68467-4 9/29/2010 1/16

U.S. ENVIRONMENTAL PROTECTION AGENCY
Office of Pesticide Programs
Biopesticides and Pollution Prevention Division (7511P)
1200 Pennsylvania Avenue NW
Washington, D.C. 20460

EPA Reg. Number:	Date of Issuance:
68467-4	SEP 29 2010

Term of Issuance:

Unconditional, Time-Limited

Name of Pesticide Product:

B.t. Cry1F Event DAS-06275-8

NOTICE OF PESTICIDE:

[X] Registration

[ ] Reregistration (under FIFRA, as amended)

Name and Address of Registrant (include ZIP Code):

Mycogen Seeds c/o
Dow AgroSciences LLC
9330 Zionsville Road
Indianapolis, IN 46268-1054

Note: Changes in labeling differing in substance from that accepted in connection with this registration must be submitted to and accepted by the Biopesticides and Pollution Prevention Division prior to use of the label in commerce. In any correspondence on this product, always refer to the above EPA registration number.

On the basis of information furnished by the registrant, the above named pesticide is hereby registered under the Federal Insecticide, Fungicide, and Rodenticide Act.

Registration is in no way to be construed as an endorsement or recommendation of this product by the Agency. In order to protect health and the environment, the Administrator, on her motion, may at any time suspend or cancel the registration of a pesticide in accordance with the Act. The acceptance of any name in connection with the registration of a product under this Act is not to be construed as giving the registrant a right to exclusive use of the name or to its use if it has been covered by others.

This registration does not eliminate the need for continual reassessment of the pesticide. If the EPA determines at any time, that additional data are required to maintain in effect an existing registration, the Agency will require submission of such data under section 3(c)(2)(B) of FIFRA.

This product, originally registered in May 2005, is now registered in accordance with FIFRA section 3(c)(5) and is subject to the following terms and conditions:

1] The subject registration will automatically expire on midnight September 30, 2015.

2] The subject registration will be limited to *: Bacillus thuringiensis var. aizawai strain* PS811 Cry1F protein and the genetic material necessary for its production (plasmid insert PHP12537) in corn event DAS-Ø6275-8 in field corn.

3] This plant-incorporated protectant may be combined through conventional breeding with other registered plant-incorporated protectants that are similarly approved for use in combination, through conventional breeding, with other registered plant-incorporated protectants to produce inbred corn lines and hybrid corn varieties with combined pesticidal traits.

Signature of Approving Official:	Date:
W. Michael McDavit	9/29/10
Biopesticides and Pollution Prevention Division (7511P)	

EPA Form 8570-6

4] You must do the following Insect Resistance Management Program

The following registration requirements and conditions shall not require any action by Mycogen Seeds c/o Dow AgroSciences LLC unless and until Mycogen Seeds c/o Dow AgroSciences LLC commercializes moCry1F corn in the United States The term "commercialization" shall mean the sale of moCry1F corn seed to one or more growers for the purposes of growing a commercial grain corn crop in the United States

Insect Resistance Management

The required IRM program for *Bt* corn must have the following elements

1] Requirements relating to creation of a non-*Bt* corn and/or non-lepidopteran resistant *Bt* corn refuge in conjunction with the planting of any acreage of *Bt* corn,

2] Requirements for the registrants to prepare and require *Bt* corn users to sign "grower agreements" that impose binding contractual obligations on the grower to comply with the refuge requirements,

3] Requirements regarding programs to educate growers about IRM requirements,

4] Requirements regarding programs to evaluate and promote growers' compliance with IRM requirements,

5] Requirements regarding programs to evaluate whether there are statistically significant and biologically relevant changes in target insect susceptibility to Cry1F protein in the target insects,

6] Requirements regarding a "remedial action plan" that contains measures the registrants would take in the event that any field relevant insect resistance was detected as well as to report on activity under the plan to EPA,

