



U.S. ENVIRONMENTAL PROTECTION AGENCY
Office of Pesticide Programs
Biopesticides and Pollution Prevention Division (7511M)
1200 Pennsylvania Ave., N.W.
Washington, D.C. 20460

EPA Reg. Number:

96144-2

Date of Issuance:

10/30/2024

NOTICE OF PESTICIDE:

☒ Registration
☐ Reregistration
(under FIFRA, as amended)

Term of Issuance:

Unconditional

Name of Pesticide Product:

ECB-Resistant Bt11 Corn

Name and Address of Registrant (include ZIP Code):

Inari Agriculture, Inc.
One Kendall Square
Building 600/700, Suite 7-501
Cambridge, MA 02139

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 U.S. Environmental Protection Agency. In order to protect health and the environment, the Administrator, on his or 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 the 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 product is unconditionally registered in accordance with FIFRA section 3(c)(5) provided that you:

1. Submit and/or cite all data required for registration or registration review of your product when the EPA requires all registrants of similar products to submit such data.

Signature of Approving Official:

Digitally signed by
ALAN REYNOLDS
Date: 2024.10.30
16:15:39 -04'00'

Alan Reynolds, Product Manager 94
Emerging Technologies Branch
Biopesticides and Pollution Prevention Division (7511M)
Office of Pesticide Programs

Date:

10/30/2024

2. The subject registration will automatically expire at midnight on September 30, 2027.
3. The subject registration will be limited to Cry1Ab [*Bacillus thuringiensis* Cry1Ab protein and the genetic material necessary for its production (via elements of vector pZO1502)] in corn event Bt11 (OECD Unique Identifier: SYN-BTØ11-1) for use in field corn.
4. This plant-incorporated protectant product 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.
5. ECB-Resistant Bt11 Corn may be grown on 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 year. The product may only be planted in the following states: Illinois, Indiana, Iowa, Kansas, Kentucky, Michigan, Minnesota, Missouri (except for the following counties: Dunklin, New Madrid, Pemiscot, Scott, and Stoddard), Nebraska, North Dakota, Ohio, South Dakota, and Wisconsin.
6. **Insect Resistance Management (IRM) Program.** The required IRM program for ECB-Resistant Bt11 Corn must have the following elements:
 - a) 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 ECB-Resistant Bt11 Corn;
 - b) Requirements for Inari Agriculture, Inc. (Inari) to prepare and require ECB-Resistant Bt11 Corn users to sign "grower agreements" that impose binding contractual obligations on the grower to comply with the refuge requirements;
 - c) Requirements regarding programs to educate growers about IRM requirements;
 - d) Requirements regarding programs to evaluate and promote growers' compliance with IRM requirements;
 - e) Requirements regarding programs to evaluate whether there are statistically significant and biologically relevant changes in target insect susceptibility to Cry1Ab protein in the target insects;
 - f) Requirements regarding a "remedial action plan" that contains measures Inari 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;
 - g) Requirements for Inari to maintain, and provide the Agency upon request, the number of units sold by state and county, IRM grower agreement results, and substantive changes to educational programs. Inari is required to submit reports within three months of the Agency's request;
 - h) Bag Tag Requirements for ECB-Resistant Bt11 Corn: Seed bags and/or bag tags for corn hybrids that contain the plant-incorporated protectant produced in ECB-Resistant Bt11 Corn

must display the active ingredient, registration number, refuge size requirement, and the states permitted for use of the product. The bag tag must also stipulate that growers read the Inari Stewardship Guide (or equivalent guidance) prior to planting this product.

- i) Requirements for annual reports on or before the time frames specified in the Annual Reports section below.

7. Refuge Requirements for ECB-Resistant Bt11 Corn

- a) Grower agreements (also known as stewardship agreements) must 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.
- b) 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.
- c) Refuges must be planted using one of the following deployment options: separate fields, blocks within fields (e.g., along the edges or headlands), and strips across the field.
- d) External refuges must be planted within 1/2 mile of the ECB-Resistant Bt11 Corn field(s).
- e) When planting the refuge in strips across the field, refuges must be at least 4 rows wide.
- f) Insecticide treatments for control of European Corn Borer (ECB), 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.

8. Grower Agreements for ECB-Resistant Bt11 Corn

- a) Persons purchasing ECB-Resistant Bt11 Corn must sign a grower agreement. The term grower agreement refers to any grower purchase contract, license agreement, or similar legal document.
- b) 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.
- c) If Inari 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, then thirty (30) days prior to implementing a proposed change, Inari must submit to EPA the text of such changes to ensure that it is consistent with the terms and conditions of this registration.

