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May 14, 2018

Office of Pesticide Programs
Regulatory Public Docket (7502P)
U.S. Environmental Protection Agency
1200 Pennsylvania Ave., NW
Washington, DC 20460

RE: Docket ID Number EPA-HQ-OPP-2018-0059; Trunemco Nematode Management, cis-Jasmone (2-Cyclopenten-1-one, 3-methyl-2-(2Z)-2-pentenyl-) at 0.88% and *Bacillus amyloliquefaciens* strain MBI 600 at 1.00%

Dear Mr. Goodis:

The National Cotton Council (NCC) appreciates the opportunity to comment on the Environmental Protection Agency's (EPA) docket "Pesticide Product Registrations: New Active Ingredients." The NCC is pleased to see the prospects of a new active ingredient targeting nematodes in cotton. Cotton yield losses to nematodes have been recorded by university plant pathologists since the 1952 crop (Cotton Nematode Research and Education Program, <http://www.cotton.org/tech/pest/nematode/index.cfm>) Their data show an average annual percent bales lost to nematodes between the years of 2000 and 2016 was 4.5%. Control of nematodes is a critical challenge for US cotton production.

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.

The NCC appreciates EPA's continued protection of human health and the environment based on scientific data of merit. The NCC urges EPA to move forward with the registration process for this product realizing the need for additional nematicides in cotton production.

Thank you for allowing the NCC to comment on the EPA's docket "Pesticide Product Registrations: New Active Ingredients."

Respectfully,

A handwritten signature in black ink that reads "Steve Hensley". The signature is written in a cursive style with a large, stylized "S" and "H".

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