7] Submit annual reports on units sold by state (units sold by county level will be made available to the Agency upon request), IRM grower agreements results, and the compliance assurance program including the education program on or before January 31st each year

a Refuge Requirements

These refuge requirements do not apply to seed propagation of inbred and hybrid corn seed corn up to a total of 20,000 acres per county and up to a combined U S total of 250,000 acres per PIP active ingredient per registrant per year

When on-farm assessments identify non-compliance with refuge requirements for one or more *Bt* corn products, additional educational material and assistance are provided by the registrant to help these growers meet the refuge requirements across their farming operations

1] Corn-Belt Refuge Requirements

Field corn grown outside cotton-growing areas (e g , the Corn Belt), grower agreements (also known as stewardship agreements) will specify that growers must adhere to the refuge requirements as described in the grower guide/product use guide and/or in supplements to the grower guide/product use guide

Specifically, growers must plant a structured refuge of at least 20% non-*Bt* corn and/or non-lepidopteran resistant *Bt* corn that may be treated with insecticides as needed to control lepidopteran stalk-boring and other pests

Refuge planting options include separate fields, blocks within fields (e g , along the edges or headlands), and strips across the field

External refuges must be planted within ½ mile

When planting the refuge in strips across the field, refuges must be at least 4 rows wide

Insecticide treatments for control of ECB, CEW, Southwestern corn borer (SWCB) and other lepidopteran target pests listed on the label, grower guides, or other educational material may be applied only if economic thresholds are reached for one or more of these target pests Economic thresholds will be determined using methods recommended by local or regional professionals (e g , Extension Service agents, crop consultants) Instructions to growers will specify that microbial *Bt* insecticides must not be applied to non-*Bt* corn and/or non-lepidopteran resistant *Bt* corn refuges

2] Cotton-Growing Area Refuge Requirements for *Bt* Corn

For *Bt* field corn grown in cotton-growing areas, grower agreements (also known as stewardship agreements) will specify that growers must adhere to the refuge requirements as described in the grower guide/product use guide and/or in supplements to the grower guide/product use guide

Specifically, growers in these areas must plant a structured refuge of at least 50% non-*Bt* corn and/or non-lepidopteran resistant *Bt* corn that may be treated with insecticides as needed to control lepidopteran stalk-boring and other pests

Refuge planting options include separate fields, blocks within fields (e g , along the edges or headlands), and strips across the field

External refuges must be planted within ½ mile

When planting the refuge in strips across the field, refuges must be at least 4 rows wide

Insecticide treatments for control of ECB, CEW, Southwestern corn borer (SWCB), and other lepidopteran target pests listed on the label, grower guides, or other educational

material may be applied only if economic thresholds are reached for one or more of these target pests Economic thresholds will be determined using methods recommended by local or regional professionals (e g , Extension Service agents, crop consultants) Instructions to growers will specify that microbial *Bt* insecticides must not be applied to non-*Bt* corn and/or non-lepidopteran resistant *Bt* corn refuges

Cotton-growing areas include the following states Alabama, Arkansas, Georgia, Florida, Louisiana, North Carolina, Mississippi, South Carolina, Oklahoma (only the counties of Beckham, Caddo, Comanche, Custer, Greer, Harmon, Jackson, Kay, Kiowa, Tillman, Washita), Tennessee (only the counties of Carroll, Chester, Crockett, Dyer, Fayette, Franklin, Gibson, Hardeman, Hardin, Haywood, Lake, Lauderdale, Lincoln, Madison, Obion, Rutherford, Shelby, and Tipton), Texas (except the counties of Carson, Dallam, Hansford, Hartley, Hutchinson, Lipscomb, Moore, Ochiltree, Roberts, and Sherman), Virginia (only the counties of Dinwiddie, Franklin City, Greensville, Isle of Wight, Northampton, Southampton, Suffolk City, Surrey, Sussex) and Missouri (only the counties of Dunklin, New Madrid, Pemiscot, Scott, Stoddard)

b Grower Agreements

1] Persons purchasing the *Bt* corn product must sign a grower agreement The term "grower agreement" refers to any grower purchase contract, license agreement, or similar legal document

