



Arizona Farm Bureau Federation

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November 13, 2017

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

RE: EPA-HQ-OPP-2010-0028; Registration Reviews: Draft Human Health and/or Ecological Risk Assessments for Several Pesticides – oxamyl

To Whom It May Concern:

The Arizona Farm Bureau Federation represents farmers and ranchers from across Arizona. Our members produce an array of crops and livestock that contribute over \$23.3 billion of economic impact to the state. Our comments below address the Environmental Protection Agency's (EPA) draft human health and ecological risk assessment of oxamyl, as we believe it does not fully recognize the critical role this chemistry provides to the success of a number of Arizona's agricultural crops.

Although oxamyl is a product that is no longer routinely used, it is an important chemistry in the crop protection tool box, especially for farmers growing cotton and melons. These two crops add significant value to Arizona's agricultural receipts. Of the state's 15 counties, cotton is grown in 9 and continues to be an important agricultural commodity. Arizona cotton yields are consistently twice the national average and contributes \$400 to \$500 million annually to the state's economy. Arizona is also a major melon producing state and ranks second in the nation in cantaloupe and honeydew production.

Cotton

Oxamyl targets cotton leafperforators and lygus. Cotton leafperforator infestations still occur in Pima and non-transgenic, non-Bt cotton varieties. Cotton leafperforators are notoriously difficult to control because of their unusual life cycle that has them protected within the leaf of the plant for a period of time. Oxamyl is a uniquely effective product that can help prevent severe defoliation and the premature opening of cotton bolls, by controlling cotton leafperforators directly with its translaminar action. Pima and non-transgenic, non-Bt cotton varieties are a small, yet important portion, of Arizona's cotton crop. Pima cotton is a premium, extra-long staple cotton.

Lygus is another major pest in cotton that is effectively treated by oxamyl. Currently other products are more widely used, but should they not be available due to canceled registrations or resistance, oxamyl is only one of two effective products left to address lygus infestations.

Cotton farmers today face a number challenges including commodity prices being at their lowest point in years, rising input costs, and increasing global competition. Added to this are the day-to-day challenges of dealing with weeds, insect and disease pests, and weather. It is important that growers retain crop protection tools, such as oxamyl, to preserve their ability to manage insects and diseases efficiently and effectively.

Melons

Leafminer larvae in melons mine through the leaves of the plant and reduce the photosynthetic capacity of the plant resulting in defoliation and exposure of the fruit to the sun. As with cotton, oxamyl is no longer widely used to address leafminer infestations, but is a product that remains available in the event of other products not being available or effective.

We believe oxamyl should remain a viable pest management option for Arizona's cotton and melon producers. It is an effective crop protection tool, although not widely used, has a unique niche for rare circumstances. We strongly encourage the EPA to consider the extremely safe track record and the economic importance of oxamyl to Arizona's farmers as it conducts its human health and ecological risk assessment.

Sincerely,

A handwritten signature in cursive script that reads "Stefanie A. Smallhouse". The ink is dark and the signature is fluid.

Stefanie Smallhouse, President
Arizona Farm Bureau Federation