- d) Inari shall maintain records of all ECB-Resistant Bt11 Corn grower agreements for a period of three (3) years from December 31st of the year in which the agreement was signed.
- e) Inari shall make available to the Agency upon request records of the number of units of ECB-Resistant Bt11 Corn seed sold or shipped and not returned, and the number of such units that were sold to persons who have signed grower agreements for the previous growing season. Inari is required to submit reports within three months of the Agency's request.
- f) Inari 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 numbers of the growers, will be protected.

9. IRM Education and IRM Refuge Compliance for ECB-Resistant Bt11 Corn

- a) Inari must implement a comprehensive IRM education program designed to convey to ECB-Resistant Bt11 Corn users the importance of complying with the IRM program, as well as guidance to growers on actions to take when unexpected damage occurs. The program shall include information encouraging ECB-Resistant Bt11 Corn users to pursue optional elements of the IRM program relating to refuge configuration and proximity to ECB-Resistant Bt11 Corn fields. Specifically, the IRM education program will include the following elements:
 - i. Inari will create a Technical Use Guide (TUG) for ECB-Resistant Bt11 Corn, which clearly outlines the importance of proper stewardship, requirements of structured refuge, IRM compliance monitoring plans, and best management practices when planting. Inari will make the TUG available via a portal on an Inari-hosted website;
 - ii. Inari will clearly indicate the refuge requirements in product literature;
 - iii. Inari will include language on seed invoices that indicates that purchasing growers are aware of refuge requirements and agree to adhere to refuge requirements as a condition of sale;
 - iv. Inari will send a pre-planting reminder of refuge requirements to seed dealers and growers who have purchased and received ECB-Resistant Bt11 Corn.
- b) Inari must submit a copy of the TUG to EPA by November 30th of the year prior to commercialization of ECB-Resistant Bt11 Corn.
- c) Inari will provide marketing support and incentives to licensing seed companies selling the appropriate amount of refuge corn with ECB-Resistant Bt11 Corn to all growers purchasing the product. Incentives may include special pricing to incentivize growers to implement the appropriate refuge, financial assistance to cover any additional costs associated with selling refuge corn with ECB-Resistant Bt11 Corn, or for additional customer education efforts.
- d) Upon EPA request, Inari shall provide copies of grower education materials and information on grower education activities including any substantive changes to these materials and activities within three months of the Agency's request.

- e) Inari must implement an IRM compliance assurance program designed to evaluate the extent to which growers purchasing ECB-Resistant Bt11 Corn are compliant with the requirement of a 20% refuge, 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 to Inari's Bt corn product(s). Required features of the program are described in paragraphs f–n of this section.
- f) Inari must maintain and publicize a phased compliance approach (i.e., a guidance document that indicates how it will address instances of non-compliance with the terms of the IRM program and general criteria for choosing among options for responding to any noncompliant growers after the first year of non-compliance). An individual grower found to be significantly out of compliance two (2) years in a row would be denied access to Inari's Bt corn product(s) for a period of three years. Similarly, seed dealers who are not fulfilling their obligations to inform/educate growers of their IRM obligations will lose their opportunity to sell Inari's Bt corn.
- g) Inari shall conduct an annual on-farm assessment program. Inari shall train its representatives (or a third party auditor) who make on-farm visits to growers planting ECB-Resistant Bt11 Corn to perform assessments of compliance with IRM requirements. Inari will audit at least 1% of ECB-Resistant Bt11 Corn growers annually. In the event that any of these visits result in the identification of a grower who is not in compliance with the IRM program, Inari shall take appropriate action, consistent with its phased compliance approach (paragraph f above), to promote compliance.
- h) If a grower, who purchases ECB-Resistant Bt11 Corn for planting, was specifically identified as not being in compliance during the previous year, Inari shall visit with the grower and evaluate whether the grower is in compliance with the IRM program for the current year.
- i) Inari shall implement a program for investigating legitimate tips and complaints that ECB-Resistant Bt11 Corn 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, Inari shall take appropriate action, consistent with its phased compliance approach (paragraph f above).
- j) Inari 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 numbers of the growers, will be protected.
- k) Inari must implement a "bag tag" that will be attached to all bags of ECB-Resistant Bt11 Corn sold and delivered. The purpose of this bag tag is to remind growers that ECB-Resistant Bt11 Corn products require a 20% refuge. The product label accepted by EPA must include how this information will be conveyed to growers via text and graphics.
- l) Inari will use its available ECB-Resistant Bt11 Corn 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 ECB-Resistant Bt11 Corn product but may have purchased little or no refuge seed from the registrant, licensee, or affiliated company.
- m) Inari will annually refine the on-farm assessment program for the ECB-Resistant Bt11 Corn product to reflect the adoption rate and level of refuge compliance for the product.
- n) Annually, by March 31st each year, Inari must provide a report to EPA summarizing the ECB-Resistant Bt11 Corn compliance assurance program activities and results for the prior year and modified plans (if any) for the current year. The report must inform EPA of the number of growers deemed ineligible to purchase the product on the basis of continued non-compliance with the insect resistance management refuge requirements.

