



BOLLGARD[®] 3

RESISTANCE MANAGEMENT PLAN (RMP)

FOR CENTRAL & SOUTHERN QUEENSLAND, NEW SOUTH WALES AND VICTORIA



Bollgard[®]3

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Bollgard³

RESISTANCE MANAGEMENT PLAN

CENTRAL & SOUTHERN QUEENSLAND, NEW SOUTH WALES & VICTORIA

Developed by Monsanto Australia Pty Ltd

The Resistance Management Plan is based on three basic principles: (1) minimising the exposure of *Helicoverpa* spp. to the *Bacillus thuringiensis* (Bt) proteins Cry1Ac, Cry2Ab and Vip3A; (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. These principles are supported through the implementation of five elements that are the key components of the Resistance Management Plan. These elements are:

1. Planting timing restrictions;
2. Refuge crops;
3. Control of volunteers and ratoon cotton;
4. Pupae destruction/trap crops; and
5. Spray limitations

Growers of Bollgard 3 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 3 Technology User Agreement and per the Conditions of Registration for Bollgard 3 under the *Agricultural and Veterinary Chemicals Act 1994*.

1. PLANTING TIMING RESTRICTIONS

Victoria, New South Wales and Southern Queensland

All Bollgard 3 crops and refuges must be planted into moisture or watered-up between August 1 and before December 31 each year, unless otherwise specified in this Resistance Management Plan.

Central Queensland

Planting Window 1:

All Bollgard 3 crops and refuges must be planted into moisture or watered-up between August 1 and before October 31 each year, unless otherwise specified in this Resistance Management Plan. Bollgard 3 can only be planted from August 1 to October 31 each year. Seed cannot be planted wet or dry prior to August 1.

- All growers who plant Bollgard 3 cotton between August 1 and October 31 (planting window 1) and intend to grow their Bollgard 3 cotton for longer than 230 days (measured from the first day of planting for each field to the date of complete crop destruction, defined as slashed or mulched and controlled to prevent regrowth) must plant 10% irrigated unsprayed cotton refuge (or its equivalent – must be irrigated) of the Bollgard 3 area that will be grown longer than 230 days. Growers intending to grow Bollgard 3 cotton fields for longer than 230 days are required to comply with the timing conditions stipulated in "General conditions for all refuges" section (a).

- e.g., The additional refuge required for irrigated Bollgard 3 cotton grown longer than 230 days must be planted within 3 weeks of the first sowing date of Bollgard 3.
- Any Bollgard 3 fields that are planted between August 1 and October 31 (planting window 1) that only have an associated 5% unsprayed cotton refuge (or its equivalent) must be destroyed 230 days (or prior) after planting (measured from the first day of planting for each field).
 - e.g., A Bollgard 3 field that begins planting on August 1 that only has an associated 5% unsprayed cotton refuge (or its equivalent) must be completely destroyed by March 18.
- Any Bollgard 3 cotton that is planted in planting window 1 and is grown for greater than 230 days with only a 5% unsprayed cotton refuge (or its equivalent) will be recorded as non-compliant and be issued with a Resistance Risk Management Plan (RRMP).

Planting Window 2:

Any Bollgard 3 crops planted into moisture or watered-up after October 31 and up to December 31 must plant additional refuge as specified in Table 3 and 4. Bollgard 3 cannot be planted dry prior to December 31 if not watered up.

2. REFUGES

Growers planting Bollgard 3 cotton will 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 the Bt proteins Cry1Ac, Cry2Ab and Vip3A. These unselected moths are expected to dominate matings with any survivors from Bollgard 3 crops and thus help to maintain resistant alleles to the Bt proteins Cry1Ac, Cry2Ab and Vip3A at low frequencies.

All refuge options are based on the requirement of a 5% 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 3 cotton planted, a grower is required to plant one or more of the following:

Table 1. Irrigated Bollgard 3 cotton refuge options

CROP	CONDITIONS	% OF BOLLGARD 3
Cotton	Irrigated, sprayed conventional cotton	100
	Irrigated, unsprayed conventional cotton	5
Pigeon pea	Fully irrigated, unsprayed	2.5

Table 2. Dryland Bollgard 3 cotton refuge options

CROP	CONDITIONS	% OF BOLLGARD 3
Cotton	Dryland or irrigated, sprayed conventional cotton	100
	Dryland or irrigated, unsprayed conventional cotton	5
Pigeon pea	Dryland or fully irrigated, unsprayed. Dryland pigeon peas can only be planted with an approved plan from Monsanto Australia	2.5

