

June 24, 2015

Regulatory Analysis and Development
Policy and Program Development
Animal and Plant Health Inspection Services
Station 3A-03.8
4700 River Road, Unit 118
Riverdale, MD 20737-1238

Regarding the Preliminary Determination of Nonregulated Status for Cotton Genetically Engineered for Resistance to 2,4-D and Glufosinate

DOCKET ID: **APHIS-2013-0113**

The Georgia Cotton Commission (GCC) is a producer funded organization representing the cotton producers of Georgia. Georgia is the second largest cotton growing state with a \$1.3 billion farm gate value and a total economic contribution of \$2.5 billion to the economy of Georgia. The Georgia cotton industry also accounts for over 20,000 jobs in our state. Agriculture is the largest industry in Georgia accounting for over 375,000 jobs and has a total economic impact of over \$72 billion to Georgia's economy.

GCC supports the deregulation of Dow AgroSciences' new Enlist cotton that is resistant to 2,4-D and glufosinate. Palmer amaranth control is estimated to cost Georgia cotton farmers over \$100 million annually. Without new herbicidal modes of action for cotton production, our farmers will have to continue paying these high costs and rely on older technologies to combat palmer amaranth.

GCC has been actively engaged in the knowledge transfer process of this new technology. Both our staff and board members have met with Dow AgroSciences representatives and attended educational field days specifically for this new technology.

In conclusion, GCC supports the deregulation of Dow AgroSciences new Enlist cotton. Georgia cotton farmers need additional tools such as Enlist cotton to combat palmer amaranth.

Sincerely,



Mike Lucas
Chairman, Georgia Cotton Commission