



1521 New Hampshire Avenue, N.W.
Washington, DC 20036
(202) 745-7805 • FAX (202) 483-4040
www.cotton.org

PRODUCERS • GINNERS • WAREHOUSEMEN • MERCHANTS • COTTONSEED • COOPERATIVES • MANUFACTURERS

December 7, 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-2010-0028

Dear Bilin Basu:

The National Cotton Council (NCC) appreciates the opportunity to comment on the Environmental Protection Agency's (EPA) "Oxamyl: Proposed Interim Registration Decision Case Number 0253." The NCC urges EPA to recognize the long-term registration of this crop protection product and to recognize the unique mode of action (MOA) it offers for resistance management scenarios. As EPA urges producers to recognize the values of rotating chemical MOA's for resistance management purposes, EPA should recognize rotation is not possible unless there are multiple MOA's available. Even more importantly, the NCC urges EPA to recognize this product is the only post planting nematicide for management of root knot nematodes.

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

Oxamyl is a carbamate insecticide that has a long history of safe use in cotton. EPA notes that cotton uses approximately 200,000 lbs of Oxamyl per year. Given the acreage of cotton (approximate 5-year average) is 10.5 Million acres, it is clear the product is not overly used. EPA additionally notes

that of those acres that are treated with oxamyl, 83% only receive one application. Although the market share is not enormous, it should be recognized that its use is critical to certain pest situations. Oxamyl is recognized as a broad-spectrum insecticide, miticide, and nematocide. Use of oxamyl is highly varied based on the geographic production location. For example, portions of Texas rely highly on oxamyl as a post emergent nematocide. They have no post emerge alternative nematocide. Oxamyl may not be the first product of choice for tarnished plant bugs and nematodes in Arkansas, but is a very important component of a system rotation of MOAs for several producers in Arkansas. Arizona has noted little use for most years. However, when high populations of cotton leafperforator (particularly in pima cottons) occur, oxamyl holds a critical niche for leafperforator control. Additionally, cotton producers continue to face control challenges to multiple other piercing sucking insect pests, with few rotational Modes of Action. Piercing sucking pests such as thrips, aphids, plantbugs, and stinkbugs are an increasing challenge for the cotton industry, and fewer products are available for control of these pests. Cotton producers need more control choices rather than limited choices.

The NCC appreciates EPA's recognition of the niche benefits of oxamyl but urges EPA to understand the critical importance of niche benefits. Nematodes and leaf perforators are extremely challenging pest to manage. Piercing sucking pest management options/alternatives are rapidly diminishing due to registration review limits on active ingredient rates and application intervals.

The NCC urges EPA to retain the aerial application for cotton, and to understand that droplet size for controlling insects cannot be viewed as droplet size for controlling weeds. Many pest species require movement of the droplet into the canopy or underside of the leaf to reach pest location. The NCC discourages EPA from identifying specific nozzle requirements and notes the current label sufficiently addresses nozzle selection to minimize drift.

The NCC thanks the EPA for the opportunity to provide comment and encourages EPA to make no changes to the current label of this safe product.

Respectfully,

A handwritten signature in black ink that reads "Steve Hensley". The signature is written in a cursive, flowing style.

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