National Cotton Council OF AMERICA

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November 2, 2020

OPP Docket
Environmental Protection Agency Docket Center (EPA/DC), (28221T)
1200 Pennsylvania Ave. NW
Washington, DC 20460-0001

RE: Docket No. EPA-HQ-OPP-2015-0803

Dear Ms. Weissenborn,

The National Cotton Council (NCC) appreciates this opportunity to provide comments regarding the Environmental Protection Agency's (EPA's) draft human health and environmental safety risk assessments for registration review of dimethenamid/dimethenamid-P, a group 15 herbicide registered for multiple crops. Current weed management programs must have herbicides representing multiple distinct Modes of Action (MOA). The continual germination of weed seeds in the soil requires several herbicide applications to maintain weed control during the year, but weed resistance management (and past failures to practice weed resistance management) has clearly shown MOA should be rotated in order to avoid development of weed species resistant to a MOA. Dimethenamid/dimethenamid-P represent critical active ingredients utilized to inhibit root and shoot growth of multiple weed species to prevent successful germination and establishment while provide residual control to extend the interval between herbicide applications.

The NCC is the central organization of the United States cotton industry. Its members include producers, ginners, cottonseed processors and merchandizers, merchants, cooperatives, warehousers 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 10 and 14 million acres of cotton with production averaging 12 to 20 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 $75 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 cotton industry continues to seek additional weed control options to incorporate into the weed management and resistant weed management practices. The struggle to maintain efficacy of current products and meet the desired practices of weed resistance management is limited by the availability of herbicides with different MOA. The NCC continues to follow future products

that would enhance cotton weed management systems and acknowledges the lack of new MOA moving forward in the research and development industry. The continual evolution of weed species resistant to the effects of a particular MOA reinforces the need for multiple MOAs in weed management systems. The loss of any current MOA will likely begin a cascade effect resulting in loss of weed control in cotton.

The NCC reached out to 30 agronomy and/or weed scientists across the cotton belt for their estimates of the importance and use of dimethenamid/dimethenamid-P. Those who work in the same state provided compiled responses (except Texas, which has vast differences in production environment and production practices; Texas provided two). The respondents (9) represented 8 states across the cotton belt. The following information summarizes responses:

The estimated percent of acres treated with dimethenamid/dimethenamid-P averaged across respondents was 19% (Max 65% and Min 1%).

The number of respondents identifying the application method show predominately single application (n=8; sequential application n=1). Additionally, most of the single applications are post-emerge (n=8) with little pre-plant (n=1) or pre-emerge (n=1) use. When asked about the application equipment, the respondents identified closed cab self-propelled sprayers/hi-boys (n=6) and closed cab tractors (n=4) as the equipment used. This information provides evidence that few, if any, cotton producers apply pesticides using open cab equipment.

Some of the respondents have heard about impregnated fertilizer, but none were aware of any use in cotton. One respondent commented their belief that turf and ornamental were the main users of impregnated fertilizer.

When asked to identify benefits related to the use of dimethenamid/dimethenamid-P, the responses were: resistance management (n=6), good residual activity (n=6), importance of the additional mode of action (MOA) (n=2), and economic benefits (n=2). One respondent noted the unique activity on high organic soils. One noted that the residual value can eliminate one or two other herbicide applications. One noted the unique efficacy on 6-way resistant pigweed in the state and said no alternative has provided that efficacy.

The respondents' information represents variation in regions, but all agree dimethenamid/dimethenamid-P is a valuable component for resistance management and effective residual activity.

The NCC would encourage EPA to revise the risk assessments to reflect the water model (PWC) currently approved for regulatory use in the Office of Pesticide Programs. The NCC appreciates the work of EPA scientists as well as other scientists who have developed improvements to the water model for regulatory use.

The NCC notes EPA has identified a risk of concern regarding impregnated fertilizer and occupational workers. The NCC could not identify such use in cotton. The NCC did note the calculation process stated by EPA seems very high and encourages EPA to revisit the mixing/loading rate for commercial impregnation of dry bulk fertilizer. The NCC recognizes the

concern may be addressed with the completion of an appropriate sub chronic inhalation study, but that does not address the assumptions of estimated tons of fertilizer processed per 8-hour day.

The NCC appreciates the opportunity to provide these comments and appreciates their consideration in the registration review of dimethenamid/dimethenamid-P.

Sincerely,

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