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November 16, 2020

Ms. Cindy Ech  
USDA APHIS Biotechnology Regulatory Services  
4700 River Road  
Riverdale, MD 20737-1236

**RE: Docket No. APHIS-2019-0050**

Dear Ms. Ech,

The National Cotton Council (NCC) appreciates this opportunity to provide comments regarding the draft plant pest risk assessment and draft environmental assessment for cotton designated as MON 88702 (Lygus trait) that the Animal and Plant Health Inspection Service's (APHIS's) Biotechnology Regulatory Services (BRS) has prepared. The NCC appreciates the stepwise procedural process identified by BRS complying with 7 CFR part 340. The procedural process cautiously evaluates all genetically engineered plants as "regulated articles" until sufficient scientific studies support conclusions that the plants are not likely to pose a plant pest risk. APHIS BRS assumes the genetically engineered plants pose a pest risk thus enforcing extreme protective measures on importation, interstate movement, and release into the environment until science has shown otherwise.

The NCC agrees that APHIS has abundantly evaluated MON 88702 in the Plant Pest Risk Assessment (PPRA) and the separate Environmental Risk Assessment supporting the conclusion of no risk likely. The NCC urges BRS to proceed with deregulation of MON 88702. MON 88702 would enhance cotton production Integrated Pest Management (IPM) programs for thrips and lygus pests. Thrips and lygus are destructive annual pests of cotton and both have demonstrated resistance to many marketed control products. An additional control/suppression product for thrips and lygus would aid preservation of existing technologies by integrating MON 88702 into the overall pest management program.

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 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.

Thrips and lygus spp. are major pests of U.S. cotton with multiple hosts and high mobility of adults. Additionally, thrips and lygus species have demonstrated variation of susceptibility to multiple foliar pesticide Modes of Action (MOAs). The combination of multiple hosts, high mobility, and variable pesticide efficacy due to MOA resistance results in multiple applications of mixtures of pesticide MOAs throughout the growing season. Studies have indicated the inclusion of MON 88702 in cotton pest management programs will reduce the number of foliar applications, thus reducing selection pressure for existing pesticide resistance. The cotton industry strongly supports the expedient deregulation and commercialization of MON 88702 which will provide an additional IPM tool for control of thrips and lygus in cotton.

The NCC appreciates the opportunity to provide these comments and appreciates their consideration by APHIS BRS for a timely completion of deregulation of MON 88702 cotton by the end of this year so growers can make their seed selection and planting decisions for the upcoming growing season.

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