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April 25, 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-2017-0510

Dear Mr. Goodis:

The National Cotton Council (NCC) appreciates the opportunity to comment on the Environmental Protection Agency's (EPA) docket "Pesticide Product Registration: New Active Ingredient." The NCC urges EPA to move forward with the registration of this crop protection product and to recognize that the mode of action (MOA), reported as a Group 15 Chloroacetamide, could enhance resistance management scenarios in cotton production. As EPA urges producers to recognize the values of rotating chemical MOAs for resistance management purposes, EPA must recognize rotation is not possible unless there are multiple MOAs available. The addition of the active ingredient will enhance producer options to improve their strategies for effective weed control, including glyphosate resistant palmer amaranth and Italian ryegrass, that complies with weed resistance management guidance.

The NCC is the central organization of the United States cotton industry. Its members include producers, ginnors, 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 of this product realizing similar MOAs currently have registration. It is our understanding that this

active ingredient has been registered for use in the EU since 2006. Additionally, the NCC has reviewed some of the European Commission Draft Renewal Assessment Reports supporting conclusions that pethoxamid has an acceptable profile for herbicide registration use in crops.

The NCC has great concern for Weed Resistance Management (WRM) alternatives in cotton. As EPA is aware, new herbicide MOA chemistry does not seem to be projected now. Many of the herbicide MOAs used today have some species resistance, thus requiring multiple MOAs to achieve weed control. The cotton industry believes the addition of this active ingredient will increase producer options, enhance weed control, and enhance WRM.

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

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