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October 13, 2020

OPP Docket

Environmental Protection Agency Docket Center (EPA/DC) (28221T)  
1200 Pennsylvania Ave. NW  
Washington, DC 20460-0001

**RE: Docket No. EPA-HQ-OPP-2020-0202, for Isoxaflutole**

The National Cotton Council (NCC) appreciates the opportunity to provide comments on the Environmental Protection Agency's (EPA's) "Petition Filed for Residues of Pesticide Chemicals in or on Various Commodities (July 2020)."

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 California to Virginia. U.S. cotton producers cultivate between 10 and 14 million acres of cotton with production averaging 12 to 20 million 480-lb bales annually. The downstream manufacturers of cotton apparel and home furnishings are located in virtually every state. Farms and businesses directly involved in the production, distribution and processing of cotton employ more than 125,000 workers and produce direct business revenue of more than \$21 billion. Annual cotton production is valued at more than \$5.5 billion at the farm gate, the point at which the producer markets the crop. Accounting for the ripple effect of cotton through the broader economy, direct and indirect employment surpasses 280,000 workers with economic activity of almost \$75 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.

EPA is announcing receipt of a pesticide petition filed under section 408 of the Federal Food, Drug, and Cosmetic Act (FFDCA), 21 U.S.C. 346a, requesting the establishment or modification of regulations in 40 CFR part 174 and/or part 180 for residues of pesticide chemicals in or on various food commodities. The Agency is taking public comment on the request before responding to the petitioner. EPA is not proposing any particular action at this time.

This notice, in part, is in response to a petition from BASF Corporation requesting to "establish tolerances in 40 CFR part 180 for residues of the herbicide, isoxaflutole, in or on cottonseed at 0.02 ppm and cotton gin byproducts at 0.02 ppm." <sup>1</sup> It is this product alone that we will address here.

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<sup>1</sup> PP 9F8818., (EPA-HQ-OPP-2020-0202).

The NCC has reviewed the data on isoxaflutole and we do not foresee issues affecting boll development. In addition, due to the timing of the application which is prior to squaring or development of the cotton fruit, we do not foresee export concerns resulting from maximum residue levels.

NCC therefore supports the petition for tolerances and asks that EPA grant the tolerances as requested.

The NCC appreciates the opportunity to provide these comments regarding BASF's petition for tolerances for isoxaflutole. Please do not hesitate to contact me with any questions.

Respectfully,

A handwritten signature in black ink that reads "Steve Hensley". The signature is written in a cursive, flowing style.

Steve Hensley  
Senior Scientist, Regulatory and Environmental Issues  
National Cotton Council