



Agri-Mark, Inc.

Associated Milk Producers Inc.

Bongards' Creameries

California Dairies, Inc.

Cayuga Marketing

Cooperative Milk Producers Association

Dairy Farmers of America, Inc.

First District Association

Foremost Farms USA

Lanco Pennland

Land O'Lakes, Inc.

Lone Star Milk Producers

Maola Local Dairies

Michigan Milk Producers Association

Mount Joy Farmers Cooperative Association

Northwest Dairy Association

Oneida-Madison Milk Producers Cooperative Association

Prairie Farms Dairy, Inc.

Scioto Cooperative Milk Producers' Association

Southeast Milk, Inc.

Tillamook County Creamery Association

United Dairywomen of Arizona

Upstate Niagara Cooperative, Inc.

April 22, 2026

U.S. Environmental Protection Agency

BPPD (Biopesticides and Pollution Prevention Division) (Mail Code 7511M)
RD (Registration Division) (Mail Code 7505T)

SUBMITTED ELECTRONICALLY VIA REGULATIONS.GOV

Re: Pesticide Product Registration: Emergency Exemption Request and Application for a New Active Ingredient (EPA-HQ-OPP-2026-0991; EPA File Symbol, 91213-L)

To whom it may concern:

The National Milk Producers Federation (NMPF) submits these comments in support of the U.S. Environmental Protection Agency's review of the Section 3 registration application for the *NovoFly* male-only genetically engineered New World screwworm (NWS) (EPA-HQ-OPP-2026-0991; EPA File Symbol, 91213-L). NMPF's 23 member cooperatives represent 20,000 U.S. dairy producers, who collectively produce two-thirds of the nation's milk supply. Since our founding in 1916, NMPF has been dedicated to representing dairy farmers and their cooperatives in national policy discussions that affect the future of U.S. agriculture and public health. The proposed registration represents a scientifically robust, economically prudent, and ecologically responsible advancement in safeguarding U.S. agriculture and wildlife from one of the most destructive parasitic pests in the Western Hemisphere.

Economic and Societal Rationale for Support

New World screwworm historically caused hundreds of millions of dollars in annual livestock losses before its eradication from the United States. Even a limited re-establishment would impose severe economic and societal burdens:

- **Cattle, sheep, goat, and equine producers:** would face direct losses from animal morbidity and mortality.
- **Veterinary and animal-health systems:** would incur substantial treatment and surveillance costs.
- **State and federal agencies:** would be forced to deploy emergency response programs at significant public expense.
- **Consumers:** would face increased food costs and potential food insecurity due to reduced livestock product availability.
- **Trade deficits:** would increase as trading partners may place restrictions on livestock and livestock product exports.
- **General public health threats:** include screwworm infestations that affect people, with a risk of human cases requiring medical intervention in affected regions.

The *NovoFly* strain enhances the efficiency of the Sterile Insect Technique (SIT), a method already proven to be cost-effective at regional and national scales. By improving male-only release ratios and reducing production inefficiencies, this technology strengthens the economic sustainability of the U.S.–Mexico barrier program that protects billions of dollars in agricultural value annually.

Investing in a more precise and scalable SIT tool is fiscally responsible and reduces the likelihood of far more costly emergency eradication campaigns in the future.

Ecological and Environmental Considerations

The ecological benefits of the *NovoFly* approach are substantial:

- **Target specificity:** Only the New World screwworm is affected, avoiding the non-target impacts associated with broad-spectrum chemical pesticides.
- **Environmental compatibility:** Sterile males do not feed on hosts, do not persist in the environment, and do not introduce toxic residues into soil, water, or wildlife habitats.
- **Protection of native wildlife:** Many wild mammals—including deer, pronghorn, and endangered species—are highly susceptible to screwworm infestation. Preventing NWS re-establishment protects biodiversity and reduces morbidity in wildlife populations.
- **Reduced chemical load:** Enhancing SIT capacity decreases reliance on chemical insecticides, aligning with long-term ecological stewardship goals.
- **Integrated pest management alignment:** This technology supports a modern, ecologically grounded pest-management framework that minimizes environmental disruption while maximizing protective outcomes.

Scientific Basis for Support

The scientific foundation for SIT is well established, with decades of empirical evidence demonstrating its safety, precision, and effectiveness. The *NovoFly* male-only genetically engineered strain builds on this foundation through:

- **Improved biological efficiency:** enabling higher proportions of sterile males in release populations.
- **Genetic constructs designed for stability and containment:** ensuring that released insects cannot establish or persist.
- **A mode of action that is self-limiting:** with no mechanism for long-term propagation in the environment.
- **Compatibility with existing USDA operational infrastructure:** allowing rapid integration into current surveillance and suppression programs.

EPA's rigorous scientific review process ensures that all environmental, ecological, and human-health considerations are thoroughly evaluated. Based on the nature of the technology and the long history of SIT safety, this product is well-positioned to meet the Agency's high standards.

Regulatory Oversight and Compliance

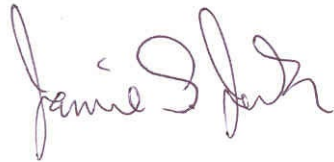
EPA provides oversight for manufacturing, quality control, and compliance processes related to the *NovoFly* male-only genetically engineered New World screwworm. This oversight is consistent with EPA's regulatory authority under the Federal Insecticide, Fungicide, and Rodenticide Act, as well as its established protocols for biotechnology-derived and microbial biopesticides. Production will follow stringent manufacturing and quality assurance standards, with inspections and compliance verification to uphold genetic stability, containment, and adherence to registered product specifications. Coordination between EPA and USDA regarding *NovoFly* production will occur as necessary, and robust identification, documentation, and recordkeeping practices will support traceability and accountability.

Conclusion

The *NovoFly* male-only genetically engineered New World screwworm represents a scientifically sound, economically justified, and environmentally responsible tool for protecting U.S. agriculture and ecosystems. Given the ongoing risk of NWS incursion from neighboring regions and the significant national interests at stake, NMPF strongly supports EPA's approval of the Section 3 registration application.

Thank you for the opportunity to provide comment and for the Agency's continued commitment to evidence-based decision-making in pest-management and environmental protection.

Sincerely,

A handwritten signature in blue ink that reads "Jamie Jonker". The signature is written in a cursive, flowing style.

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National Milk Producers Federation
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