THE AMERICAN MOSQUITO CONTROL ASSOCIATION

Individuals enhancing the health and quality of life through the suppression of mosquitoes, other vectors and pests of public health importance.

AMERICAN MOSQUITO CONTROL ASSOCIATION FOUNDED 1935

A Partner in the EPA's Pesticide Environmental Stewardship Program

4 June, 2018

Biopesticides and Pollution Prevention Division (7511P)
Office of Pesticide Programs
Environmental Protection Agency
1200 Pennsylvania Ave. NW, Washington, DC 20460-0001

Docket ID: EPA-HQ-OPP-2017-0756
Experimental use permit for the OX513A *Aedes aegypti* mosquitoes expressing tetracycline Trans-Activator Variant protein.

Serving as the world's premier professional vector control organization, the American Mosquito Control Association wishes to express its full support for the granting of an experimental use permit for the OX513A *Aedes aegypti* mosquitoes expressing tetracycline Trans-Activator Variant protein.

The American Mosquito Control Association is a nonprofit organization dedicated to providing **leadership**, **information** and **education** to enhance public health and quality of life through the suppression of mosquitoes. New and effective tools to combat mosquitoes are essential to carrying out this vital mission. That need is especially acute for the *Aedes aegypti* mosquito that carries Zika, dengue and other deadly viruses. With mosquito season already upon us, Americans are at increased risk from these diseases and additional control tools are needed.

Our inventory of public health pesticides available to control disease-transmitting peridomestic species is under continual regulatory challenge, which threatens to leave us defenseless in controlling adult host seeking mosquitoes. As a result, the dwindling array of control alternatives needs augmentation if control of vector-borne diseases is to be realized.
The OX513A *Aedes aegypti* mosquitoes represent a most welcome and innovative technology that could serve as a valuable adjunct to existing integrated mosquito control programs if successfully tested. Prior successful usage in Brazil and the Cayman Islands

speaks well to its value as a potential control agent here in the United States as well. Its potential as an added mosquito population suppressive measure to control modalities already in use cannot be underestimated. If proven to be effective, its availability would enhance (but not necessarily supplant) our current capabilities at a time when CDC has

documented a three-fold increase in vector-borne diseases in the past 12 years. To be sure, the recent introduction and spread of chikungunya and Zika viruses in the continental United States demonstrates our vulnerability and underscores the need for a full complement of tools that can prevent ad/or limit their spread – particularly in areas underserved by mosquito-control organizations. OX513A *Aedes aegypti* mosquitoes are particularly well-suited to suppress vector mosquito populations below disease transmission threshold in smaller, rural communities not possessing the tax base to establish and maintain fully resourced county/municipal mosquito control programs. This is an issue of environmental justice that could be addressed, in part, by the utilization of OX513A mosquitoes as control measures.

As mosquito control professionals, we know all too well the strength and resilience of the enemy we combat. In addition, we fully realize the importance of developing and testing innovative technologies beyond those in our current chemical inventory that could help us improve public health. We thank the Agency for its leadership in reviewing and approving new tools to help us in this fight, and look forward to working with you to protect the health of our citizenry.

Sincerely,

Joseph M. Conlon
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American Mosquito Control Association

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