May 16, 2017

Mr. Michael Gregoire  
Associate Administrator  
U.S. Department of Agriculture  
Animal & Plant Health Inspection Service  
7519 Standish Place  
Rockville, MD 20855

Re: Docket No: APHIS-2014-0056; Availability for the Field Release of Genetically Engineered Diamondback Moths

The National Association of State Departments of Agriculture (NASDA) appreciates the opportunity to submit the following comments on the U.S. Department of Agriculture (USDA) Animal and Plant Health Inspection Service’s (APHIS) Environmental Assessment (EA) for the field release of Genetically Engineered (GE) Diamondback Moths (Docket No. APHIS-2014-0056), published on April 19, 2017.

I. About NASDA

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 food safety, conservation, and fostering the economic vitality of our rural communities. Combating the spread of disease and environmental protection are also among our chief responsibilities.

NASDA supports agricultural biotechnology and recognizes the important role this technology plays in both meeting growing global demand for food and helping farmers and ranchers address the sustainability of their land and operation for generations to come. Further, NASDA supports the Coordinated Framework for the Regulation of Biotechnology (Coordinated Framework)\(^1\), established as a formal policy by the Executive Office of the President, Office of Science and Technology Policy (OSTP) in 1986. NASDA also supports innovative breeding methods, including biotechnology, which hold enormous promise for improving the productivity and environmental sustainability of agriculture.

II. General Comments

NASDA supports approving Cornell University’s permit application to conduct a very limited trial to control the diamondback moth by utilizing a self-limiting insect technology. The diamondback moth is one of the most devastating insect pests of Brassica crops (including cabbage, broccoli, etc) in the U.S. and across the world with associated costs, including crop losses, estimated to be approximately $4 to

$5 billion annually. The genetically modified (GM) diamondback moth currently under development and testing will provide another tool to fight this hard-to-control agricultural pest. Moreover, this tool will help reduce the use of less efficacious controls for this pest such as insecticides.

According to Cornell’s application, “Successful pest control will rely upon strong performance of released males, in terms of female-seeking behavior and mating competitiveness. [Cornell] will seek to measure relevant performance traits in one or more mark-release-recapture field experiments. [Cornell] will also conduct caged trials to support information about relevant performance traits, including release rates.” NASDA supports conducting this trial, which is an excellent example of the type of research and innovative solutions USDA and other government agencies should support. While the experiment is limited in scope, it is critically important to fully assess the technology’s efficacy and advance technical development of this technology to deliver additional tools to producers to combat this agriculturally devastating pest.

The food security challenge ahead is formidable, especially given the fragile environment and the innovation pipeline that must be enabled to drive sustainable growth in agriculture. NASDA members are intimately familiar with the robust, science-based review process undertaken prior to approving these types of field trials, and NASDA supports the Cornell permit application and this type of innovation that will continue to increase the global competitiveness of US agriculture.

III. Conclusion

NASDA appreciates the opportunity to provide these comments, and NASDA supports the review and approval of Cornell University’s permit application to conduct this field trial.

NASDA stands ready to assist our federal partners in facilitating new science-based tools and technologies to enhance agriculture and protect human health. Please contact Dudley Hoskins (dudley@nasda.org) if you have any questions or would like any additional information at this time.

Sincerely,

Barbara P. Glenn, Ph.D.
Chief Executive Officer