

PHILLIPS, Scott

From: [REDACTED]
Sent: Friday, 11 January 2013 20:07
To: Wenzel Peter; OGTR Monitoring_ & Compliance
Cc: [REDACTED]
Subject: Incident reporting form for DIR114 [SEC=No Protective Marking]
Attachments: nc-report-form DIR114 Jan 11 2013.pdf

Hi Peter

Please find attached an incident reporting form for DIR 114 as per the discussion [REDACTED] had today with Dr Joe Smith. I look forward to discussion this further with you when you return to work on Monday.

Thanks and regards

[REDACTED]
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Incident Reporting Form

This form should be used to report any incident of potential non-compliance arising from dealings with genetically modified organisms (GMOs). This includes Dealings involving Intentional Release (DIR), e.g. crop field trials; through to Dealings Not involving Intentional Release (DNIR), Notifiable Low Risk Dealings (NLRDs) or other authorisations conducted in Certified Facilities or alternate facilities authorised by the Regulator. Please fill out as much information as possible.

In case of emergency, please contact the OGTR via free call on 1800 181 030 (24 hours), e.g. if it is known or suspected that GMOs have escaped authorised containment.

Overview

Has the GMO escaped beyond authorised containment? Has it subsequently been contained / decontaminated?

Event: Sheep have been allowed to graze a fenced paddock that contains a single GM canola trial site. Whilst the site has been harvested and remaining GM material has been destroyed there is a potential that viable GM canola seed may be present within the trial area and could be consumed by livestock and/or be transported from the site via livestock movement.

Issue: This event raises two issues.

- i) the potential for the animals to inadvertently eat GM canola material, including viable seeds; and
- ii) the potential movement of viable GM canola seed off-site via undigested seed being carried within a sheep's gut and excreted via dung.

Containment Status:

1. All GM material was destroyed following harvest within the Monitoring Zone and Isolation Zone of the trial site.
2. There is however low level potential that sheep currently grazing within the fenced paddock have ingested viable GM canola seed and could move seed off site through the lack of complete digestion and breakdown within the rumen, resulting in subsequent distribution within the sheep dung.
3. At the direction of Pioneer all sheep remain contained within the fenced paddock where the trial site and Pollen Trap area are located.
4. To reduce the risk of further grazing the trial site area and pollen trap are to be fenced immediately so as to exclude animals from further grazing the trial site and pollen trap areas within the fenced paddock.
5. Under guidance from the OGTR and Pioneer, animals are to be retained within the fenced paddock and excluded from the trial site area for a minimum of 48-72 hours following the fencing of the trial site and pollen trap. This will allow any undigested GM canola seed to pass through the digestive tract and to be deposited within the fenced paddock.

Details of GMO dealings

Description of GMO dealing:

(e.g. DIR or DNIR Licence number, NLRD number, exempt or nil GM work)

DIR114 – Limited and controlled release of canola genetically modified for herbicide tolerance.

For DIR licences specify:

- **location of the dealings (site number or facility)**
- **current status of the dealing (e.g. current; flowering; or post-harvest monitoring)**
- **surrounding environment / crops (e.g. proximity to other crops; detail whether other GM or non-GM crops are in the vicinity and their developmental stages such as flowering)**

For contained dealings specify:

- **the facility certification number (if applicable)**
- **current status of the dealing (e.g. active work at the time of incident; or in storage)**
- **what other work is conducted in the facility (e.g. description and authorisation number for dealings; DNIR, NLRD, exempt or non-GM work)**

Location: DIR114 Approved Trial Site 5, Marrar Rd, Marrar, NSW 2652

GPS co-ordinates of the site:

-34.86732 S, 147.35023 E

-34.86750 S, 147.35018 E

-34.86759 S, 147.35098 E

-34.86744 S, 147.35095 E

Current Status:

1. The OGTR was notified that Harvest at the Site commenced on the 23rd November 2012. Harvest was completed on 13th December 2012.
2. Remaining GM material was destroyed by slashing on 13th December 2012.
3. The site is scheduled to be sprayed with herbicide (Cleaned) before the 11th February 2013.
4. All seed that was harvested has been destroyed off-site by incineration at a licensed waste disposal facility.

