

Georgia Cotton Commission
401 Larry Walker Parkway, Suite A
PO Box 1464
Perry, Georgia 31069
478-988-4235
www.georgiacottoncommission.org



February 23, 2016

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

Regarding Registration Review of Tribufos

DOCKET ID: **EPA-HQ-OPP-2008-0883**

Dear Ms. Mannix,

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.

Tribufos is a defoliant commonly used in Georgia cotton production. Defoliation is a very important process in the harvesting of cotton in our state. Much like our neighboring states in the cotton belt, we can experience warm and/or wet winters that allow cotton to continue to grow and remain full of foliage. Proper defoliation is imperative to capturing the highest fiber quality possible. Without proper defoliation the lint can become stained and lose value. GCC has funded numerous projects with the University of Georgia demonstrating the proper use and value of our range of defoliation products.

In conclusion, we believe that tribufos is an effective and valuable product for our Georgia cotton farmers. We urge EPA to retain the current labeled uses for tribufos in cotton.

Sincerely,



Mike Lucas
Chairman
Georgia Cotton Commission