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August 28, 2015

Mr. Jack Housenger, Director  
Office of Pesticide Programs  
Environmental Protection Agency Docket Center  
1200 Pennsylvania Ave. NW  
Washington, DC 20460-0001

**Regarding the Proposal to Mitigate Exposure to Bees from Acutely Toxic  
Pesticide Products**

DOCKET ID: **EPA-HQ-OPP-2014-0818**

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.

As members of the National Cotton Council, we are endorsing the attached comments on behalf of Georgia cotton producers.

Sincerely,



Mike Lucas  
Chairman  
Georgia Cotton Commission

The National Cotton Council (NCC) appreciates the opportunity to comment on the Environmental Protection Agency's (EPA) Proposal to Mitigate Exposure to Bees from Acutely Toxic Pesticide Products, [EPA-HQ-OPP-2014-0818]. The NCC supports EPA's encouragement of state and tribal Managed Pollinator Protection Plans to reduce pesticide exposure through the development of locally-based measures for crops not under contractual pollination services. The NCC understands the increased concerns for crops under contractual pollination services due to the more intensive congregation

of hives throughout the crop, but does have concerns that crop producers could suffer significant yield loss under EPA's proposed label language. The NCC urges EPA to consider mitigation options such as relocation of hives, nighttime pesticide applications, or other possible measures rather than not allowing affected producers any mitigation alternatives.

The NCC is the central organization of the United States cotton industry. Its members include producers, ginner, cottonseed processors and merchandizers, merchants, cooperatives, warehousemen and textile manufacturers. A majority of the industry is concentrated in 17 cotton-producing states stretching from Virginia to California. Annual cotton production is valued at more than \$5 billion at the farm gate. The downstream manufacturers of cotton apparel and home furnishings are located in virtually every state. The industry and its suppliers, together with the cotton product manufacturers, account for approximately 200,000 jobs and generate total annual economic activity in excess of \$100 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.

### **5.2 Application to sites with bees present under contract pollination services:**

Although cotton is a self-pollinating crop that does not require pollination services (i.e. not under contractual pollination services), the NCC has concerns that the EPA's proposal does not seem to provide growers of crops under contractual pollination services with any options to utilize necessary crop protection products for pest control when faced with damaging pest densities. The proposal would be more risky for crops, such as watermelons, that continue bloom throughout the growing season. The NCC recommends the relocation of hives or covering of hives as an acceptable alternative when a grower is under a threat of yield loss. Additionally, the proposal identifies product restrictions based solely on hazard values and does not follow EPA's risk based system that typically identifies mitigation measures to reduce risk. The NCC urges EPA to base decisions and label restrictions on exposure risks, not on hazard values. Further, the NCC interprets "site" to mean the crop requiring contract pollination service and not adjacent fields and crops. The NCC believes this interpretation is supported by the EPA's distinction of differing language for crops under contract pollination services and crops not contracting pollination services. The NCC also urges support for "contract pollination services" to be defined as the existence of an agreement between two businesses, but not pertaining to producers who may own their own bee livestock.

**5.3 Application to sites that are not under contracted Pollination Services:** The NCC supports EPA's proposal to rely on state/tribal pollinator protection plans to reduce pesticide exposures and agrees it is consistent with the Presidential directive issued in June of 2014. The NCC is aware of several states that are in various development phases of managed pollinator protection plans. These states have brought together stakeholders (beekeepers, crop producers, other businesses involved in pesticide application on farms, university experts, etc.) in order to share information related to each operation's needs and identify practices to enhance the coexistence of all parties. The importance of local based solutions cannot be over-emphasized because of the

differences in crop mixtures, environmental constraints, terrain, and production practices across the country. The state pollinator plans provide a mechanism to vary protection practices that best fit local area needs. The routine re-evaluation of such plans by the organizing group allows flexibility to modify the practices based on experience and provides additional peer pressure that will likely enhance awareness of pollinators and increase sensitivity of practices near hives. The NCC believes the partnership created by these local collaborators will provide enhanced protection of pollinators, and that surveys of participants will provide measurements that demonstrate the success.

**6. Uncertainties:** Regarding Section 6 of EPA's proposal, the NCC compliments EPA's statements of scientific facts that do not support allegations of harm to bees caused by certain insect growth regulators and fungicide tank mixes. EPA's response and reliance on scientific data at environmentally relevant concentrations is critical and should not diminish. The NCC also urges EPA to recognize the costly burden of requiring additional studies for registration or re-registration of products and urges EPA to minimize the requirement of studies to only those essential in risk assessment decisions.

The NCC urges EPA to recognize that any restriction placed on a crop protection product for protection of managed bees should not apply to farms with no managed bees present. The current estimate of managed honey bee colonies in the U.S. is 2.5 million colonies. Cotton acreage alone exceeds 8 million acres. Some producers provide beekeepers access to a portion of their farm, while other producers do not have managed colonies present on their farm. Without the presence of the managed colonies, there is no risk to managed bees for EPA to address under FIFRA. As EPA reviews products for registration and reregistration, the NCC urges EPA to allow product use where there is no risk.

The NCC appreciates this opportunity to provide comments regarding EPA's Proposal to Mitigate Exposure to Bees from Acutely Toxic Pesticide Products. Please do not hesitate to contact us with any questions or concerns.

Sincerely,



Reece Langley  
Vice President, Washington Operations