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March 23, 2023

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

RE: Docket EPA-HQ-OPP-2012-0565; Norflurazon

Dear Ms. Reaves,

The National Cotton Council (NCC) appreciates the opportunity to provide comments related to the Environmental Protection Agency's (EPA's) Proposed Interim Decision (PID) for registration of norflurazon.

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.

Norflurazon is an herbicide utilized to manage certain grasses and some broadleaf weed species in cotton production (except for California). Norflurazon is a pyridazinone herbicide (Group 12, PDS inhibitor) with one known case of resistance in the U.S. and can be applied as a preplant or pre-emerge in accordance with regional and soil type restrictions. There are only two Group 12 herbicides currently labeled for use in agricultural field crops, making this a unique mode of action (MOA) for use in resistance management of weeds. There are numerous documented cases of various weeds resistant to one or more herbicide MOA's, thus requiring mixtures of product combinations to achieve sufficient weed control. Although the cotton industry desires new, novel MOA

weed control products, none are expected in the near future. Producers are currently forced to select a combination of available products to achieve 4 or 5 applications of weed control products during the growing season. With current restrictions on labels and herbicide resistant weeds, producers struggle to comply with resistance management recommendation requesting a rotation of herbicide MOA. The NCC urges EPA to recognize the current dilemma producers face to comply with label restrictions, comply with resistance management recommendations, recognize herbicide resistant weeds of fields that further limits options, and achieve acceptable weed control for crop production.

Norflurazon is not extensively used in cotton production, largely due to the need for incorporation. Many cotton producers have migrated to reduced- and no-till operations, thus eliminating the ability to incorporate products into the soil. However, some uses remain and are important to the cotton industry as producers struggle with a lack of herbicide MOA's. Additionally, the actions pertaining to this PID set a precedent as to how EPA will move forward with concepts of the ESA Workplan Update.

The PID identifies several new requirements for the label. Most of the requirements appear in sentence form. The NCC urges EPA to consider the use of tables that may relay the information with more clarity. An example would be in the "Mandatory Spray Drift Management" section for Aerial Application.

		Wind Speed (mph)		
		Less than or equal to 10	10-15	Greater than 15
Release Height		10 ft or closest safety needs	10 ft or closest safety needs	Do not apply
Nozzle		Medium or courser droplet adhering to ASABE S641	Medium or courser droplet adhering to ASABE S641	Do not apply
Swath Displacement upwind on downwind edge of field		1/2	3/4	Do not apply
Boom Length Fixed Wing Helicopter	% wingspand	75	65	Do not apply
	% rotor diameter	90	75	Do not apply
INVERSION		Do not apply	Do not apply	Do not apply

The NCC suggests such a table allow users to clearly identify requirements related to various wind speed and application equipment.

The NCC respects EPA's conceptual direction to comply with requirements of the Endangered Species Act and is engaged in communication and educational efforts to aid our members awareness of compliance requirements. The NCC appreciates EPA's tutorial for Bulletins Live! Two (BLT) and urges EPA and OPMP to utilize the Regional IPM center to disseminate the information to university extension personnel. Additionally, grower organizations can assist with BLT and "Pick-List" education to achieve awareness and compliance. The NCC appreciates the opportunity to further collaborate with EPA on these efforts.

The NCC urges EPA to ENSURE the definitions of each "Runoff Mitigation" pick-list is compatible with NRCS definitions. The NCC highlights this point in hopes to avoid much confusion with compliance. The items of the pick list reflect conservation program initiatives in which many producers have participated. These practices, implemented over numerous years, have aided producers to protect their production lands, minimize erosion, and manage excessive water events. The implementation of these program engaged voluntary partnerships with NRCS whose trained field technician helped identify the needed practice, design the construction of the practice, and verify the final project met design specifications. EPA's reference to these practices should also reflect the NRCS design specifications that have been embedded participants' mind.

The NCC urges EPA to consider field slope in relations to water and sediment management. Many crop production fields exist in areas with a relatively flat topography. Many of the producers in such areas have worked with experts to achieve control of the slope of each field. Extensive design, construction, and unique equipment have allowed producers to have predictable water flow direction with minimal slope. Such designs have allowed producers to manage irrigation efficiently with field uniformity as well as minimized water and sediment runoff.

The NCC expresses concern that EPA has not fully grasped the complexity of implementing BLT and pick-list mitigations at the farm level. The NCC is not objecting to the direction, but we urge EPA to continue to work with the user community to identify efficiencies for compliance.

The NCC appreciates EPA's recognition of hooded-booms to reduce spray drift. The NCC and Cotton Incorporated have been working with scientists at the University of Georgia Crop and Soil Science Department to further the research data associated with the use of a hooded-boom sprayer. Dr. Simerjeet S. Virk has recently submitted his

research findings related to hooded-boom sprayers. Upon review and publication, NCC will share the research with EPA.

The NCC appreciates EPA's recognition of a small portion of conservation and environmental practices that producers have been implementing for many years. We applaud producers who have actively enhanced ~~the U.S.~~ production on working lands to protect agricultural production abilities and the associated eco-system.

The NCC appreciates the opportunity to provide these comments related to EPA's Proposed Interim Decision for the registration of Norflurazon. The NCC urges EPA to continue open dialog as we collectively work to achieve the needs of FIFRA and ESA.

Regards,

A handwritten signature in black ink, reading "Steve Hensley". The signature is fluid and cursive, with the first name "Steve" and last name "Hensley" clearly distinguishable.

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