Surrounding environment/crops:

1. The Location, Pollen Trap, Monitoring Zone and Isolation Zone are contained within a fenced farm paddock.
2. The areas outside the canola trial area (i.e. within the Monitoring Zone and Isolation Zone) consists of wheat stubble.

Details of incident

Details of the incident:

- **Time and date of incident**
- **Address of the incident / dealings**
- **Persons involved** (e.g. name – include also where possible; organisation, position, contact details)

Time and date of incident: From approximately the 15th December 2012, following trial harvest and material destruction.

Address of the incident: DIR114 site 5 (Marrar site), Marrar Rd, Marrar, NSW 2652

GPS co-ordinates of the site:

-34.86732 S, 147.35023 E

-34.86750 S, 147.35018 E

-34.86759 S, 147.35098 E

-34.86744 S, 147.35095 E

Persons involved:

1. **Incident-** [REDACTED] Trial Contractor
2. **Non-Compliance Incident Response-** Pioneer Hi-Bred Australia GM Canola Non-Compliance Team

Detailed description of the incident, including:

- **Sequence of events**
- **Contributing or mitigating factors**
- **Actions / proposed actions in response to the incident** (e.g. existing / proposed contingency plans / decontamination)

Description of the event:

The following outlines the sequence of events to date:

Incident Identification and Notification

1. The OGTR was notified of an commencement of Harvest at the site–23rd November 2012.
2. Harvest was completed and material destroyed–13th December 2012
3. Seeking additional grazing for livestock, the Farmer/Co-operator introduced stock into the fenced paddock containing wheat stubble and the trial site–approximately 15th December 2012.
4. Pioneer Hi-Bred Australia became aware of the introduction of stock to the trial site area and a possible non-compliance–11th January 2013.
5. In accordance with the Pioneer Hi-Bred Australia Contingency Plan, the non-compliance team was notified and the non-compliance resolution process invoked–11th January 2013.
6. The non-compliance team convened and the issue was assessed–11th January 2013.
7. The Project Sponsor was notified and the OGTR formally advised via telephone of the incident [REDACTED] directly to Dr Joe Smith). Pioneer advised to complete the Incident Reporting Form and to submit to Mr Peter Wenzel (OGTR Monitoring and Compliance)–11th January 2013.
8. The OGTR Incident Reporting Form completed and submitted to the OGTR–11th January 2013.

Contributing or mitigating factors:

Seeking additional grazing for livestock, the Farmer/Co-operator introduced sheep into the fenced paddock containing wheat stubble and the trial site.

Actions/proposed actions in response to the incident:

The following outlines the management action plan, including proposed actions, following incident identification and notification. The plan is in accordance with the Licence

Contingency Plan:

1. The Farmer/Co-operator was notified that **all** stock are to be retained within the fenced paddock until further notice—**Completed 11th January 2012.**
2. The Trial Contractor was advised to construct a fence around the trial site (Pollen Trap and Location areas) within the fenced paddock—**Notification Completed 11th January 2013.**
3. Trial site fenced—to be completed by 14th January 2013 due to weather constraints.
4. All other trial Contractors contacted reinforcing the importance of adherence to DIR114 licence conditions—**Completed 11th January 2013.**
5. To prevent the movement of viable seed from the site, the sheep are to remain confined within the fenced paddock (i.e. within the Monitoring and Isolation Zones) and excluded from the trial site area and pollen trap for a period of at least 48-72h post-construction of the fence around this area so as to allow potentially undigested GM canola seed to pass through the animals digestive system—14th-16th January 2013.
6. Subject to OGTR approval of the management plan, remove sheep from the fenced paddock per point 5.
7. Extend the monitoring areas of the site to include the entire fenced paddock.
8. Complete internal Pioneer notifications as required under the Contingency Plan.
9. Review incident and prepare an incident report.
10. Conduct a Process Review (if required)
11. Implement process changes and re-train all persons associated with the license.

Other information and evidence attached (e.g. photographs)

The OGTR have been notified by phone on the 11th January 2013 [REDACTED] directly to Dr Joe Smith). This report follows that notification.

Your contact details

Title: Mr

Name: [REDACTED]

Organisation and role: Pioneer Hi-Bred Australia (Project Manager)

Phone number: [REDACTED]

Email address: [REDACTED]

Date: 11th January 2013

Signature:

[REDACTED]