2] The grower agreement and/or specific stewardship documents referenced in the grower agreement must clearly set forth the terms of the current IRM program By signing the grower agreement, a grower must be contractually bound to comply with the requirements of the IRM program

3] The registrant must maintain a system that is reasonably likely to assure that persons purchasing the *Bt* corn product will affirm annually that they are contractually bound to comply with the requirements of the IRM program

4] The registrant must continue to use their current grower agreement If the registrant wishes to change any part of the grower agreement or any specific stewardship documents referenced in the grower agreement that would affect either the content of the IRM program or the legal enforceability of the provisions of the agreement relating to the IRM program, thirty days prior to implementing a proposed change, the registrant must submit to EPA the text of such changes to ensure that it is consistent with the terms and conditions of the amendment

5] The registrant must maintain a system that is reasonably likely to assure that persons purchasing the *Bt* corn sign grower agreement(s)

6] The registrant shall maintain records of all *Bt* corn grower agreements for a period of three years from December 31 of the year in which the agreement was signed

7] The registrant shall provide EPA with a report showing the number of units of its *Bt* corn seeds sold or shipped and not returned, and the number of such units that were sold to persons who have

signed grower agreements The report shall cover the time frame of the twelve-month period covering the prior August through July

8] The registrant must allow a review of the grower agreements and grower agreement records by EPA or by a State pesticide regulatory agency if the State agency can demonstrate that confidential business information, including names, personal information, and grower license number, will be protected

c IRM Education and IRM Compliance Monitoring Programs

1] The registrant must maintain a comprehensive, ongoing IRM education program designed to convey to *Bt* corn users the importance of complying with the IRM program The program shall include information encouraging *Bt* corn users to pursue optional elements of the IRM program relating to refuge configuration and proximity to *Bt* corn fields The education program shall involve the use of multiple media, e g face-to-face meetings, mailing written materials, EPA reviewed language on IRM requirements on the bag or bag tag, and electronic communications such as by Internet, radio, or television commercials Copies of the materials will be provided to EPA for its records The program shall involve at least one written communication annually to each *Bt* corn user separate from the grower technical guide The communication shall inform the user of the current IRM requirements The registrant shall coordinate its education programs with educational efforts of other registrants and other organizations, such as the National Corn Grower Association and state extension programs

2] Annually, the registrant shall revise, and expand as necessary, its education program to take into account the information collected through the compliance survey required and from other sources The changes shall address aspects of grower compliance that are not sufficiently high

3] Annually, each January 31st, the registrant must provide EPA any substantive changes to its grower education activities as part of the overall IRM compliance assurance program report The registrant must either submit a separate report or contribute to the report from the industry working group (ABSTC)

4] The registrant must maintain an ongoing IRM compliance assurance program designed to evaluate the extent to which growers purchasing its *Bt* corn product are complying with the IRM program and that takes such actions as are reasonably needed to assure that growers who have not complied with the program either do so in the future or lose their access the registrant's *Bt* corn products The registrant shall coordinate with other *Bt* corn registrants in improving its compliance assurance program and continue to integrate this registration into the current compliance assurance program used for its other *Bt* corn plant-incorporated protectants Other required features of the program are described in paragraphs 5–22

5] The registrant must maintain and publicize a "phased compliance approach," i e , a guidance document that indicates how the registrant will address instances of non-compliance with the terms of the IRM program and general criteria for choosing among options for responding to any non-compliant growers after the first year of noncompliance While recognizing that for reasons of

difference in business practices there are needs for flexibility between different companies, all *Bt* corn registrants must use a consistent set of standards for responding to non-compliance An individual grower found to be significantly out of compliance two years in a row would be denied access to the registrant's Bt corn products the next year Similarly, seed dealers who are not fulfilling their obligations to inform/educate growers of their IRM obligations will lose their opportunity to sell *Bt* corn