10. Insect Resistance Monitoring and Mitigation Plan for ECB-Resistant Bt11 Corn

- a) Inari must monitor for resistance to Cry1Ab expressed in ECB-Resistant Bt11 Corn. Monitoring must be conducted for the key target pests: *Ostrinia nubilalis* (European corn borer; ECB) and *Diatraea grandiosella* (southwestern corn borer; SWCB).
- b) The monitoring program shall be focused on investigating reports of unexpected levels of damage by ECB and/or SWCB that meet the criteria below in paragraph d. Inari will instruct its customers to contact them if such incidents occur. Inari must investigate all legitimate reports submitted to the company or the company's representatives.
- c) If reports of unexpected levels of damage lead to the suspicion of resistance in any of the key target pests (ECB and SWCB), Inari will implement the actions described below, based on the following definitions of suspected and confirmed resistance.
- d) **Suspected resistance:** EPA defines suspected resistance to mean field reports of unexpected levels of insect-feeding damage for which:
 - i. The corn in question has been confirmed to express Cry1Ab;
 - ii. 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 there could be no other reasonable causes for the damage.
 - iii. For ECB, at least one of the following criteria are met:
 - Leaf feeding damage that includes elongated lesions in addition to the pin-hole- and shot-hole-sized feeding scars characteristic of ECB. This is equivalent to an ECB damage rating of 4 on the Guthrie 1–9 rating scale (Guthrie et al. 1960);
 - In a 30-plant sample from the affected area of field, more than 2 places with more than 2 inches of tunneling (stalk, ears, ear shanks);
 - The presence of entrance holes in the plant stalk, with the accumulation of frass near and behind leaf axils;
 - The presence of live ECB larvae.

iv. For SWCB, at least one of the following criteria are met:

- Leaf feeding damage includes small lesions and a few small, elongated lesions characteristic of SWCB. This is equivalent to a damage rating of 3 on the modified Davis 1–9 scale (Davis et al. 1992);
- In a 30-plant sample from the affected area of the field, more than two Cry1Ab-expressing plants each with more than four inches of tunneling and/or girdling by overwintering SWCB larvae;
- The presence of live SWCB larvae.

v. If ECB or SWCB resistance is suspected, Inari will do the following:

- Report any cases of suspected ECB or SWCB resistance to EPA within 30 days;
- Attempt to collect the respective insect from the field with unexpected damage levels;
- Neonate ECB or SWCB generated from the populations collected from UXI fields will be tested in diet overlay assays similar to those described by Marçon et al. (1999). Assays will be conducted using lyophilized leaf tissue from Inari Bt11 plants. LC_{50} and EC_{50} values from the collected population will be compared to results from a susceptible population.

e) **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 the following criterion is met:

i. In a standardized laboratory bioassay (paragraph d above), the LC_{50} or EC_{50} of the collected population exceeds the upper limit of the 95% confidence interval of the baseline LC_{50} or EC_{50} for susceptible populations.

f) Response to suspected or confirmed resistance in a key target pest as the cause of unexpected levels of damage in the field:

- Report any cases of suspected or confirmed ECB or SWCB resistance to EPA within 30 days. As part of this consultation, Inari will propose a resistance mitigation plan for Agency review for cases of confirmed resistance.
- Actions to be taken by Inari during the year the unexpected damage event was recorded (i.e., suspected resistance):
 - Reinforce educational materials with the affected grower(s), specifically reviewing ECB and/or SWCB pest management practices;

- Provide Integrated Pest Management (IPM) recommendations to the affected grower(s), including assessment of fields adjacent to the affected field(s) with similar traits;
- Inform regional extension/local crop consultants of the unexpected damage event in the county where damage occurred as well as the surrounding counties. These communications will be coordinated between Inari's local sales team and seeds dealers, growers, consultants, county extension agents, seed distributors, in-state university cooperators and state/federal authorities.
- Where in-season management tactics are possible, Inari will recommend to affected grower(s) to:
 - Destroy stalk tissue and apply appropriate tillage. Shred the corn stubble shortly after harvest using a flail mower in order to assist in the prevention of ECB or SWCB from overwintering and then emerging in following spring.
 - Consider applying appropriate foliar chemical insecticides if the damage is from first-generation ECB or SWCB (i.e., leaf-feeding larvae) to control any second-generation moths that emerge.

