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June 9, 2025

Ms. Shannon Borges  
Deputy Director, Biopesticides and Pollution Prevention Division  
Office of Pesticide Programs  
Environmental Protection Agency  
1200 Pennsylvania Ave, NW  
Washington, DC 20460-0001

*Submitted electronically via Federal eRulemaking Portal:*

**RE: Pesticide Product Registration; Receipt of Application from GreenLight Biosciences to Register Vadescana dsRNA as a New Active Ingredient (94614-G; 94614-L; 94614-U) (EPA-HQ-OPP-2023-0558)**

Dear Ms. Borges:

The National Association of State Departments of Agriculture (NASDA) appreciates the opportunity to comment on the U.S. Environmental Protection Agency's (EPA) overall proposal to register the New Active Ingredient Vadescana for use in honeybee hives.

NASDA represents the commissioners, secretaries, and directors of the state departments of agriculture in all 50 states and four U.S. territories. State departments of agriculture are responsible for a wide range of programs, including food safety, combating the spread of disease, and fostering the economic vitality of our rural communities. Conservation and environmental protection are also among our chief responsibilities. In 43 states, the state department of agriculture is a co-regulator with the EPA and is responsible for administering, implementing, and enforcing the production, labeling, distribution, sale, use, and disposal of pesticides under the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA).

Bees play a critical role in plant reproduction. Three-fourths of the world's flowering plants and about 35 percent of the world's food crops depend on pollinators to reproduce. The health of pollinators is critical to U.S. agriculture and food security.

Without a doubt, the Varroa mite is perhaps the most significant threat facing bee health, honey production, and pollination services. The U.S. Department of Agriculture cites the

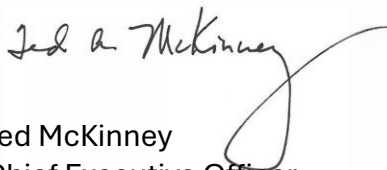
Varroa mite as inflicting more damage and higher economic costs than all other apicultural diseases. Before the introduction of Varroa mites, beekeepers managed more than 3 million colonies with winter losses typically about 10 to 15 percent. Today, annual colony losses are averaging more than 40 percent.

To address this widespread problem, beekeepers need more tools in their toolbox to provide long-term solutions to these and other parasitic mites that may arrive. For commercial beekeepers, only three treatments are available to combat Varroa mites. They are generally effective; however, this shortlist has not changed in many years.

Therefore, NASDA strongly supports the proposed registration of Vadeskana in one technical product and two end-use products to control against Varroa mites in honeybee hives. This will add an essential new tool to that limited toolbox and help beekeepers in their ongoing battle against this devastating pest. We appreciate EPA's recognition of the urgency of this issue and hope to see the agency continue to take actions to expand the tools available to beekeepers.

Thank you for your consideration of NASDA's comments on this critical issue. Should you have any questions, please contact Patrick Wade, Director of Public Policy, at [patrick.wade@nasda.org](mailto:patrick.wade@nasda.org).

Sincerely,

A handwritten signature in black ink, reading "Ted McKinney". The signature is fluid and cursive, with a long, sweeping underline that extends to the right.

Ted McKinney  
Chief Executive Officer  
NASDA