6] The IRM compliance assurance program shall include an annual survey conducted by an independent third party of a statistically representative sample of growers of *Bt* corn borer protected products who plant the vast majority of all corn in the U S and in areas in which the selection intensity is greatest The survey shall consider only those growers who plant 200 or more acres of corn in the Corn-Belt and who plant 100 or more acres of corn in corn-cotton areas The survey shall measure the degree of compliance with the IRM program by growers in different regions of the country and consider the potential impact of non-response The sample size and geographical resolution may be adjusted annually, based upon input from the independent marketing research firm and academic scientists, to allow analysis of compliance behavior within regions or between regions The sample size must provide a reasonable sensitivity for comparing results across the U S

1 A third party is classified as a party other than the registrant, the grower, or anyone else with a direct interest in IRM compliance for *Bt* corn

7] The survey shall be designed to provide an understanding of any difficulties growers encounter in implementing IRM requirements An analysis of the survey results must include the reasons, extent, and potential biological significance of any implementation deviations

8] The survey shall be designed to obtain grower feedback on the usefulness of specific educational tools and initiatives

9] The registrant shall provide a written summary of the results of the prior year's survey (together with a description of the regions, the methodology used, and the supporting data) to EPA by January 31st of each year The registrant shall confer with other registrants and EPA on the design and content of the survey prior to its implementation

10] Annually, the registrant shall revise, and expand as necessary, its compliance assurance program to take into account the information collected through the compliance survey and from other sources The changes shall address aspects of grower compliance that are not sufficiently high The registrants must confer with the Agency prior to adopting any changes

11] The registrant shall conduct an annual on-farm assessment program The registrant shall train its representatives who make on-farm visits with growers of their *Bt* corn borer protected products to perform assessments of compliance with IRM requirements There is no minimum corn acreage size for this program Therefore, growers will be selected for this program from across all farm sizes In the event that any of these visits result in the identification of a grower who is not in compliance with the IRM program, the registrant shall take appropriate action, consistent with its "phased compliance approach," to promote compliance

12] The registrant shall carry out a program for investigating legitimate "tips and complaints" that its growers are not in compliance with the IRM program Whenever an investigation results in the identification of a grower who is not in compliance with the IRM program, the registrant shall take appropriate action, consistent with its "phased compliance approach "

13] If a grower, who purchases *Bt* corn for planting, was specifically identified as not being in compliance during the previous year, the registrant shall visit with the grower and evaluate whether that the grower is in compliance with the IRM program for the current year

14] Each registrant shall annually provide a report to EPA summarizing the activities carried out under their compliance assurance program for the prior year and the plans for the compliance assurance program during the current year Within one month of submitting this report to EPA, the registrant shall meet with EPA to discuss its findings The report will include information regarding grower interactions (including, but not limited to, on-farm visits, verified tips and complaints, grower meetings and letters), the extent of non-compliance, corrective measures to address the non-compliance, and any follow-up actions taken The report must inform EPA of the number of growers deemed ineligible to purchase Bt corn seed on the basis of continued non-compliance with the insect resistance management refuge requirements The registrants may elect to coordinate information and report collectively the results of their compliance assurance programs

15] The registrant and the seed corn dealers for the registrant must allow a review of the compliance records by EPA or by a State pesticide regulatory agency if the State agency can demonstrate that confidential business information, including the names, personal information, and grower license number of the growers will be protected

16] The registrant shall revise and expand its existing Compliance Assurance Program to include the following elements The registrant must prepare and submit by January 31, 2011, a written description of its revised Compliance Assurance Program The registrant may coordinate with other registrants in designing and implementing its Compliance Assurance Program

17] The registrant will enhance the refuge education program throughout the seed delivery channel

i Ensure sales representatives, licensees, seed dealers, and growers recognize the importance of correct refuge implementation and potential consequences of failure to plant the required refuge,

ii Include the refuge size requirement on all *Bt* corn seed bags or bag tags The PIP product label accepted by EPA must include how this information will be conveyed to growers via text and graphics This requirement may be phased in over the next three growing seasons Revised PIP product labels must be submitted by January 31, 2011, 50% implementation on the *Bt* corn seed bags or bag tags must occur by the 2012 growing season, and full implementation must occur by the 2013 growing season

