

Office of the Gene Technology Regulator  
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Canberra ACT 2601  
Via e-mail: [ogtr@health.gov.au](mailto:ogtr@health.gov.au)

10 January 2018

Dear Sir/Madam,

## DIR157: Invitation to comment on the commercial release of a genetically modified cotton (COT102)

Cotton Australia welcomes the opportunity to provide comment and, as the industry representative body, speak on behalf of cotton growers regarding the *Risk Assessment and Risk Management Plan for DIR157; Commercial release of cotton genetically modified for insect resistance (COT102)*.

The Australian cotton industry strongly supports the use of transgenic insecticidal (Bt) technology to deliver productivity and sustainability gains to cotton growers, provided that these technologies can be delivered safely and stewarded responsibly.

### Overall support for the Risk Assessment and Risk Management Plan (RARMP)

Cotton Australia supports the findings of the COT102 RARMP; that the COT102 technology poses negligible risk to human health and environmental safety. As such, no specific risk treatment measures are required to be applied by the OGTR.

However, a robust resistance management plan for COT102 should be subsequently considered by the Australian Pesticides and Veterinary Medicines Authority (APVMA) to assure long-term beneficial environmental and human health outcomes associated with Bt technology.

### Additional risk mitigation strategies should not be required for COT102

Currently, over 95% of the Australian cotton area is planted to third-generation Bt varieties. For the 2017-18 cotton season, an area exceeding 360,000 hectares is reportedly planted to cotton already containing the COT102 technology as part of the Monsanto Bollgard®3 technology package.

In agreement with the findings of the COT102 RARMP, it is likely that the risks to human health and environmental safety associated with COT102 are commensurate with currently registered products containing this technology and thus do not require implementation of additional risk mitigation strategies.

### Single-gene Bt products require strong stewardship

Bt technologies have delivered a suite of direct and indirect benefits to the cotton industry including improved environmental and human safety outcomes associated with a 96% reduction in pesticide use. However, ongoing stewardship is required for single-gene Bt products to mitigate risks associated with field-evolved *Helicoverpa* resistance.



*Advancing Australian Cotton*

As highlighted in the COT102 RARMP, the resistance risks associated with single-gene Bt products require consideration by the APVMA and cotton industry's Transgenic and Insecticides Management Strategies (TIMS) Committee.

The development of a robust resistance management plan to accompany any commercial release of single-gene Bt products in Australia (including COT102) is essential for avoiding the field-evolved resistance which is currently threatening the environmental safety and commercial viability of some overseas cotton systems.

**Further information**

Cotton Australia welcomes any opportunity to provide further information on its position regarding the RARMP for COT102. For more information, contact Nicola Cottee, Policy Officer by calling (02) 9669 5222 or emailing [nicolac@cotton.org.au](mailto:nicolac@cotton.org.au)

Yours sincerely,

Nicola Cottee

Policy Officer, Research Direction and Stewardship