iii. Actions to be taken by Inari following resistance confirmation:

- Continued reinforcement of educational material with the affected grower(s), including a review of lepidopteran (ECB or SWCB) pest management practices and IPM recommendations. These recommendations include assessments of fields adjacent to the affected field(s) with similar traits.
- Reviewing refuge compliance obligations with the affected grower(s).
- Continued communication with regional extension/local crop consultants of the unexpected damage event in the county where damage occurred as well as the surrounding counties. These communications will be coordinated between Inari's local sales team and seeds dealers, growers, consultants, county extension agents, seed distributors, in-state university cooperators and state/federal authorities.
- Recommended management options include:
 - Rotation to a non-ECB or SWCB host crop;
 - Switching to a Bt corn product with a different mode of insecticidal action or planting non-Bt corn.

- iv. Unless otherwise agreed with EPA, stop sale and distribution of the ECB-Resistant Bt11 Corn product in the affected area immediately until an effective local mitigation plan, approved by EPA, has been implemented;
- v. In subsequent growing seasons, maintain sales suspension and alternative resistance management strategies in the affected region(s) for the ECB-Resistant Bt11 Corn product affected by the resistant population until an EPA-approved local resistance management plan is in place to mitigate the resistance.

11. Annual Reporting Requirements for ECB-Resistant Bt11 Corn

- a) The following annual reports must be submitted:
- i. Product stewardship, including the refuge compliance activities. This report must include on-farm assessment results for the prior year and plans for the compliance assurance program for the current year, on or before March 31st each year.
 - ii. Insect Resistance Monitoring Results: results of monitoring and investigations of damage reports, September 30th of each year.

Should you wish to add/retain a reference to your company's website on your label, then please be aware that the website becomes labeling under FIFRA and is subject to review by the EPA. If the website is false or misleading, the product will be considered to be misbranded and sale or distribution of the product is unlawful under FIFRA section 12(a)(1)(E). 40 CFR § 156.10(a)(5) lists examples of statements the EPA may consider false or misleading. In addition, regardless of whether a website is referenced on your product's label, claims made on the website may not substantially differ from those claims approved through the registration process. Therefore, should the EPA find or if it is brought to our attention that a website contains false or misleading statements or claims substantially differing from the EPA-approved registration, the website will be referred to the EPA's Office of Enforcement and Compliance Assurance.

Your release for shipment of this product constitutes acceptance of these terms. If these terms are not complied with, this registration will be subject to cancellation in accordance with FIFRA section 6.

A stamped copy of the labeling is enclosed for your records. Please also note that the record for this product currently contains the following acceptable Confidential Statement of Formula (CSF):

- Basic CSF dated 06/22/2023

If you have any questions about the issuance of this registration, please contact me at reynolds.alan@epa.gov.

Sincerely,



Digitally signed by
ALAN REYNOLDS
Date: 2024.10.30
16:16:17 -04'00'

Alan Reynolds, Product Manager 94
Emerging Technologies Branch
Biopesticides and Pollution
Prevention Division (7511M)
Office of Pesticide Programs

Enclosure

Plant-Incorporated Protectant Label

ECB-Resistant Bt11 Corn

OECD Unique Identifier: SYN-BTØ11-1

This product is effective in limiting corn leaf, stalk, and ear damage caused by European corn borers and certain other lepidopteran pests.

Active Ingredient:

Bacillus thuringiensis Cry1Ab protein and the genetic material necessary for its production (via elements of vector pZO1502) in Bt11 field corn (SYN-BTØ11-1).....≤ 0.0461%*

Inert Ingredient:

Phosphinothricin acetyltransferase (PAT) protein and the genetic material necessary for its production (via elements of vector pZO1502) in Bt11 field corn (SYN-BTØ11-1).....≤ 0.0000900%*

*Percentage on a dry weight basis from the highest concentration measured in individual whole plant tissues.

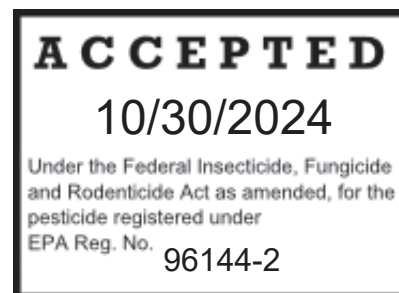
Keep Out of the Reach of Children

CAUTION

EPA Reg. No. 96144-x
EPA Est. No. 96144-IN-001

Inari Agriculture, Inc.