18] The registrant will focus the majority of on-farm assessments on regions with the greatest risks for resistance

i Use *Bt* corn adoption, pest pressure information, and other available information to identify regions where the risk of resistance is greatest,

ii Focus approximately two-thirds of on-farm assessments on these regions, with the remaining assessments conducted across other regions where the product is used

19] The registrant will use its available *Bt* sales records and other information to refine grower lists for on-farm assessments of their compliance with refuge requirements

i Identify for potential on-farm assessment growers whose sales information indicates they have purchased the *Bt* corn product but may have purchased little or no refuge seed from the registrant, licensee, or affiliated company

20] The registrant will contract with third parties to perform on-farm assessments of compliance with refuge requirements

i The third-party assessors will conduct all first-time on-farm assessments as well as second-year on-farm assessments of those growers found out of compliance in a first-time assessment

21] The registrant will annually refine the on-farm assessment program for the *Bt* corn product to reflect the adoption rate and level of refuge compliance for the product

22] The registrant will follow up with growers who have been found significantly out of compliance under the on-farm assessment program and are found to be back in compliance the following year

i All growers found to be significantly out of compliance in a prior year will annually be sent additional refuge assistance information for a minimum of two years by the registrant, seed supplier, or third party assessor, after completing the assessment process,

ii The registrant will conduct follow-up checks on growers found to be significantly out of compliance within three years after they are found to be back in compliance,

iii A grower found with a second incident of significant non-compliance with refuge requirements for the *Bt* corn product within a five-year period will be denied access to the registrant's Bt corn products the next year

d Insect Resistance Monitoring and Remedial Action Plan

The Agency is imposing the following conditions for the Cry1F toxin Expressed in this product

The registrant will monitor for resistance to its lepidopteran-resistant *Bt* corn The monitoring program shall consist of two approaches (1) focused population sampling and laboratory testing, and (2) investigation of reports of less-than expected control of labeled insects Should field-relevant resistance be confirmed, an appropriate resistance management action plan will be implemented

9/16

(1) Focused Population Sampling

The registrant shall annually sample and bioassay populations of the key target pests *Ostrinia nubilalis* (European corn borer, ECB), *Diatraea grandiosella* (Southwestern corn borer, S WCB), and *Helicoverpa zea* (corn earworm, CE W) Sampling for the target pests will be focused in areas identified as those with the highest risk of resistance development (e g , where lepidopteran-active *Bt* hybrids are planted on a high proportion of the corn acres, and where the insect species are regarded as key pests of corn) Bioassay methods must be appropriate for the goal of detecting field-relevant shifts in population response to lepidopteran resistant *Bt* corn and/or changes in resistance allele frequency in response to the use of *Bt* corn and, as far as possible, should be consistent across sampling years to enable comparisons with historical data

The number of populations to be collected shall reflect the regional importance of the insect species as a pest, and specific collection regions will be identified for each pest For ECB, a minimum of 12 populations across the sampling region will be targeted for collection at each annual sampling For SWCB, the target will be a minimum of six populations For CEW, the target will be a minimum of 10 populations Pest populations should be collected from multiple corn-growing states reflective of different geographies and agronomic conditions To obtain sufficient sensitivity to detect resistance alleles before they become common enough to cause measurable field damage, each population collection shall attempt to target 400 insect genomes (egg masses, larvae, mated females, and/or mixed-sex adults), but a successful population collection will contain a minimum of 100 genomes It is recognized that it may not be possible to collect the target number of insect populations or genomes due to factors such as natural fluctuations in pest density, environmental conditions, and area-wide pest suppression

The sampling program and geographic range of collections may be modified as appropriate based on changes in pest importance and for the adoption levels of lepidopteran-resistant *Bt* corn The Agency shall be consulted prior to the implementation of such modifications

The registrant will report to the Agency before August 31 each year the results of the population sampling and bioassay monitoring program