Table 3: Irrigated Bollgard 3 cotton refuge options for Central Queensland planted in planting window 1 and grown for longer than 230 days OR planted in planting window 2 (after October 31)

CROP	CONDITIONS	% OF BOLLGARD 3
Cotton	Irrigated, sprayed conventional cotton	100
	Irrigated, unsprayed conventional cotton	10
Pigeon pea	Fully irrigated, unsprayed	5

Table 4: Dryland Bollgard 3 cotton refuge options for Central Queensland planted after October 31

CROP	CONDITIONS	% OF BOLLGARD 3
Cotton	Dryland or irrigated, sprayed conventional cotton	100
	Dryland or irrigated, unsprayed conventional cotton	10
Pigeon pea	Dryland or fully irrigated, unsprayed. Dryland pigeon peas can only be planted with an approved plan from Monsanto Australia	5

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 refuge is at risk due to early or late season pressure by Helicoverpa spp., or any other caterpillar species, contact Monsanto Australia immediately. With prior approval from Monsanto Australia, a non-Bt heliocide can be applied.*

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 3 cotton varieties.

Irrigated: It is preferable that all refuge is planted within the 2 week period prior to planting Bollgard 3. If this is not possible, refuge planting must be completed within 3 weeks of the first day of sowing of Bollgard 3. At this time, sufficient refuge must have been planted to cover all of the Bollgard 3 cotton proposed to be planted for the season (including Bollgard 3 already planted and any that remains unplanted). If additional Bollgard 3 is planted 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 3.

Dryland: A dryland refuge must be planted within the 2 week period prior to the first day of planting Bollgard 3 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) All refuges should preferably be planted into a fallow or rotation field that has not been planted to Bt cotton in the previous season to avoid volunteer and ratoon cotton. See Refuge Management Guide for all unsprayed refuges.
- (d) Once Bollgard 3 cotton begins to flower, the corresponding refuge must not be cultivated and ideally should begin to flower.
- (e) All refuges are to be planted within the farm unit growing Bollgard 3 cotton no more than 2 km from the associated Bollgard 3 cotton field. For any cases where it may not be possible to plant the refuge within 2 km from the associated Bollgard 3, approval must be sought from Monsanto Australia.
- (f) To minimise the possibility of refuge attractiveness being affected by herbicide drift, non-herbicide tolerant refuges should be separated from herbicide tolerant Bollgard 3 cotton crops by a sufficient distance to minimise such drift, but no more than 2 km from the Bollgard 3 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 3 refuge crops must be at least 48 metres wide and each refuge area must be a minimum of 2 hectares. If sprayed conventional cotton is not grown on the same farm unit, Bollgard 3 refuge crops must be at least 24 metres wide and each refuge area must be a minimum of 0.5 hectares. 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 unless a sufficient buffer is in place to prevent insecticide drift.

- (h) In all regions, destruction of refuges must only be carried out after Bollgard 3 has been harvested (refer to section 4 Pupae Destruction).
- (i) Refuges for dryland Bollgard 3 cotton crops must be planted in the same row configuration as the Bollgard 3 crop unless the refuge is irrigated. If an irrigated option is utilised for a dryland Bollgard 3 crop, then that refuge may be planted in a solid configuration. Dryland cotton is measured as Green Hectares.

3. 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 Cry1Ac, Cry2Ab and Vip3A produced by Bollgard 3 cotton.

As soon as practical after harvest, Bollgard 3 cotton crops must be destroyed by cultivation, root cutting or herbicide so that they do not continue to act as hosts for *Helicoverpa* spp.

Growers must ensure that volunteer and ratoon plants are removed prior to flowering from all fields, including fallow areas, Bollgard 3 crops, conventional cotton crops and all refuges. **The presence of Bollgard 3 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.*

4. PUPAE DESTRUCTION/ TRAP CROPS

Victoria, New South Wales and Southern Queensland

To further mitigate the risk of resistance, each grower of Bollgard 3 must undertake *Helicoverpa* spp. pupae destruction in fields with a higher probability of carrying over wintering pupae according to the following key guidelines:

- If first defoliation of a Bollgard 3 field occurs on or before March 31, the Bollgard 3 field must be slashed or mulched and controlled to prevent regrowth within 4 weeks of harvesting.
- If first defoliation of a Bollgard 3 field occurs after March 31, the Bollgard 3 field must be slashed or mulched and controlled to prevent regrowth within 4 weeks of harvesting and pupae busting must be complete by July 31 for all valleys except for all regions including the Lachlan, Murrumbidgee, Menindee and Murray Valleys and Victoria where pupae busting must be complete by August 31.
- Ensure disturbance of the soil surface to a depth of 10 cm to a distance of 30 cm both sides of the plant line.