One Kendall Square
Building 600/700
Suite 7-501
Cambridge, MA 02139



Directions for Use

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

ECB-Resistant Bt11 Corn can be planted for commercial production purposes as well as for research, agronomic evaluation, seed increase, and production in breeding nurseries as specified in the terms and conditions of this registration and on the labeling.

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 plant-incorporated protectants to produce inbred corn lines and hybrid corn varieties with combined pesticidal traits.

Cultivation of commercial hybrids of ECB-Resistant Bt11 Corn under Inari Agriculture's registration cannot exceed a combined annual U.S. total of 250,000 acres and cannot exceed 20,000 acres per county annually. Commercial cultivation may not occur in cotton-growing regions but is permitted in the following states, designated as primary corn-growing areas: Illinois, Indiana, Iowa, Kansas, Kentucky, Michigan, Minnesota, Missouri (excluding Dunklin, New Madrid, Pemiscot, Scott, and Stoddard counties), Nebraska, North Dakota, Ohio, South Dakota, and Wisconsin.

All commercial ECB-Resistant Bt11 Corn seed that is sold by Inari Agriculture, Inc., or its distributors must be accompanied by informational material (*e.g.*, bag tag) indicating the EPA registration number and the active ingredient, and stipulating that growers read the product Insect Resistance Management (IRM) Stewardship Guide (or equivalent guidance) prior to planting the seed.

A 20% structured block, strip, or perimeter refuge for cultivation is required. This information must be displayed on the seed bag or bag tag in both text and graphic format as shown below.

IMPORTANT GROWER INFORMATION:

This hybrid requires you to plant a 20% structured block, strip, or perimeter refuge.

This product may only be used in the states of: Illinois, Indiana, Iowa, Kansas, Kentucky, Michigan, Minnesota, Missouri (excluding Dunklin, New Madrid, Pemiscot, Scott, and Stoddard counties), Nebraska, North Dakota, Ohio, South Dakota, and Wisconsin.

Cultivation in cotton-growing regions is prohibited.

For more information refer to the Inari Stewardship Guide

Insects Controlled or Suppressed

ECB-Resistant Bt11 Corn has been genetically modified to produce a *Bacillus thuringiensis* Cry1Ab delta-endotoxin protein for control or suppression of:

- Southern cornstalk borer (*Diatraea crambidoides*)
- Southwestern corn borer (*Diatraea grandiosella*)
- Lesser cornstalk borer (*Elasmopalpus lignosellus*)
- Sugarcane borer (*Diatraea saccharalis*)
- European corn borer (*Ostrinia nubilalis*)
- Common stalk borer (*Papaipema nebris*)
- Fall armyworm (*Spodoptera frugiperda*)
- Beet armyworm (*Spodoptera exigua*)

Insect Resistance Management

An IRM Stewardship Guide (or equivalent guidance) must be distributed to all customers using seed containing the plant incorporated protectant. The IRM Stewardship Guide will include instructions and recommendations regarding product use, insect resistance management, and integrated pest management. The following information regarding refuge requirements for commercial production must be included in the IRM Stewardship Guide.

These IRM requirements do not apply to breeding, research, propagation of inbred seed, or production of hybrid seed corn containing the registered plant-incorporated protectant on up to a total of 20,000 acres per county and up to a combined U.S. total of 250,000 acres per plant-incorporated protectant active ingredient per year.

Primary Corn-growing Areas (Noncotton-Growing Regions)

For ECB-Resistant Bt11 Corn grown in primary corn-growing areas as defined on p. 2 (non-cotton-growing areas), growers must adhere to the following refuge requirements:

- Growers must plant a refuge of at least 20% non-Bt corn and/or non-lepidopteran-resistant Bt corn.
- The refuge may be planted as a block, strips within the field, perimeter around the field, adjacent or a separate block planted within ½ mile.
- A neighbor's field of non-Bt corn and/or non-lepidopteran-resistant Bt corn does not meet the requirements for a refuge.
- Strips, blocks, or perimeter refuges must be a minimum of 4 contiguous rows wide.
- Non-Bt foliar insecticide treatments for corn borer control may be applied only if economic thresholds are reached for one or more pests. Economic thresholds will be determined using methods recommended by local or regional professionals (e.g., Extension service agents, crop consultants).
- The refuge should be planted with a hybrid that is agronomically similar to and managed similarly to the ECB-Resistant Bt11 Corn.

Below are schematics of acceptable refuge planting configurations:

Field Refuge Options