Any incidence of unusually low sensitivity to the *Bt* protein in bioassays shall be investigated as soon as possible to understand any field relevance of such a finding Such investigations shall proceed in a stepwise manner until the field relevance can be either confirmed or refuted, and results of these shall be reported to the Agency annually before August 31 The investigative steps will include

1 Re-test progeny of the collected population to determine whether the unusual bioassay response is reproducible and heritable If it is not reproducible and heritable, no further action is required

2 If the unusual response is reproducible and heritable, progeny of insects that survive the diagnostic concentration will be tested using methods that are representative of exposure to *Bt* corn hybrids under field conditions If progeny do not survive to adulthood, any suspected resistance is not field relevant and no further action is required

3 If insects survive steps 1 and 2, resistance is confirmed, and further steps will be taken to evaluate the resistance These steps may include

- determining the nature of the resistance (*i e* , recessive or dominant, and the level of functional dominance),

- estimating the resistance-allele frequency in the original population,

- determining whether the resistance-allele Frequency is increasing by analyzing field collections in subsequent years sampled from the same site where the resistance allele(s) was originally collected,

- determining the geographic distribution of the resistance allele by analyzing field collections in subsequent years from sites surrounding the site where the resistance allele(s) was originally collected

Should field-relevant resistance be confirmed, and the resistance appears to be increasing or spreading, the registrant will consult with the Agency to develop and implement a case-specific resistance management action plan

(2) Investigation of Reports of Unexpected Levels of Damage by the Target Pests

The registrant will follow up on grower, extension specialist or consultant reports of unexpected levels of damage by the lepidopteran pests listed on the pesticide label The registrant will instruct its customers to contact them if such incidents occur The registrant will investigate all legitimate reports submitted to the company or the company's representatives

If reports of unexpected levels of damage lead to the suspicion of resistance in any of the key target pests (ECB, SWCB, and CEW), the registrant will implement the actions described below, based on the following definitions of *suspected resistance* and *confirmed resistance*

Suspected resistance

EPA defines *suspected resistance* to mean field reports of unexpected levels of insect feeding damage for which

- the corn in question has been confirmed to be lepidopteran-active *Bt* corn,

- the seed used had the proper percentage of corn expressing *Bt* protein,

- the relevant plant tissues are expressing the expected level of *Bt* protein, and

- it has been ruled out that species not susceptible to the protein could be responsible for the

damage, that no climatic or cultural reasons could be responsible for the damage, and that that there could be no other reasonable causes for the damage

The Agency does not interpret *suspected resistance* to mean grower reports of possible control failures or suspicious results from annual insect monitoring assays, nor does the Agency intend that extensive field studies and testing be undertaken to confirm scientifically the presence of insects resistant to *Bt* corn in commercial production fields before responsive measures are undertaken

If resistance is *suspected* the registrant will instruct growers to do the following

- Use alternative control measures in the *Bt* corn fields in the affected region to control the target pest during the immediate growing season

- Destroy *Bt* corn crop residues in the affected region within one month after harvest with a technique appropriate for local production practices to minimize the possibility of resistant insects over-wintering and contributing to the next season's target pest population

Additionally, if possible, and prior to the application of alternative control measures or destruction of crop residue, the registrant will collect samples of the insect population in the affected fields for laboratory rearing and testing Such rearing and testing shall be conducted as expeditiously as practical

Confirmed resistance

EPA defines *confirmed resistance* to mean, in the case of field reports of unexpected levels of damage from the key target pests, that all the following criteria are met

- There is >30% insect survival and commensurate insect feeding in a bioassay, initiated with neonate larvae, that uses methods that are representative of exposure to *Bt* corn hybrids under field conditions (ECB and SWCB only)

- In standardized laboratory bioassays using diagnostic concentrations of the *Bt* protein suited to the target pest in question, the pest exhibits resistance that has a genetic basis and the level of survivorship indicates that there may be a resistance allele frequency of ≥ 0.1 in the sampled population

- In standardized laboratory bioassays, the LC_{50} exceeds the upper limit of the 95% confidence interval of the LC_{50} for susceptible populations surveyed both in the original baselines developed for this pest species and in previous years of field monitoring

