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May 15, 2023

Mary Elissa Reaves, Director
Pesticide Re-evaluation Division (7508P)
Environmental Protection Agency
1200 Pennsylvania Ave. NW
Washington, DC 20460-0001

RE: EPA-HQ-OPP-2023-0144

Dear Director Reaves,

The National Cotton Council appreciates the opportunity to provide comments to EPA's Docket EPA-HQ-OPP-2023-0144 regarding the Carbaryl and Methomyl Biological Opinion. Methomyl is an important pest control tool for the cotton industry due to its unique mode of action (MOA). There are few MOA pesticides available for critical pests such as the destructive cotton bollworm. While Methomyl's use has dramatically declined in cotton since the mid 1990's, it is needed to address situations requiring an alternative MOA. For this reason, the NCC continues to support the registration of Methomyl for use on cotton.

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 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.

The NCC recognizes Methomyl is used on multiple crops, including cotton. The NCC urges EPA to understand why the cotton industry's use has declined and why the decline does not imply a lack of need.

The cotton bollworm/corn earworm is a highly destructive pest of multiple crops, including cotton. Fortunately, the introduction of Bt traits in cotton has provided a unique tool for cotton bollworm management. Unfortunately, the cotton bollworm has sufficient genetic variability to allow some individual to survive the Bt trait, often called resistant to the trait. While the number of resistant individuals is low when the trait is released, the number increases as the surviving mating pairs are predominately resistant. The industry has, and continues to, engaged in resistance management practices that have delayed this evolution of resistance beyond initial expectations. However, resistance has evolved to several of the current Bt toxins thus requiring some additional MOA to achieve economic crop protection. Unfortunately, the anticipate release of new, unique Bt traits is many years in the future. Management of this pest will continue to require alternate MOA until the new Bt toxins are released. Methomyl is needed to provide a unique MOA.

There are few alternative control products for cotton bollworm which are currently used, predominantly Pyrethroids and Diamides. Unfortunately, resistance to Pyrethroids has increased thus raising concerns for preservation of Diamides. This situation will be critical to the cotton industry over the next 15 to 20 years.

The NCC is working with EPA to better understand measures that protect endangered species. In many instances, it has been identified that producers have implemented measures on their farm that provide endangered species protection. The NCC desires to continue working for endangered species protection without placing millions of acres needed for food and fiber production into a buffer wasteland.

The NCC appreciates the opportunity to provide these comments to EPA for EPA's Docket EPA-HQ-OPP-2023-0144 regarding the Carbaryl and Methomyl Biological Opinion.

Respectfully,

A handwritten signature in black ink, appearing to read "Steven Hensley". The signature is fluid and cursive, with the first name "Steven" written in a larger, more prominent script than the last name "Hensley".

Senior Scientist, Regulatory and Environmental Issues
National Cotton Council