

Georgia Cotton Commission
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February 23, 2016

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

Regarding Registration Review of Dicrotophos

DOCKET ID: **EPA-HQ-OPP-2008-0440**

Dear Mr. Nguyen,

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 \$960 million farm gate value and a total economic contribution of \$2.6 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 411,000 jobs and has a total economic impact of over \$74 billion to Georgia's economy.

Dicrotophos, commonly referred to by Georgia cotton farmers by its trade name Bidrin, is a valuable part of cotton production in our state. We have and will continue to use integrated pest management (IPM) practices here in Georgia. Bidrin has been a valuable tool to make our IPM program successful. GCC has funded many research projects with the University of Georgia to create a sustainable IPM program since the eradication of the boll weevil. We have funded several studies in particular that have shown Bidrin to be a valuable asset in our struggle to control stink bugs.

In conclusion, GCC believes that Bidrin is a valuable tool for our cotton farmers. Removing this tool would cause harm to our growers and give them less options for controlling pest. We urge the EPA to retain the current labeled uses for Bidrin in cotton.

Sincerely,



Mike Lucas
Chairman
Georgia Cotton Commission