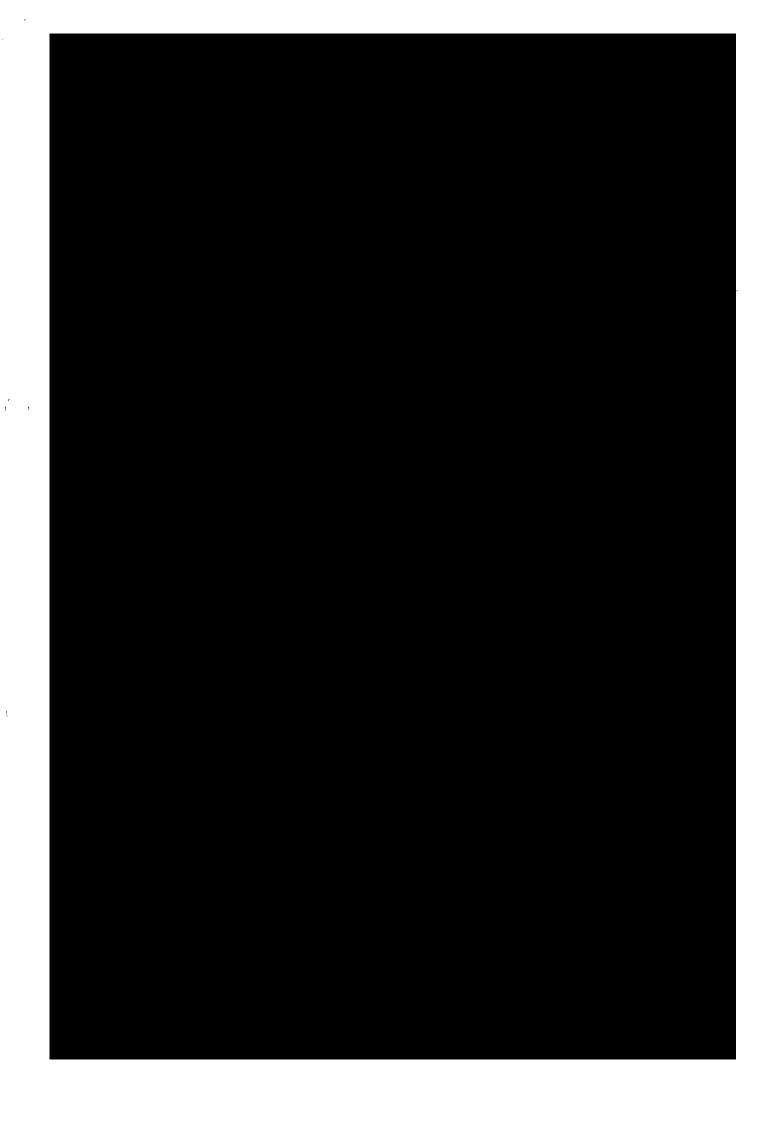


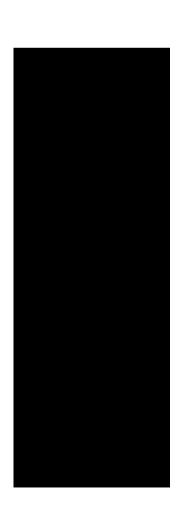
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### Bayer CropScience BioScience

06 Nóvember 2009

Office of the Gene Technology Regulator MDP 54 GPO Box 9848 CANBERRA ACT 2601 3 NOV 2609 200 THE CEIVED OF THE CONTRACT OF T



Attention:

**Applications Entry Point** 

The Regulator

Dear Dr Smith,

#### Annual Report for DIR 062/2005 for the year 8 August 2008 to 7 August 2009

Bayer CropScience Pty Ltd 391-393 Tooronga Road East Hawthorn Vic 3123 Australia Tel. +61 3 9248 6888 Fax +61 3 9248 6680 A.B.N. 87 000 226 022 www.bayercropscience.com.au

I refer to the requirements of the above licence (viz. condition No. 20), to provide the OGTR with an annual report within 90 days of the licence issue date anniversary.

During the period of 8 August 2008 to 7 August 2009, commercial quantities of less than 450 ha of Liberty Link cotton (also known as LLCotton25) were planted in Australia. Approximately 15.7 ha of Liberty Link cotton was planted in field trials by Cotton Seed Distributors (CSD).

There were no commercial plantings of LLCotton25/Bollgard II cotton in Australia during the reporting period. Small-scale field trials were conducted by the CSIRO (approximately 4.6 ha) and CSD (approximately 33 ha).

During the reporting period, no adverse effects were observed or reported to us as a result of dealings with Liberty Link or LLCotton25/Bollgard II cotton under licence DIR 062/2005.

Yours sincerely, Bayer CropScience



Regulatory Affairs Manager BioScience

### Bayer CropScience BioScience





5 November 2008

Office of the Gene Technology Regulator MDP 54 PO Box 100 WODEN ACT 2606

Attention:

Applications Entry Point

Dear Ms Flynn,

#### Amended Annual Report for DIR 062/2005, for the year 8 August 2007 to 7 August 2008

Bayer CropScience Pty Ltd 391-393 Tooronga Road East Hawthorn Vic 3123 Australia Tel. +61 3 9248 6888 Fax +61 3 9248 6680 A.B.N. 87 000 226 022 www.bayercropscience.com.au

I refer to the requirements of the above licence (viz. condition No. 20), to provide the OGTR with an annual report within 90 days of the licence issue date anniversary.

During the period 8 August 2007 to 7 August 2008, small commercial quantities of less than 500 ha of Liberty Link cotton (also known as LLCotton25) were planted in Australia. It is anticipated that this area will increase in the 2008-09 season.

On 20 September 2007, the OGTR approved a variation to DIR 062/2005 to include the commercial release of LLCotton/Bollgard II® (Mon 15985). This variation added the activities of licence DIR 056/2004, where Liberty Link and Bollgard II were combined, to DIR 062/2005. Licence DIR056/2004 was surrendered 7 December 2007.

During the current reporting period, there were no commercial plantings of LLCotton25/Bollgard II cotton in Australia. Small-scale plantings were conducted by the CSIRO for field trials, and Cotton Seed Distributors (CSD) for seed increase.

The CSIRO conducted three field trials of LLCotton25/Bollgard II on a total area of 5.94 hectares. Two of these were conducted at Narrabri in NSW (1.29 and 4.35 ha), and the third was conducted at Pampas, near Toowoomba in QLD (0.30 ha). For seed increase, CSD assessed ten nurseries of 0.144 ha each, from which five selections were made for planting in the 2008-09 season.

During the period from August 2007 through to August 2008, no adverse effects were observed or reported to us as a result of dealings with Liberty Link or LLCotton25/Bollgard II cotton under licence DIR 062/2005.

Yours sincerely,

Regulatory Affairs Manager BioScience



LICENCE NO: DIR066

LICENCE HOLDER: Monsanto Australia Limited

**ACCREDITATION NO:** ACCR 034/2002

**SUBMISSION:** 2015 Annual Report for Commercial release of GM

herbicide tolerant and/or insect resistant cotton lines

**REPORTING PERIOD:** 1 June 2014 – 1 June 2015

(covering 2014/15 cotton growing season)

**DATE:** 30 June 2015

**PREPARED BY:** 

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#### **SECTION 1. LICENCE HOLDER DETAILS**

Name: Monsanto Australia Limited

Address: 600 St Kilda rd, Melbourne 3004

PO Box 6051 St Kilda rd Central Victoria, 8008

**Telephone:** (03)9522 7122

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Contact email:

Accreditation

Number: ACCR 034/2002

#### **SCOPE OF THE REPORT**

This report addresses the annual reporting condition of the DIR066 commercial licence covering Roundup Ready® cotton, Roundup Ready Flex® cotton and the Bollgard II® trait issued to Monsanto Australia Limited by the Office of the Gene Technology Regulator.

This report details compliance with general and specific conditions of Sections 2 to 6 of the DIR066 licence as issued to Monsanto Australia Limited on 26 October 2006, and as varied 22 December 2006, 6 December 2007, 15 April 2009 and 20 June, 2013.

This report covers the period of time from 1 June 2014 to 1 June 2015, including the 2014/15 cotton planting season.



#### **SECTION 2. LICENCE CONDITIONS**

#### **Condition 1. Duration of Licence**

DIR066 has not been suspended, cancelled or surrendered.

#### **Condition 2. Holder of Licence**

Monsanto Australia Limited (Monsanto) remains the holder of the licence.

#### Conditions 3 and 4. Project Supervisor

The project supervisor is

#### Condition 5. No dealings with GMOs except as authorized by this Licence

Persons covered by the licence did not deal with GMOs except as expressly permitted by the licence.

#### Conditions 6 and 7. Location

The licence allows for dealings with GMOs to be conducted anywhere in Australia. This licence supersedes any previous licences regarding location.

#### Conditions 8 and 9. Persons covered by this GMO Licence

Monsanto acknowledges that the persons covered by the 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.

#### Conditions 10 and 11. Informing people of their obligations

DIR066 was issued in October 2006, permitting dealings with the GMOs to be undertaken during the cotton growing seasons.

Monsanto Australia Limited informed all persons covered by the DIR066 licence of the obligations imposed on them as a result of the conditions of the licence. This was primarily achieved through the Monsanto accreditation program, which includes information on regulatory obligations as well as management of the crop.

Accreditation programs require all persons having management responsibility for Roundup Ready (no longer sold commercially), Roundup Ready Flex and Bollgard II cotton crops to undergo training.



#### Condition 12. Applicant to notify of circumstances that might affect suitability

During the reporting period, Monsanto Australia Ltd did not receive a relevant conviction occurring after the commencement of this licence; nor was there any revocation or suspension of a licence or permit held by Monsanto Australia Ltd under a law of the Australian Government, a State or foreign country, being a law relating to the health and safety of people or the environment; or any event or circumstance occurring after the commencement of this licence that would affect the capacity of Monsanto to meet the conditions of the DIR066 licence.

#### Condition 13. Licence holder must provide information on matters related to suitability

Monsanto acknowledges that it must provide information related to its ongoing suitability to hold a licence when requested to do so in writing by the Regulator and must provide information within a time period stipulated by the Regulator.

#### Condition 14. People dealing with the GMOs must allow auditing and monitoring if the dealing

Monsanto acknowledges that if a person authorized 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 authorized by the Regulator, to enter the premises where the dealing is being undertaken, for the purposes of auditing or monitoring the dealing.

#### **Condition 15. Remaining an Accredited organization**

At all times, Monsanto remained an accredited organization and complied with conditions of accreditation as set out in the OGTR Guidelines for Accreditation of Organisations.

#### Conditions 16 - 19 Additional information must be given to the Regulator

During the reporting period, Monsanto did not become aware of any additional information as to any risks to the health and safety of people, or to the environment, associated with the dealings authorized by this licence; or of any unintended effects of the dealings authorized by this licence.

#### **Condition 20. Compliance Management Plan**

A Compliance Management Plan was provided to the Regulator on issuance of the DIR066 licence. A copy of the current Resistance Management Plans showing compliance metrics is in Appendix A and B.



#### **SECTION 3. GROWING THE GMOS**

#### 3.1 GMOs covered by this licence

The only dealings with GMOs under this licence were those with the GMOs described in DIR066 Licence.

#### 3.2 Permitted dealings

Sales and planting of the Roundup Ready Flex (RRF), Bollgard II (BGII) and Bollgard II were undertaken under a Technology User Agreement, which sets out the conditions for planting and growing a cotton crop containing RRF and BGII technology. Roundup Ready cotton has been removed from the market in Australia. In order to be eligible to sign such an agreement, a grower is required to attend an accreditation program and pass a test based on the material covered in the accreditation program.

#### 3.3 Commercial Crop Locations and Volumes

Valley	BGII ha	RR ha	RRF ha	BGII w RR ha	BGII w RRF ha	BGII w ha	Total ha
Belyando	0.00	0.00	126.84	0.00	1171.70	0.00	1298.54
Bourke	0.00	0.00	61.00	0.00	1566.15	0.00	1627.15
Darling Downs	11.10	0.00	2249.63	0.00	19926.51	0.00	22187.24
Dawson/Callide	0.00	0.00	56.03	0.00	3037.04	0.00	3093.07
Dirranbandi	0.00	0.00	11.45	0.00	11214.67	0.00	11226.12
Emerald	0.00	0.00	0.00	0.00	10585.18	0.00	10585.18
Gwydir	0.00	0.00	5200.57	0.00	21594.50	0.00	26795.07
Lachlan	0.00	0.00	67.22	0.00	11252.30	0.00	11319.52
Lower Namoi	0.00	0.00	3782.29	0.00	20884.49	0.00	24666.78
MacIntyre	0.00	0.00	98.76	0.00	11069.82	0.00	11168.58
Macquarie	0.00	0.00	202.35	0.00	10061.97	0.00	10264.32
McKenzie River	0.00	0.00	9.13	0.00	429.83	0.00	438.96
Mungindi	0.00	0.00	145.80	0.00	2211.14	0.00	2356.94
Murrumbidgee	0.00	0.00	769.44	0.00	33245.97	0.00	34015.41
St George	0.00	0.00	340.44	0.00	10011.80	0.00	10352.24
Tandou	0.00	0.00	345.23	0.00	3366.29	0.00	3711.52
Upper Namoi	0.00	0.00	1340.80	0.00	19420.17	0.00	20760.97
Walgett	0.00	0.00	0.00	0.00	894.97	0.00	894.97
Total ha	11.10	0.00	14,806.98	0.00	191,944.50	0.00	206,762.60

Total Bollgard II ha planted	191,955.60
Total Roundup Ready Flex ha planted	206,751.50

Note – Total Bollgard II figure includes Bollgard II, Bollgard II/Roundup Ready Flex and Bollgard II/Roundup Ready Flex figure includes Roundup Ready Flex and Bollgard II/Roundup Ready Flex.



Valley: Belyando

**Boundaries:** Includes the shires of Moranbah, Clermont, Kilcummin, Mistake Creek, Belyando, Elgin, Wolfgagn, Winchester, Old Labona, Gemini Mountains, Amaroo, South Copperfield, Laglan, Birimgan, Blair Athol and Pasha.

Valley: Bourke

Boundaries: West of Walgett Shire, north of Coolahbah. Includes Cunnamulla in Queensland.

**Valley: Darling Downs** 

**Boundaries:** Follows the Condamine River. Includes Toowoomba, Murgon, Dalby, Chinchilla, Condamine, and Roma. South-west boundary is Surat.

Valley: Dawson/Callide

**Boundaries:** Includes Taroom, Biloela, Moura and Theodore regions.

Valley: Dirranbandi

**Boundaries:** Runs north toward St George and includes Lower Plains, follows south along the Balonne River right down to the NSW border.

Valley: Emerald

**Boundaries:** South-eastern boundary formed by the Expedition Ranges between Rolleston and Bauhinia. Region runs north-west from there to include Emerald and Dysart.

Valley: Gwydir

**Boundaries:** South of Fox Lane, north-west to Garah, west to Collarenebri, south to Bellata. The road that runs east-west through Bellata and to Rowena is southern boundary.

Valley: Lachlan

**Boundaries:** Northern boundary is Peak Hill and Tullamore and the cotton follows the Lachlan River through to Booligal. The southern boundary is the road through to Gunbar and then follows the Great Western Highway through to West Wyalong.

**Valley: Lower Namoi** 

**Boundaries:** North-west of Baan Baa-Manilla Road and south of Bellata-Rowena Road. Western boundary is formed by the road that runs from Pilliga via Burren Junction to Collarenebri.

Valley: MacIntyre

**Boundaries:** North of Gwydir, western boundary is Garah to Talwood Road north include Moonie and east to include Texas. Southern boundary is Foxes Lane which runs Garah back to the Newell Highway and then along to Croppa Creek, Yallaroi and Coolatai.

Valley: Macquarie



**Boundaries:** Dubbo and south to Peak Hill. West to Tullamore. North through Tottenham. Nyngan and Coolabah, then east via southern boundary of Walgett shire and then south back to Dubbo via Coonabarabran.

Valley: McKenzie River

Boundaries: North West of Comet, to include McKenzie River and Alton Downs

Valley: Mungindi

**Boundaries:** West of Garah and Boomi Road to Talwood and follows Barwon River south-west of Mungindi towards Collarenebri. Southern boundary is the Watercourse Road from Colly through to Gingham and then to Garah.

Valley: Murrumbidgee

**Boundaries:** Northern boundary is the Great Western Highwayfrom West Wyalong through Goolgowi to Gunbar, from Gunbar west to Booligal on the Lachlan River. Downstream of Booligal on the Lachlan and south-west is the Murrumbidgee River.

Valley: St George

**Boundaries:** Above Lower Plains on the southern side and north-east to include majority of Waroo Shire with the north-east boundary being Surat.

Valley: Tandou

Boundaries: surrounds Menindee shire. North of Mildura and west of the SA border

Valley: Upper Namoi

**Boundaries:** South-east of Baan Baa-Manilla Road. Includes Coolah, Merriwa, Mullaley, Gunnedah and

Quirindi.

Valley: Walgett

**Boundaries:** Includes almost entirety of Walgett Shire, with eastern boundary being the road that runs south from Collarenebri to Burren Junction.

#### 3.4 Trial/Research Crop Locations and Volumes

Valley	BGII ha	RR ha	RRF ha	BGII w RR ha	BGII w RRF ha	BGII w ha	Total ha
Total ha	0.00	0.00	55.23	0.00	192.16	11.50	258.89





#### **APPENDIX A -**

#### Resistance Management Plan for Bollgard II® Cotton 2014/2015

Developed by Monsanto Australia Limited and the Transgenic and Insect Management Strategy (TIMS) Committee of Cotton Australia Ltd.

The resistance management plan is based on three basic principles: (1) minimising the exposure of *Helicoverpa* spp. to the *Bacillus thuringiensis* (Bt) proteins Cry 1Ac and Cry 2Ab; (2) providing a population of susceptible individuals that can mate with any resistant individuals, hence diluting any potential resistance; and (3) removing resistant individuals at the end of the cotton season. The three principles are supported through the implementation of 5 elements that are the key components of the Resistance Management Plan. These elements are:

- 1. Refuge crops
- 2. Planting window
- 3. Pupae busting/Trap crops
- 4. Control of volunteers and ratoon cotton and
- 5. Spray limitations.

Growers of Bollgard II cotton are required to practice preventative resistance management as set out below. Compliance with the Resistance Management Plan is required under the terms of the Bollgard II Technology User Agreement and under the conditions of registration (*Agricultural and Veterinary Chemicals Act 1994*).

Section 1 is applicable to all regions in New South Wales and Queensland that grow cotton while sections 2 and 3 detail specific requirements for New South Wales and Southern Queensland, and Central Queensland respectively.

#### SECTION 1: NEW SOUTH WALES, SOUTHERN QUEENSLAND & CENTRAL QUEENSLAND

#### 1. Refuges

Growers planting Bollgard II cotton will also be required to grow a refuge crop that is capable of producing large numbers of *Helicoverpa* spp. moths which have not been exposed to selection with Bt proteins Cry 1Ac and Cry 2Ab. These unselected moths are expected to dominate matings with any survivors from Bollgard II crops and thus help to maintain resistance to Bt proteins Cry 1Ac and Cry 2Ab at low levels.



All refuge options are based on the requirement of a 10% unsprayed cotton refuge or its equivalent, as determined by the relative production of *Helicoverpa* spp. from each of the refuge types as described in Tables 1 and 2, for irrigated and dryland production scenarios respectively. Irrespective of the irrigation regime for the Bollgard II cotton, all pigeon pea refuges must be fully irrigated so that they are attractive to *Helicoverpa* spp. during the growing period of the Bollgard II cotton.

For each area of irrigated Bollgard II cotton planted, a grower is required to plant a minimum of one or a combination of the following:

Table 1. Irrigated Bollgard II cotton refuge options

Crop	Conditions	% of Bollgard II
Cotton	Irrigated, sprayed conventional cotton	100
	Irrigated, unsprayed conventional cotton	10
Pigeon pea	Fully irrigated, unsprayed	5

Table 2. Dryland Bollgard II cotton refuge options

Crop	Conditions	% of Bollgard II
Cotton	Dryland or irrigated, sprayed conventional cotton	100
	Dryland or irrigated, unsprayed conventional cotton	10
Pigeon pea	Fully irrigated, unsprayed	5

No other refuge options are approved for dryland Bollgard II.

**Note:** Unsprayed means not sprayed with any insecticide that targets any life stage of *Helicoverpa* spp.

Bt products must not be applied to any refuge (including sprayed cotton).

If the viability of an unsprayed conventional cotton refuge is at risk due to early season pressure by *Helicoverpa* spp., and with prior approval from the Monsanto Compliance and Stewardship Manager, a non-Bt heliocide can be applied. An unsprayed refuge should not be planted in the same field as any crop sprayed with a rate of insecticide that is registered for *Helicoverpa* spp, with the exception of Bollgard II. Sprayed crops and unsprayed refuges that are planted in



adjacent fields must be separated by sufficient distance to *minimise the likelihood of insecticide* drift onto the unsprayed refuge.

For the purposes of this Resistance Management Plan, conventional cotton includes any cotton varieties that do not have Bt proteins in the plant that control *Helicoverpa* spp. larvae.

#### **General conditions for all refuges:**

(a) Refuge crops are to be planted and managed so that they are attractive to *Helicoverpa* spp. during the growing period of the Bollgard II cotton varieties.

Irrigated: It is preferable that all refuge is planted within the 2 week period prior to planting Bollgard II. If this is not possible, refuge planting must be completed within 3 weeks of the first day of sowing of Bollgard II. At this time, sufficient refuge must have been planted to cover all of the Bollgard II cotton proposed to be planted for the season (including Bollgard II already planted and any that remains unplanted). Should additional Bollgard II planting be made after this date, which is not already covered by refuge, additional refuge must be planted as soon as possible and no more than 2 weeks after sowing of the additional Bollgard II.

Dryland: A dryland refuge must be planted within the 2 week period prior to the first day of planting Bollgard II cotton.

- (b) Pigeon pea refuges should not be planted until the soil temperature reaches 17°C, which is a requirement for germination, and should also be planted into moisture to ensure successful germination. If soil temperatures are not suitable to allow germination of pigeon peas in line with condition (a), an alternative refuge must be planted in its place within the prescribed period (under (a) above).
- (c) Once Bollgard II cotton begins to flower the corresponding refuge should not be cultivated.
- (d) Insecticide preparations containing Bt may be used on Bollgard II cotton throughout the season BUT NOT on any refuge crops.
- (e) All refuges are to be planted within the farm unit growing Bollgard II cotton. Subject to clause (f) below, all reasonable effort should be taken to plant the refuge either on one side of, or next to a Bollgard II cotton field and all Bollgard II fields must be no more than 2 km from the nearest associated Bollgard II refuge.
- (f) To minimise the possibility of refuge attractiveness being affected by herbicide drift, non-herbicide tolerant refuges should be separated from herbicide tolerant Bollgard II cotton crops by a sufficient distance to minimise such drift, but no more than 2km from the Bollgard II cotton.



