



TENNESSEE FARM BUREAU FEDERATION

May 30, 2025

Anne Overstreet
Biopesticides and Pollution Prevention Division
Office of Pesticide Programs
Environmental Protection Agency
1200 Pennsylvania Avenue, NW
Washington, DC 20460-0001

Re: Docket No. EPA-HQ-OPP-2023-0558; Pesticide Product Registration: Applications for New Active Ingredient Vadescana (*Varroa destructor*-Specific Recombinant Double-Stranded Interfering Oligonucleotide EP15)

The Tennessee Farm Bureau Federation (TFBF) appreciates the opportunity to provide comments regarding the registration of the active ingredient Vadescana dsRNA (*Varroa destructor*-Specific Recombinant Double-Stranded Interfering Oligonucleotide EP15) – one manufacturing-use pesticide product (Product Name: EP15 Technical; EPA File Symbol 94614-G) and two end-use pesticide products (Product Name: EP15 Formulation 4g/L; EPA File Symbol: 94614-U and Product Name: EP15 Formulation 2g/L; EPA File Symbol 94614-L) – submitted by Greenlight Biosciences, Inc. On behalf of our member producers, we support the registration of this active ingredient used to combat *Varroa* mite (*Varroa destructor*) pressures in honeybee hives.

Honeybees are essential to the success of production agriculture as key pollinators for agricultural crops and as producers themselves. *Varroa* mites pose significant threats to honeybees and their colonies by transmitting numerous viruses to honeybees, feeding on honeybees themselves, and ultimately decimating entire colonies if not treated. We acknowledge EPA's recognition of the harm this not only causes to honeybee colonies, but the larger threat to the entire agricultural industry and food supply.

Beekeepers need every viable option to respond to pest pressures. The success of honeybees is crucial to farmers of all types. Because of this, TFBF encourages swift approval of a label for Vadescana dsRNA. Thank you for your consideration.

Sincerely,

A handwritten signature in black ink that reads "Eric Mayberry".

Eric Mayberry
President
Tennessee Farm Bureau Federation