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April 30, 2018

Office of Pesticide Programs
Regulatory Public Docket (7502P)
U.S. Environmental Protection Agency
1200 Pennsylvania Ave.,
NW Washington, DC 20460

RE: Docket ID Number EPA-HQ-OPP-2012-0167

Dear Ms. Bartow:

The National Cotton Council (NCC) appreciates the opportunity to comment on the U.S. Environmental Protection Agency's (EPA) notice "Registration Review: Draft Human Health and/or Ecological Risk Assessments for Several Pesticides." The Notice included Cypermethrin, a pyrethroid that has long been a crop protection tool available for producers' Integrated Pest Management (IPM) programs and Insect Resistance Management (IRM) programs.

The NCC urges EPA to recognize the long history of this mode of action (MOA) to control insects that damage our crops and its importance for resistance management scenarios. As EPA urges producers to recognize the value of rotating chemical MOA's for resistance management purposes, EPA must recognize rotation is not possible unless there are multiple MOA's available. The pyrethroid group, including cypermethrin, provides critical value in managing destructive cotton pests such as budworms, bollworms, plant bugs, and stinkbugs.

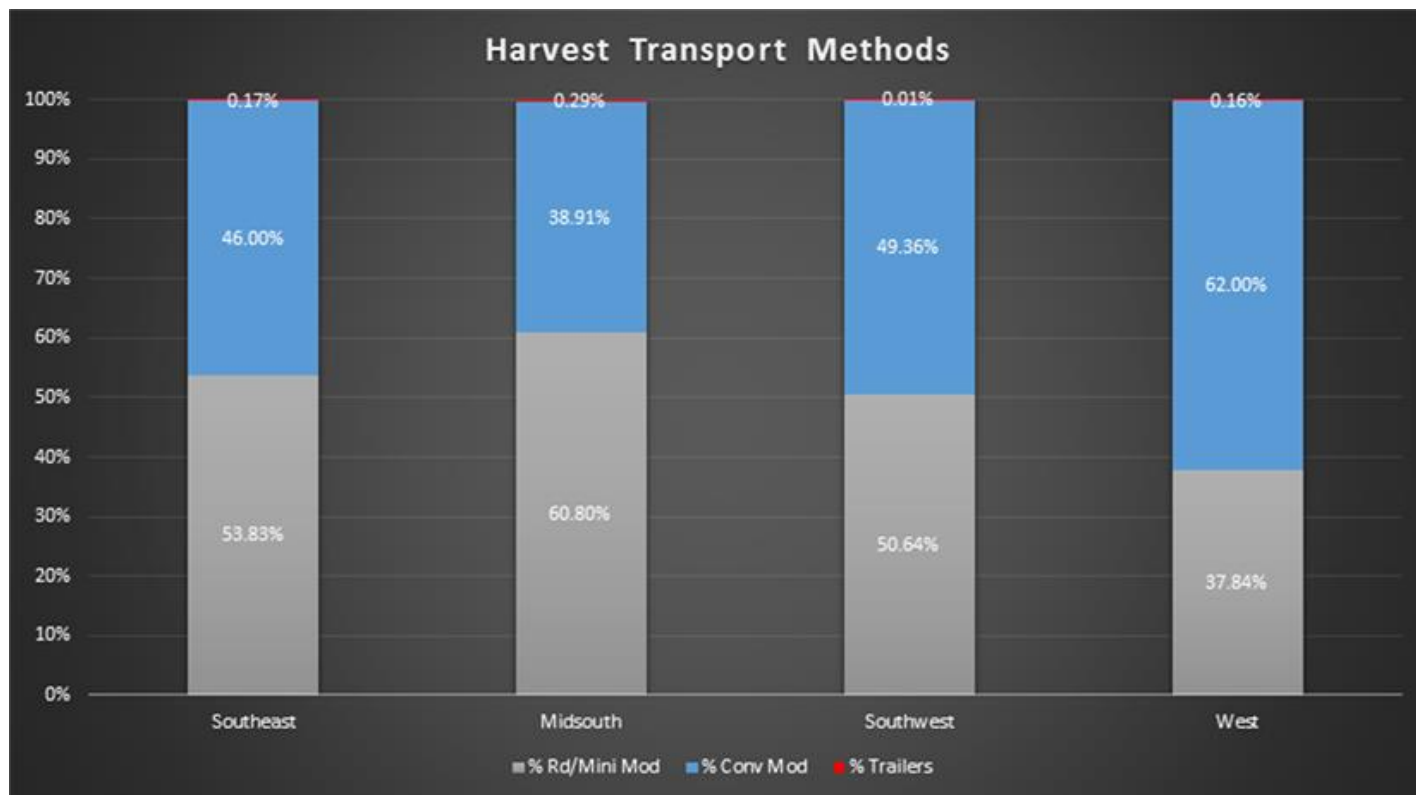
The NCC is the central organization of the United States cotton industry. Its members include producers, ginnery, cottonseed processors and merchandizers, merchants, cooperatives, warehousemen and textile manufacturers. A majority of the industry is concentrated in 17 cotton-producing states stretching from California to Virginia. U.S. cotton producers cultivate between 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.