- (g) To account for possible insecticide drift, the options for the width of refuge crops vary according to spray regime. If any sprayed conventional cotton is grown on the same farm unit, Bollgard II refuge crops must be at least 48 metres wide and each refuge area must be a minimum of 2 hectares. If no sprayed conventional cotton is grown on the same farm unit, Bollgard II refuge crops must be at least 24 metres wide and 24 metres long. Different unsprayed refuge options may be planted in the same field as a single unit; however a sprayed conventional cotton refuge must not be planted in a field that is also planted to an unsprayed refuge type.
- (h) In all regions, destruction of refuges should only be carried out after Bollgard II cotton lint removal has been completed.
- (i) Refuges for dryland Bollgard II cotton crops must be planted in the same row configuration as the Bollgard II crop unless the refuge is irrigated. If an irrigated option is utilised for a dryland Bollgard II crop, then that refuge may be planted in a solid configuration. Dryland cotton is measured as green hectares (calculated as defined in the Technology User Agreement).

#### 2. Control of volunteer and ratoon cotton

Volunteer and ratoon cotton may impose additional selection pressure on *Helicoverpa* spp. to develop resistance to the Bt Cry 1Ac and Cry 2Ab proteins produced by Bollgard II cotton.

Growers must make all reasonable efforts to remove volunteer and ration plants, as soon as possible from all fields, including fallow areas, Bollgard II crops, conventional cotton crops and all refuges. The presence of Bollgard II volunteers/ration cotton in any refuge will diminish the value of the refuge and must be removed as soon as possible.

Note: The refuge should preferably be planted into fallow or rotation fields that have not been planted to cotton in the previous season.

#### 3. Post-harvest crop destruction

As soon as practical after harvest, Bollgard II cotton crops must be destroyed by cultivation or herbicide so that they do not continue to act as hosts for *Helicoverpa* spp.

#### **SECTION 2: NEW SOUTH WALES AND SOUTHERN QUEENSLAND ONLY**

#### 1. Planting windows



All Bollgard II crops are to be planted into moisture or watered-up by 15 November, unless otherwise advised by a Bollgard II Planting Window Variation Notice.

#### 2. <u>Pupae destruction</u>

In Bollgard II cotton fields, each grower will be required to undertake *Helicoverpa* spp. pupae destruction after harvest according to the following key guidelines:

- Bollgard II crops should be slashed or mulched and fields cultivated for pupae control within 4 weeks
  of harvesting. All pupae busting must be completed by July 31.
- Ensure disturbance of the whole soil surface to a depth of 10 cm.
- All fields that are sown to any winter crop following a Bollgard II crop must be inspected by the Technology Service Provider before sowing commences in order to ensure that pupae busting has occurred.

In Refuge crops:

In New South Wales and Southern Queensland, to ensure maximum emergence of late pupae from associated refuges, soil disturbance of refuge crops should not be undertaken until after the pupae busting in Bollgard II cotton crops on the farm unit is complete. All unsprayed refuges, should preferably be left uncultivated until the following October.

#### 3. Failed crops

Bollgard II crops that will not be grown through to harvest for various reasons and are declared to, and verified by, Monsanto as failed must be destroyed within two weeks after verification, in such a way that prevents regrowth. Crops abandoned before February 28 do not require pupae busting. Crops abandoned on February 28 or later must be pupae busted.

**NB:** If any grower encounters problems in complying with the Resistance Management Plan please contact your local Monsanto Regional Business Manager.



#### **SECTION 3: CENTRAL QUEENSLAND ONLY**

#### 1. Planting Windows

**Emerald:** All Bollgard II crops are to be planted into moisture or watered-up in the period between September 15 and October 26, unless advised otherwise by a Bollgard II Planting Window Variation Notice.

**Dawson Callide Valleys:** All Bollgard II crops are to be planted into moisture or watered-up in the period between September 15 and October 26, unless advised otherwise by a Bollgard II Planting Window Variation Notice.

**Belyando - Clermont:** All Bollgard II crops are to be planted into moisture or watered-up in the period between November 4 and Decmber 15, unless advised otherwise by a Bollgard II Planting Window Variation Notice.

**Mackenzie:** All Bollgard II crops are to be planted into moisture or watered-up in the period between November 4 and Decmber 15, unless advised otherwise by a Bollgard II Planting Window Variation Notice.

#### 2. Refuges

Pigeon Pea refuge should preferably be planted into a fallow or rotation field that has not been planted to cotton in the previous season to avoid volunteer and ratoon cotton.

In Central Queensland soil disturbance of refuge crops can only occur 2 weeks after final defoliation of the Bollgard II cotton.

#### 3. <u>Late summer pigeon pea trap crop</u>

A late summer trap crop (pigeon pea) must be planted for all Bollgard II cotton grown in Central Queensland. The planting configuration of the trap crop should be the same as that of the Bollgard II crop. Irrigated Bollgard II must have an irrigated trap crop. Table 3 shows the requirements for the late summer pigeon pea trap crop. Dryland Bollgard II growers who do not have any irrigated cotton on their farm should contact their Monsanto Regional Business Manager for alternative options.

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Refuge and late summer trap crops have different purposes and, if pigeon pea is selected for both, two separate plantings may be required. However, where a pigeon pea refuge is utilised as a trap crop the full 5% pigeon pea refuge area must be managed to become the late summer trap crop and must adhere to the requirements in Table 3 below.

Table 3. Late summer pigeon pea trap crop requirements in Central Queensland

Criterion	Trap crop*
Minimum area & dimension	A minimum trap crop of 1% of planted Bollgard II cotton crop is required.
(Requirement)	If sprayed conventional cotton is grown on that farm unit: the trap crop must be at least 48m x 48m.
	If no sprayed conventional cotton is grown on that farm unit: the trap crop must be at least 24m x 24m.
Planting time	The trap crop should preferably be planted between November 1 and November 30 Note: if growers choose to plant their trap crop to coincide with the planting of pigeon pea refuges they must manage the trap crop in such a way that it remains attractive to <i>Helicoverpa</i> spp. 2-4 weeks after final defoliation.
Planting rate **	35kg/ha (recommended establishment greater than 4 plants per metre)
Insect control	The trap crop can be sprayed with virus after flowering; while avoiding insecticide spray drift, except where a pigeon pea refuge is converted to a trap crop. In this case the full 5% pigeon pea refuge area managed to become the late summer trap crop can only be sprayed with virus after the first defoliation of Bollgard II cotton.
Irrigation	The trap crop must be planted into an area where it can receive the additional irrigation required to keep the trap crop attractive to <i>Helicoverpa</i> spp. until after the cotton is defoliated.
Weed control	The trap crop should be kept free of weeds and particularly volunteer Bollgard II cotton. When using the full 5% pigeon pea trap crop option, weed control must not be carried out by cultivation once flowering of the associated Bollgard II cotton crop has commenced



Crop destruction	The trap crop must be destroyed 2-4 weeks (but not before 2 weeks)
	after final defoliation of the Bollgard II cotton crop, (slash and pupae
	bust – full soil disturbance to a depth of 10cm across the entire trap
	crop area). All Bollgard II and associated trap crops must be destroyed
	by July 31.

- * A pigeon pea trap crop is to be planted so that it is attractive (flowering) to *Helicoverpa* spp. after the cotton crop has cut out, and as any survivors from the Bollgard II crop emerge. Planting pigeon pea too early (e.g. before November) or too late (e.g. mid December) is not adequate for cotton crops planted during September through to October.
- ** The planting rate is a recommendation based on a minimum of 85% seed germination.

NB: <u>If any grower encounters problems in complying with the resistance management plan, please contact your Monsanto Regional Business Manager.</u>

For further background information on the various components of this plan see the "Preamble to the Resistance Management Plan for Bollgard II" in the current Cotton Pest Management Guide.



#### **APPENDIX B**

### Resistance Management Plan for Bollgard II® cotton 2014/2015 - Ord River Irrigation and Burdekin Bowen Basin Areas

Ord River Irrigation, Burdekin Bowen Basin and Richmond Areas

Developed by Monsanto Australia Limited and the Transgenic and Insect Management Strategy (TIMS) Committee of Cotton Australia Limited.

The resistance management plan is based on three basic principles: (1) minimising the exposure of *Helicoverpa* spp. to the *Bacillus thuringiensis* (Bt) proteins Cry 1Ac and Cry 2Ab; (2) providing a population of susceptible individuals that can mate with any resistant individuals, hence diluting any potential resistance; and (3) removing resistant individuals at the end of the cotton season. The three principles are supported through the implementation of 5 elements that are the key components of the Resistance Management Plan. These elements are:

- 1. Refuge crops
- 2. Planting window
- 3. Pupae busting/Trap crops
- 4. Control of volunteers and ratoon cotton and
- 5. Spray limitations.

Growers of Bollgard II cotton are required to practice preventative resistance management as set out below. Compliance with the Resistance Management Plan is required under the terms of the Bollgard II Technology User Agreement and under the conditions of registration (*Agricultural and Veterinary Chemicals Act, 1994*).

#### This RMP is for the following areas:

- Ord River Irrigation Area, Western Australia
- Burdekin Bowen Basin Area, Queensland
- Richmond Area, Queensland

#### 1. Refuges

Growers planting Bollgard II cotton will also be required to grow a refuge crop that is capable of producing large numbers of *Helicoverpa* spp. moths which have not been exposed to selection with Bt proteins Cry 1Ac and Cry 2Ab. These unselected moths are expected to dominate matings with any survivors from Bollgard II crops and thus help to maintain resistance to Bt proteins Cry 1Ac and Cry 2Ab at low levels.

All refuge options are based on the requirement of a 10% unsprayed cotton refuge or its equivalent as determined by the relative production of *Helicoverpa* spp. from each of the refuge types as described in the tables below.

For each area of irrigated Bollgard II cotton planted, a grower is required to plant a minimum of one, or a combination of, the following:



Table 1. Irrigated Bollgard II cotton refuge options

Crop	Conditions	% of Bollgard II	Regions permitted
Conventional Cotton	Irrigated, unsprayed conventional cotton	10	All Regions
Pigeon pea	Fully irrigated, unsprayed	5	All Regions

**Note:** Unsprayed means not sprayed with insecticides that target any life stage of *Helicoverpa* spp. Bt products must not be applied to any refuge.

If the viability of an unsprayed refuge is at risk due to early or late season pressure by *Helicoverpa* spp., or any other caterpillar species, contact Monsanto immediately. With prior approval from the Monsanto Compliance and Stewardship Manager, a non-Bt heliocide can be applied.

An unsprayed refuge should not be planted in the same field as any crop sprayed with a rate of insecticide that is registered for Helicoverpa spp, with the exception of Bollgard II unless a sufficient buffer is in place to prevent insecticide drift.

Sprayed crops and unsprayed refuges that are planted in adjacent fields must also be separated by sufficient distance to *minimise the likelihood of insecticide drift onto the unsprayed refuge*. For the purposes of this Resistance Management Plan, conventional cotton includes any cotton varieties that do not have Bt proteins in the plant that control *Helicoverpa* spp. larvae.

#### **General conditions for all refuges:**

(a) Refuge crops are to be planted and managed so that they are attractive to *Helicoverpa* spp. during the growing period of the Bollgard II cotton varieties.

#### Ord River Irrigation Area

It is preferable that all refuge is planted within the 2 week period prior to planting Bollgard II. If this is not possible, refuge planting must be completed within 3 weeks of the first day of sowing of Bollgard II. At this time, sufficient refuge must have been planted to cover all of the Bollgard II cotton proposed to be planted for the season (including Bollgard II already planted and any that remains unplanted). Should additional Bollgard II planting be made after this date, which is not already covered by refuge, additional refuge must be planted as soon as possible and no more than 2 weeks after sowing of the additional Bollgard II.

Burdekin Bowen and Richmond Areas

Refuges must be sown within the 2 weeks prior to planting any Bollgard II. This timing attempts to mitigate wet season planting risks.

- (b) Group J legume innoculant should be used to treat pigeon pea planting seed just prior to sowing to ensure effective root zone colonisation by nitrogen fixing rhizobium bacteria
- (c) Once the Bollgard II cotton begins to flower the corresponding refuge must not be cultivated.
- (d) Insecticide preparations containing Bt may be used on Bollgard II cotton throughout the season BUT NOT on any refuge crops.
- (e) All refuges are to be planted within the farm unit growing Bollgard II cotton. Subject to clause (f) below, all reasonable effort should be taken to plant the refuge either on one side of, or next to, a Bollgard II cotton field, and all Bollgard II fields must be no more than 2 km from the nearest Bollgard II refuge.



#### **DIR066 OGTR ANNUAL REPORT 2014/15 SEASON**

- (f) To minimise the possibility of refuge attractiveness being affected by herbicide drift, non-herbicide tolerant refuges should be separated from herbicide tolerant Bollgard II cotton crops by a sufficient distance to minimise such drift, but no more than 2km from the Bollgard II cotton.
- (g) To account for possible insecticide drift, Bollgard II refuge crops must be at least 24 metres wide and 24 metres long. Different unsprayed refuge options may be planted in the same field as a single unit.
- (h) Slashing of plants within the refuge should only be carried out after Bollgard II cotton lint removal has been completed. Soil disturbance of refuge crops can only occur 2 weeks after Bollgard II cotton plants have been harvested.
- (i) Refuges for Bollgard II crops must be planted in the same row configuration as the Bollgard II crop.

#### 2. Control of volunteer and ratoon cotton

Volunteer and ratoon cotton may impose additional selection pressure on *Helicoverpa* spp. to develop resistance to the Bt proteins Cry 1Ac and Cry 2Ab produced by Bollgard II cotton.

Growers must make all reasonable efforts to remove volunteer and ration plants as soon as possible from all fields - including fallow areas, Bollgard II crops, conventional cotton crops and all refuges. The presence of Bollgard II volunteers/ration cotton in any refuge will diminish the value of the refuge and must be removed as soon as possible.

Note: The refuge should preferably be planted into fallow or rotation fields that have not been planted to cotton in the previous season.

#### 3. Post-harvest crop destruction

As soon as practical after harvest, Bollgard II cotton crops must be destroyed by cultivation or herbicide so that they do not continue to act as hosts for *Helicoverpa* spp. Unsprayed refuges must be left uncultivated for two weeks after harvest to allow emergence of any pupating *Helicoverpa* spp.

#### 4. Planting windows

All Bollgard II crops and cotton refuges are to be planted into moisture or watered-up in a five week window. In each region, the start date of the planting window will be determined by TIMS in consultation with local growers and reflected in a regionally amended "Bollgard II Planting Window Variation Notice".

The planting window will occur within the following periods:

Ord River Irrigation Area: March 1 and May 1.

**Burdekin Bowen Basin Area:** December 1 and April 1.

Richmond Area: December 1 and April 1.

#### 5. Refuge

Unsprayed Pigeon Pea refuge should preferably be planted into a fallow or rotation field that has not been planted to cotton in the previous season.

#### 6. End of season chick pea trap crop

An end of season chick pea trap crop must be planted. The planting configuration of the trap crop should be the same as that of the Bollgard II crop. Table 2 shows the requirements for the chick pea trap crop.

Table 2. End of season chick pea trap crop requirements Criterion	End of season chick pea trap crop	
Minimum area & dimensions	A trap crop of 1% of planted Bollgard II crop area is required. This planting must be at least 24 m x 24m wide.	



## **DIR066 OGTR ANNUAL REPORT 2014/15 SEASON**

Planting time	In April for Burdekin Bowen Area. In July/August for
	Ord area. The trap crop is to be planted such that it
	is attractive to Helicoverpa spp. from 2 weeks
	before defoliation of the Bollgard II cotton. It must
	remain attractive to Helicoverpa spp. until at least 2
	weeks after defoliation of the Bollgard II cotton.
Insect control	The trap crop should be monitored and sprayed
	with insecticide if the larval pressure threatens the
	viability of the crop.
Irrigation	The trap crop is to remain attractive to Helicoverpa
	spp. until after defoliation of cotton. In some cases
	this may require one additional irrigation after the
	cotton is defoliated. The trap crop must be planted
	into an area where it can receive the additional
	irrigation required to ensure the trap crop remains
	attractive to Helicoverpa spp.
Weed control	The trap crop should be kept free of weeds and
	particularly volunteer Bollgard II cotton.
Crop destruction	The trap crop must be destroyed 2-4 weeks after
	defoliation of the Bollgard II cotton crop, but not
	before 3 weeks (slash and pupae bust – full soil
	disturbance to a depth of 10 cm across the entire
	trap crop area). All Bollgard II cotton and associated
	trap crops must be destroyed by:
	Burdekin Bowen Basin/Richmond Area – August 31
	Ord River Irrigation Area – December 10

# NB: If any grower encounters problems in complying with the resistance management plan, please contact your Monsanto Regional Business Manager.

For further background information on the various components of this plan see the "Preamble to the Resistance Management Plan for Bollgard II" in the current Cotton Pest Management Guide.



Limited.

#### DIR 066/2006 OGTR ANNUAL REPORT 2008/09 SEASON

**LICENCE No:** DIR 066/2006 **LICENCE HOLDER:** Monsanto Australia Limited **PROJECT SUPERVISOR: ACCREDITATION NO:** ACCR 034/2002 SUBMISSION: 2009 Annual Report for Commercial release of GM herbicide tolerant and/or insect resistant cotton lines. **REPORTING PERIOD:** 26 October 2008 - 26 October 2009 (Covering 2007/08 cotton growing season) DATE: 26 November 2009 PREPARED BY:

In Confidence

Information and data submitted herein contains trade secrets, or privileged or confidential information the property of Monsanto Australia Limited and no government agency or representative thereof is authorised to disclose such data and information without written permission from Monsanto Australia



#### **SECION 1. LICENCE HOLDER DETAILS**

Name: Monsanto Australia Limited

**Address:** 600 St Kilda Road, Melbourne 3004

PO Box 6051

St Kilda Road Central, Melbourne Victoria 8008

**Telephone:** 03 9522 7121 **Facsimile:** 03 9522 6121

**Contact email:** 

Accreditation

Number: ACCR 034/2002

#### **SCOPE OF THE REPORT**

This report addresses the annual reporting condition of the DIR 066/2006 commercial licence covering Roundup Ready Cotton, Roundup Ready Flex Cotton and the Bollgard II trait issued to Monsanto Australia Limited by the Office of the Gene Technology Regulator.

This report details compliance with general and specific conditions of Sections 2 to 6 of the DIR 066 licence as issued to Monsanto Australia Limited on 26 October 2006, and as varied 22 December 2006, 6 December 2007 and 15 April 2009.

The report covers the period of time from 26 October 2008 to 26 October 2009, including the 2008/09 cotton growing season.





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#### **SECTION 2. GENERAL CONDITIONS**

#### 2.1 Duration of Licence

DIR066/2006 (DIR066) has not been suspended, cancelled or surrendered.

#### 2.2 Holder of Licence

Monsanto Australia Ltd (Monsanto) remains the holder of the licence.

## 2.3 Project Supervisor

is the project supervisor as per Attachment A of the licence. The licence was varied 15 April 2009 to reflect the change of contact details.

## 2.4 No dealings with GMOs except as authorised by this Licence

Persons covered by the licence did not deal with GMOs except as expressly permitted by the licence.

#### 2.5 Location

The licence allows for dealings with GMOs to be conducted anywhere within Australia. This licence supersedes any previous licences regarding location.

## 2.6 Persons covered by this GMO Licence

Monsanto acknowledges that the persons covered by the 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.

#### 2.7 Informing people of their obligations

DIR066 was issued in October 2006, permitting dealings with the GMOs to be undertaken during the cotton growing seasons in 2006/07, 2007/08 and 2008/09.

Monsanto Australia Limited informed all persons covered by the DIR066/2006 licence of the obligations imposed on them as a result of the conditions of this licence. This was primarily achieved through the Monsanto accreditation program and information course which includes information on regulatory obligations, as well as management of the crop.

Accreditation programs require all persons having management responsibility for Roundup Ready, Roundup Ready Flex and Bollgard II Cotton crops, to undergo training.

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## 2.8 Applicant to notify of circumstances that might affect suitability

During the reporting period, Monsanto Australia Ltd did not receive a relevant conviction occurring after the commencement of this licence; nor was there any revocation or suspension of a licence or permit held by Monsanto Australia Ltd 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; or any event or circumstance occurring after the commencement of the licence that would affect the capacity of Monsanto to meet the conditions of the DIR 066 licence.

# 2.9 Licence holder must provide information on matters related to suitability

Monsanto acknowledges that it must provide information related to its ongoing suitability to hold a licence when requested to do so in writing by the Regulator and must provide the information within a time period stipulated by the Regulator.

#### 2.10 Additional information must be given to the Regulator

During the reporting period, Monsanto did not become 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 of any unintended effects of the dealings authorised by the licence.

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

Monsanto acknowledges that 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.

## 2.12 Remaining an Accredited organisation

At all times, Monsanto remained an accredited organisation and complied with conditions of accreditation as set out in the OGTR Guidelines for Accreditation of Organisations.



#### **SECTION 3. GROWING THE GMOS**

## 3.1 GMOs covered by this licence

The only dealings with GMOs under this licence were those with the GMOs described in DIR 066/2006 Licence.

## 3.2 Permitted dealings

Sales and planting of the Roundup Ready Cotton (RRC), Roundup Ready Flex (RRF) and Bollgard II (BGII) were undertaken under a Technology User Agreement, which sets out the conditions for planting and growing a cotton crop containing RRC, RRF and BGII technology. In order to be eligible to sign such an agreement, a grower was required to attend an accreditation program and pass a test based on the material covered in the accreditation program.



# 3.3 Crop Location and Volumes

Valley	BGII ha	RRC ha	RRF ha	BGII w RRC ha	BGII w RRF ha
Bourke	106.16	-	-	-	1,743.25
Burdekin	-	-	86.50	-	805.20
Darling Downs	1,469.49	407.07	665.36	1,592.13	16,489.32
Dawson/Callide	366.96	31.44	167.14	217.78	4,416.37
Dirranbandi	-	-	-	-	12,248.50
Emerald	23.20	-	256.27	312.00	10,966.76
Gwydir	516.46	3,688.07	4,429.22	2,649.61	14,027.80
Lachlan	-	-	41.20	435.50	1,527.46
Lower Namoi	522.25	1,154.36	1,896.89	5,687.30	9,796.09
MacIntyre	2,745.00	282.29	131.53	1,254.37	4,490.47
Macquarie	-	1,015.86	32.70	1,118.76	2,663.23
Mungindi	545.48	736.79	874.11	1,003.00	3,288.28
Murrumbidgee	-	-	-	106.00	876.00
St George	441.10	397.62	40.15	1,242.43	6,401.80
The Ord	-	-	-	-	12.15
Upper Namoi	7.00	31.00	22.90	5,515.10	2,536.76
Walgett	-	-	51.23	208.83	3,034.79
Grand Total	6,743.10	7,744.50	8,695.20	21,342.81	95,324.23

**Total Bollgard II Hectares planted:** 

102,067.33На

Total Roundup Ready/Roundup Ready Flex Hectares planted:

133,106.74 Ha

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Valley: Ord (WA)

**Boundaries:** Area north of 22° south in Western Australia.

**Crop Location:** 

TUA#	BGII ha	RRC ha	RRF ha	BGII w RRC ha	BGII w RRF ha

Valley: Burdekin (QLD)

**Boundaries:** Area north of 22° South in Queensland.

TUA#	BGII ha	RRC ha	RRF ha	BGII w RRC ha	BGII w RRF ha



Valley: Emerald (QLD)

**Boundaries:** South-eastern boundary formed by the Expedition Ranges between

Rolleston and Bauhinia. Region runs north-west from there to include

Emerald and Dysart.

