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September 27, 2017

OPP Docket, Environmental Protection Agency Docket Center (EPA/DC), (28221T)
1200 Pennsylvania Ave. N.W.
Washington, DC 20460-0001

Re: Public Participation for New Active Ingredient (*Wolbachia pipientis*, ZAP Strain in male *Aedes albopictus* (Asian tiger mosquitoes) – FIFRA)
(Docket No. EPA-HQ-OPP-2016-0205)

To Whom It May Concern,

I am writing to you today on behalf of the more than 6,000 members of the Entomological Society of America (ESA) regarding the Notice of Public Comment Period for “Pesticide Product with a New Active Ingredient (*Wolbachia pipientis*, ZAP Strain in male *Aedes albopictus* (Asian tiger mosquitoes) – FIFRA),” Docket Number EPA-HQ-OPP-2016-0205.

After consultation with Dr. Allan Felsot (Washington State University)—ESA’s subject matter expert and liaison with the EPA’s Office of Pesticide Programs—and other experts within the Society, ESA offers the comments below regarding the registration application.

Because *Wolbachia*, the product being registered, is a naturally occurring bacterium and because the registration of *Wolbachia* is not significantly different than the registration for any other biopesticide, the ESA does not have any findings of significant concern with regards to this registration. It is important to note that ESA is not endorsing the technology underlying the ZAP product nor the ZAP Strain as a product. Rather, we are endorsing the scientific approach which supports this registration application and regulatory evaluation process.

The ESA has long called for the development of additional methods to manage mosquitoes and other arthropod pests. We need to develop management systems that are sustainable over many decades as well as outreach programs that enlist individuals in every community at risk to engage in management efforts. This registration will provide one more tool in the mosquito management toolbox.

The ESA recently published a fact sheet on the topic of non-chemical approaches to mosquito management (<http://www.entsoc.org/policy-initiatives/esa-fact-sheets>) which may prove to be of value to you as you review this application.

We thank you for the opportunity to provide comments on this issue and seek to remain a resource for the Agency, should you need expert opinion on any topic of entomological importance.

Sincerely,

A handwritten signature in cursive script that reads "Susan J. Weller".

Susan J. Weller, Ph.D.
President, ESA