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August 17, 2018

Office of Science Advisor  
U.S. Environmental Protection Agency  
EPA Docket Center, Mail Code 28221T  
1200 Pennsylvania Ave., NW  
Washington, DC 20460

**RE: Docket ID Number EPA-HQ-OA-2018-0259; Strengthening Transparency in Regulatory Science**

The National Cotton Council (NCC) appreciates the opportunity to comment on this important topic. The NCC is the central organization of the United States cotton industry. Its members include producers, ginners, cottonseed processors and merchandizers, merchants, cooperatives, warehousemen and textile manufacturers. A majority of the industry is concentrated in 17 cotton-producing states stretching from California to Virginia. U.S. cotton producers cultivate between 9 and 12 million acres of cotton with production averaging 12 to 18 million 480-lb bales annually. The downstream manufacturers of cotton apparel and home furnishings are located in virtually every state. Farms and businesses directly involved in the production, distribution and processing of cotton employ more than 125,000 workers and produce direct business revenue of more than \$21 billion. Annual cotton production is valued at more than \$5.5 billion at the farm gate, the point at which the producer markets the crop. Accounting for the ripple effect of cotton through the broader economy, direct and indirect employment surpasses 280,000 workers with economic activity of almost \$100 billion. In addition to the cotton fiber, cottonseed products are used for livestock feed and cottonseed oil is used as an ingredient in food products as well as being a premium cooking oil.

NCC believes that regulatory transparency is of the utmost importance and we have encountered incidences in the past where the industry was not allowed to study raw data that was being used as justification to regulate agriculture. On the other hand, EPA's offices rely on proprietary databases (e.g. health data) and confidential business information integral to data that industries supply for EPA to study in their regulatory process. While NCC is not clear on where to draw the line, we do ask that EPA take a carefully balanced, thoughtful approach to carrying out this transparency project that is desperately needed.

In addition, we ask that the agency avoid the precautionary principle approach to regulatory action. Thus, we believe the agency should be very transparent with those datasets that seek to establish the precautionary approach for a product or for all regulations within the U.S. This approach is the antithesis to a true scientific method.

Models should reflect real-world data when that data is available for comparison. The agency should not accept model results that contradict actual sample data. Furthermore, different offices within the agency or different agencies should not have models that suggest wildly different result-scenarios for the same test subject. For example, one model for the spread of a pesticide should not show a result of a potential risk of low-level drifting into populated areas while a model for the same subject, but in a different office, shows that the pesticide rises quickly and affects the ozone layer. When you have the introduction of

such model uncertainty and discrepancy based on competing models then some investigation must occur. The same goes for model uncertainty at low-dose ranges. If one model shows a possible adverse condition while other models do not, that is no justification for simply accepting outliers.

The NCC appreciates EPA's continued protection of human health and the environment based on scientific data of merit.

Respectfully,

A handwritten signature in black ink that reads "Steve Hensley". The signature is written in a cursive, flowing style.

Steve Hensley  
Senior Scientist, Regulatory and Environmental Issues  
National Cotton Council