National Pork Producers Council®

The Global Voice for the U.S. Pork Industry

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The National Pork Producers Council (NPPC), which represents the interest of more than 60,000 U.S. pork producers, submits the following comments in response to the Environmental Protection Agency (EPA) notice on *Pesticide Product Registration: Emergency Exemption Request and Application for a New Active Ingredient*. Docket (EPA-HQ-OPP-2026-0991)

NPPC supports EPA's review and consideration of the Section 3 product registration application (EPA-HQ-OPP-2026-099) for NovoFly, as well as the associated emergency condition described under Section 18 of the Federal Insecticide, Fungicide, and Rodenticide Act. The application submitted by the United States Department of Agriculture's Agricultural Research Service (USDA-ARS) reflects both the urgency and the importance of maintaining effective tools to prevent the establishment of New World screwworm (Cochliomyia hominivorax) in the United States.

The swine industry, along with the broader livestock sector, recognizes the value of this technology as part of a necessary and comprehensive biosecurity strategy for the United States to protect its food supply. While swine producers operate within tightly managed health systems, ectoparasites are ever-present in the environment. The introduction of a pest like New World screwworm into the United States presents immediate animal and human health risks and implications that will cascade onto significant portions of the U.S. economy and food supply security, if not addressed rapidly.

Recent detections of New World screwworm in Mexico—and its continued northward spread, as we approach summer months—present an urgent and immediate threat to U.S. livestock industries. History demonstrates that this pest is capable of causing severe and fatal damage to livestock, wildlife, pets, and humans. The economic consequences of an outbreak are substantial. Infestations can lead to severe tissue damage, secondary infections, reduced productivity, and increased mortality. Additionally, such outbreaks can disrupt interstate and international trade, further amplifying losses. These challenges present a novel, non-routine risk and make proactive prevention and rapid-response capability essential.

NovoFly represents an important advancement in the application of Sterile Insect Technique (SIT) programs. By incorporating a genetically engineered female-lethal trait, resulting in male-only sterile

screwworm populations, we can substantially improve our efficiency and impact of traditional SIT programs. Given the scale of potential release areas and the need for rapid suppression, this increased efficiency is not simply beneficial but necessary.

It is also important to note that many chemical treatment options to manage screwworm infestations are no longer widely available or practical for large-scale prevention. Therefore, NovoFly provides a targeted, species-specific, and environmentally responsible alternative that aligns with modern integrated pest management principles.

USDA-ARS has indicated that NovoFly would be integrated into existing SIT programs, supported by surveillance, animal movement controls, and education efforts. This layered approach is widely recognized as the most effective means of preventing establishment and achieving eradication. The ability to deploy NovoFly in both aerial and ground-based release strategies further enhances its operational flexibility and responsiveness to emerging detections.

Given the urgent threat, limited availability of alternative tools, and demonstrated effectiveness of SIT-based approaches, NPPC encourages the EPA to give full and timely consideration to the registration of NovoFly. Supporting this application will help ensure that the United States remains prepared to prevent the reintroduction and spread of New World screwworm, protecting animal health, agricultural producers, and the broader economy.

Thank you for the opportunity to provide comments, and please contact us with questions.

Sincerely,

Dr. Anna Forseth
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National Pork Producers Council