



# GEORGIA COTTON COMMISSION

February 8, 2018

OPP Docket, Environmental Protection Agency Docket Center (EPA/DC), (28221T)  
1200 Pennsylvania Ave. NW  
Washington, DC 20460-0001  
Docket No. EPA-HQ-OPP-2011-0677

## Comments on Pyriproxyfen Registration Review

To Whom It May Concern:

The Georgia Cotton Commission is a producer funded organization that represents the over 3,000 family farmers that grow cotton in Georgia through research, promotion, and education. We are writing to inform the Environmental Protection Agency of our support for the continued availability of the insecticide pyriproxyfen, which is undergoing registration review. The United States planted nearly 12 million acres of cotton in 2017, and Georgia averages over 1.25 million of production every year. In 2017, one acre of cotton in Georgia produced approximately 850 of cotton lint on average (which was lower than recent years). Cotton is an extremely important crop to the engine that is American agriculture and agribusiness.

Pyriproxyfen is the primary insecticidal tool used to manage silverleaf whitefly in Georgia cotton production. Georgia growers utilize integrated pest management practices for whiteflies and other pests with the objective of minimizing insecticide inputs. Whiteflies negatively affect cotton in two ways; first, they take nutrients from the cotton plant that affects the growth and development of the plant which results in decreased yield; secondly, whiteflies excrete a sugary liquid known as honeydew, which has a severe impact on the quality of cotton lint. Research and on farm experience proves that pyriproxyfen preserves both yield and quality of cotton under pressure from whiteflies. Whiteflies are a sporadic pest of cotton in Georgia, requiring treatment on limited acres in most years (percent treated acreage ranged from 0 to 10 percent from 1996-2016). However, 2017 was an outbreak year for silverleaf whitefly in Georgia and significant acreage required treatment for this pest.

Thank you for the opportunity to provide comments on this issue. The Georgia Cotton Commission implores you to continue to make this tool available to the American Farmer so that they can continue to feed the growing world.

Sincerely,

Bart Davis, Chairman  
Georgia Cotton Commission