

November 30, 2016

2,4-D: Uses on Herbicide-Tolerant Corn, Cotton, and Soybean
Environmental Protection Agency
Mailcode 28221T
1200 Pennsylvania Avenue, NW
Washington, DC 20460

**Regarding the Evaluation of 2,4-D Choline Salt Herbicide on Enlist Corn,
Soybeans, and Cotton**

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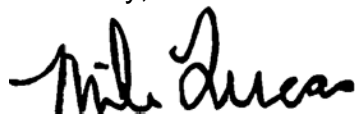
The Georgia Cotton Commission (GCC) is a producer funded organization representing the cotton producers of Georgia. Cotton is the largest crop in Georgia, and Georgia is the second largest cotton growing state with an \$826 million farm gate value and a total economic contribution of \$2.5 billion to the economy of Georgia. The Georgia cotton industry also accounts for over 15,000 jobs in our state. Agriculture is the largest industry in Georgia accounting for over 411,000 jobs and has a total economic impact of over \$74 billion to Georgia's economy.

GCC supports the deregulation of Dow AgroSciences' (DAS) new Enlist Duo herbicide for use on Enlist cotton, corn, and soybeans. 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. Additionally, cotton producers have had to rely more on costly hand-weeding 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 DAS representatives and attended educational field days specifically for this new technology.

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

Sincerely,



Mike Lucas
Chairman, Georgia Cotton Commission