TUA#	BGII ha	RRC ha	RRF ha	BGII w RRC ha	BGII w RRF ha
					D.



TUA#	BGII ha	RRC ha	RRF ha	BGII w RRC ha	BGII w RRF ha

Valley: Dawson/Callide (QLD)
Boundaries: Includes Taroom, Biloela, Moura and Theodore regions.

TUA#	BGII ha	RRC ha	RRF ha	BGII w RRC ha	BGII w RRF ha



TUA#	BGII ha	RRC ha	RRF ha	BGII w RRC ha	BGII w RRF ha

Valley: Darling Downs (QLD)

Boundaries: Follows the Condamine River. Includes Toowoomba, Murgon, Dalby,

Chinchilla, Condamine, and Roma. South-west boundary is Surat.

**Crop Locations:** 

TUA#	BGII ha	RRC ha	RRF ha	BGII w RRC ha	BGII w RRF ha



TUA#	BGII ha	RRC ha	RRF ha	BGII w RRC ha	BGII w RRF ha



TUA#	BGII ha	RRC ha	RRF ha	BGII w RRC ha	BGII w RRF ha



TUA#	BGII ha	RRC ha	RRF ha	BGII w RRC ha	BGII w RRF ha
L	1				



TUA#	BGII ha	RRC ha	RRF ha	BGII w RRC ha	BGII w RRF ha



TUA#	BGII ha	RRC ha	RRF ha	BGII w RRC ha	BGII w RRF ha



TUA#	BGII ha	RRC ha	RRF ha	BGII w RRC ha	BGII w RRF ha



Valley: St George (QLD)

Boundaries: Above Lower Plains on the southern side and north-east to include majority

of Waroo Shire with the north-east boundary being Surat.

TUA#	BGII ha	RRC ha	RRF ha	BGII w RRC ha	BGII w RRF ha



TUA#	BGII ha	RRC ha	RRF ha	BGII w RRC ha	BGII w RRF ha

**Crop Locations:** 

Valley: Dirranbandi (QLD)

Boundaries: Runs north toward St George and includes Lower Plains, follows south

along the Balonne River right down to the NSW border.

TUA#	BGII ha	RRC ha	RRF ha	BGII w RRC ha	BGII w RRF ha



Valley: Macintyre (NSW/QLD)

**Boundaries:** North of Gwydir, western boundary is Garah to Talwood Road north include

Moonie and east to include Texas. Southern boundary is Foxes Lane which runs Garah back to the Newell Highway and then along to Croppa Creek,

Yallaroi and Coolatai.

TUA#	BGII ha	RRC ha	RRF ha	BGII w RRC ha	BGII w RRF ha



TUA#	BGII ha	RRC ha	RRF ha	BGII w RRC ha	BGII w RRF ha

Valley: Mungindi (NSW/QLD)

**Boundaries:** West of Garah and Boomi Road to Talwood and follows Barwon River

south-west of Mungindi towards Collarenebri. Southern boundary is the Watercourse Road from Colly through to Gingham and then to Garah.

TUA#	BGII ha	RRC ha	RRF ha	BGII w RRC ha	BGII w RRF ha



TUA#	BGII ha	RRC ha	RRF ha	BGII w RRC ha	BGII w RRF ha

Valley: Gwydir (NSW)

**Boundaries:** South of Fox Lane, north-west to Garah, west to Collarenebri, south to

Bellata. The road that runs east-west through Bellata and to Rowena is

southern boundary.

TUA#	BGII ha	RRC ha	RRF ha	BGII w RRC ha	BGII w RRF ha



TUA#	BGII ha	RRC ha	RRF ha	BGII w RRC ha	BGII w RRF ha



TUA#	BGII ha	RRC ha	RRF ha	BGII w RRC ha	BGII w RRF ha
				_	

Valley: Bourke (NSW/QLD)

Boundaries: West of Walgett Shire, north of Coolahbah. Includes Cunnamulla in

Queensland.

**Crop Locations:** 

TUA#	BGII ha	RRC ha	RRF ha	BGII w RRC ha	BGII w RRF ha

Valley: Upper Namoi (NSW)

Boundaries: South-east of Baan Baa-Manilla Road. Includes Coolah, Merriwa, Mullaley,

Gunnedah and Quirindi.

TUA#	BGII ha	RRC ha	RRF ha	BGII w RRC ha	BGII w RRF ha



TUA#	BGII ha	RRC ha	RRF ha	BGII w RRC ha	BGII w RRF ha



Valley: Lower Namoi (NSW)

**Boundaries:** North-west of Baan Baa-Manilla Road and south of Bellata-Rowena Road.

Western boundary is formed by the road that runs from Pilliga via Burren

Junction to Collarenebri.

TUA#	BGII ha	RRC ha	RRF ha	BGII w RRC ha	BGII w RRF ha



TUA#	BGII ha	RRC ha	RRF ha	BGII w RRC ha	BGII w RRF ha



TUA#	BGII ha	RRC ha	RRF ha	BGII w RRC ha	BGII w RRF ha



TUA#	BGII ha	RRC ha	RRF ha	BGII w RRC ha	BGII w RRF ha



Valley: Macquarie (NSW)

**Boundaries:** Dubbo and south to Peak Hill. West to Tullamore. North through

Tottenham. Nyngan and Coolabah, then east via southern boundary of

Walgett shire and then south back to Dubbo via Coonabarabran.

TUA#	BGII ha	RRC ha	RRF ha	BGII w RRC ha	BGII w RRF ha



TUA#	BGII ha	RRC ha	RRF ha	BGII w RRC ha	BGII w RRF ha

Valley: Lachlan (NSW)

**Boundaries:** Northern boundary is Peak Hill and Tullamore and the cotton follows the

Lachlan River through to Booligal. The southern boundary is the road through to Gunbar and then follows the Great Western Highway through to

West Wyalong.

TUA#	BGII ha	RRC ha	RRF ha	BGII w RRC ha	BGII w RRF ha



Valley: Murrumbidgee (NSW)

**Boundaries:** Northern boundary is the Great Western Highwayfrom West Wyalong

through Goolgowi to Gunbar, from Gunbar west to Booligal on the Lachlan River. Downstream of Booligal on the Lachlan and south-west is the

Murrumbidgee River.

#### **Crop Locations:**

TUA#	BGII ha	RRC ha	RRF ha	BGII w RRC ha	BGII w RRF ha

#### **Research Trial Site Locations:**

Valley	TUA#	BGII	RRC	RRF ha	BGII w	BGII w
valley	TUA#	ha	ha	KKF NA	RRC ha	RRF ha
		IIa	IIa		KKC IIa	KKF IIA
Subtotal		22.78	0.00	25.84	3.32	123.09



#### **DIR124 OGTR ANNUAL REPORT 2014/15 SEASON**

LICENCE NO: DIR124

LICENCE HOLDER: Monsanto Australia Limited

**ACCREDITATION NO:** ACCR 034/2002

**SUBMISSION:** 2015 Annual Report for Commercial release of GM

insect resistant and/or herbicide tolerant cotton lines

**REPORTING PERIOD:** 1 June 2014 – 1 June 2015

(covering 2014/15 cotton growing season)

**DATE:** 30 June 2015

**PREPARED BY:** 

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#### **SECTION 1. LICENCE HOLDER DETAILS**

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**Telephone:** (03)9522 7122

Facsimilie: (03)9522 6122

Contact email:

Accreditation

Number: ACCR 034/2002

#### **SCOPE OF THE REPORT**

This report addresses the annual reporting condition of the DIR124 commercial licence covering Bollgard® 3 and Bollgard® 3 x Roundup Ready Flex® cotton trait issued to Monsanto Australia Limited by the Office of the Gene Technology Regulator.

This report details compliance with general and specific conditions of Sections 2 to 3 of the DIR124 licence as issued to Monsanto Australia Limited on 19 June 2014.

This report covers the period of time from 19 June 2014 to 1 June 2015, including the 2014/15 cotton planting season.

#### **SECTION 2. LICENCE CONDITIONS AND OBLIGATIONS**



### **Condition 3. Authorised Dealings**

No dealings were conducted with GMOs under this licence 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.

#### **Condition 4. Duration of Licence**

DIR124 has not been suspended, cancelled or surrendered.

#### **Condition 5. Holder of Licence**

Monsanto Australia Limited (Monsanto) remains the holder of the licence.

#### **Condition 6. Project Supervisor**

The project supervisor is

#### Condition 7. Persons covered by this GMO Licence

Monsanto acknowledges that any person, including the licence holder, may conduct any permitted dealings with the GMOs as covered by the licence.

### Condition 8. Dealings with GMOs as authorized by this Licence

All dealings with the GMOs are permitted under this licence.

#### **Condition 9. Location**

The licence allows for dealings with GMOs to be conducted in all areas of Australia.

## Condition 10. GMOs covered by this licence

The only dealings with GMOs under this licence were those with the GMOs described in DIR124 Licence.

#### **Condition 11. Licence Conditions**

Monsanto acknowledges that if the conditions of any prior licence authourising dealings with the GMO are inconsistent with the conditions of this licence, the conditions of this licence will prevail.

#### Condition 12. Remaining an Accredited organization

At all times, Monsanto remained an accredited organization and complied with the Act and with its instrument of accreditation.

#### Condition 13. Applicant to notify of circumstances that might affect suitability

During the reporting period, Monsanto Australia Ltd did not receive a relevant conviction occurring after the commencement of this licence; nor was there any revocation or suspension of a licence or permit held by Monsanto Australia Ltd under a law of the Australian Government, a State or foreign country, being a law relating to the health and safety of people or the environment; or any event or circumstance occurring after the commencement of this licence that would affect the capacity of Monsanto to meet



the conditions of the DIR124 licence. Monsanto acknowledges that it must provide information related to its ongoing suitability to hold a licence, if requested, within a time period stipulated by the Regulator.

#### Condition 14. Informing people of their obligations

DIR124 was issued in June 2014, permitting dealings with the GMOs to be undertaken during the 2014/15 cotton growing season. Bollgard 3 will be grown under APVMA PER 14438 until Monsanto receives approval of from the APVMA for the product.

Monsanto Australia Limited informed all persons covered by the DIR124 licence of the obligations imposed on them as a result of the conditions of the licence. This was primarily achieved through the Monsanto accreditation program and contractual obligations, which includes information on regulatory obligations as well as management of the crop. Accreditation requires all persons having management responsibility for Bollgard 3 cotton crops to undergo training.

Monsanto recognizes that any persons covered by the DIR124 licence, to whom a particular condition of the licence applies, must be informed of particular conditions and any variations, the cancellation, suspension or surrender of the licence. This is achieved through training and contractual obligations.

#### Conditions 15 - 17. Applicant to notify of circumstances that might affect the risk assessment

During the reporting period, Monsanto Australia Ltd did not become aware of any risks to the health and safety of people, or to the environment, associated with the dealings authorised under DIR124; or of any contraventions of the licence by a person covered by the licence; or any unintended effects of the dealings authorised by the licence.

Monsanto acknowledges that should it be required to inform the regulator of additional information under these licence conditions it must do so without delay.

#### Conditions 18 and 19. Persons covered by the licence

Monsanto acknowledges that the persons covered by the licence must not deal with the GMOs except as expressly permitted by this licence.

Monsanto acknowledges that if a person authorized 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 authorized by the Regulator, to enter the premises where the dealing is being undertaken, for the purposes of auditing or monitoring the dealing.



#### **SECTION 3. GROWING THE GMOS**

#### 3.1 GMOs covered by this licence

The only dealings with GMOs under this licence were those with the GMOs described in the DIR124 Licence.

### 3.2 Permitted dealings

Planting of Bollgard 3 were undertaken under a Technology User Agreement (TUA), which sets out the conditions for planting and growing a cotton crop containing Bollgard 3 technology.

In order to be eligible to sign such an agreement, a grower is required to attend an accreditation and training program.

In the 2014/15 season, all Bollgard 3 cotton planted was managed underthe Bollgard II cotton Resistance Management Plan (RMP), which is attached in Appendix A. Management of Bollgard 3 cotton under the Bollgard II RMP was a requirement for the APVMA permit (PER14438) as issued by the APVMA. Bollgard 3 cotton planted in the 2015/16 season will be managed under a Bollgard 3 RMP as per the APVMA permit (PER80841) issued in May, 2015.

## 3.3 Commercial Crop Locations

There were no crops of Bollgard 3 cotton planted for commercial purposes during the reporting period.

#### 3.4 Trial/Research Crop Locations and Volumes by State

State	Trial/Research BG3 ha
<b>NSW</b> (Murrumbidgee, MacIntyre, Gwydir, Lachlan, Lower Namoi and Macquarie valleys )	461.16
QLD (Darling Downs and Emerald valleys)	30.47
Total BG3 ha planted	491.63

Valley: Belyando

**Boundaries:** Includes the shires of Moranbah, Clermont, Kilcummin, Mistake Creek, Belyando, Elgin, Wolfgagn, Winchester, Old Labona, Gemini Mountains, Amaroo, South Copperfield, Laglan, Birimgan, Blair Athol and Pasha.

Valley: Bourke

Boundaries: West of Walgett Shire, north of Coolahbah. Includes Cunnamulla in Queensland.



**Valley: Darling Downs** 

**Boundaries:** Follows the Condamine River. Includes Toowoomba, Murgon, Dalby, Chinchilla, Condamine, and Roma. South-west boundary is Surat.

Valley: Dawson/Callide

**Boundaries:** Includes Taroom, Biloela, Moura and Theodore regions.

Valley: Dirranbandi

**Boundaries:** Runs north toward St George and includes Lower Plains, follows south along the Balonne River right down to the NSW border.

Valley: Emerald

**Boundaries:** South-eastern boundary formed by the Expedition Ranges between Rolleston and Bauhinia. Region runs north-west from there to include Emerald and Dysart.

Valley: Gwydir

**Boundaries:** South of Fox Lane, north-west to Garah, west to Collarenebri, south to Bellata. The road that runs east-west through Bellata and to Rowena is southern boundary.

Valley: Lachlan

**Boundaries:** Northern boundary is Peak Hill and Tullamore and the cotton follows the Lachlan River through to Booligal. The southern boundary is the road through to Gunbar and then follows the Great Western Highway through to West Wyalong.

Valley: Lower Namoi

**Boundaries:** North-west of Baan Baa-Manilla Road and south of Bellata-Rowena Road. Western boundary is formed by the road that runs from Pilliga via Burren Junction to Collarenebri.

Valley: MacIntyre

**Boundaries:** North of Gwydir, western boundary is Garah to Talwood Road north include Moonie and east to include Texas. Southern boundary is Foxes Lane which runs Garah back to the Newell Highway and then along to Croppa Creek, Yallaroi and Coolatai.

Valley: Macquarie

**Boundaries:** Dubbo and south to Peak Hill. West to Tullamore. North through Tottenham. Nyngan and Coolabah, then east via southern boundary of Walgett shire and then south back to Dubbo via Coonabarabran.

Valley: McKenzie River

Boundaries: North West of Comet, to include McKenzie River and Alton Downs

Valley: Mungindi



**Boundaries:** West of Garah and Boomi Road to Talwood and follows Barwon River south-west of Mungindi towards Collarenebri. Southern boundary is the Watercourse Road from Colly through to Gingham and then to Garah.

### Valley: Murrumbidgee

**Boundaries:** Northern boundary is the Great Western Highwayfrom West Wyalong through Goolgowi to Gunbar, from Gunbar west to Booligal on the Lachlan River. Downstream of Booligal on the Lachlan and south-west is the Murrumbidgee River.

### Valley: St George

**Boundaries:** Above Lower Plains on the southern side and north-east to include majority of Waroo Shire with the north-east boundary being Surat.

### Valley: Tandou

Boundaries: surrounds Menindee shire. North of Mildura and west of the SA border

#### Valley: Upper Namoi

**Boundaries:** South-east of Baan Baa-Manilla Road. Includes Coolah, Merriwa, Mullaley, Gunnedah and Quirindi.

#### Valley: Walgett

**Boundaries:** Includes almost entirety of Walgett Shire, with eastern boundary being the road that runs south from Collarenebri to Burren Junction.





## **APPENDIX A -**

# Resistance Management Plan for Bollgard II® Cotton 2014/2015

Developed by Monsanto Australia Limited and the Transgenic and Insect Management Strategy (TIMS) Committee of Cotton Australia Ltd.

The resistance management plan is based on three basic principles: (1) minimising the exposure of *Helicoverpa* spp. to the *Bacillus thuringiensis* (Bt) proteins Cry 1Ac and Cry 2Ab; (2) providing a population of susceptible individuals that can mate with any resistant individuals, hence diluting any potential resistance; and (3) removing resistant individuals at the end of the cotton season. The three principles are supported through the implementation of 5 elements that are the key components of the Resistance Management Plan. These elements are:

- 1. Refuge crops
- 2. Planting window
- 3. Pupae busting/Trap crops
- 4. Control of volunteers and ratoon cotton and
- 5. Spray limitations.

Growers of Bollgard II cotton are required to practice preventative resistance management as set out below. Compliance with the Resistance Management Plan is required under the terms of the Bollgard II Technology User Agreement and under the conditions of registration (*Agricultural and Veterinary Chemicals Act 1994*).

Section 1 is applicable to all regions in New South Wales and Queensland that grow cotton while sections 2 and 3 detail specific requirements for New South Wales and Southern Queensland, and Central Queensland respectively.

#### SECTION 1: NEW SOUTH WALES, SOUTHERN QUEENSLAND & CENTRAL QUEENSLAND

## 1. Refuges

Growers planting Bollgard II cotton will also be required to grow a refuge crop that is capable of producing large numbers of *Helicoverpa* spp. moths which have not been exposed to selection with Bt proteins Cry 1Ac and Cry 2Ab. These unselected moths are expected to dominate matings with any survivors from Bollgard II crops and thus help to maintain resistance to Bt proteins Cry 1Ac and Cry 2Ab at low levels.



All refuge options are based on the requirement of a 10% unsprayed cotton refuge or its equivalent, as determined by the relative production of *Helicoverpa* spp. from each of the refuge types as described in Tables 1 and 2, for irrigated and dryland production scenarios respectively. Irrespective of the irrigation regime for the Bollgard II cotton, all pigeon pea refuges must be fully irrigated so that they are attractive to *Helicoverpa* spp. during the growing period of the Bollgard II cotton.

For each area of irrigated Bollgard II cotton planted, a grower is required to plant a minimum of one or a combination of the following:

Table 1. Irrigated Bollgard II cotton refuge options

Crop	Conditions	% of Bollgard II
Cotton	Irrigated, sprayed conventional cotton	100
	Irrigated, unsprayed conventional cotton	10
Pigeon pea	Fully irrigated, unsprayed	5

Table 2. Dryland Bollgard II cotton refuge options

Crop	Conditions	% of Bollgard II
Cotton	Dryland or irrigated, sprayed conventional cotton	100
	Dryland or irrigated, unsprayed conventional cotton	10
Pigeon pea	Fully irrigated, unsprayed	5

No other refuge options are approved for dryland Bollgard II.

**Note:** Unsprayed means not sprayed with any insecticide that targets any life stage of *Helicoverpa* spp.

Bt products must not be applied to any refuge (including sprayed cotton).

If the viability of an unsprayed conventional cotton refuge is at risk due to early season pressure by *Helicoverpa* spp., and with prior approval from the Monsanto Compliance and Stewardship Manager, a non-Bt heliocide can be applied. An unsprayed refuge should not be planted in the same field as any crop sprayed with a rate of insecticide that is registered for *Helicoverpa* spp, with the exception of Bollgard II. Sprayed crops and unsprayed refuges that are planted in



adjacent fields must be separated by sufficient distance to *minimise the likelihood of insecticide* drift onto the unsprayed refuge.

For the purposes of this Resistance Management Plan, conventional cotton includes any cotton varieties that do not have Bt proteins in the plant that control *Helicoverpa* spp. larvae.

## **General conditions for all refuges:**

(a) Refuge crops are to be planted and managed so that they are attractive to *Helicoverpa* spp. during the growing period of the Bollgard II cotton varieties.

Irrigated: It is preferable that all refuge is planted within the 2 week period prior to planting Bollgard II. If this is not possible, refuge planting must be completed within 3 weeks of the first day of sowing of Bollgard II. At this time, sufficient refuge must have been planted to cover all of the Bollgard II cotton proposed to be planted for the season (including Bollgard II already planted and any that remains unplanted). Should additional Bollgard II planting be made after this date, which is not already covered by refuge, additional refuge must be planted as soon as possible and no more than 2 weeks after sowing of the additional Bollgard II.

Dryland: A dryland refuge must be planted within the 2 week period prior to the first day of planting Bollgard II cotton.

- (b) Pigeon pea refuges should not be planted until the soil temperature reaches 17°C, which is a requirement for germination, and should also be planted into moisture to ensure successful germination. If soil temperatures are not suitable to allow germination of pigeon peas in line with condition (a), an alternative refuge must be planted in its place within the prescribed period (under (a) above).
- (c) Once Bollgard II cotton begins to flower the corresponding refuge should not be cultivated.
- (d) Insecticide preparations containing Bt may be used on Bollgard II cotton throughout the season BUT NOT on any refuge crops.
- (e) All refuges are to be planted within the farm unit growing Bollgard II cotton. Subject to clause (f) below, all reasonable effort should be taken to plant the refuge either on one side of, or next to a Bollgard II cotton field and all Bollgard II fields must be no more than 2 km from the nearest associated Bollgard II refuge.
- (f) To minimise the possibility of refuge attractiveness being affected by herbicide drift, non-herbicide tolerant refuges should be separated from herbicide tolerant Bollgard II cotton crops by a sufficient distance to minimise such drift, but no more than 2km from the Bollgard II cotton.



- (g) To account for possible insecticide drift, the options for the width of refuge crops vary according to spray regime. If any sprayed conventional cotton is grown on the same farm unit, Bollgard II refuge crops must be at least 48 metres wide and each refuge area must be a minimum of 2 hectares. If no sprayed conventional cotton is grown on the same farm unit, Bollgard II refuge crops must be at least 24 metres wide and 24 metres long. Different unsprayed refuge options may be planted in the same field as a single unit; however a sprayed conventional cotton refuge must not be planted in a field that is also planted to an unsprayed refuge type.
- (h) In all regions, destruction of refuges should only be carried out after Bollgard II cotton lint removal has been completed.
- (i) Refuges for dryland Bollgard II cotton crops must be planted in the same row configuration as the Bollgard II crop unless the refuge is irrigated. If an irrigated option is utilised for a dryland Bollgard II crop, then that refuge may be planted in a solid configuration. Dryland cotton is measured as green hectares (calculated as defined in the Technology User Agreement).

## 2. Control of volunteer and ratoon cotton

Volunteer and ratoon cotton may impose additional selection pressure on *Helicoverpa* spp. to develop resistance to the Bt Cry 1Ac and Cry 2Ab proteins produced by Bollgard II cotton.

Growers must make all reasonable efforts to remove volunteer and ration plants, as soon as possible from all fields, including fallow areas, Bollgard II crops, conventional cotton crops and all refuges. The presence of Bollgard II volunteers/ration cotton in any refuge will diminish the value of the refuge and must be removed as soon as possible.

Note: The refuge should preferably be planted into fallow or rotation fields that have not been planted to cotton in the previous season.

