



P.O. Box 2995 • Cordova, TN 38088-2955
(901) 274-9030 • FAX (901) 725-0510
www.cotton.org

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October 25, 2021

Tracy Perry
Pesticide Re-Evaluation Division (7508P)
Office of Pesticide Programs, Environmental Protection Agency
1200 Pennsylvania Ave. NW.
Washington, DC 20460-0001

RE: Docket ID Number EPA-HQ-OPP-2021- 0575

Dear Tracy,

The National Cotton Council (NCC) appreciates the opportunity to provide comments to EPA's Draft Endangered Species Act (ESA) Biological Evaluations for the Registration Review of Clothianidin, Imidacloprid and Thiamethoxam. These products collectively will be referred to as neonics. The neonic chemistries provide critical control of damaging insect pests of cotton, particularly piercing/sucking insects. The NCC appreciates EPA's recognition of the benefits of the neonic chemistries for cotton production as a critical component of IPM practices but disagrees with inferences of alternatives. NCC urges EPA to reconsider the impact of proposed rate reductions and to recognize the impacts on crops planted following cotton for efficient utilization of land.

The NCC is the central organization of the United States cotton industry. Its members include producers, ginners, 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.

Several piercing/sucking insects are pests of cotton production (thrips, aphids, whiteflies, plant bugs, etc.). These pests vary in the time of year they are most likely to invade and damage cotton fields. Additionally, the frequency of infestations and pest species vary greatly between regions of the cotton belt. The important point to recognize is, based on scouting, that one field may necessitate multiple applications of insecticide over the course of a year to protect against

multiple insect species. Some polyphagous pests, such as plant bugs, may alone require multiple applications of insecticide due to multiple generations invading the crop during a single year. The unfortunate fact is producers must rely on only a few insecticide mode of actions (MOAs) to provide effective control for the duration of the crop year and minimize and slow the development rate of MOA resistance. Currently, many MOA's lack high efficacy due to the development of moderate resistance. To achieve necessary reductions in pest populations, producers must simultaneously treat with more than one MOA in a tank mix. The lack of sufficient MOAs is well documented. The suggestion of adequate alternatives is not supported by the evidence, and the reality is that producers are deficient in alternatives, thus forcing selection for resistance of the few remaining MOAs. This is of serious concern to the cotton industry and has been discussed with multiple registrants. Unfortunately, at this time no new MOA insecticides are known to be near commercialization for piercing/sucking pests of cotton.

The cotton industry has been fortunate for several years to have avoided catastrophic damage from piercing/sucking pests such as whiteflies. There is evidence showing the use of neonic insecticides had less disruptive effects on beneficial insects within the cotton field eco-system. Scientists have shown the more disruptive insecticides tend to "flare" or cause populations of pest to rapidly increase after the initial mortality. Scientists believe the phenomena is related to preservation of beneficial insects in the field environment. This is particularly important for whitefly management. Whitefly infestations in the past have shown yield loss, grade loss (due to sticky residue and staining from whitefly excretion), ginning inefficiencies (sticky residue causes clogging of equipment), and processing inefficiencies at mills (again, sticky residue clogging equipment). The significance of whiteflies and their damage is well documented, and marketers and mills expressly seek to avoid the purchase of "sticky cotton". The importance of the neonic chemistries is exceptional to the cotton industry.

A reduction in application rate is strongly discouraged by the cotton industry. Scientific data defining the efficacy of an insecticide is used by companies to determine the rate necessary to control the pest population. Reducing the application rate results in a reduction in the number of pests controlled. Scientifically, the result is greater selection for individual pests possessing a copy of the resistant gene and thereby speeding up the rate at which pest species will become resistant to the insecticide. EPA has noted this fact in numerous dialogs and training as weeds became resistant to glyphosate herbicide. EPA is urged to avoid mandates inconsistent with resistance management principles.

The NCC appreciates the complexity of conducting a biological evaluation of a pesticide on a national level encompassing all endangered species. EPA has faced challenges meeting the demands of FIFRA and ESA for numerous years. The NCC recognizes EPA's current methodology has taken a vast investment of time and collaboration with Fish and Wildlife Services and National Marine and Fisheries Services (collectively referred to as the "Services"), but recent results indicating the majority of the species meet the "Likely to Adversely Affect" (LAA) demonstrates numerous flaws remain which overburdens both EPA and the Services. The NCC believes EPA has performed the BE with use rates not reflective of crop production practices and urges EPA to focus on field relevant use rates and uses. The NCC believes EPA has developed an efficient model for rapid determination, but believes the outcomes are not considered in the biological context of the species locality, protective surroundings, and

relevance to location in water shed areas. The NCC urges EPA and the Services to continue engagement and refinement of the BE for relevant meaning and efficiency.

The NCC appreciates the opportunity to provide these comments and encourages the EPA to contact NCC staff if additional information is desired.

Sincerely,

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