(3) Response to Confirmed Resistance in a Key Target Pest as the Cause of Unexpected Levels of Damage in the Field

When field resistance is *confirmed* (as defined above), the following steps will be taken by the registrant

- EPA will receive notification within 30 days of resistance confirmation,

- Affected customers and extension agents will be notified about confirmed resistance within 30 days,

- Monitoring will be increased in the affected area and local target pest populations will be sampled annually to determine the extent and impact of resistance,

- If appropriate (depending on the resistant pest species, the extent of resistance, the timing of resistance, and the nature of resistance, and the availability of suitable alternative control measures), alternative control measures will be employed to reduce or control target pest populations in the affected area Alternative control measures may include advising customers and extension agents in the affected area to incorporate crop residues into the soil following harvest to minimize the possibility of over-wintering insects, and/or applications of chemical insecticides,

- Unless otherwise agreed with EPA, stop sale and distribution of the relevant lepidopteran-active *Bt* corn hybrids in the affected area immediately until an effective local mitigation plan approved by EPA has been implemented,

- The registrant will develop a case-specific resistance management action plan within 90 days according to the characteristics of the resistance event and local agronomic needs The registrant will consult with appropriate stakeholders in the development of the action plan, and the details of such a plan shall be approved by EPA prior to implementation,

- Notify affected parties (e g growers, consultants, extension agents, seed distributors, university cooperators and state/federal authorities as appropriate) in the region of the resistance situation and approved action plan, and

- In subsequent growing seasons, maintain sales suspension and alternative resistance management strategies in the affected region(s) for the *Bt* corn hybrids that are affected by the resistant population until an EPA-approved local resistance management plan is in place to mitigate the resistance

A report on results of resistance monitoring and investigations of damage reports must be submitted to the Agency annually by August 31st each year for the duration of the conditional registration

e Annual Reports

1] Annual Sales reported and summed by state (county level data available by request), January 31st each year,

2] Grower Agreement number of units of Bt corn seeds shipped or sold and not returned, and the number of such units that were sold to persons who have signed grower agreements, January 31st

each year;

3] Grower Education: substantive changes to education program completed the previous year, January 31st each year;

4] Compliance Assurance Plan: Compliance Assurance Program activities and results, January 31st each year;

5] Compliance: to include annual survey results and plans for the next year; full report January 31st each year;

6] Insect Resistance Monitoring Results: results of monitoring and investigations of damage reports, August 31st each year.

A stamped copy of the label is enclosed for your records.

Sincerely,

W. Michael McDavit

W. Michael McDavit, Acting Director
Biopesticides and Pollution
Prevention Division (7511P)

Enclosure

14/16

Mycogen Seeds
B t Cry1F Event DAS-06275-8

OECD Unique Identifier DAS Ø6275 8

This package contains insect resistant corn seed expressing a *B t* moCry1F insecticidal crystal protein derived from *Bacillus thuringiensis* var *aizawai* strain PS811

Active Ingredient

Bacillus thuringiensis var *aizawai* strain PS811 Cry1F protein and the genetic material necessary for its production (plasmid insert PHP12537) in corn event DAS-Ø6275 8 ≤ 0 000957%*

Other Ingredient

Phosphinothricin acetyltransferase (PAT) protein and the genetic material (plasmid insert PHP12537) necessary for its production in corn event DAS Ø6275 8 ≤ 0 0108%*

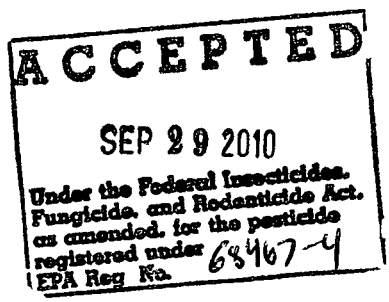
*% total protein on a dry weight basis in plant cells (whole plant)