#### 3. Post-harvest crop destruction

As soon as practical after harvest, Bollgard II cotton crops must be destroyed by cultivation or herbicide so that they do not continue to act as hosts for *Helicoverpa* spp.

## **SECTION 2: NEW SOUTH WALES AND SOUTHERN QUEENSLAND ONLY**

## 1. Planting windows



All Bollgard II crops are to be planted into moisture or watered-up by 15 November, unless otherwise advised by a Bollgard II Planting Window Variation Notice.

## 2. <u>Pupae destruction</u>

In Bollgard II cotton fields, each grower will be required to undertake *Helicoverpa* spp. pupae destruction after harvest according to the following key guidelines:

- Bollgard II crops should be slashed or mulched and fields cultivated for pupae control within 4 weeks
  of harvesting. All pupae busting must be completed by July 31.
- Ensure disturbance of the whole soil surface to a depth of 10 cm.
- All fields that are sown to any winter crop following a Bollgard II crop must be inspected by the Technology Service Provider before sowing commences in order to ensure that pupae busting has occurred.

In Refuge crops:

In New South Wales and Southern Queensland, to ensure maximum emergence of late pupae from associated refuges, soil disturbance of refuge crops should not be undertaken until after the pupae busting in Bollgard II cotton crops on the farm unit is complete. All unsprayed refuges, should preferably be left uncultivated until the following October.

## 3. Failed crops

Bollgard II crops that will not be grown through to harvest for various reasons and are declared to, and verified by, Monsanto as failed must be destroyed within two weeks after verification, in such a way that prevents regrowth. Crops abandoned before February 28 do not require pupae busting. Crops abandoned on February 28 or later must be pupae busted.

**NB:** If any grower encounters problems in complying with the Resistance Management Plan please contact your local Monsanto Regional Business Manager.



#### **SECTION 3: CENTRAL QUEENSLAND ONLY**

### 1. Planting Windows

**Emerald:** All Bollgard II crops are to be planted into moisture or watered-up in the period between September 15 and October 26, unless advised otherwise by a Bollgard II Planting Window Variation Notice.

**Dawson Callide Valleys:** All Bollgard II crops are to be planted into moisture or watered-up in the period between September 15 and October 26, unless advised otherwise by a Bollgard II Planting Window Variation Notice.

**Belyando - Clermont:** All Bollgard II crops are to be planted into moisture or watered-up in the period between November 4 and Decmber 15, unless advised otherwise by a Bollgard II Planting Window Variation Notice.

**Mackenzie:** All Bollgard II crops are to be planted into moisture or watered-up in the period between November 4 and Decmber 15, unless advised otherwise by a Bollgard II Planting Window Variation Notice.

#### 2. Refuges

Pigeon Pea refuge should preferably be planted into a fallow or rotation field that has not been planted to cotton in the previous season to avoid volunteer and ratoon cotton.

In Central Queensland soil disturbance of refuge crops can only occur 2 weeks after final defoliation of the Bollgard II cotton.

# 3. <u>Late summer pigeon pea trap crop</u>

A late summer trap crop (pigeon pea) must be planted for all Bollgard II cotton grown in Central Queensland. The planting configuration of the trap crop should be the same as that of the Bollgard II crop. Irrigated Bollgard II must have an irrigated trap crop. Table 3 shows the requirements for the late summer pigeon pea trap crop. Dryland Bollgard II growers who do not have any irrigated cotton on their farm should contact their Monsanto Regional Business Manager for alternative options.

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Refuge and late summer trap crops have different purposes and, if pigeon pea is selected for both, two separate plantings may be required. However, where a pigeon pea refuge is utilised as a trap crop the full 5% pigeon pea refuge area must be managed to become the late summer trap crop and must adhere to the requirements in Table 3 below.

Table 3. Late summer pigeon pea trap crop requirements in Central Queensland

Criterion	Trap crop*					
Minimum area & dimension (Requirement)	A minimum trap crop of 1% of planted Bollgard II cotton crop is required.  If sprayed conventional cotton is grown on that farm unit: the trap crop must be at least 48m x 48m.  If no sprayed conventional cotton is grown on that farm unit: the trap crop must be at least 24m x 24m.					
Planting time	The trap crop should preferably be planted between November 1 and November 30 Note: if growers choose to plant their trap crop to coincide with the planting of pigeon pea refuges they must manage the trap crop in such a way that it remains attractive to <i>Helicoverpa</i> spp. 2-4 weeks after final defoliation.					
Planting rate **	35kg/ha (recommended establishment greater than 4 plants per metre)					
Insect control	The trap crop can be sprayed with virus after flowering; while avoiding insecticide spray drift, except where a pigeon pea refuge is converted to a trap crop. In this case the full 5% pigeon pea refuge area managed to become the late summer trap crop can only be sprayed with virus after the first defoliation of Bollgard II cotton.					
Irrigation	The trap crop must be planted into an area where it can receive the additional irrigation required to keep the trap crop attractive to <i>Helicoverpa</i> spp. until after the cotton is defoliated.					
Weed control	The trap crop should be kept free of weeds and particularly volunteer Bollgard II cotton. When using the full 5% pigeon pea trap crop option, weed control must not be carried out by cultivation once flowering of the associated Bollgard II cotton crop has commenced					



Crop destruction	The trap crop must be destroyed 2-4 weeks (but not before 2 weeks)
	after final defoliation of the Bollgard II cotton crop, (slash and pupae
	bust – full soil disturbance to a depth of 10cm across the entire trap
	crop area). All Bollgard II and associated trap crops must be destroyed
	by July 31.

- * A pigeon pea trap crop is to be planted so that it is attractive (flowering) to *Helicoverpa* spp. after the cotton crop has cut out, and as any survivors from the Bollgard II crop emerge. Planting pigeon pea too early (e.g. before November) or too late (e.g. mid December) is not adequate for cotton crops planted during September through to October.
- ** The planting rate is a recommendation based on a minimum of 85% seed germination.

NB: <u>If any grower encounters problems in complying with the resistance management plan, please contact your Monsanto Regional Business Manager.</u>

For further background information on the various components of this plan see the "Preamble to the Resistance Management Plan for Bollgard II" in the current Cotton Pest Management Guide.



Limited.

#### DIR 066/2006 OGTR ANNUAL REPORT 2007/08 SEASON

**LICENSE No:** DIR 066/2006 **LICENSE HOLDER:** Monsanto Australia Limited **PROJECT SUPERVISOR: ACCREDITATION NO:** ACCR 034/2002 SUBMISSION: 2007 Annual Report for Commercial release of GM herbicide tolerant and/or insect resistant cotton lines. **REPORTING PERIOD:** 26 October 2007 - 26 October 2008 (Covering 2007/08 cotton growing season) DATE: 27 November 2008 PREPARED BY:

In Confidence

Information and data submitted herein contains trade secrets, or privileged or confidential information the property of Monsanto Australia Limited and no government agency or representative thereof is authorised to disclose such data and information without written permission from Monsanto Australia



## **SECION 1. LICENSE HOLDER DETAILS**

Name: Monsanto Australia Limited

**Address:** 600 St Kilda Road, Melbourne 3004

PO Box 6051

St Kilda Road Central, Melbourne Victoria 8008

**Telephone:** 03 9522 7158 **Facsimile:** 03 9521 2725

**Contact email:** 

Accreditation

Number: ACCR 034/2002

### **SCOPE OF THE REPORT**

This report addresses the annual reporting condition of the DIR 066/2006 commercial license for Roundup Ready Cotton, Roundup Ready Flex Cotton and the Bollgard II trait issued to Monsanto Australia Limited by the Office of the Gene Technology Regulator.

This report details compliance with general and specific conditions of Sections 2 to 6 of the DIR 066 license as issued to Monsanto Australia Limited on 26 October 2006, and as varied 22 December 2006 and 6 December 2007.

The report covers the period of time from 26 October 2007 to 26 October 2008, including the 2007/08 cotton growing season.

In Confidence



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#### **SECTION 2. GENERAL CONDITIONS**

#### 2.1 Duration of License

DIR066/2006 (DIR066) has not been suspended, cancelled or surrendered

#### 2.2 Holder of License

Monsanto Australia Ltd (Monsanto) remains the holder of the License.

## 2.3 Project Supervisor

## 2.4 No dealings with GMOs except as authorised by this License

Persons covered by the License did not deal with GMOs except as expressly permitted by the License.

## 2.5 Location

The license allows for dealings with GMO's to be conducted anywhere within Australia. This license supercedes any previous licenses regarding location of this license.

# 2.6 Persons covered by this GMO License

Monsanto acknowledges that the persons covered by the License are the License holder and employees, agents or contractors of the License 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 License.

# 2.7 Informing people of their obligations

DIR066 was issued in October 2006, permitting dealings with the GMOs to be undertaken during the cotton growing seasons in 2006/07 and 2007/08.

Monsanto Australia Limited informed all cotton growers and cotton gins covered by DIR066/2006 license, of the obligations imposed on them as a result of the conditions of this license. This was primarily achieved through the Monsanto Accreditation program and information course which includes information on regulatory obligations, as well as management of the crop.

Accreditation programs require all persons having management responsibility for Roundup Ready, Roundup Ready Flex and Bollgard II Cotton crops, to undergo training and pass a test on the content of the training. Growers were only required to attend these courses and pass the accreditation test once.



# 2.8 Applicant to notify of circumstances that might affect suitability

During the reporting period, Monsanto Australia Ltd did not receive a relevant conviction occurring after the commencement of this License; nor was there any revocation or suspension of a License or permit held by Monsanto Australia Ltd 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; or any event or circumstance occurring after the commencement of the License that would affect the capacity of Monsanto to meet the conditions of the DIR 066 License.

# 2.9 License holder must provide information on matters related to suitability

Monsanto acknowledges that it must provide information related to their ongoing suitability to hold a License when requested to do so in writing by the Regulator and must provide the information within a time period stipulated by the Regulator.

## 2.10 Additional information must be given to the Regulator

During the reporting period, Monsanto did not become 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 License; or of any unintended effects of the dealings authorised by the License.

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

Monsanto acknowledges that if a person is authorised by this License to deal with GMOs and a particular condition of this License 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.

# 2.12 Remaining an Accredited organisation

At all times, Monsanto remained an accredited organisation and complied with conditions of accreditation as set out in the OGTR Guidelines for Accreditation of Organisations.



## **SECTION 3. GROWING THE GMOS**

# 3.1 GMOs covered by this License

The only dealings with GMOs under this License were those with the GMOs described in DIR 066/2006 License.

# 3.2 Permitted dealings

Sales and planting of the Roundup Ready Cotton (RRC), Roundup Ready Flex (RRF) and Bollgard II(BGII) were undertaken under a Technology User Agreement, which sets out the conditions for planting and growing a cotton crop containing RRC, RRF and BGII technology. In order to be eligible to sign such an agreement, a grower was required to attend an accreditation program and pass a test based on the material covered in the accreditation program.

# 3.3 Crop Locations

	BGII ha	RRC ha	RRF ha	BGII w RRC ha	BGII w RRF ha
Ord	0.00	0.00	0.00	0.00	1.00
Burdekin	0.00	0.00	73.98	0.00	720.46
Emerald	780.89	3.20	0.00	2102.96	377.86
Dawson/Callide	585.94	16.74	6.48	837.55	121.15
<b>Darling Downs</b>	2269.00	38.53	252.34	3146.67	5966.71
St George	250.80	17.56	66.20	2583.39	617.15
Dirranbandi	0.00	10.30	0.00	66.70	0.00
Macintyre	2793.87	25.03	13.46	2456.90	250.22
Mungindi	37.80	0.00	0.00	332.19	392.43
Gwydir	247.20	1839.97	363.28	4339.35	4039.49
Bourke	79.90	0.00	0.00	45.11	0.00
Upper Namoi	299.60	0.00	0.00	6558.52	700.05
Lower Namoi	893.69	117.87	414.18	7856.90	3101.89
Macquarie	93.90	110.64	34.43	2665.71	453.84
Lachlan	0.00	10.00	15.00	941.30	1300.84
Murrumbidgee	0.00	0.00	0.00	135.00	143.00
Total Crop ha	8332.59	2189.84	1239.35	34068.25	18186.09
% of Total	13.02%	3.42%	1.94%	53.22%	28.41%

**Total Bollgard II Ha planted:** 

60586.93Ha = 94.65%

Total Roundup Ready Ha and Roundup Ready Flex Ha planted:

55683.53Ha = 86.98%

In Confidence



Valley: Ord (WA)

**Boundaries:** Area north of 22° south in Western Australia.

**Crop Location:** 

TUA#	BGII ha	RRC ha	RRF ha	BGII w RRC ha	BGII w RRF ha
Subtotal	0.00	0.00	0.00	0.00	1.00

Valley: Burdekin (QLD)

**Boundaries:** Area north of 22° South in Queensland.

TUA#	BGII ha	RRC ha	RRF ha	BGII w RRC ha	BGII w RRF ha
Subtotal	0.00	0.00	73.98	0.00	720.46



Valley: Emerald (QLD)

**Boundaries:** South-eastern boundary formed by the Expedition Ranges between

Rolleston and Bauhinia. Region runs north-west from there to include

Emerald and Dysart.

## **Crop Locations:**

TUA#	BGII ha	RRC ha	RRF ha	BGII w RRC ha	BGII w RRF ha
Subtotal	780.89	3.20	0.00	2,102.96	239.20

Valley: Dawson/Callide (QLD)

**Boundaries:** Includes Taroom, Biloela, Moura and Theodore regions.

TUA#	BGII ha	RRC ha	RRF ha	BGII w RRC ha	BGII w RRF ha



Valley: Darling Downs (QLD)

Boundaries: Follows the Condamine River. Includes Toowoomba, Murgon, Dalby,

Chinchilla, Condamine, and Roma. South-west boundary is Surat.

TUA#	BGII ha	RRC ha	RRF ha	BGII w RRC ha	BGII w RRF ha
					<u> </u>
					<u> </u>



TUA#	BGII ha	RRC ha	RRF ha	BGII w RRC ha	BGII w RRF ha



TUA#	BGII ha	RRC ha	RRF ha	BGII w RRC ha	BGII w RRF ha

In Confidence



TUA#	BGII ha	RRC ha	RRF ha	BGII w RRC ha	BGII w RRF ha

Valley: St George (QLD)

Boundaries: Above Lower Plains on the southern side and north-east to include majority

of Waroo Shire with the north-east boundary being Surat.

TUA#	BGII ha	RRC ha	RRF ha	BGII w RRC ha	BGII w RRF ha



Valley: Dirranbandi (QLD)

Boundaries: Runs north toward St George and includes Lower Plains, follows south

along the Balonne River right down to the NSW border.

**Crop Locations:** 

TUA#	BGII ha	RRC ha	RRF ha	BGII w RRC ha	BGII w RRF ha

Valley: Macintyre (NSW/QLD)

Boundaries: North of Gwydir, western boundary is Garah to Talwood Road north include

Moonie and east to include Texas. Southern boundary is Foxes Lane which runs Garah back to the Newell Highway and then along to Croppa Creek,

Yallaroi and Coolatai.

TUA#	BGII ha	RRC ha	RRF ha	BGII w RRC ha	BGII w RRF ha



Valley: Mungindi (NSW/QLD)

**Boundaries:** West of Garah and Boomi Road to Talwood and follows Barwon River

south-west of Mungindi towards Collarenebri. Southern boundary is the Watercourse Road from Colly through to Gingham and then to Garah.

**Crop Locations:** 

<u> </u>					
TUA#	BGII ha	RRC ha	RRF ha	BGII w RRC ha	BGII w RRF ha

Valley: Gwydir (NSW)

Boundaries: South of Fox Lane, north-west to Garah, west to Collarenebri, south to

Bellata. The road that runs east-west through Bellata and to Rowena is

southern boundary.

TUA#	BGII ha	RRC ha	RRF ha	BGII w RRC ha	BGII w RRF ha



TUA#	BGII ha	RRC ha	RRF ha	BGII w RRC ha	BGII w RRF ha

Valley: Bourke (NSW/QLD)

Boundaries: West of Walgett Shire, north of Coolahbah. Includes Cunnamulla in

Oueensland.

**Crop Locations:** 

TUA#	BGII ha	RRC ha	RRF ha	BGII w RRC ha	BGII w RRF ha

Valley: Upper Namoi (NSW)

Boundaries: South-east of Baan Baa-Manilla Road. Includes Coolah, Merriwa, Mullaley,

Gunnedah and Quirindi.

**Crop Locations:** 

TUA#	BGII ha	RRC ha	RRF ha	BGII w RRC ha	BGII w RRF ha

In Confidence



TUA#	BGII ha	RRC ha	RRF ha	BGII w RRC ha	BGII w RRF ha
					<u> </u>
					<u> </u>
					<u> </u>
		<u> </u>			<u> </u>
					<u> </u>
					<u> </u>



Valley: Lower Namoi (NSW)

**Boundaries:** North-west of Baan Baa-Manilla Road and south of Bellata-Rowena Road.

Western boundary is formed by the road that runs from Pilliga via Burren

Junction to Collarenebri.

TUA#	BGII ha	RRC ha	RRF ha	BGII w RRC ha	BGII w RRF ha



TUA#	BGII ha	RRC ha	RRF ha	BGII w RRC ha	BGII w RRF ha

In Confidence



Valley: Macquarie (NSW)

**Boundaries:** Dubbo and south to Peak Hill. West to Tullamore. North through

Tottenham. Nyngan and Coolabah, then east via southern boundary of

Walgett shire and then south back to Dubbo via Coonabarabran.

TUA#	BGII ha	RRC ha	RRF ha	BGII w RRC ha	BGII w RRF ha





Valley: Lachlan (NSW)

**Boundaries:** Northern boundary is Peak Hill and Tullamore and the cotton follows the

Lachlan River through to Booligal. The southern boundary is the road through to Gunbar and then follows the Great Western Highway through to

West Wyalong.

## **Crop Locations:**

TUA#	BGII ha	RRC ha	RRF ha	BGII w RRC ha	BGII w RRF ha

Valley: Murrumbidgee (NSW)

**Boundaries:** Northern boundary is the Great Western Highwayfrom West Wyalong

through Goolgowi to Gunbar, from Gunbar west to Booligal on the Lachlan

River. Downstream of Booligal on the Lachlan and south-west is the

Murrumbidgee River.

TUA#	BGII ha	RRC ha	RRF ha	BGII w RRC ha	BGII w RRF ha



# **Locations of Research Sites:**

# Ord:

TUA#	BGII ha	RRC ha	RRF ha	BGII w RRC ha	BGII w RRF ha

# **Emerald:**

TUA#	BGII ha	RRC ha	RRF ha	BGII w RRC ha	BGII w RRF ha

**Darling Downs:** 

Darling Down	5.				
TUA#	BGII ha	RRC ha	RRF ha	BGII w RRC ha	BGII w RRF ha

St George:

TUA#	BGII ha	RRC ha	RRF ha	BGII w RRC ha	BGII w RRF ha

Mungindi:

TUA#	BGII ha	RRC ha	RRF ha	BGII w RRC ha	BGII w RRF ha

Gwydir:

TUA#	BGII ha	RRC ha	RRF ha	BGII w RRC ha	BGII w RRF ha

**Upper Namoi:** 

TUA#	BGII ha	RRC ha	RRF ha	BGII w RRC ha	BGII w RRF ha



# DIR 066/2006 OGTR ANNUAL REPORT 2007/08 SEASON

# **Lower Namoi:**

TUA#	BGII ha	RRC ha	RRF ha	BGII w RRC ha	BGII w RRF ha

# Macquarie:

TUA#	BGII ha	RRC ha	RRF ha	BGII w RRC ha	BGII w RRF ha



LICENCE NO: DIR066

LICENCE HOLDER: Monsanto Australia Limited

**ACCREDITATION NO:** ACCR 034/2002

**SUBMISSION:** 2012 Annual Report for Commercial release of GM

herbicide tolerant and/or insect resistant cotton lines

**REPORTING PERIOD:** 26 October 2011 – 26 October 2012

(covering 2011/12 cotton growing season)

**DATE:** 7 January, 2013

PREPARED BY:

Information and data submitted herein contains trade secrets, or privileged or confidential information the property of Monsanto Australia Limited and no government agency or representative thereof is authorized to disclose such data and information without written permission from Monsanto Australia Limited.





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#### **SECTION 1. LICENCE HOLDER DETAILS**

Name: Monsanto Australia Limited

Address: 600 St Kilda rd, Melbourne 3004

PO Box 6051 St Kilda rd Central Victoria, 8008

**Telephone:** (03)9522 7122

Facsimilie: (03)9522 6122

Contact email:

Accreditation

Number: ACCR 034/2002

#### **SCOPE OF THE REPORT**

This report addresses the annual reporting condition of the DIR066 commercial licence covering Roundup Ready Cotton, Roundup Ready Flex Cotton and the Bollgard II trait issues to Monsanto Australia Limited by the Office of the Gene Technology Regulator.

This report details compliance with general and specific conditions of Sections 2 to 6 of the DIR066 licence as issued to Monsanto Australia Limited on 26 October 2006, and as varied 22 December 2006, 6 December 2007 and 15 April 2009.

This report covers the period of time from 26 October 2011 to 26 October 2012, including the 2011/12 cotton growing season.



#### **SECTION 2. LICENCE CONDITIONS**

#### **Condition 1. Duration of Licence**

DIR066 has not been suspended, cancelled or surrendered.

#### **Condition 2. Holder of Licence**

Monsanto Australia Limited (Monsanto) remains the holder of the licence.

#### Conditions 3 and 4. Project Supervisor

is the project supervisor as per attachment A of the licence. This licence was varied 15 April 2009 to reflect the change of contact details.

#### Condition 5. No dealings with GMOs except as authorized by this Licence

Persons covered by the licence did not deal with GMOs except as expressly permitted by the licence.

#### Conditions 6 and 7. Location

The licence allows for dealings with GMOs to be conducted anywhere in Australia. This licence supersedes any previous licences regarding location.

#### Conditions 8 and 9. Persons covered by this GMO Licence

Monsanto acknowledges that the persons covered by the 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.

#### Conditions 10 and 11. Informing people of their obligations

DIR066 was issued in October 2006, permitting dealings with the GMOs to be undertaken during the cotton growing seasons.

Monsanto Australia Limited informed all persons covered by the DIR066 licence of the obligations imposed on them as a result of the conditions of the licence. This was primarily achieved through the Monsanto accreditation program, which includes information on regulatory obligations as well as management of the crop.



Accreditation programs require all persons having management responsibility for Roundup Ready (no longer sold commercially), Roundup Ready Flex and Bollgard II cotton crops to undergo training.

#### Condition 12. Applicant to notify of circumstances that might affect suitability

During the reporting period, Monsanto Australia Ltd did not receive a relevant conviction occurring after the commencement of this licence; nor was there any revocation or suspension of a licence or permit held by Monsanto Australia Ltd under a law of the Australian Government, a State or foreign country, being a law relating to the health and safety of people or the environment; or any event or circumstance occurring after the commencement of this licence that would affect the capacity of Monsanto to meet the conditions of the DIR066 licence.

#### Condition 13. Licence holder must provide information on matters related to suitability

Monsanto acknowledges that it must provide information related to its ongoing suitability to hold a licence when requested to do so in writing by the Regulator and must provide information within a time period stipulated by the Regulator.

