



22nd October, 2007

RE: Permit to extend Bollgard II® planting windows (No. PER 10372)

Monsanto Australia Ltd. has been granted a Permit to extend the Bollgard II® planting windows for this season [only] by the Australian Pesticides and Veterinary Medicines Authority (APVMA). The permit has been granted in response to the dramatically reduced areas of early cotton plantings this season. In considering the permit request the APVMA has consulted with the Office of Gene technology Regulator (OGTR) and relevant state government agencies (DPI's).

The permit application was supported by the Transgenic and Insecticide Management Strategies Committee (TIMS). The TIMS Technical Panel considered that current forecasts for the planted cotton area represented significantly reduced exposure of the *Bt* toxin to the pest (*Helicoverpa spp.*) in the 2007/08 season. The forecast planted area at the beginning of October represented approximately 10% of the largest cotton crop area recorded in the 1998/99 season and was uniformly distributed across the industry. Therefore unlike a 'normal' season when 'significant' areas are planted to Bollgard II over the 42 day planting window, this season presents the possibility of a relatively small initial area being planted early to Bollgard II compared to a significantly larger 'potential' area being planted late to Bollgard II should belated spring rains occur. This skewed planting schedule would approximate the requirements needed for approving a Bollgard II Planting Window Variation (PWV) but may lengthen the total period of the window between early and late plantings.

Should there be a dramatic turnaround in seasonal conditions in late spring Monsanto and the TIMS committee wanted a mechanism to be in place to enable an immediate response to changed conditions and planting intentions. Therefore a preemptive request to the regulator was made for a contingency plan to allow growers to plant Bollgard II cotton after the close of their Bollgard II planting window as prescribed under the Resistance Management Plan (RMP) and/or Bollgard II planting window variation (if granted). This request has been approved with some conditions for fields planted in 'the extension' period.

PERMIT (NO. PER 10372) REGULATORY REQUIREMENTS
(see page 3 of 3 below for specific conditions)

Refuge crop options

To mitigate the risk of resistance the only refuge options for fields planted under the Permit will be cotton refuges (either sprayed cotton or unsprayed cotton) and these must comply with the requirements for cotton refuges under the RMP.

Audit and compliance

To ensure a high level of responsibility and compliance every Bollgard II cotton field planted in 'the extension' period will be subject to a compulsory mid-season and crop destruction audit by the local Monsanto Business Manager.

Reporting

Monsanto will provide information on the Bollgard II fields planted under any Permit to a TIMS meeting in mid 2008. At this meeting, data on audits and the level of compliance will be reported in detail.

Regions

The Bollgard II planting window extension is supported for the two main cotton growing areas in Central Queensland and all cotton growing areas in Southern Queensland and in NSW. The Permit does not apply to the Bollgard II planting windows in the Burdekin or Ord River Irrigation Area cotton growing regions in northern Australia.

Dates

Bollgard II PWV for 2007/08 has already been granted in a number of regions. By meeting the criteria for obtaining a PWV these regions have shifted their planting dates without increasing the length of exposure of the Bollgard II traits to Helicoverpa. The APVMA have agreed to recognize the commitment to consultation and organisation of these Cotton Grower Associations by enabling these areas to plant Bollgard II until the last day indicated in the current PWV. Therefore, effectively, these regions have fewer extra Bollgard II planting days in the Permit that incur the conditions outlined above.

Cotton Industry Region	Bollgard II planting window CLOSING DATE		No. of extra Bollgard II planting days in the Permit 'extension' *
	Current	Under Permit	
Central Highlands	31 st Oct. 2007 (no variation)	15 th Nov. 2007	15 days
Dawson/Callide	5 th Nov. 2007 (variation granted)	15 th Nov. 2007	10 days
Darling Downs	26 th Nov. 2007 (variation granted)	1 st Dec. 2007	5 days
St George & Dirranbandi	26 th Nov. 2007 (variation granted)	1 st Dec. 2007	5 days
Macintyre & Mungindi (Border Rivers)	15 th Nov. 2007 (no variation)	1 st Dec. 2007	15 days
Gwydir	15 th Nov. 2007 (no variation)	1 st Dec. 2007	15 days
Namoi	15 th Nov. 2007 (no variation)	1 st Dec. 2007	15 days
Macquarie	15 th Nov. 2007 (no variation)	1 st Dec. 2007	15 days
Southern NSW	15 th Nov. 2007 (no variation)	1 st Dec. 2007	15 days

* Fields planted in 'the extension' period are subject to the Permit conditions listed below.

The APVMA has granted the Permit for Bollgard II planting windows due to the extreme situation that the industry finds itself in under the current drought conditions. Therefore the permit ONLY applies to the current 2007 cotton planting.

Additional information should be obtained from your local Monsanto Australia Business Manager (contact details below page 3 of 3).

Andrew Parkes,
Chairman,
TIMS Committee.



Minor Use Permit No. PER10372 – specific conditions

- All growers must contact their local Monsanto Business Manager and inform them of all fields that are planted after the conclusion of the currently notified planting window and within the extended period for their valley as follows;
 - Emerald; 31 October to 15 November
 - Dawson and Callide; 5 November to 15 November
 - Darling Downs, St George/Dirranbandi; 26 November to 1 December
 - Macintyre/Mungindi, Gwydir, Namoi, Macquarie, Southern NSW; 15 November to 1 December.
- All late planted Bollgard II must have only cotton as refuge ie 10% Unsprayed cotton or 100% Sprayed cotton. These refuges must be managed the same as the Bollgard II area as stated in the current Resistance Management Plan.
- All late planted Bollgard II must be managed for earliness.
- Pupae destruction of late planted Bollgard II fields must be completed immediately after harvest (and inspection conducted by the local Monsanto Business Manager).
- THIS PERMIT provides for the planting of Bollgard II in a manner other than specified in the Technology User Agreement (Resistance Management Plan) as it relates to the planting window. Unless otherwise stated in this permit, the planting and management of Bollgard II must be in accordance with the TUA and RMP.
- PERSONS who wish to prepare for use and/or use products for the purposes specified in this permit must read, or have read to them, the details and conditions of this permit.
- All late planted Bollgard II fields and refuges relating to these fields must be inspected by the local Monsanto Business Manager by 20 January 2008.
- The local Monsanto Business Manager must conduct an inspection audit of pupae destruction of all late planted Bollgard II fields (as required above).
- All late planted Bollgard II must be recorded by Monsanto Business Manager's on a Late Cotton Management form and provided to the Monsanto Compliance and Stewardship Manager. The permit holder must maintain these records for a minimum period of two years and be made available to the APVMA upon request.

For any further information please contact your local Monsanto Business Manager below:

Business Manager	Mobile Contact
Annabel Wiseman (Emerald, Dawson Callide)	0429 979916
Jim Wark (Darling Downs)	0427 050832
Roger Henderson (Darling Downs)	0418 717139
Anna Hedger (McIntyre, St George, Dirranbandi)	0428 556759
Bec Diprose (Gwydir, Mungindi)	0428 636413
Jodie Pedrana (Upper Namoi, Lower Namoi and Walgett)	0427 269 993
Shane Bodiam (Macquarie, Murrumbidgee, Lachlan, Bourke, Tandou).	0428 777 665

Nicole Griffin,
Compliance & Stewardship Manager,
Monsanto Australia.