

Summary of ESA EPA-OPP SME

October 12, 2017

The three society SME liaisons (Weed Science Society Am; Am Phytopathological Society, ESA) will be traveling to DC on December 11/12 for meetings with staff at the Office of Pesticide Programs. An agenda is not formed as of today, but I will be requesting a more prolonged discussion with the biopesticides section staff. The purpose of such a meeting will be to clarify issues such as occurred with the Wolbachia modified mosquitoes in the ZAP product and get a heads up on any similar or analogous products in the pipeline. Furthermore, with the recent decision by the FDA not to regulate the Oxitec mosquitoes to be used in the Sterile Insect Release mode, and the intention to place the regulatory responsibility in the hands of the EPA, I would like to get a clarification of exactly what they would be regulating. The use of modified insects for SIR (i.e., cobalt 60 irradiated insects are modified, no?) has not been an issue historically, so we need to understand what the regulators thinking is now that gene drive mechanisms are operational. The regulatory system for PIPs (Plant Incorporated Protectants) has matured so that regulation of the gene and protein product as pesticides has some rationale, but the outstanding question is would the gene construct in gene drives be considered a pesticide. In addition to the burning issues above, I would welcome any feedback for other issues that members would like to see discussed with EPA.