KEEP OUT OF REACH OF CHILDREN
CAUTION

EPA REGISTRATION NUMBER 68467 4

EPA ESTABLISHMENT NUMBER 62719 IN-1

Mycogen Seeds
c/o Dow AgroSciences LLC
9330 Zionsville Road
Indianapolis IN 46268



DIRECTIONS FOR USE

It is a violation of Federal law to use this product in any manner inconsistent with its labeling

The subject registration will automatically expire on midnight September 30 2015

The Mycogen Brand *B t* moCry1F insect resistant corn seed must be used as specified in the terms and conditions of the registration

This plant incorporated protectant may be combined through conventional breeding with other registered plant incorporated protectants that are similarly approved for use in combination through conventional breeding with other registered plant incorporated protectants to produce inbred corn lines and hybrid corn varieties with combined pesticidal traits

Mycogen Brand *B t* moCry1F Insect Resistant Corn Seed has been transformed to express *Bacillus thuringiensis* var *aizawai* strain PS811 moCry1F insecticidal crystal protein (ICP) for control of European corn borer and other lepidopteran pests

Routine applications of insecticides to control European corn borer are unnecessary when corn expressing the *B t a* moCry1F ICP is planted

INSECT RESISTANCE MANAGEMENT

Growers are instructed to read information on insect resistance management

These refuge requirements do not apply to seed increase/propagation of inbred and hybrid seed corn up to a total of 20 000 acres per county and up to a combined United States (U S) total of 250 000 acres per plant incorporated protectant (PIP) active ingredient per registrant per year

The following information regarding commercial production must be included in the grower guides for cotton and non cotton growing areas

1 *Refuge size* Corn-Growing Areas (Corn Belt and other non corn/cotton growing regions) The use of Mycogen Brand B t moCry1F Insect Resistant Corn Seed (moCry1F) requires an accompanying 20% refuge consisting of non *Bacillus thuringiensis (Bt)* corn or corn that is not a lepidopteran protected *Bt* hybrid

2 *Refuge size* (Corn/Cotton growing areas) * The use of moCry1F corn seed requires an accompanying 50% refuge consisting of non-*Bt* corn or corn that is not a lepidopteran protected *Bt* hybrid

3 *Refuge location*

- The lepidopteran refuge can be planted in a separate field not more than ½ mile from the moCry1F corn field
- The lepidopteran refuge can be planted within the moCry1F corn field as blocks (e g along the edges or headlands)
- The lepidopteran refuge can be planted within the moCry1F corn field as strips across the field at least four consecutive rows wide

4 *Refuge management*

Insecticide treatments for control of European corn borer corn earworm southwestern corn borer and other lepidopteran target pests listed on the label grower guides or other educational material may be applied only if economic thresholds are reached for one or more of these target pests Economic thresholds will be determined using methods recommended by local or regional professionals

(e g Extension Service Agents crop consultants) Instructions to growers will specify that microbial *Bt* insecticides must not be applied to refuges consisting of non-*Bt* corn or corn that is not a lepidopteran protected *Bt* hybrid

* Cotton-growing areas consist of the following states Alabama Arkansas Georgia Florida Louisiana North Carolina Mississippi South Carolina Oklahoma (only the counties of Beckham Caddo Comanche Custer Greer Harmon Jackson Kay Kiowa Tillman and Washita) Tennessee (only the counties of Carroll Chester Crockett Dyer Fayette Franklin Gibson Hardeman Hardin Haywood Lake Lauderdale Lincoln Madison Obion Rutherford Shelby and Tipton) Texas (except the counties of Carson Dallam Hansford Hartley Hutchinson Lipscomb Moore Ochiltree Roberts and Sherman) Virginia (only the counties of Dinwiddie Franklin City Greensville Isle of Wight Northampton Southampton Suffolk City Surrey and Sussex) and Missouri (only the counties of Dunklin New Madrid Pemiscot Scott and Stoddard)

USE PATTERN

CROP	PESTS
Field corn	Black cutworm Corn earworm European corn borer Fall armyworm Southwestern corn borer Western bean cutworm

EPA Accepted __/__/__