#### Condition 14. People dealing with the GMOs must allow auditing and monitoring if the dealing

Monsanto acknowledges that if a person authorized 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 authorized by the Regulator, to enter the premises where the dealing is being undertaken, for the purposes of auditing or monitoring the dealing.

#### **Condition 15. Remaining an Accredited organization**

At all times, Monsanto remained an accredited organization and complied with conditions of accreditation as set out in the OGTR Guidelines for Accreditation of Organisations.

#### Conditions 16 - 19 Additional information must be given to the Regulator

During the reporting period, Monsanto did not become aware of any additional information as to any risks to the health and safety of people, or to the environment, associated with the dealings authorized by this licence; or of any unintended effects of the dealings authorized by this licence.

#### **Condition 20. Compliance Management Plan**

A Compliance Management Plan was provided to the Regulator on issuance of the DIR066 licence. A copy of the current Resistance Management Plans showing compliance metrics is in Appendix A and B.



#### **SECTION 3. GROWING THE GMOS**

## 3.1 GMOs covered by this licence

The only dealings with GMOs under this licence were those with the GMOs described in DIR066 Licence.

#### 3.2 Permitted dealings

Sales and planting of the Roundup Ready Flex (RRF), Bollgard II (BGII) and Bollgard II stacked with were undertaken under a Technology User Agreement, which sets out the conditions for planting and growing a cotton crop containing RRF and BGII technology. Roundup Ready Cotton is no longer sold in Australia. In order to be eligible to sign such an agreement, a grower was required to attend an accreditation program and pass a test based on the material covered in the accreditation program.

#### 3.3 Commercial Crop Locations and Volumes

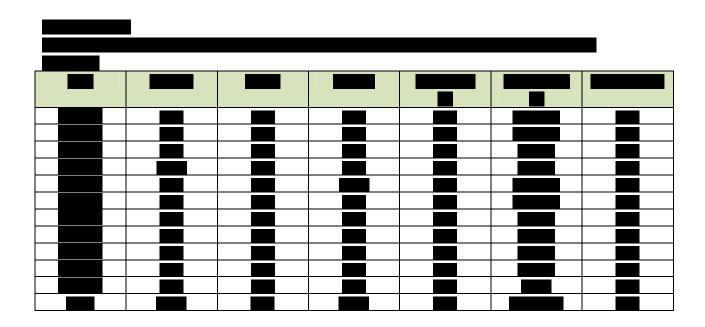
Valley	BGII ha	RR ha	RRF ha	BGII w RR ha	BGII w RRF ha	BGII w ha	Total ha
Belyando	0.00	0.00	858.30	0.00	2,709.47	0.00	3,567.77
Bourke	45.63	0.00	18.70	0.00	10,030.21	0.00	10,094.54
Burdekin	0.00	0.00	45.96	0.00	390.61	0.00	436.57
Darling Downs	0.00	0.00	4,901.40	0.00	82,079.19	367.80	87,423.09
Dawson/Callide	0.00	0.00	728.68	0.00	7,991.11	0.00	8,719.79
Dirranbandi	0.00	0.00	0.00	0.00	31,828.62	0.00	31,828.62
Emerald	0.00	0.00	626.20	0.00	21,834.31	511.30	22,977.81
Gwydir	0.00	0.00	8,735.81	0.00	85,043.80	289.70	94,279.19
Lachlan	0.00	0.00	299.56	0.00	16,535.37	0.00	16,873.93
Lower Namoi	1.50	0.00	2,644.99	0.00	56,050.44	23.83	58,752.96
MacIntyre	0.00	0.00	2,745.98	0.00	65,162.80	0.00	68,949.66
Macquarie	0.00	0.00	267.82	0.00	43,793.87	0.00	44,061.69
McKenzie River	0.00	0.00	148.47	0.00	1,539.68	0.00	1,688.15
Mungindi	0.00	0.00	6,954.78	0.00	17,059.87	27.50	27,658.81
Murrumbidgee	0.00	0.00	1,425.67	0.00	35,545.85	54.30	37,039.32
St George	0.00	0.00	269.54	0.00	29,203.75	235.15	29,977.60
Tandou	0.00	0.00	0.00	0.00	5,773.59	0.00	6,639.09
Upper Namoi	0.00	0.00	1,031.45	0.00	27,730.11	461.90	29,247.56
Walgett	0.00	0.00	707.85	0.00	9,590.89	0.00	10,298.74
Total ha	47.13	0.00	32,411.16	0.00	549,893.54	1,971.48	590,514.89

Total Bollgard II ha planted	551,912
Total Roundup Ready Flex ha planted	582,305



## Valley: Belyando

**Boundaries:** Includes the shires of Moranbah, Clermont, Kilcummin, Mistake Creek, Belyando, Elgin, Wolfgagn, Winchester, Old Labona, Gemini Mountains, Amaroo, South Copperfield, Laglan, Birimgan, Blair Athol and Pasha.





Valley: Burdekin

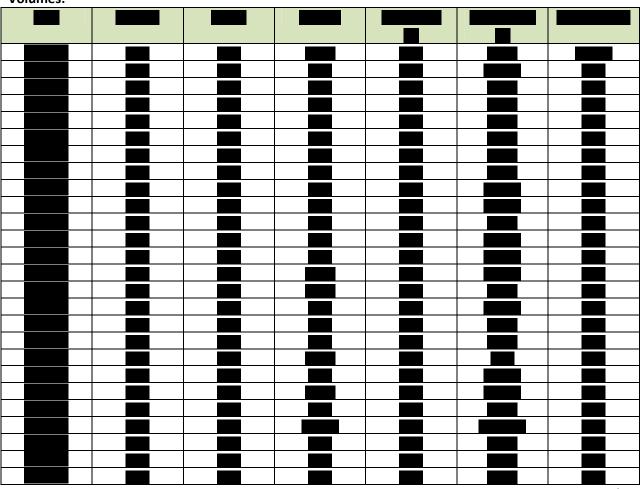
Boundaries: Area north of 22° south in Queensland

**Volumes:** 

**Valley: Darling Downs** 

**Boundaries:** Follows the Condamine River. Includes Toowoomba, Murgon, Dalby, Chinchilla, Condamine, and Roma. South-west boundary is Surat.

## **Volumes:**

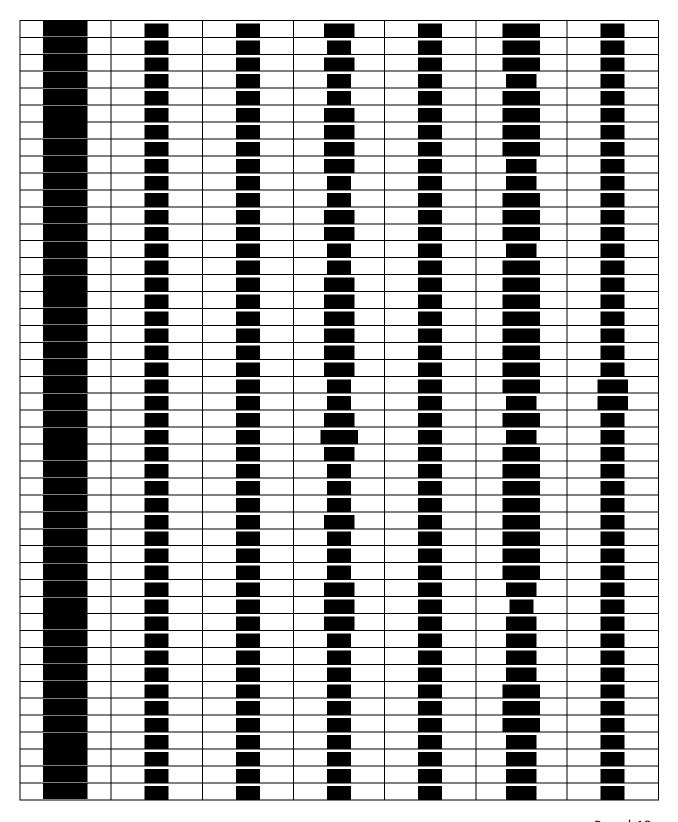


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**In Confidence** 

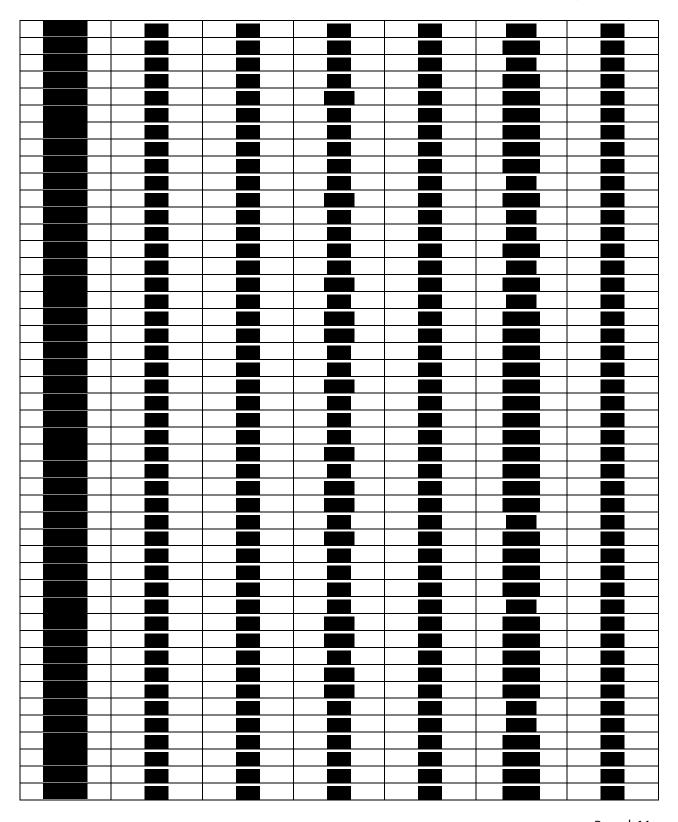






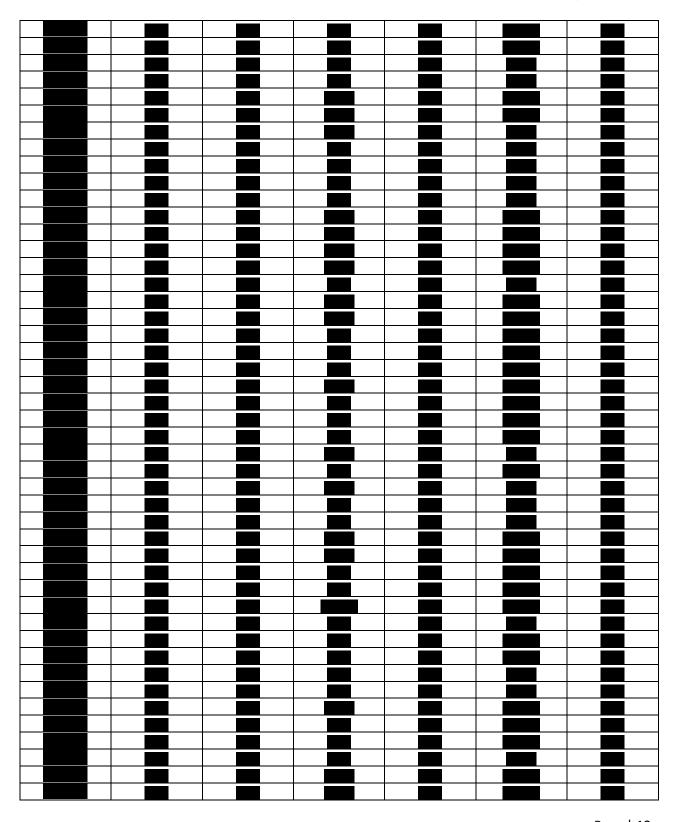
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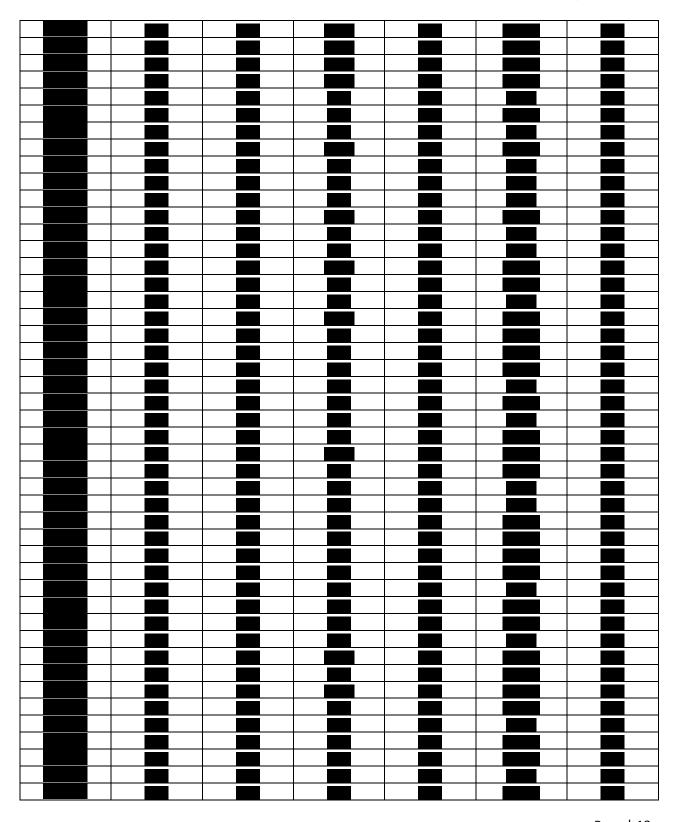
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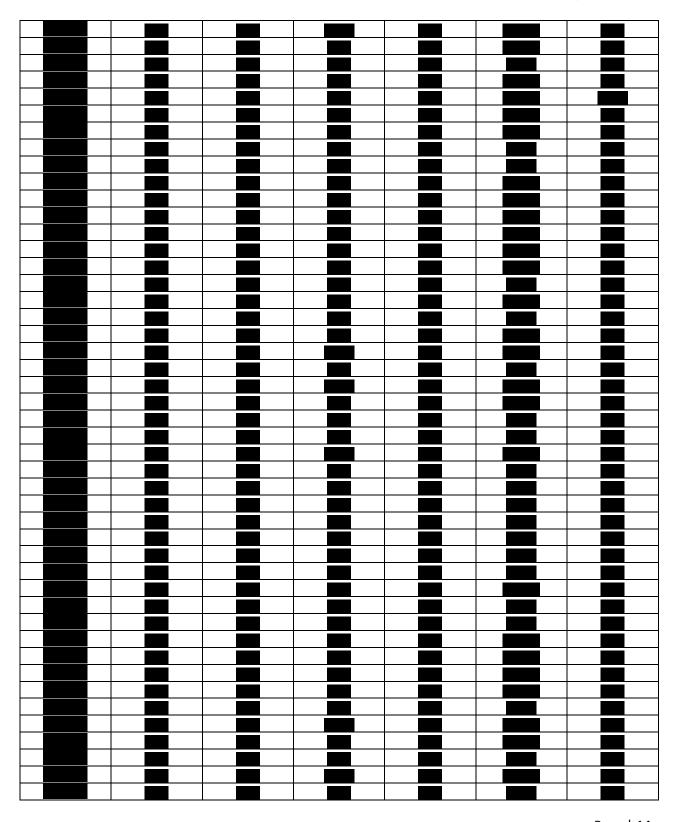
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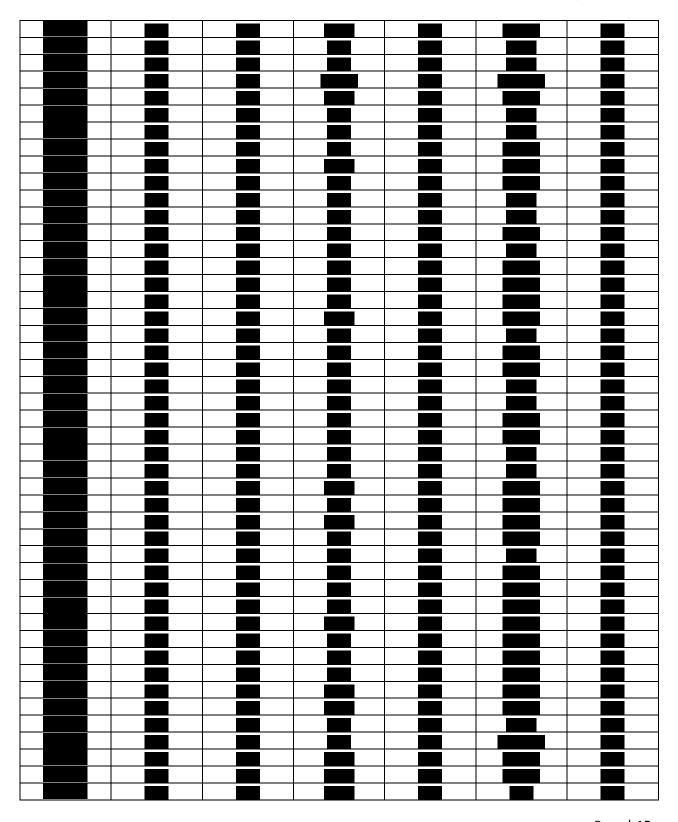
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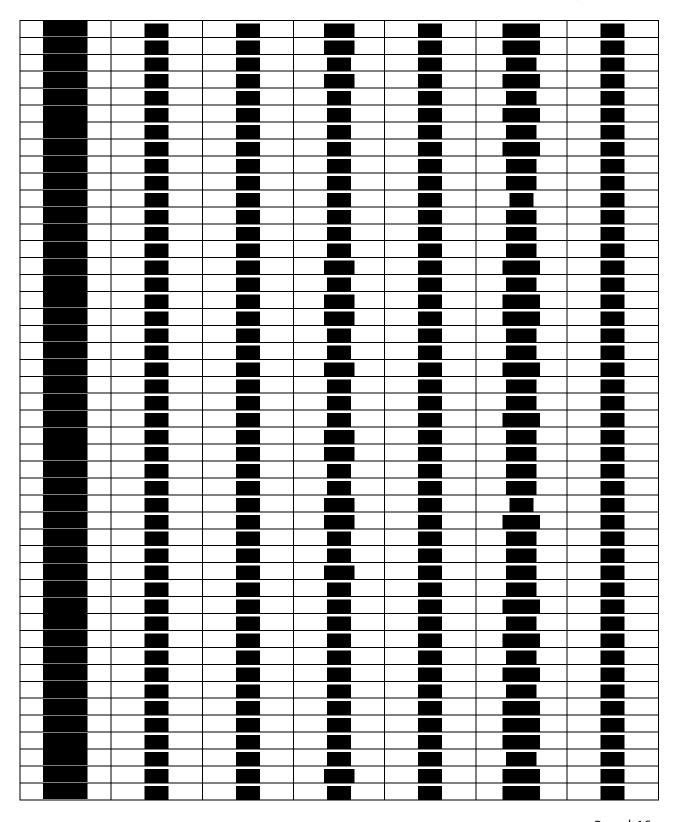
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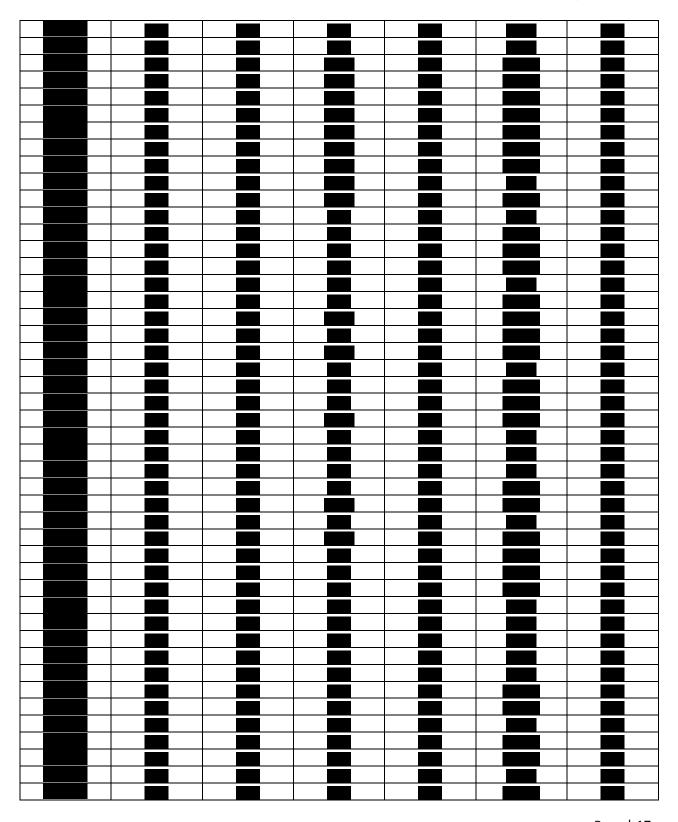
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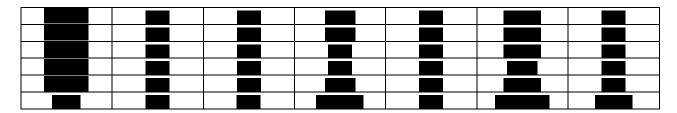
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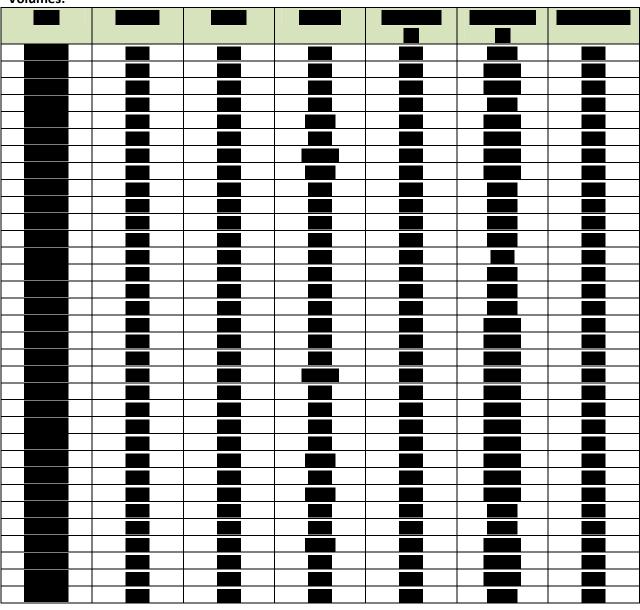
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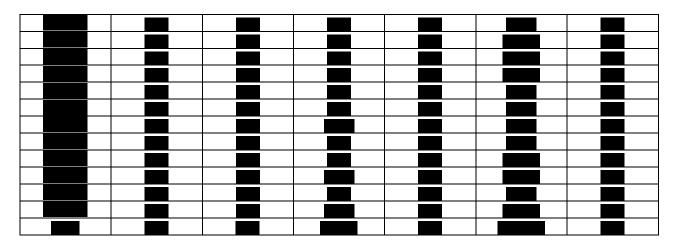
Valley: Dawson/Callide

**Boundaries:** Includes Taroom, Biloela, Moura and Theodore regions.



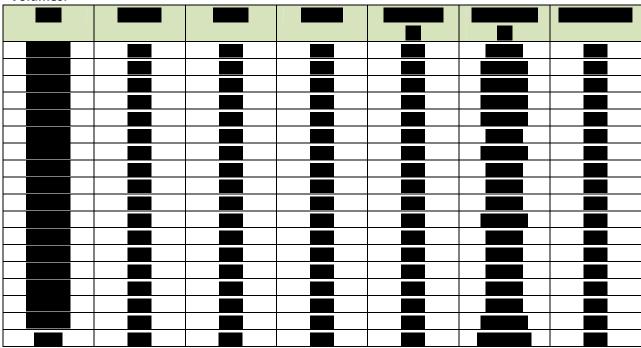
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Valley: Dirranbandi

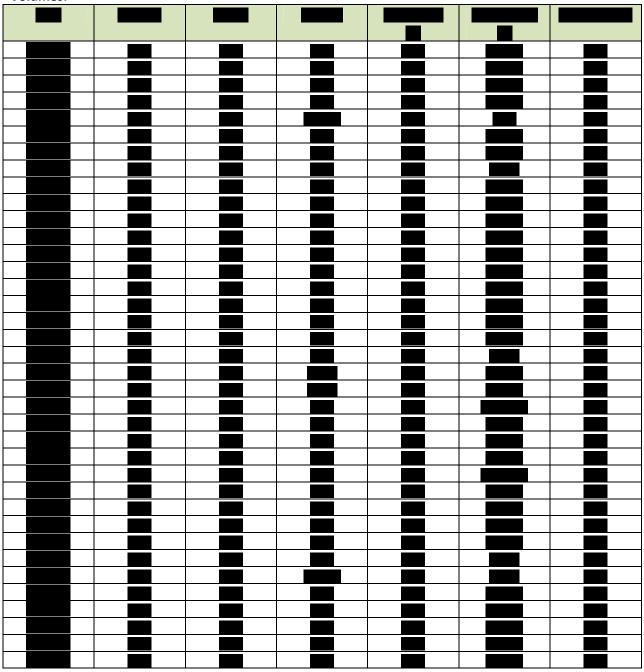
**Boundaries:** Runs north toward St George and includes Lower Plains, follows south along the Balonne River right down to the NSW border.



