



National Association of State Departments of Agriculture

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April 27, 2026

U.S. Environmental Protection Agency  
EPA Docket Center  
Office of Pesticide Programs  
1200 Pennsylvania Avenue, NW  
Washington, DC 20460

***Submitted via Regulations.gov***

Re: Request for Comments on NovoFly™ Male-Only GE New World screwworm (NWS); EPA-HQOPP-2026-0991

The National Association of State Departments of Agriculture (NASDA) appreciates the opportunity to provide comments on the United States Environmental Protection Agency's (EPA) Notice of Receipt (NOR) for the new active ingredient, the LshidAla2 and tTAo proteins, contained in NovoFly™ *Cochliomyia hominivorax* (New World screwworm), and on the accompanying FIFRA Section 18 emergency exemption.

NASDA represents the commissioners, secretaries, and directors of the state departments of agriculture in all fifty states and four U.S. territories. State departments of agriculture are responsible for a wide range of programs, including conservation, environmental protection, food safety, plant and animal disease prevention, and the economic vitality of our rural communities. Our members both enforce pesticide regulations and respond to foreign animal disease outbreaks. As a coregulator of pesticides and of foreign animal disease prevention, NASDA supports the approval of this technology.

The New World screwworm poses a significant threat to the U.S. economy. Estimates indicate that NWS could cause \$10.6 billion in annual economic losses in the U.S. annually. Given this destructive potential, we believe it is critical to have all viable tools available to combat the pest. Historically, the most effective tool to prevent NWS from spreading has been the sterile insect technique (SIT).

While the COPEG SIT facility in Panama has been operating at maximum capacity, the 100 million flies it produces per week pales in comparison to the estimated 400-500 million flies needed to fight NWS. NovoFly™ offers an innovative solution to help alleviate this capacity problem. By producing only sterile male flies, the program greatly increases efficiency. We commend USDA-ARS for this breakthrough and encourage the EPA to approve the new active ingredient and Section 18 emergency exemption expeditiously.

Sincerely,

A handwritten signature in black ink that reads "Ted McKinney". The signature is fluid and cursive, with a long, sweeping tail that loops back under the name.

Ted McKinney  
CEO  
NASDA