First, the NCC appreciates the EPA's thorough review of merited science that demonstrates the safety of these products with regards to human health. We also urge EPA to continue to refine

the risk assessment by reducing safety and uncertainty factors that are not needed to protect human health. The Insecticide Resistance Action Committee (IRAC) MOA Group 3A Sodium channel modulators, (Mode of Action Classification Scheme, July 2017, Version 8.3), has a long history of safe use when used according to labels.

Even with the uncertainty factors, these products are clearly of low, if any, human health concerns when used as labeled. The NCC believes refinements that result in reduction of these conservative safety factors will allow continued or additional uses while supporting the human health safety of these products. The NCC urges EPA to refine risk assessments to support real world use. For example, Table 8.2.2.1 and Table 8.2.2.3 identify activities in cotton mechanical harvesting and trampers. The NCC has previously shared with EPA the following survey results that demonstrate the advancements in harvest and movement of cotton from the field to the gin that has made cotton wagons and trampers obsolete.

**National Cotton Council
December 2016 Gin Survey of Harvest Transport Practices.**



A survey was sent to 436 cotton ginning operations inquiring how cotton was delivered to the gin from fields. A total of 152 responses were received and were summarized by region of operation. The survey shows high adoption of new harvest technology utilizing round bale or mini module cotton harvesters (% Rd/Mini Mod). Many still utilize the conventional module builders that are mechanically packed (% Conv. Mod). For the U.S. cotton crop, the wagon or trailer transport method (% Trailers) is only used for a very small percentage of cotton and most cotton transported in trailers is not packed. The manual packing method is used by a few producers on a very small number of bales.

According to survey respondents (n=152):

0.17% of the harvested cotton is transported in trailers in the Southeast

0.29% of the harvested cotton is transported in trailers in the Midsouth

0.01% of the harvested cotton is transported in trailers in the Southwest

0.16% of the harvested cotton is transported in trailers in the West.

Of the 0.17% of cotton transported in trailers in the Southeast, 18.57% is manually packed and 81.43% is not packed. Of the 0.29% of cotton transported in trailers in the Midsouth, 20% is mechanically packed and 80% is not packed. In the Southwest and West regions, no cotton transported in trailers is packed. The Southeast was the only region reporting the use of trailers combined with manual packing of harvested cotton.

Applying the survey results from 2016 production to determine an estimate of manually packed seed cotton at harvest yields:

3,891,000 total bales produced in the Southeast in 2016 with 0.17% transported in trailers = 6,615 bales originally transported in trailers. 18.57% of those 6,615 bales manually packed = 1,228 bales manually packed (which would likely be lower if weighting was applied).

Therefore, $1,228/16,524,000$ (total U.S. production in bales of ginned lint) = 0.00743% of total U.S. cotton production was transported in trailers to the gin that were manually packed.

Additionally, the NCC notes the risk assessment (Table 8.2.2.1) for cotton assumes foliage density to be “FULL” during the activity of “Mechanical Harvesting, Trumper”. The NCC requests that EPA recognize that the U.S. crop is defoliated ahead of harvest to aid mechanical harvesting, and, therefore, assigning a practically nil foliage density.

The NCC urges EPA to recognize the benefits of the pyrethroid group of chemistries, which includes cyfluthrin and beta-cyfluthrin. The NCC reminds EPA that the Pyrethroid Working Group (PWG) contracted AgInformatics to conduct an extensive analysis with different methodologies to determine the value of pyrethroids

(http://aginformatix.com/uploads/3/4/2/2/34223974/03_aginformatix_pyrethroids_impactsummary_2017.pdf). The main data used in that study were taken from the extensive GfK Kynetec data on insecticide use by U.S. crop farmers for 2012-2014.

Below are a few critical considerations for cotton production resulting from the AgInformatics study that we feel deserve your focused consideration:

- At least 80% of cotton farmers identified six features of pyrethroids as very important.
 1. Protecting yield
 2. Family and worker safety
 3. Consistent insect control
 4. Crop price
 5. Production and application cost
 6. Long-lasting insect control
- Pyrethroids reduced crop damage as much as 65% in cotton. Targeted pests in cotton differ pre-bloom and post-bloom. Pre-bloom, the primary pest is thrips, while plant bugs and aphids are minor targets. Post-bloom, the targeted pests shift to bollworms, stink bugs, and plant bugs.
- For cotton, stink bugs are the primary target pest of pyrethroid insecticides in foliar-based systems, with a 43.8% share of all foliar treated acres.

- Lepidopterans are overwhelmingly the primary target pest in soil-based systems, with an 86.3% share of soil applied acreage.
- The estimated value to the farmer for foliar pyrethroid treatments was \$36.62 per treated acre pre-bloom and \$50.06 per treated acre post- bloom.

The NCC appreciates the opportunity to comment on “Registration Review: Draft Human Health and/or Ecological Risk Assessments for Several Pesticides”, among which is the product cypermethrin. The NCC urges EPA to engage stakeholders to preserve the safe use of this product.

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
Senior Scientist, Regulatory and Environmental Issues
National Cotton Council