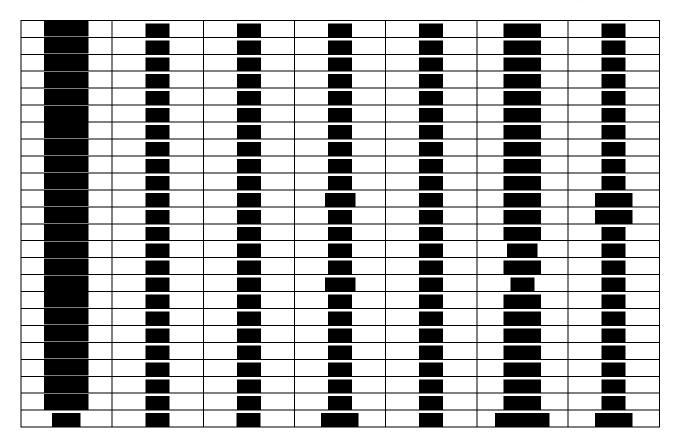


**Valley: Emerald** 

**Boundaries:** South-eastern boundary formed by the Expedition Ranges between Rolleston and Bauhinia. Region runs north-west from there to include Emerald and Dysart.

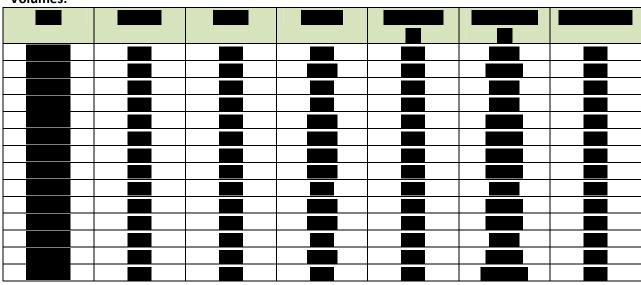






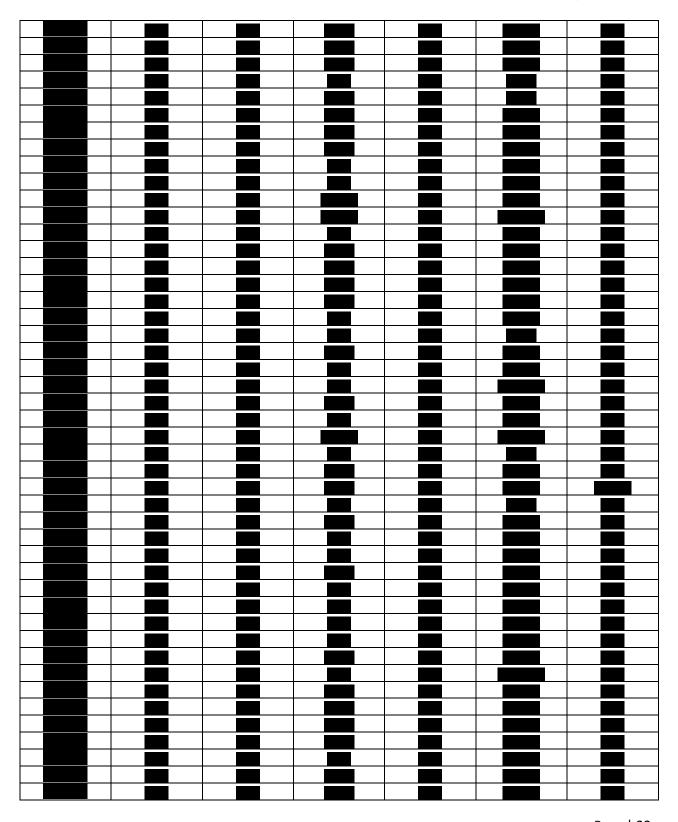
# Valley: Gwydir

**Boundaries:** South of Fox Lane, north-west to Garah, west to Collarenebri, south to Bellata. The road that runs east-west through Bellata and to Rowena is southern boundary.



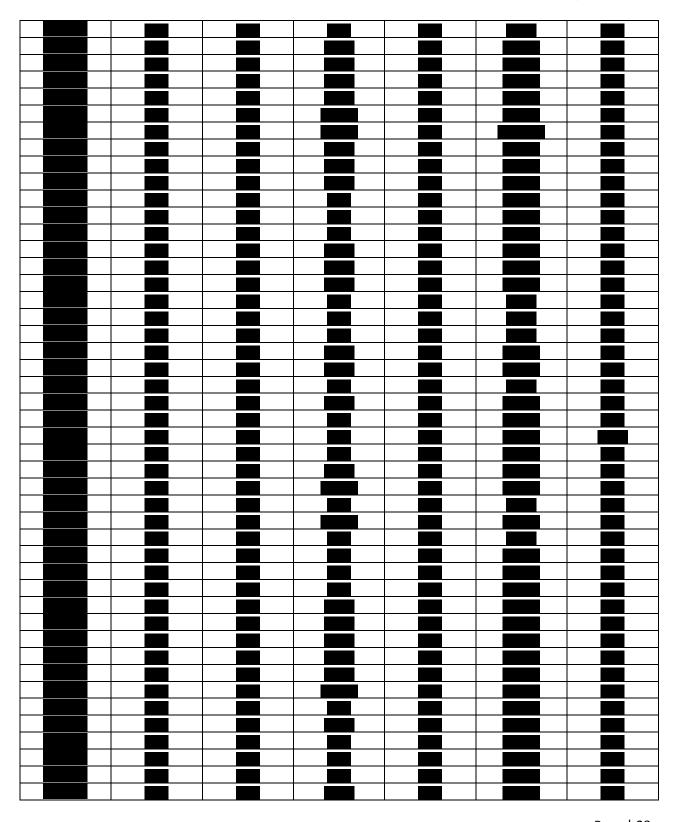
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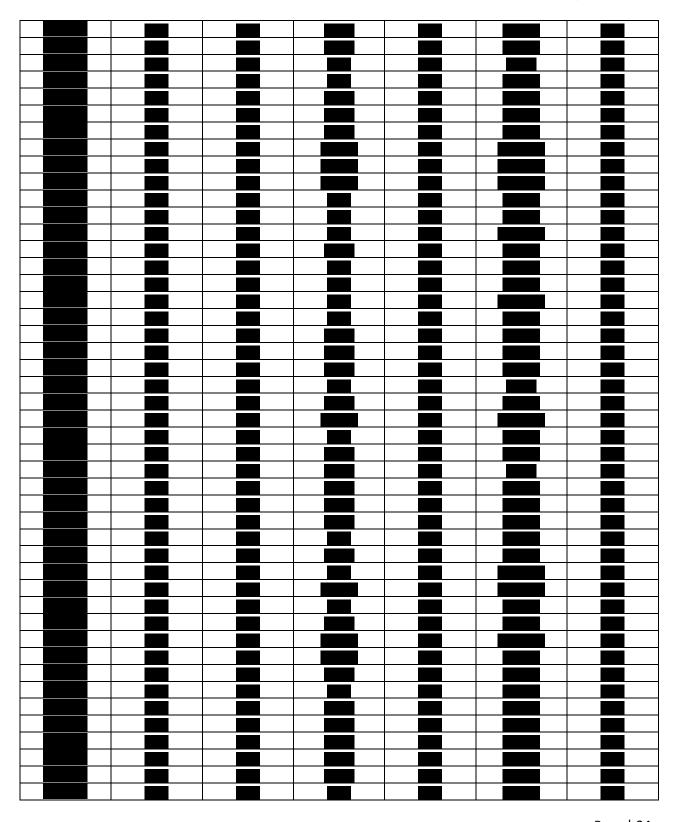
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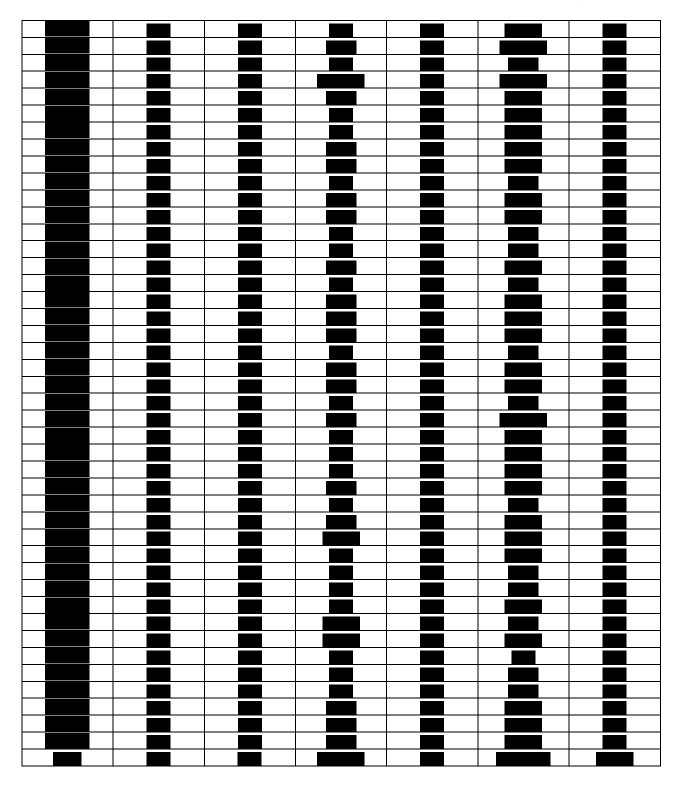
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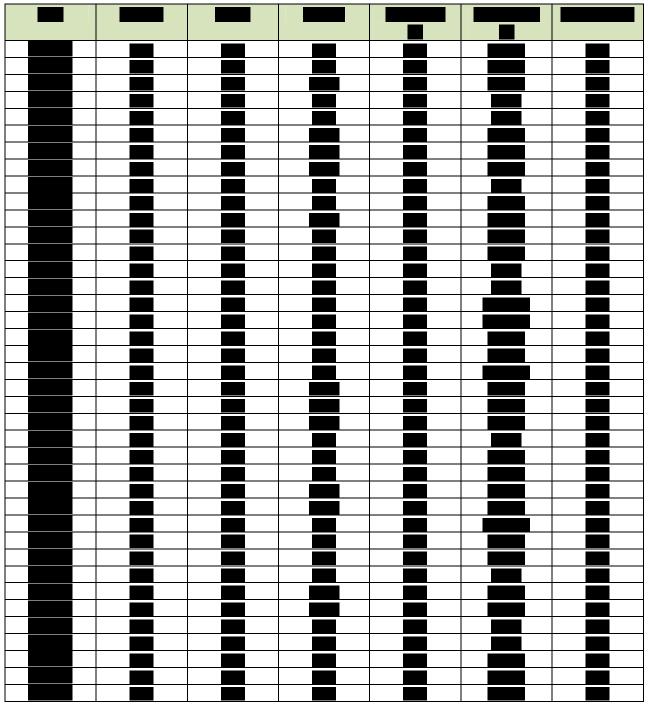


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# Valley: Lachlan

**Boundaries:** Northern boundary is Peak Hill and Tullamore and the cotton follows the Lachlan River through to Booligal. The southern boundary is the road through to Gunbar and then follows the Great Western Highway through to West Wyalong.

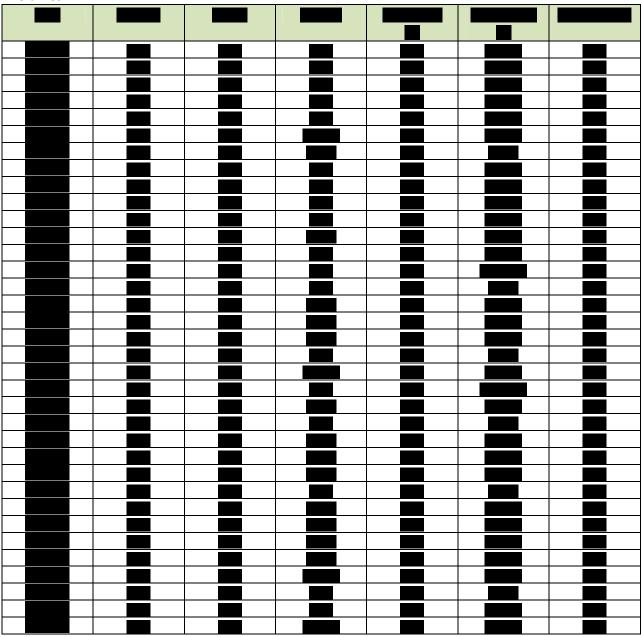


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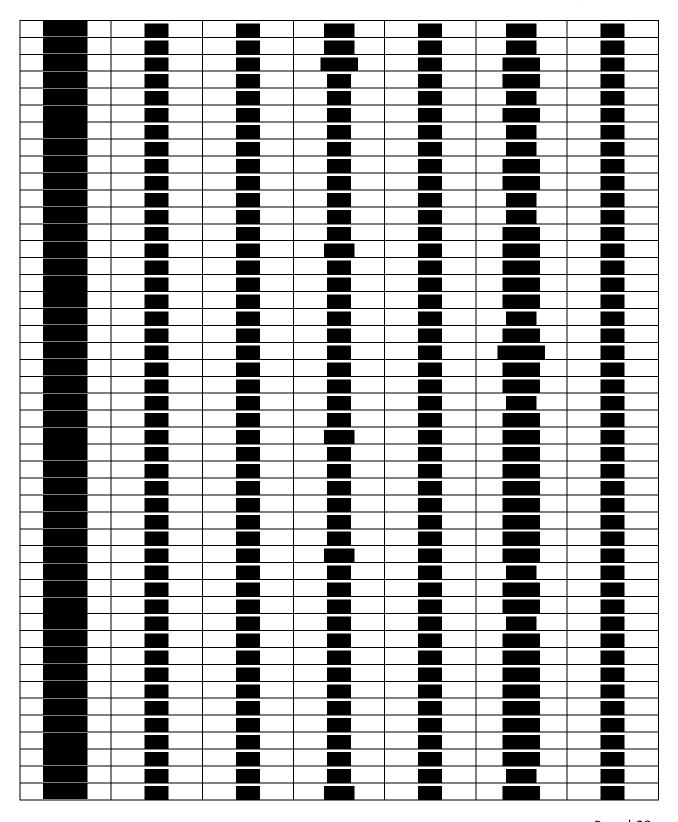
**Valley: Lower Namoi** 

**Boundaries:** North-west of Baan Baa-Manilla Road and south of Bellata-Rowena Road. Western boundary is formed by the road that runs from Pilliga via Burren Junction to Collarenebri.



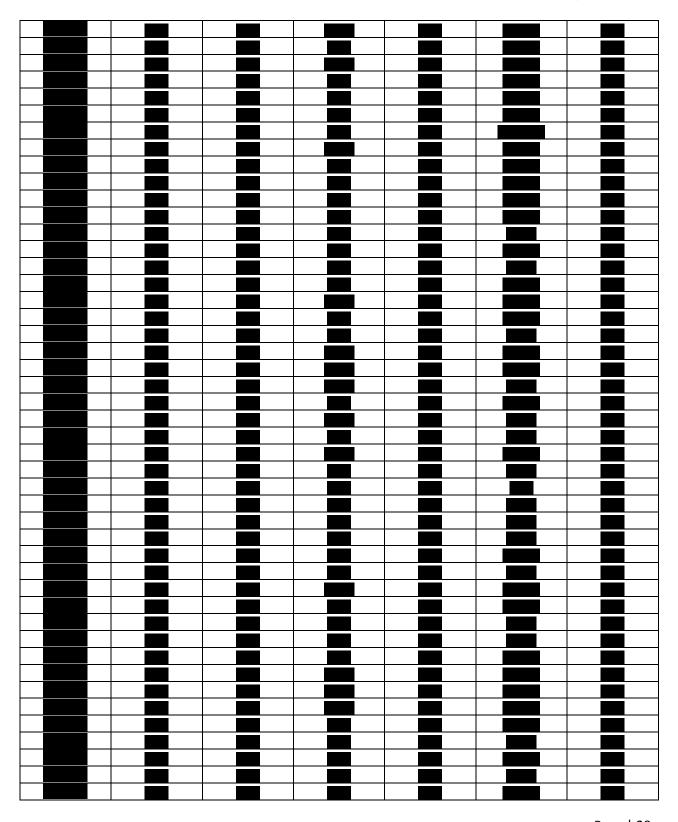
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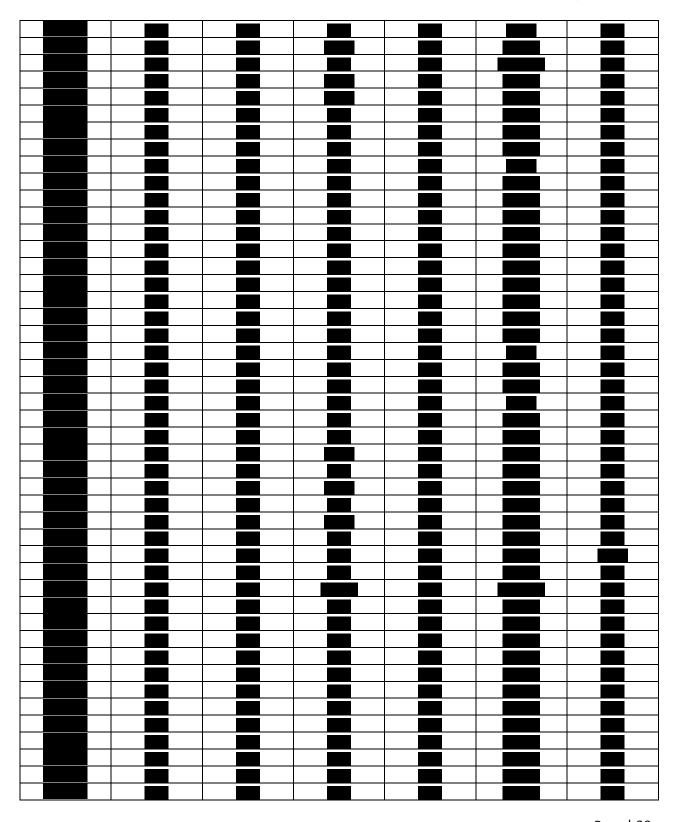
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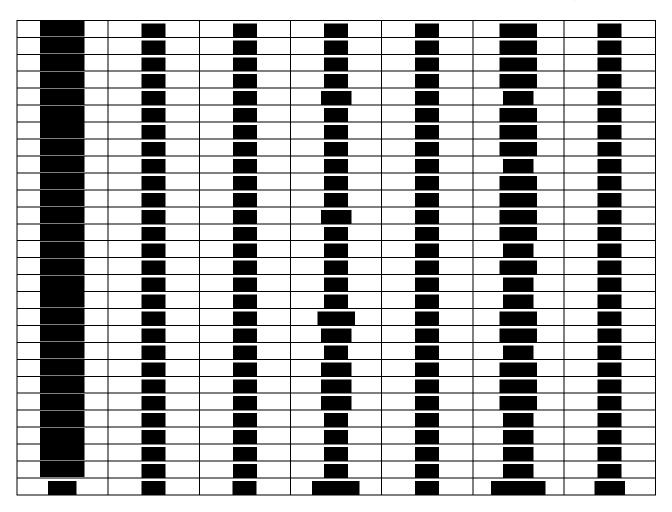
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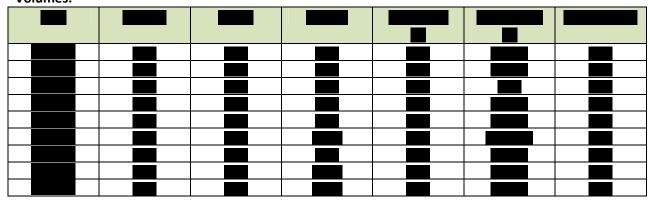
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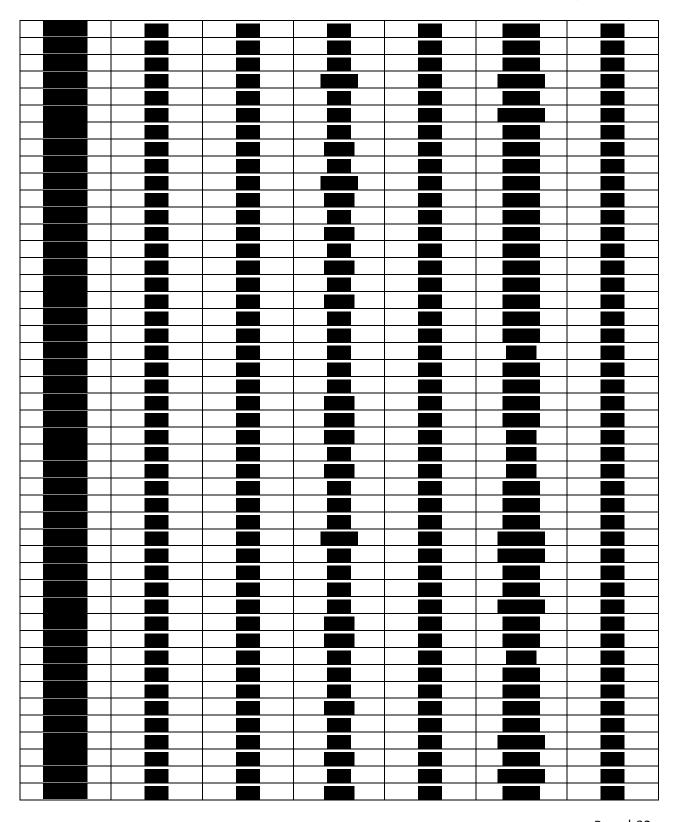
# Valley: MacIntyre

**Boundaries:** North of Gwydir, western boundary is Garah to Talwood Road north include Moonie and east to include Texas. Southern boundary is Foxes Lane which runs Garah back to the Newell Highway and then along to Croppa Creek, Yallaroi and Coolatai.



