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September 29, 2021

Via email @ [reaves.elissa@epa.gov](mailto:reaves.elissa@epa.gov)

Elissa Reaves  
Director Pesticide Re-evaluation Division  
Environmental Protection Agency

**RE: MSMA proposed label restrictions on crop rotation**

Dear Dr. Reaves,

The National Cotton Council (NCC) has been informed that EPA intends to apply a label restriction for MSMA use on cotton prohibiting rotation to other crops for 12 months. Such action would adversely affect the utility of the product or force producers to alter production practices in a manner inconsistent with the Climate-Smart Agriculture position of the Biden Administration.

The NCC is the central organization of the United States cotton industry. Its members include producers, ginnery, 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 115,000 workers and produce direct business revenue of more than \$22 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 265,000 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.

Cotton is grown from Virginia, through the South and into California. There are many regional and climatic differences that dictate production practices such as tillage, cover crops, and crop rotations. It is not clear how EPA's consideration of a rotation restriction would apply to cover crops or how it may encourage tillage practices. NCC believes that the proposed restrictions could have a significant negative impact on growers, effective weed management, resistant weed management, and compliance with tillage contracts between producers and NRCS.

Therefore, we oppose the inclusion of the crop rotation label restriction and respectfully request that it not be included. We request that EPA work with NCC and the registrants to allow

sufficient time to conduct the appropriate rotational crop studies necessary for the crops that are of concern to the Agency and defer any label restriction at present.

Thank you for taking time to note our concern. If you have any questions or would like to discuss cotton issues or needed studies, please don't hesitate to contact us.

Regards,

A handwritten signature in black ink that reads "Reece Langley". The signature is written in a cursive style with a long, sweeping underline.

Reece Langley  
VP – Washington Operations  
National Cotton Council

Cc: [britton.cathryn@epa.gov](mailto:britton.cathryn@epa.gov)