National Cotton Council of America

P.O. Box 2995 • Cordova, TN 38088-2955
(901) 274-9030 • FAX (901) 725-0510
www.cotton.org

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April 30, 2015

Mr. Carmen J. Rodia, Jr.
Environmental Protection Specialist
U.S. EPA
Office of Pesticide Programs
1200 Pennsylvania Ave. NW.
Washington, DC 20460-0001

RE: Registration of flubendiamide.

Dear Mr. Rodia:

The National Cotton Council (NCC) appreciates the opportunity to comment on the insecticide flubendiamide marketed as Belt SC (Belt) by Bayer CropScience. The NCC urges EPA to recognize the need to retain the registration of Belt for cotton as a valuable tool that provides protection against damaging cotton insect pests.

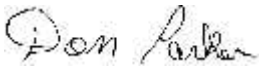
The NCC is the central organization of the U.S. cotton industry representing producers, ginners, merchants, warehousemen, cooperatives, textile manufacturers, and cottonseed processors and merchandisers in 17 states stretching from California to the Carolinas. U.S. cotton producers historically cultivate between 10 and 14 million acres of cotton. Annual cotton production, averaging approximately 20 million 480-lb bales, is valued at more than $5 billion at the farm gate. While a majority of the industry is concentrated in the 17 cotton-producing states, the down-stream manufacturers of cotton apparel and home-furnishings are located in virtually every state. The industry and its suppliers, together with the cotton product manufacturers, account for more than 230,000 jobs in the U.S. In addition to the cotton fiber, cottonseed products are used for livestock feed and cotton-seed oil is used for food products ranging from margarine to salad dressing. Taken collectively, the annual economic activity generated by cotton and its products in the U.S. economy is estimated to be in excess of $120 billion.

BELT SC insecticide has been in the market since 2008 and has provided growers with a reliable option for control of a variety of pest control, including the difficult to manage caterpillar pest. Even with transgenic Bt crops included, the summary of damaging insect pests for the US in 2014 ranked the caterpillar pest as the fourth most damaging pest. In addition, Belt has proven to be an excellent fit with integrated pest management systems and resistance management practices. Belt provides highly effective control of the caterpillar pest while minimizing impacts on beneficial insects and does not “flare” outbreaks of mite pests. Belt is an excellent tool for resistance management without known cross-resistance to conventional

insecticides. The availability of multiple Modes of Action (MOA) for rotation in resistance management plan is critical to maintaining effective pest control without over-reliance on single or few MOAs. EPA has previously acknowledged that Belt was not expected to have significant side effects on bumblebees or honey bees.

The NCC urges EPA to continue the registration and availability of Belt as a valuable tool for controlling insect pests of cotton. As the EPA considers the weight of scientific evidence for registration of flubendiamide, the NCC urges EPA to maintain scientific integrity by relying on all data without discounting actual data points in favor of simulation models. The NCC appreciates the opportunity to provide these comments in support of the continued registration of flubendiamide.

Sincerely,



Don Parker, Ph.D.
Manager, IPM