United States Senate

COMMITTEE ON ENVIRONMENT AND PUBLIC WORKS
WASHINGTON, DC 20510-6175

May 10, 2016

Administrator Gina McCarthy
Environmental Protection Agency
William Jefferson Clinton Building
1200 Pennsylvania Avenue, N.W.
Washington, DC 20460

Dear Administrator McCarthy,

We write to request that your agency move forward swiftly in the decision making process for emergency use requests authorized in (Section 18) of the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA) for sulfoxaflor (Transform) for cotton. We have been told that a number of state requests for cotton are pending before EPA. We are particularly concerned about the status of the cotton Section 18 request from Mississippi, which was submitted to EPA on March 10th. Time is of the essence for farmers to have access to this critical tool.

In previous years, Transform requests have been approved in a timely fashion, which we consider to be within 50 days of the initial submission, as is indicated on EPA's Pesticide Emergency Exemption webpage.[1] However, as of this letter the Mississippi request for cotton stands at 61 days and requires a comment period, which just opened on May 5th. The recent Texas sorghum emergency use request for Transform provides a worrying example because it took 129 days to approve[2] – a full 75 days after its comment period opened. We strongly encourage EPA to shorten the comment period and move forward with a decision on the cotton requests as soon as possible.

Cotton growers in the Mid-South are getting dangerously close to when applications must be made to treat for the tarnished plant bug (*Lygus lineolaris*). Without Transform in their toolbox soon, growers of these crops are destined for significant crop losses that are otherwise avoidable.

We appreciate your attention to this important issue and would like an update on the status of the aforementioned requests by May 17, 2016.

Sincerely,

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[1] https://www.epa.gov/pesticide-registration/pesticide-emergency-exemptions.

[2] Agri-Pulse. April 11, 2016. Texas sorghum growers get sulfoxaflor for another season.

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