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April 30, 2015

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

RE: Docket No. EPA-HQ-OPP-2008-0850: The Environmental Protection Agency (EPA) Notice: Human Health Risk Assessments; Revisions: Chlorpyrifos Registration Review

Dear Mr. Wolf:

The National Cotton Council (NCC) appreciates the opportunity to comment on the Environmental Protection Agency's (EPA's) Human Health Risk Assessment Revision for Chlorpyrifos Registration Review.

The NCC is the central organization of the U.S. cotton industry representing producers, ginner, warehouses, merchants, cooperatives, textile manufacturers, and cottonseed processors and merchandisers in 17 states stretching from California to the Carolinas. The NCC represents producers who cultivate between 10 and 14 million acres of cotton. Annual cotton production, averaging approximately 20 million 480-lb bales, is valued at more than \$5 billion at the farm gate. While a majority of the industry is concentrated in the 17 cotton-producing states, the down-stream 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 more than 230,000 jobs in the U.S. In addition to the cotton fiber, cottonseed products are used for livestock feed and cotton-seed oil is used for food products ranging from margarine to salad dressing. Taken collectively, the annual economic activity generated by cotton and its products in the U.S. economy is estimated to be in excess of \$120 billion.

Chlorpyrifos is used on cotton (predominately in western US production areas) to control aphids, lygus and whiteflies. It is one of the few remaining crop protection products that provides a broad spectrum of control for multiple insect pests. Without control of these pests, producers can sustain yield loss and quality loss. The quality loss

results from the sugary excrement of honey dew by the insect pests followed by sooty mold, a black mold infesting honey dew deposits. The contaminated cotton lint has a black appearance with a sticky secretion that interferes with textile processing and is referred to as “sticky cotton.” Sticky cotton is known to deposit the sticky residue in processing equipment and clog equipment until the residue is removed. Sticky cotton is a major threat to potential sales of cotton lint.

EPA provided a review of studies conducted prior to the elimination of chlorpyrifos from home use. EPA acknowledges deficiencies in the studies including a lack of understanding if other exposures took place. It is our understanding that EPA requires registrants to provide toxicological studies under specific guidelines and GLP (Good Laboratory Practices). However, we fail to see where EPA compared and contrasted the findings of the required toxicological studies of registrants with the three epidemiology studies, and especially the “Columbia study”, reported. Please explain the contrast of the controlled studies required of registrants with the reported studies, and why EPA seems to have placed more weight on the reported studies. EPA admits to not having been granted access to the raw data despite multiple requests. This raises issues of transparency of the data and studies used by the EPA. It is also unclear as to how the Agency fully accounted for confounding factors that may have contributed to the results these studies have claimed are somehow linked to chlorpyrifos. We use the term “somehow” because EPA even admits they can find no causal relationship between chlorpyrifos and these effects. Considering the questions about the linkages between exposure and effects, it is even more important that agriculture is assured EPA held these studies to the same level of transparency and scientific rigor they require of registrants before using the studies to take such significant regulatory action and increasing the Food Quality Protection Act (FQPA) safety factor from 1 to 10.

The NCC understands that, as in other cases, water monitoring data has been provided to EPA that does not reflect the water concerns implied by EPA’s computer simulation model. It is understandable that in the absence of real data, the water model is the best available alternative, but the NCC has concerns that the model does not seem to be validated with real world data. The NCC understands the model has been reviewed by a Scientific Advisory Panel, but that does not validate the model results with real world data. It remains plausible that assumptions in the model are incorrect or at least extreme if they cannot be validated and match closely to real world data. Please address what monitoring data indicates related to drinking water and how that data compares to EPA’s water model. Also, we understand the EPA failed to consider a study submitted that provided guidance on how to use monitoring data with modeling, and the outcome was very different with all crop uses passing the assessment. And finally, we understand the EPA also failed to consider a toxicology study provided to the Agency that showed no toxicological effect, (so no risk) at the maximum levels of

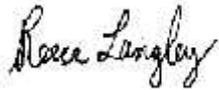
the chemical you could potentially find in water. We request the Agency to consider all submitted studies before making any final decisions.

The NCC supports the protection of human health, but has concerns that EPA is inferring harm beyond the scope of scientific data. The NCC urges EPA to continue the historic path of reliance on credible scientific data and require all studies submitted to meet the same requirements as those required of registrants.

The NCC appreciates the opportunity to provide these comments on EPA's Human Health Risk Assessments Revisions for Chlorpyrifos Registration Review.

If you have any questions or need any further information regarding this comments, please contact us.

Sincerely,

A handwritten signature in cursive script that reads "Reece Langley".

Reece Langley
Vice President – Washington Operations