

**LICENCE NO:** DIR124  
**LICENCE HOLDER:** Monsanto Australia Limited  
**ACCREDITATION NO:** ACCR 034/2002

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**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

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**PREPARED BY:** [REDACTED]  
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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 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 [REDACTED]

**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 authorising 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 under the 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><br>(Murrumbidgee, MacIntyre, Gwydir, Lachlan, Lower Namoi and Macquarie valleys ) | 461.16                |
| <b>QLD</b><br>(Darling Downs and Emerald valleys)  | 30.47                 |
| <b>Total BG3 ha planted</b>  | <b>491.63</b>         |

#### 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 Highway 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.

**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.



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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 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.

## 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 - Clermont:** All Bollgard II crops are to be planted into moisture or watered-up in the period between November 4 and December 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 December 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. 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<br>(Requirement) | A minimum trap crop of 1% of planted Bollgard II cotton crop is required.<br>If sprayed conventional cotton is grown on that farm unit: the trap crop must be at least 48m x 48m.<br>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: 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.