NMPF
NATIONAL MILK PRODUCERS FEDERATION

June 25, 2026

U.S. Environmental Protection Agency
BPPD (Biopesticides and Pollution Prevention Division) (Mail Code 7511M)
OPP (Office of Pesticide Programs) (Mail Code 7506C)

SUBMITTED ELECTRONICALLY VIA REGULATIONS.GOV

Re: Notice of Receipt for a Section 3 application for new active ingredients, LshidAla2 protein and tTAo protein, contained within *NovoFly Cochliomya hominivorax* (New World screwworm), sterilized male-only strain for targeted area wide release. (EPA-HQ-OPP-2026-0991-0037)

To whom it may concern:

The National Milk Producers Federation (NMPF) submits these comments in support of the U.S. Environmental Protection Agency's the proposed registration of the *NovoFly* male-only genetically engineered New World screwworm (NWS), including the new active ingredients tTAo and LshidAla2 (EPA-HQ-OPP-2026-0991-0037). 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.

NMPF supports EPA's continued review of these active ingredients and the associated product under the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA), particularly given the importance of effective tools to prevent the establishment and spread of New World screwworm in the United States.

Support for EPA Risk Assessment and Scientific Review
NMPF recognizes that EPA has conducted a comprehensive evaluation of the proposed active ingredients, including product characterization, environmental risk assessment, and human health assessment, consistent with statutory and scientific standards. EPA's review concludes that the proposed use of tTAo and LshidAla2 proteins meets regulatory requirements under FIFRA and is not expected to result in unreasonable adverse effects to human health or the environment.

EPA has determined that:

- There is no biologically plausible pathway for toxicity to non-target organisms, as the pesticidal protein is not present in released male insects

- Environmental exposure and persistence are expected to be negligible, given the biology of the organism and degradation of proteins in the environment
- Risks to human health are negligible across exposure routes, including for workers and bystanders

These findings are supported by the underlying scientific rationale and the established body of evidence for Sterile Insect Technique (SIT) programs.

Consistency with Proven Sterile Insect Technique Programs
The *NovoFly* product represents an advancement of the well-established Sterile Insect Technique, which EPA and USDA have identified as an effective and non-chemical method for controlling NWS populations. The incorporation of tTAo and LshidAla2 enables male-only production through inducible female lethality, improving SIT efficiency and reducing unnecessary release of non-target individuals.

EPA has also noted that SIT remains the only proven non-chemical tool for controlling NWS and that this approach reduces reliance on conventional insecticides while maintaining species specificity. These characteristics are directly relevant to protecting livestock, wildlife, and agricultural systems from a high-consequence pest.

Environmental and Ecological Considerations
NMPF supports EPA's determination that environmental and ecological risks associated with these active ingredients are expected to be minimal.

EPA concluded that:
- The pesticidal effect is species-specific and localized to NWS populations
- There is no expectation of direct or indirect adverse effects on non-target organisms
- The Agency is able to make a "No Effect" determination under the Endangered Species Act for listed species and critical habitats

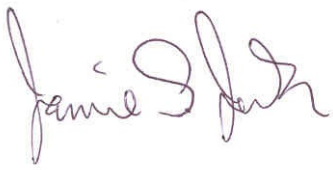
These conclusions are consistent with decades of SIT implementation and the biological characteristics of the proposed system.

Manufacturing Controls and Verification
NMPF supports EPA's requirement that confirmatory data be provided demonstrating that the production system achieves expected levels of sterility prior to environmental release. EPA appropriately notes that empirical data from the final production facility will be necessary to verify performance, including sterilization outcomes, before deployment. This approach is consistent with EPA's established practice of ensuring that registered products conform to the specifications evaluated during the registration process.

Conclusion
NMPF supports EPA's science-based evaluation of the *NovoFly* product and its active ingredients tTAo and LshidAla2 under FIFRA. Based on EPA's findings, the proposed registration meets statutory standards for safety and effectiveness and provides an important tool for preventing the establishment and spread of New World screwworm.

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

Sincerely,



Jamie Jonker, Ph.D.
Chief Science Officer
National Milk Producers Federation
jjonker@nmpf.org