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April 30, 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-2011-0661**

Dear Ms. Walsh:

The National Cotton Council (NCC) appreciates the opportunity to comment on the Environmental Protection Agency's (EPA) dockets "Registration Review: Draft Human Health and/or Ecological Risk Assessments for Several Pesticides" which includes the herbicide active ingredient pyriithiobac-sodium. The NCC urges EPA to move forward with the registration of this crop protection product and to recognize that the mode of action (MOA), Acetolactate synthase (ALS) inhibitor, continues to have a role in resistance management scenarios for cotton production. As EPA urges producers to recognize the values of rotating chemical MOA's for resistance management purposes, EPA must recognize rotation is not possible unless there are multiple MOA's available. The limited MOA available for weed control in cotton emphasizes the importance to retain current MOA's that must be used in combination or rotation with other MOA's in order to provide sufficient weed management.

The NCC is the central organization of the United States cotton industry. Its members include producers, ginner, 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 MOA's currently have registration. The NCC appreciates EPA's Tier I Update of Human Incidents and Epidemiology which clearly demonstrates the history of safe use of this product. Additionally, EPA's Occupational and Residential Exposure Assessment clearly shows the safety of this product when used as labeled.

EPA's preliminary Environmental Fate and Ecological Risk Assessment indicates few risks of concern. It is not surprising that the herbicide indicates risks to terrestrial and aquatic plants. However, the NCC is surprised EPA's drift model suggest those concerns exceed 1,000 feet from application site. The NCC would urge EPA to work with stakeholders and registrants to develop meaningful refinements to the risk assessment and meaningful mitigation measures, if necessary.

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 MOA's used today have some species resistance, thus requiring multiple MOA's to achieve weed control. The cotton industry believes the loss of any active ingredient will decrease producer options, weaken weed control, and increase resistance to the remaining MOAs.

Thank you for allowing the NCC to comment on the EPA's dockets "Registration Review: Draft Human Health and/or Ecological Risk Assessments for Several Pesticides" which includes the active ingredient pyriproxyfen-sodium.

Respectfully,

A handwritten signature in cursive script that reads "Steve Hensley".

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