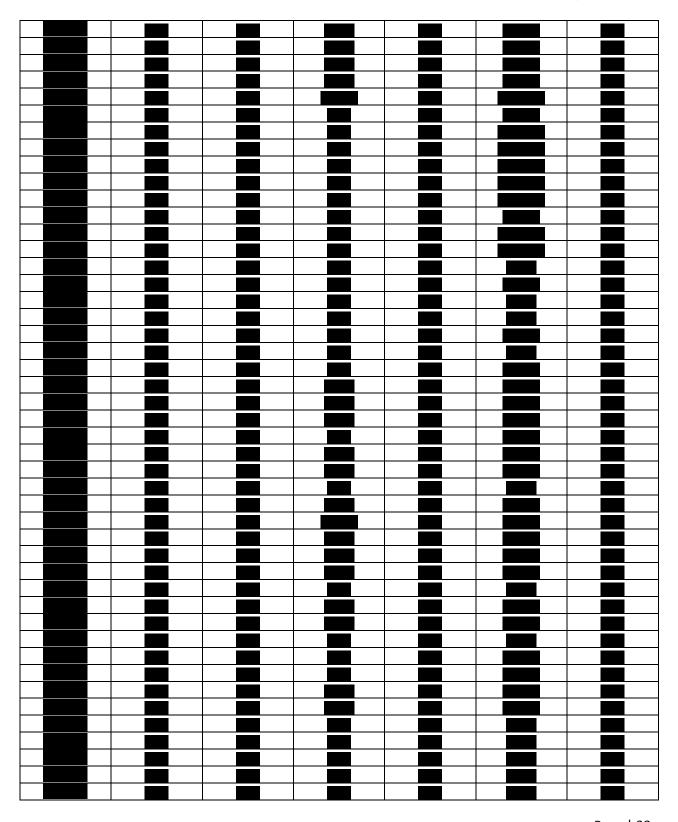
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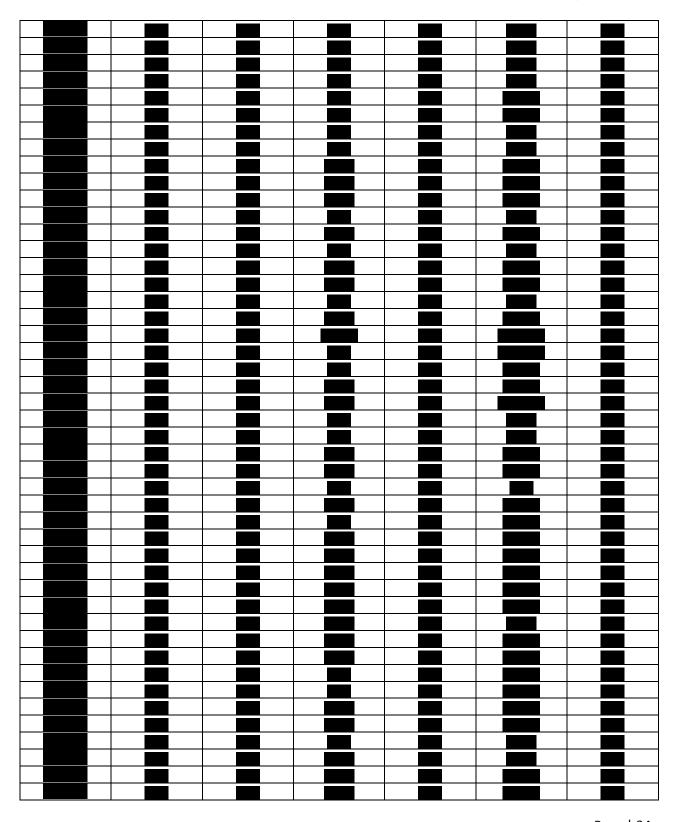
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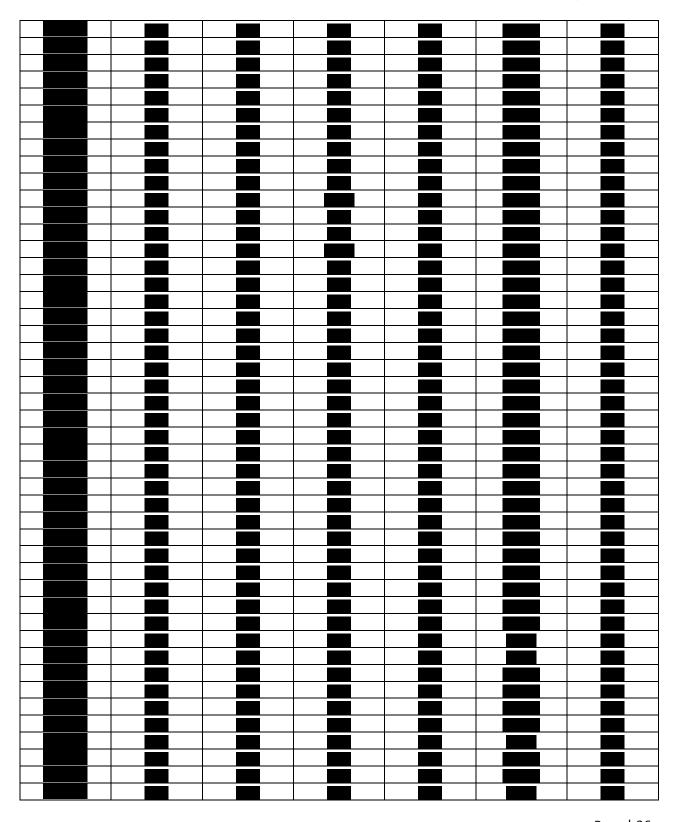
# Valley: Macquarie

**Boundaries:** Dubbo and south to Peak Hill. West to Tullamore. North through Tottenham. Nyngan and Coolabah, then east via southern boundary of Walgett shire and then south back to Dubbo via Coonabarabran.

# Volu

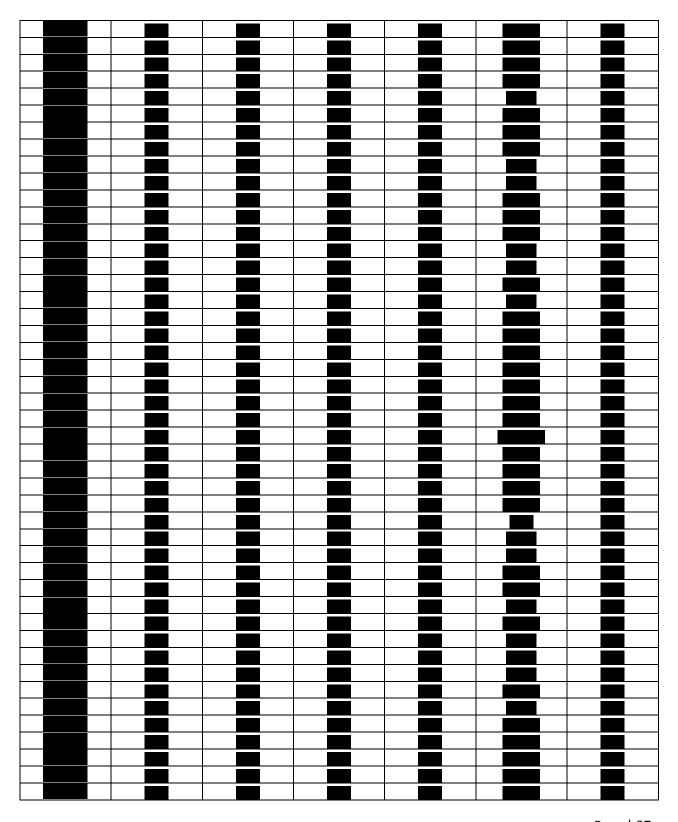
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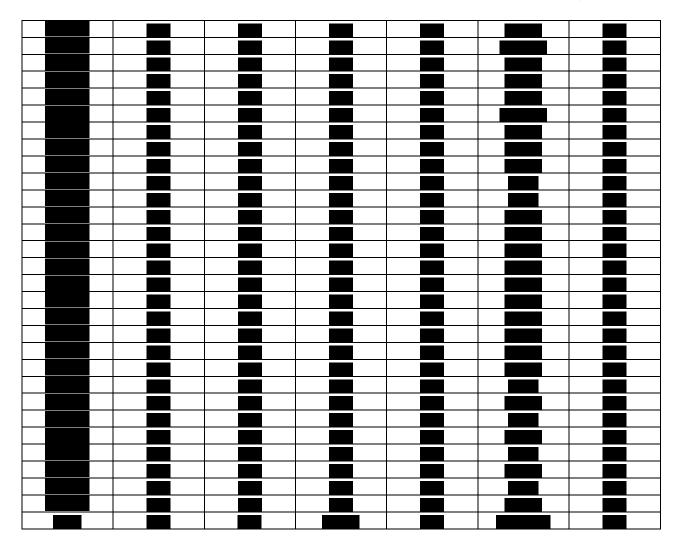
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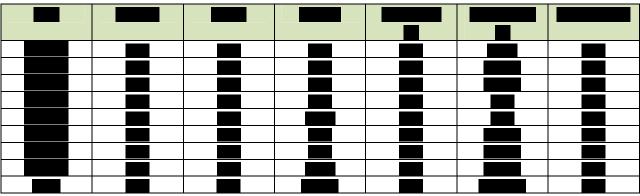
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Valley: McKenzie River

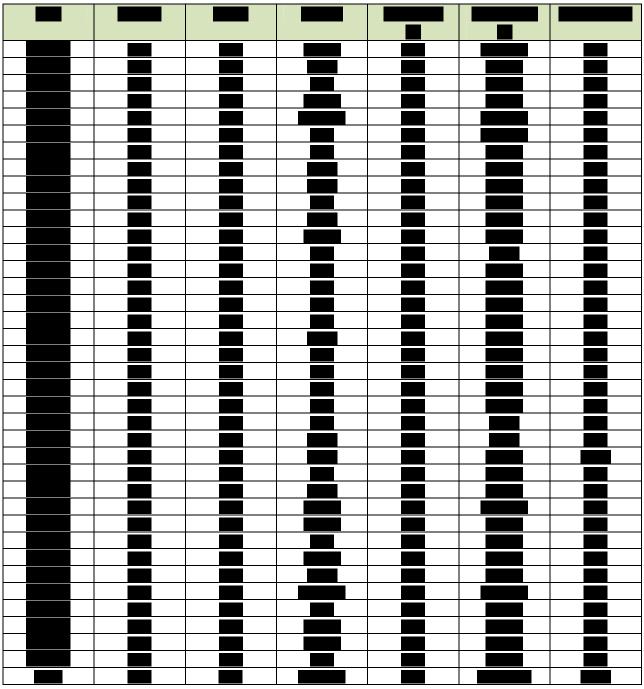
**Boundaries:** North West of Comet, to include McKenzie River and Alton Downs





## Valley: Mungindi

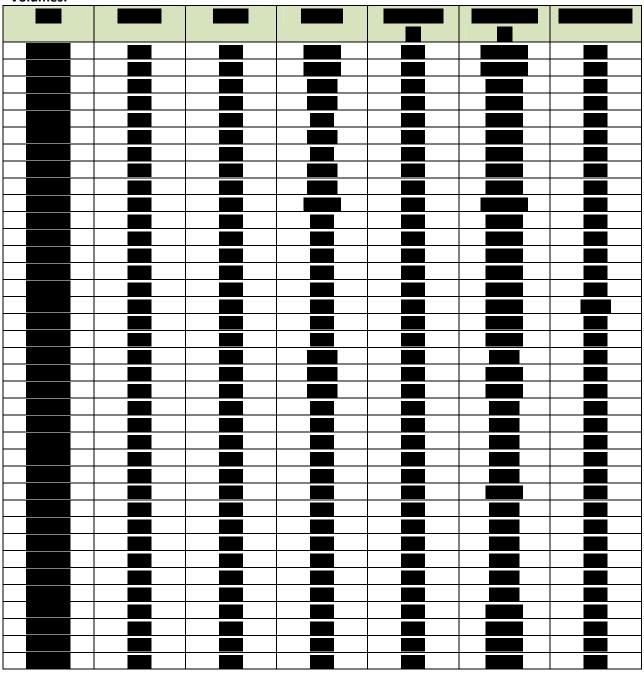
**Boundaries:** West of Garah and Boomi Road to Talwood and follows Barwon River south-west of Mungindi towards Collarenebri. Southern boundary is the Watercourse Road from Colly through to Gingham and then to Garah.





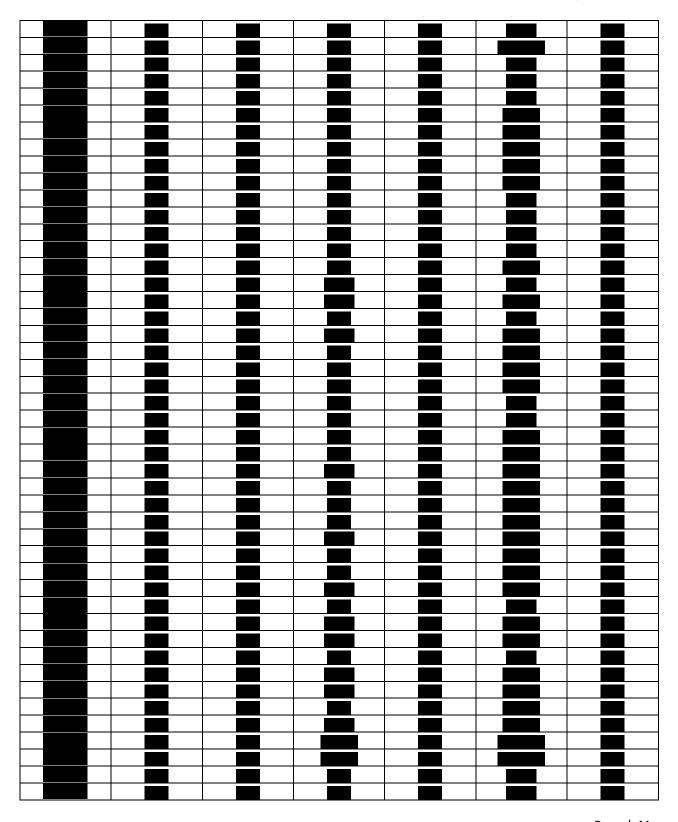
## Valley: Murrumbidgee

**Boundaries:** Northern boundary is the Great Western Highwayfrom West Wyalong through Goolgowi to Gunbar, from Gunbar west to Booligal on the Lachlan River. Downstream of Booligal on the Lachlan and south-west is the Murrumbidgee River.



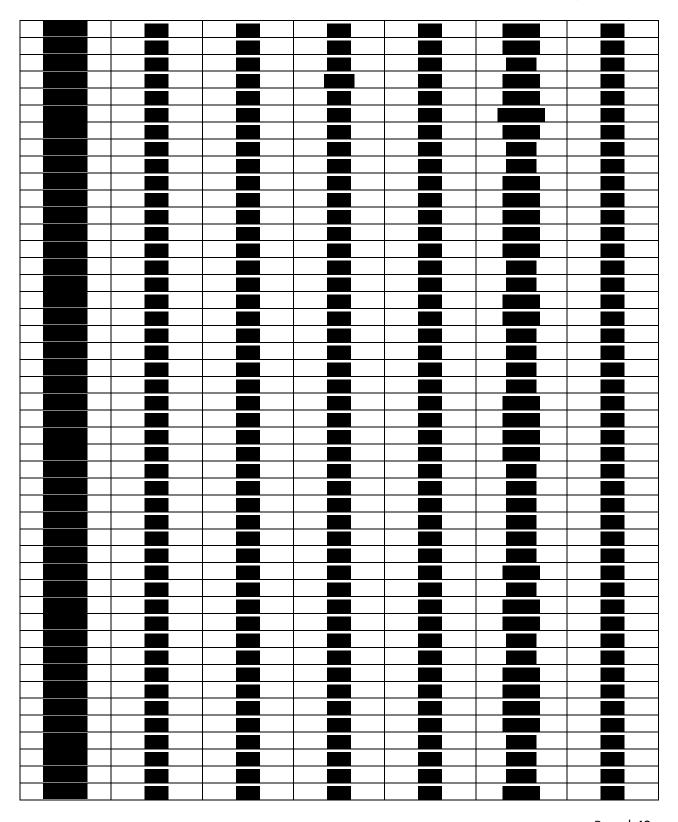
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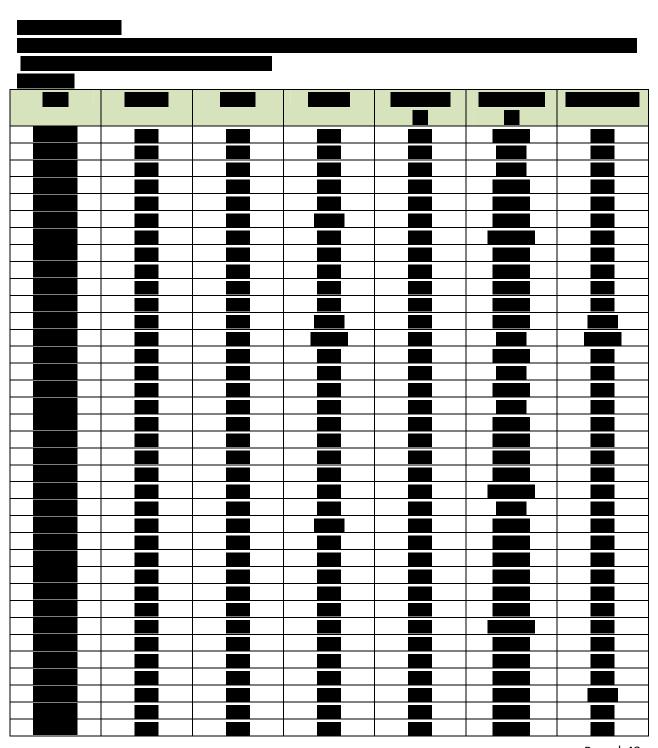
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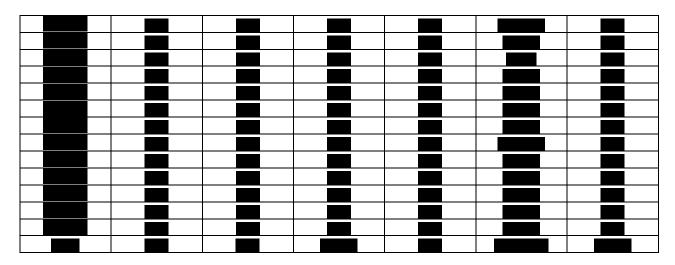
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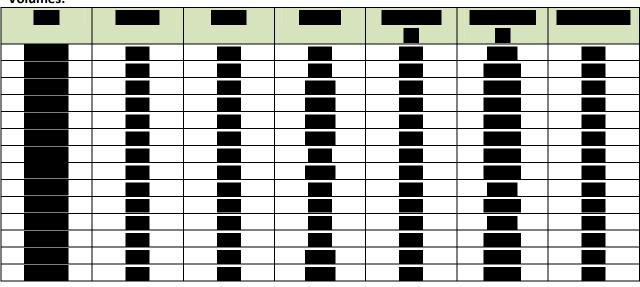
Valley: Tandou

Boundaries: surrounds Menindee shire. North of Mildure and west of the SA border

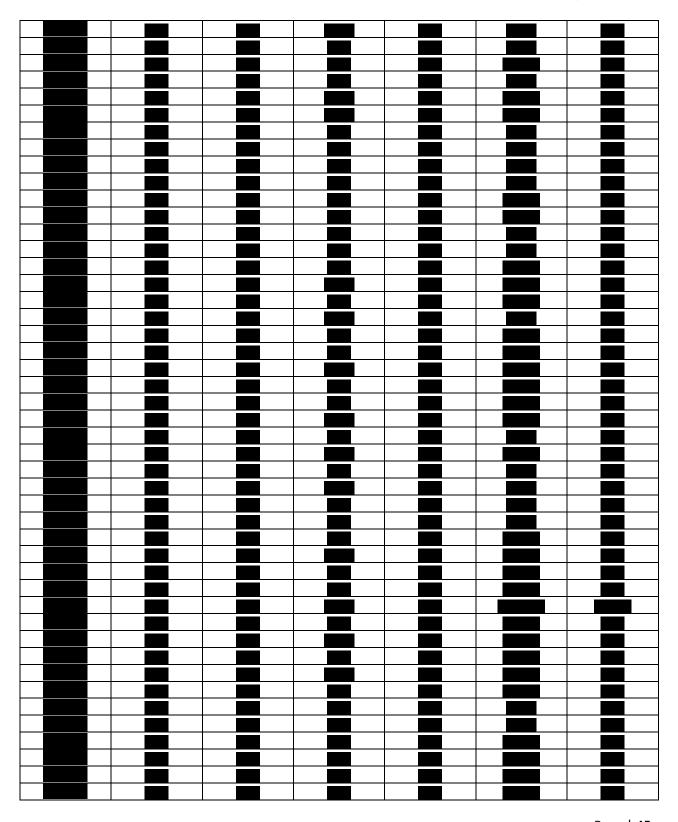
**Volumes:** 

Valley: Upper Namoi

**Boundaries:** South-east of Baan Baa-Manilla Road. Includes Coolah, Merriwa, Mullaley, Gunnedah and Quirindi.

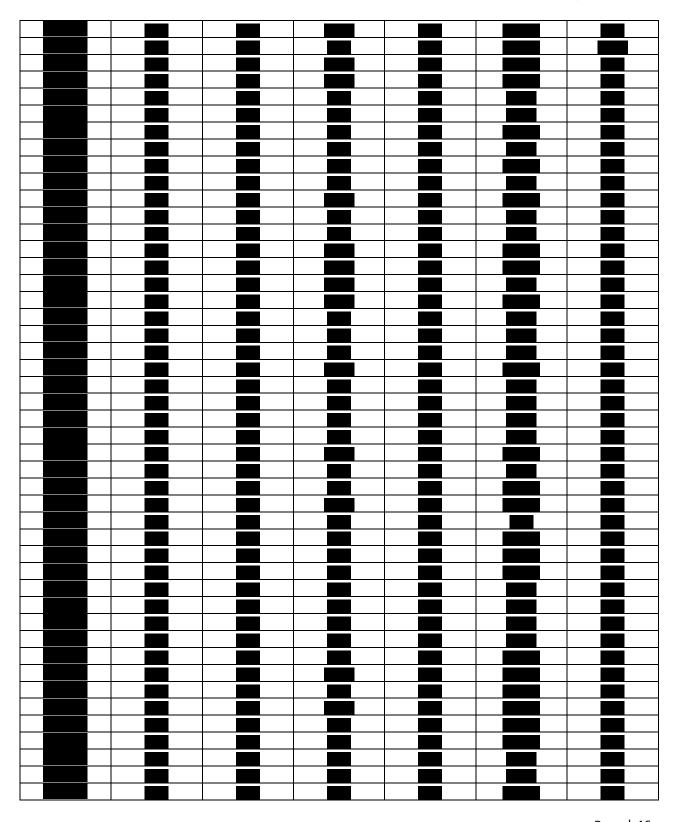






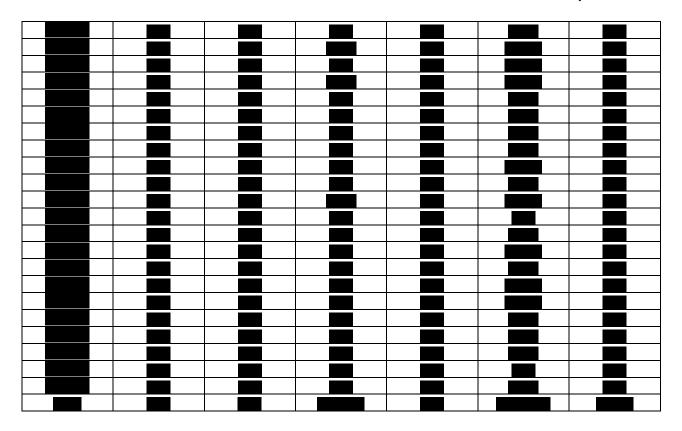
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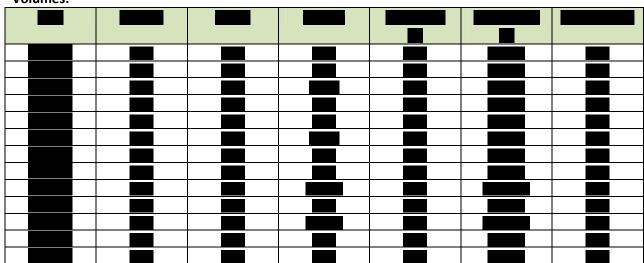
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## Valley: Walgett

**Boundaries:** Includes almost entirety of Walgett Shire, with eastern boundary being the road that runs south from Collarenebri to Burren Junction.



