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August 28, 2020

Office of Pesticide Programs
Regulatory Public Docket (7502P)
U.S. Environmental Protection Agency
One Potomac Yard (South Building)
2777 S. Crystal Drive
Arlington, VA 22202

RE: Docket No. EPA-HQ-OPP-2019-0413

The National Cotton Council (NCC) appreciates the opportunity to provide comments on the Environmental Protection Agency's (EPA's) "Memorandum Supporting Proposed Decision to Approve Registration for the New Active Ingredient, Tiafenacil."

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 are used as an ingredient in food products, as well as being a premium cooking oil.

The NCC supports the unconditional registration of tiafenacil and recognizes the addition of this new active ingredient that will increase weed control program options in cotton and other crops. The Mode of Action (MOA) for Tiafenacil has been identified as a Protoporphyrinogen IX oxidase (PPO) inhibitor, placing it in the Weed Science Society of America's (WSSA) Group 14 classification.

The NCC has reviewed EPA's proposed decision to approve the registration and uses of tiafenacil, and compliments EPA's thorough review of risk assessments for protection of Human Health (including Food, Water, and combined assessment as dietary), and the Environmental Fate and Ecological Risk Assessment. The NCC noted EPA's highly conservative approach to the risk assessments and the use of assumptions not possible in real world biology (e.g. mammal only forage in treated area) and was pleased to see results show no concern even at the

impossible extremes of exposure. The proposed decision document concisely reported the procedural process and vast data lending to the decision to approve registration.

The NCC appreciates EPA's recognition that additional weed control tools are needed due to the evolution of weed species resistant to various herbicide MOAs. Currently, there are more than 20 PPO inhibitor active ingredients registered as herbicides for various uses. The addition of this new active ingredient will enhance weed control options. However, the NCC does not entirely concur with EPA's discussion of comparison to alternatives. The extremely short half-life of tiafenacil does not permit comparison to products with extended residual activity. The lack of residual activity will require more frequent applications to achieve similar levels of control. However, many other valid points support EPA's unconditional registration.

The NCC appreciates the opportunity to provide these comments regarding EPA's Proposed Decision to Approve Registration for the New Active Ingredient, Tiafenacil. The NCC applauds the transparency, completeness, and clarity of the justification for the registration decision.

Respectfully,

A handwritten signature in cursive script that reads "Steve Hensley". The signature is written in black ink and is positioned below the word "Respectfully,".

Steve Hensley
National Cotton Council