Option for an alternative pupae destruction management

If opting to apply a registered attract and kill for *Helicoverpa* instead of pupae destruction:

- Grower must advise Monsanto if opting in for attract and kill strategy, contact your TSP for opt in dates and process.
- For growers in the Lachlan, Murrumbidgee, Menindee, Murray Valleys and Victoria, grower must apply three (3) weekly applications commencing no earlier than February 10 with the final application being no later than March 1.
 - For all other valleys (excluding Central Queensland) contact your local Bayer Cotton Territory Business Manager.
- Application must be made by an applicator accredited and approved by AgBiTech
- Grower must make applications as per the label of the registered attract and kill for *Helicoverpa*.

If for any reason the attract and kill applications are not completed as required in the RMP i.e.

- All three applications are not completed (i.e. due to weather or applicator availability only 2 out of 3 applications are made).
- Applications are not completed on the correct dates.
- Incorrect products or rates are used.
- A registered attract and kill product is not available (i.e. out of stock).
- All affected fields will be recorded as non-compliant and a Resistance Risk Management Plan (RRMP) will be issued to the grower to bring affected field(s) back into compliance with the RMP.

Central Queensland

Crop destruction

All Bollgard 3 crops must be slashed or mulched and controlled to prevent regrowth within 4 weeks of harvesting.

End of season management of refuges/trap crops

End of season pupae busting practices are not effective in the Central Queensland region as *Helicoverpa* spp. are less likely to diapause. A late summer trap crop (pigeon pea) must be planted for all Bollgard 3 cotton grown in Central Queensland. The planting configuration of the trap crop should be the same as that of the Bollgard 3 crop. Irrigated Bollgard 3 must have an irrigated trap crop.

Table 5 shows the requirements for the late summer pigeon pea trap crop. **Dryland Bollgard 3 growers who do not have any irrigated cotton on their farm should contact Monsanto Australia for alternative options.**

Refuge and late summer trap crops have different purposes. Where a pigeon pea refuge is utilised, the full pigeon pea refuge area must be managed to become the late summer trap crop. If unsprayed cotton is used as the refuge, an additional area of 1% pigeon pea must be planted as the late summer trap crop. Requirements for late summer trap crops are detailed in Table 5 below.

Table 5: Late summer pigeon pea trap crop requirements in Central Queensland

CRITERION	TRAP CROP*
Minimum area & dimension (Requirement)	<p>A minimum trap crop of 1% of planted Bollgard 3 cotton crop is required.</p> <p>If sprayed conventional cotton is grown on that farm unit: the trap crop must be at least 48 m x 48 m.</p> <p>If no sprayed conventional cotton is grown on that farm unit: the trap crop must be at least 24 m x 24 m.</p>
Planting time	<p>The trap crop should preferably be planted 4 weeks after the associated Bollgard 3.</p> <p>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.</p>
Planting rate**	35 kg/ha (recommended establishment greater than 4 plants per meter)
Insect control	<p>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 2.5% (or 5% if cotton is planted in the later window after October 31) pigeon pea refuge area managed to become the late summer trap crop can only be sprayed with virus after the first defoliation of Bollgard 3 cotton.</p>
Irrigation	<p>The refuge/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.</p>
Weed control	<p>The trap crop should be kept free of weeds and particularly volunteer Bollgard 3 cotton. When using the full pigeon pea refuge area as the trap crop, weed control must not be carried out by cultivation once flowering of the associated Bollgard 3 cotton crop has commenced.</p>
Crop destruction	<p>The trap crop must be destroyed 2–4 weeks (but not before 2 weeks) after final defoliation of the Bollgard 3 cotton crop, (slash and pupae bust – full soil disturbance to a depth of 10 cm across the entire trap crop area). All Bollgard 3 and associated trap crops must be destroyed by July 31.</p>

* 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 3 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.

Failed crops – all regions

Bollgard 3 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 that are abandoned before March 31 (except for Central Queensland) should be slashed and mulched within 4 weeks.

5. SPRAY LIMITATIONS

Insecticide preparations containing Bt may be used on Bollgard 3 cotton throughout the season BUT NOT on any refuge crops.

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 3. 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.

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 Australia immediately. With prior approval from Monsanto Australia, a non-Bt heliocide can be applied.

Note: *If any grower encounters problems in complying with the Resistance Management Plan, please contact Monsanto Australia.*

For further background information on the various components of this plan see the "Preamble to the Resistance Management Plan for Bollgard 3" in the current Cotton Pest Management Guide.

For more information visit bollgard3.com.au or contact your Bayer Territory Business Manager.



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