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# 3.4 Trial/Research Crop Locations and Volumes

Valley	BGII ha	RR ha	RRF ha	BGII w RR ha	BGII w RRF ha	BGII w ha	Total ha
Total ha	1.50	0.00	54.35	0.00	709.8	7.83	773.48





## **APPENDIX A -**

## Resistance Management Plan for Bollgard II® Cotton 2011/2012

Developed by Monsanto Australia Limited and the Transgenic and Insect Management Strategy (TIMS) Committee of Cotton Australia Ltd.

The resistance management plan is based on three basic principles: (1) minimising the exposure of *Helicoverpa* spp. to the *Bacillus thuringiensis* (Bt) proteins Cry 1Ac and Cry 2Ab; (2) providing a population of susceptible individuals that can mate with any resistant individuals, hence diluting any potential resistance; and (3) removing resistant individuals at the end of the cotton season. The three principles are supported through the implementation of 5 elements that are the key components of the Resistance Management Plan. These elements are:

- 1. Refuge crops
- 2. Planting window
- 3. Pupae busting/Trap crops
- 4. Control of volunteers and ratoon cotton and
- 5. Spray limitations.

Growers of Bollgard II cotton are required to practice preventative resistance management as set out below. Compliance with the Resistance Management Plan is required under the terms of the Bollgard II Technology User Agreement and under the conditions of registration (*Agricultural and Veterinary Chemicals Act 1994*).

Section 1 is applicable to all regions in New South Wales and Queensland that grow cotton while sections 2 and 3 detail specific requirements for New South Wales and Southern Queensland, and Central Queensland respectively.

#### SECTION 1: NEW SOUTH WALES, SOUTHERN QUEENSLAND & CENTRAL QUEENSLAND

## 1. Refuges

Growers planting Bollgard II cotton will also be required to grow a refuge crop that is capable of producing large numbers of *Helicoverpa* spp. moths which have not been exposed to selection with Bt

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proteins Cry 1Ac and Cry 2Ab. These unselected moths are expected to dominate matings with any survivors from Bollgard II crops and thus help to maintain resistance to Bt proteins Cry 1Ac and Cry 2Ab at low levels.

All refuge options are based on the requirement of a 10% unsprayed cotton refuge or its equivalent, as determined by the relative production of *Helicoverpa* spp. from each of the refuge types as described in Tables 1 and 2, for irrigated and dryland production scenarios respectively. Irrespective of the irrigation regime for the Bollgard II cotton, all pigeon pea refuges must be fully irrigated so that they are attractive to *Helicoverpa* spp. during the growing period of the Bollgard II cotton.

For each area of irrigated Bollgard II cotton planted, a grower is required to plant a minimum of one or a combination of the following:

Table 1. Irrigated Bollgard II cotton refuge options

Crop	Conditions	% of Bollgard II
Cotton	Irrigated, sprayed conventional cotton	100
	Irrigated, unsprayed conventional cotton	10
Pigeon pea	Fully irrigated, unsprayed	5

Table 2. Dryland Bollgard II cotton refuge options

Crop	Conditions	% of Bollgard II
Cotton	Dryland or irrigated, sprayed conventional cotton	100
	Dryland or irrigated, unsprayed conventional cotton	10
Pigeon pea	Fully irrigated, unsprayed	5

No other refuge options are approved for dryland Bollgard II.

**Note:** Unsprayed means not sprayed with any insecticide that targets any life stage of *Helicoverpa* spp.

Bt products must not be applied to any refuge (including sprayed cotton).

If the viability of an unsprayed conventional cotton refuge is at risk due to early season pressure by *Helicoverpa* spp., and with prior approval from the Monsanto Compliance and Stewardship Manager, a non-Bt heliocide can be applied up to the 4th true leaf stage. An unsprayed refuge

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should not be planted in the same field as any crop sprayed with a rate of insecticide that is registered for *Helicoverpa* spp, with the exception of Bollgard II. Sprayed crops and unsprayed refuges that are planted in adjacent fields must be separated by sufficient distance to *minimise* the likelihood of insecticide drift onto the unsprayed refuge.

For the purposes of this Resistance Management Plan, conventional cotton includes any cotton varieties that do not have Bt proteins in the plant that control *Helicoverpa* spp. moths.

#### **General conditions for all refuges:**

(a) Refuge crops are to be planted and managed so that they are attractive to *Helicoverpa* spp. during the growing period of the Bollgard II cotton varieties.

Irrigated: It is preferable that all refuge is planted within the 2 week period prior to planting Bollgard II. If this is not possible, refuge planting must be completed within 3 weeks of the first day of sowing of Bollgard II. At this time, sufficient refuge must have been planted to cover all of the Bollgard II cotton proposed to be planted for the season (including Bollgard II already planted and any that remains unplanted). Should additional Bollgard II planting be made after this date, which is not already covered by refuge, additional refuge must be planted as soon as possible and no more than 2 weeks after sowing of the additional Bollgard II.

Dryland: A dryland refuge must be planted within the 2 week period prior to the first day of planting Bollgard II cotton.

- (b) Pigeon pea refuges should not be planted until the soil temperature reaches 17°C, which is a requirement for germination, and should also be planted into moisture to ensure successful germination. If soil temperatures are not suitable to allow germination of pigeon peas in line with condition (a), an alternative refuge must be planted in its place within the prescribed period (under (a) above).
- (c) Once Bollgard II cotton begins to flower the corresponding refuge should not be cultivated.
- (d) Insecticide preparations containing Bt may be used on Bollgard II cotton throughout the season BUT NOT on any refuge crops.
- (e) All refuges are to be planted within the farm unit growing Bollgard II cotton. Subject to clause (f) below, all reasonable effort should be taken to plant the refuge either on one side of, or next to a Bollgard II cotton field and all Bollgard II fields must be no more than 2 km from the nearest associated Bollgard II refuge.



- (f) To minimise the possibility of refuge attractiveness being affected by herbicide drift, non-herbicide tolerant refuges should be separated from herbicide tolerant Bollgard II cotton crops by a sufficient distance to minimise such drift, but no more than 2km from the Bollgard II cotton.
- (g) To account for possible insecticide drift, the options for the width of refuge crops vary according to spray regime. If any sprayed conventional cotton is grown on the same farm unit, Bollgard II refuge crops must be at least 48 metres wide and each refuge area must be a minimum of 2 hectares. If no sprayed conventional cotton is grown on the same farm unit, Bollgard II refuge crops must be at least 24 metres wide and 24 metres long. Different unsprayed refuge options may be planted in the same field as a single unit; however a sprayed conventional cotton refuge must not be planted in a field that is also planted to an unsprayed refuge type.
- (h) In all regions, destruction of refuges should only be carried out after Bollgard II cotton lint removal has been completed.
- (i) Refuges for dryland Bollgard II cotton crops must be planted in the same row configuration as the Bollgard II crop unless the refuge is irrigated. If an irrigated option is utilised for a dryland Bollgard II crop, then that refuge may be planted in a solid configuration. Dryland cotton is measured as green hectares (calculated as defined in the Technology User Agreement).

#### 2. Control of volunteer and ration cotton

Volunteer and ratoon cotton may impose additional selection pressure on *Helicoverpa* spp. to develop resistance to the Bt Cry 1Ac and Cry 2Ab proteins produced by Bollgard II cotton.

Growers must make all reasonable efforts to remove volunteer and ration plants, as soon as possible from all fields, including fallow areas, Bollgard II crops, conventional cotton crops and all refuges. The presence of Bollgard II volunteers/ration cotton in any refuge will diminish the value of the refuge and must be removed as soon as possible.

Note: The refuge should preferably be planted into fallow or rotation fields that have not been planted to cotton in the previous season.

#### 3. <u>Post-harvest crop destruction</u>

As soon as practical after harvest, Bollgard II cotton crops must be destroyed by cultivation or herbicide so that they do not continue to act as hosts for *Helicoverpa* spp.



### **SECTION 2: NEW SOUTH WALES AND SOUTHERN QUEENSLAND ONLY**

#### 1. Planting windows

All Bollgard II crops are to be planted into moisture or watered-up by 15 November, unless otherwise advised by a Bollgard II Planting Window Variation Notice.

### 2. Pupae destruction

In Bollgard II cotton fields, each grower will be required to undertake *Helicoverpa* spp. pupae destruction after harvest according to the following key guidelines:

- Bollgard II crops should be slashed or mulched and fields cultivated for pupae control within 4 weeks
  of harvesting. All pupae busting must be completed by July 31.
- Ensure disturbance of the whole soil surface to a depth of 10 cm.
- All fields that are sown to any winter crop following a Bollgard II crop must be inspected by the Technology Service Provider before sowing commences in order to ensure that pupae busting has occurred.

#### In Refuge crops:

In New South Wales and Southern Queensland, to ensure maximum emergence of late pupae from associated refuges, soil disturbance of refuge crops should not be undertaken until after the pupae busting in Bollgard II cotton crops on the farm unit is complete. All unsprayed refuges, should preferably be left uncultivated until the following October.

### 3. Failed crops

Bollgard II crops that will not be grown through to harvest for various reasons and are declared to, and verified by, Monsanto as failed must be destroyed within two weeks after verification, in such a way that prevents regrowth. Crops abandoned before February 28 do not require pupae busting. Crops abandoned on February 28 or later must be pupae busted.

**NB:** If any grower encounters problems in complying with the Resistance Management Plan please contact your local Monsanto Regional Business Manager.





#### **SECTION 3: CENTRAL QUEENSLAND ONLY**

### 1. Planting Windows

**Emerald:** All Bollgard II crops are to be planted into moisture or watered-up in the period between September 15 and October 26, unless advised otherwise by a Bollgard II Planting Window Variation Notice.

**Dawson Callide Valleys:** All Bollgard II crops are to be planted into moisture or watered-up in the period between September 15 and October 26, unless advised otherwise by a Bollgard II Planting Window Variation Notice.

**Belyando:** All Bollgard II crops are to be planted into moisture or watered-up in the period between October 10 and November 20, unless advised otherwise by a Bollgard II Planting Window Variation Notice.

#### 2. Refuges

Pigeon Pea refuge should preferably be planted into a fallow or rotation field that has not been planted to cotton in the previous season to avoid volunteer and ratoon cotton.

In Central Queensland soil disturbance of refuge crops can only occur 2 weeks after final defoliation of the Bollgard II cotton.

### 3. <u>Late summer pigeon pea trap crop</u>

A late summer trap crop (pigeon pea) must be planted for all Bollgard II cotton grown in Central Queensland. The planting configuration of the trap crop should be the same as that of the Bollgard II crop. Irrigated Bollgard II must have an irrigated trap crop. Table 3 shows the requirements for the late summer pigeon pea trap crop. Dryland Bollgard II growers who do not have any irrigated cotton on their farm should contact their Monsanto Regional Business Manager for alternative options.

Refuge and late summer trap crops have different purposes and, if pigeon pea is selected for both, two separate plantings may be required. However, where a pigeon pea refuge is utilised as a trap crop the Page | 54

#### In Confidence



full 5% pigeon pea refuge area must be managed to become the late summer trap crop and must adhere to the requirements in Table 3 below.

Table 3. Late summer pigeon pea trap crop requirements in Central Queensland

Criterion	Trap crop*	
Minimum area & dimension	A minimum trap crop of 1% of planted Bollgard II cotton crop is required.	
(Requirement)	If sprayed conventional cotton is grown on that farm unit: the trap crop must be at least 48m x 48m.	
	If no sprayed conventional cotton is grown on that farm unit: the trap crop must be at least 24m x 24m.	
Planting time	The trap crop should preferably be planted between November 1 and November 30 Note: if growers choose to plant their trap crop to coincide with the planting of pigeon pea refuges they must manage the trap crop in such a way that it remains attractive to <i>Helicoverpa</i> spp. 2-4 weeks after final defoliation.	
Planting rate **	35kg/ha (recommended establishment greater than 4 plants per metre)	
Insect control	The trap crop can be sprayed with virus after flowering; while avoiding insecticide spray drift.	
Irrigation	The trap crop must be planted into an area where it can receive the additional irrigation required to keep the trap crop attractive to <i>Helicoverpa</i> spp. until after the cotton is defoliated.	
Weed control	The trap crop should be kept free of weeds and particularly volunteer Bollgard II cotton.	
Crop destruction	The trap crop must be destroyed 2-4 weeks (but not before 2 weeks) after final defoliation of the Bollgard II cotton crop, (slash and pupae bust – full soil disturbance to a depth of 10cm across the entire trap crop area).	



- * A pigeon pea trap crop is to be planted so that it is attractive (flowering) to *Helicoverpa* spp. after the cotton crop has cut out, and as any survivors from the Bollgard II crop emerge. Planting pigeon pea too early (e.g. before November) or too late (e.g. mid December) is not adequate for cotton crops planted during September through to October.
- ** The planting rate is a recommendation based on a minimum of 85% seed germination.

NB: <u>If any grower encounters problems in complying with the resistance management plan, please</u> contact your Monsanto Regional Business Manager.

For further background information on the various components of this plan see the "Preamble to the Resistance Management Plan for Bollgard II" in the current Cotton Pest Management Guide.





## **APPENDIX B**

Resistance Management Plan for Bollgard II® Cotton 2011/2012 - Ord River Irrigation and Burdekin Bowen Basin Areas

Developed by Monsanto Australia Limited and the Transgenic and Insect Management Strategy (TIMS) Committee of Cotton Australia Limited.

The resistance management plan is based on three basic principles: (1) minimising the exposure of *Helicoverpa* spp. to the *Bacillus thuringiensis* (Bt) proteins Cry 1Ac and Cry 2Ab; (2) providing a population of susceptible individuals that can mate with any resistant individuals, hence diluting any potential resistance; and (3) removing resistant individuals at the end of the cotton season. The three principles are supported through the implementation of 5 elements that are the key components of the Resistance Management Plan. These elements are:

- 1. Refuge crops
- 2. Planting window
- 3. Pupae busting/Trap crops
- 4. Control of volunteers and ratoon cotton and
- 5. Spray limitations.

Growers of Bollgard II cotton are required to practice preventative resistance management as set out below. Compliance with the Resistance Management Plan is required under the terms of the Bollgard II Technology User Agreement and under the conditions of registration (*Agricultural and Veterinary Chemicals Act, 1994*).

### This RMP is for the following areas:

- Ord River Irrigation Area, Western Australia
- Burdekin Bowen Basin Area, Queensland

### 1. Refuges

Growers planting Bollgard II cotton will also be required to grow a refuge crop that is capable of producing large numbers of *Helicoverpa* spp. moths which have not been exposed to selection with Bt proteins Cry 1Ac and Cry 2Ab. These unselected moths are expected to dominate matings with any survivors from Bollgard II crops and thus help to maintain resistance to Bt proteins Cry 1Ac and Cry 2Ab at low levels.



All refuge options are based on the requirement of a 10% unsprayed cotton refuge or its equivalent as determined by the relative production of *Helicoverpa* spp. from each of the refuge types as described in the tables below.

For each area of irrigated Bollgard II cotton planted, a grower is required to plant a minimum of one, or a combination of, the following:

Table 1. Irrigated Bollgard II cotton refuge options

Crop	Conditions	% of Bollgard II	Regions permitted
Conventional Cotton	Irrigated, unsprayed conventional cotton	10	Ord River, Burdekin Bowen
Pigeon pea	Fully irrigated, unsprayed	5	Ord River
Chick pea	Fully irrigated, unsprayed	5	Ord River

**Note:** Unsprayed means not sprayed with insecticides that target any life stage of *Helicoverpa* spp.

Bt products must not be applied to any refuge.

If the viability of an unsprayed conventional refuge is at risk due to early season pressure by *Helicoverpa* spp., and with prior approval from the Monsanto Compliance and Stewardship Manager, a non-Bt heliocide can be applied up to the 4th true leaf stage.

An unsprayed refuge should not be planted in the same field as any crop sprayed with a rate of insecticide that is registered for *Helicoverpa* spp, with the exception of Bollgard II. Sprayed crops and unsprayed refuges that are planted in adjacent fields must be separated by sufficient distance to *minimise the likelihood of insecticide drift onto the unsprayed refuge*.

For the purposes of this Resistance Management Plan, conventional cotton includes any cotton varieties that do not have Bt proteins in the plant that control *Helicoverpa* spp. moths.

## **General conditions for all refuges:**

(b) Refuge crops are to be planted and managed so that they are attractive to *Helicoverpa* spp. during the growing period of the Bollgard II cotton varieties.

It is preferable that all refuge is planted within the 2 week period prior to planting Bollgard II. If this is not possible, refuge planting must be completed within 3 weeks of the first day of sowing of Bollgard II. At this time, sufficient refuge must have been planted to cover all of the Bollgard II cotton proposed to be planted for the season (including Bollgard II already planted and any that



remains unplanted). Should additional Bollgard II planting be made after this date, which is not already covered by refuge, additional refuge must be planted as soon as possible and no more than 2 weeks after sowing of the additional Bollgard II.

- (b) Pigeon pea refuges should not be planted until the soil temperature reaches 17°C, which is a requirement for germination, and should also be planted into moisture to ensure successful germination. If soil temperatures are not suitable to allow germination of pigeon peas in line with condition (a), an alternative refuge must be planted in its place within the prescribed period (under (a) above).
- (c) Once the Bollgard II cotton begins to flower the corresponding refuge should not be cultivated.
- (d) Insecticide preparations containing Bt may be used on Bollgard II cotton throughout the season BUT NOT on any refuge crops.
- (e) All refuges are to be planted within the farm unit growing Bollgard II cotton. Subject to clause (f) below, all reasonable effort should be taken to plant the refuge either on one side of, or next to, a Bollgard II cotton field, and all Bollgard II fields must be no more than 2 km from the nearest Bollgard II refuge.
- (f) To minimise the possibility of refuge attractiveness being affected by herbicide drift, non-herbicide tolerant refuges should be separated from herbicide tolerant Bollgard II cotton crops by a sufficient distance to minimise such drift, but no more than 2km from the Bollgard II cotton.
- (g) To account for possible insecticide drift, Bollgard II refuge crops must be at least 24 metres wide and 24 metres long. Different unsprayed refuge options may be planted in the same field as a single unit.
- (h) Slashing of plants within the refuge should only be carried out after Bollgard II cotton lint removal has been completed. Soil disturbance of refuge crops can only occur 2 weeks after Bollgard II cotton plants have been harvested.
- (i) Refuges for Bollgard II crops must be planted in the same row configuration as the Bollgard II crop.

### 2. <u>Control of volunteer and ratoon cotton</u>

Volunteer and ratoon cotton may impose additional selection pressure on *Helicoverpa* spp. to develop resistance to the Bt proteins Cry 1Ac and Cry 2Ab produced by Bollgard II cotton.

Growers must make all reasonable efforts to remove volunteer and ratoon plants as soon as possible from all fields - including fallow areas, Bollgard II crops, conventional cotton crops and all refuges. **The** 



presence of Bollgard II volunteers/ratoon cotton in any refuge will diminish the value of the refuge and must be removed as soon as possible.

Note: The refuge should preferably be planted into fallow or rotation fields that have not been planted to cotton in the previous season.

## 3. Post-harvest crop destruction

As soon as practical after harvest, Bollgard II cotton crops must be destroyed by cultivation or herbicide so that they do not continue to act as hosts for *Helicoverpa* spp. Unsprayed refuges must be left uncultivated for two weeks after harvest to allow emergence of any pupating *Helicoverpa* spp.

## 4. Planting windows

All Bollgard II crops and cotton refuges are to be planted into moisture or watered-up in a five week window. In each region, the start date of the planting window will be determined by TIMS in consultation with local growers and reflected in a regionally amended "Bollgard II Planting Window Variation Notice".

The planting window will occur within the following periods:

Ord River Irrigation Area: March 1 and May 1.

Burdekin Bowen Basin Area: December 1 and April 1.

## 5. Refuge

Unsprayed Pigeon Pea refuge should preferably be planted into a fallow or rotation field that has not been planted to cotton in the previous season.

### 6. End of season chick pea trap crop

An end of season chick pea trap crop must be planted. The planting configuration of the trap crop should be the same as that of the Bollgard II crop. Table 2 shows the requirements for the chick pea trap crop.



Table 2. End of season chick pea trap crop requirements

Criterion	End of season chick pea trap crop
Minimum area & dimensions	A trap crop of 1% of planted Bollgard II crop area is required. This planting must be at least 24 m x 24m wide.
Planting time	In April for Burdekin Bowen Area. In July/August for Ord area. The trap crop is to be planted such that it is attractive to <i>Helicoverpa</i> spp. from 2 weeks before defoliation of the Bollgard II cotton. It must remain attractive to <i>Helicoverpa</i> spp. until at least 2 weeks after defoliation of the Bollgard II cotton.
Insect control	The trap crop should be monitored and sprayed with insecticide if the larval pressure threatens the viability of the crop.
Irrigation	The trap crop is to remain attractive to <i>Helicoverpa</i> spp. until after defoliation of cotton. In some cases this may require one additional irrigation after the cotton is defoliated. The trap crop must be planted into an area where it can receive the additional irrigation required to ensure the trap crop remains attractive to Helicoverpa spp.
Weed control	The trap crop should be kept free of weeds and particularly volunteer Bollgard II cotton.
Crop destruction	The trap crop must be destroyed 2-4 weeks after defoliation of the Bollgard II cotton crop, but not before 3 weeks (slash and pupae bust – full soil disturbance to a depth of 10 cm across the entire trap crop area).

NB: <u>If any grower encounters problems in complying with the resistance management plan, please contact your Monsanto Regional Business Manager.</u>