September 14, 2021

COMMENTS ON THE PROPOSED PESTICIDE EXPERIMENTAL USE PERMIT APPLICATION: OXITEC LTD., U.S. Environmental Protection Agency Docket ID No. EPA-HQ-OPP-2019-0274-0363

Dear United States Environmental Protection Agency:

We, the undersigned, represent several California mosquito and vector control agencies charged with protecting residents within our jurisdictions from the impact of mosquitoes and the threat of mosquito-transmitted diseases. As such, we are collectively writing to express our support for the approval of Oxitec's amendment to its Experimental Use Permit (EUP) to expand the use of its Friendly™ Aedes aegypti mosquitoes.

With a changing climate and increasing global travel and trade, there has been a worldwide expansion of invasive mosquito species and the diseases they carry. This is evidenced by the rapid spread of Aedes aegypti mosquitoes in the western U.S. Aedes aegypti are now found in over 300 cities throughout California and the CDC projects that Aedes aegypti will continue to expand its range into new areas across the U.S. This mosquito exploits small water sources commonly found around the home and prefers to feed on people. Therefore, it poses considerable human health risks with the potential for local transmission of exotic viruses that cause yellow fever, Zika, dengue, and chikungunya.

Traditional mosquito control strategies show variable and often limited effectiveness against Aedes aegypti. According to the World Health Organization’s [guidance framework for testing genetically modified mosquitoes](#), Aedes aegypti have demonstrated resistance to many commonly used insecticides in the Americas, Asia, and Africa. The public health need to control this invasive mosquito urges us to consider new control methods.
Our mosquito control districts use an Integrated Vector Management approach, an evidence-based, data-driven decision-making process, to suppress mosquitoes and mosquito-borne diseases and protect public health. There is a critical need for new and innovative mosquito control strategies, including Sterile Insect Techniques, that could be integrated into our vector management programs.

We are very interested in exploring the efficacy and control potential of Oxitec’s non-biting male Friendly™ Aedes aegypti mosquitoes to determine if this method might be a viable option for use in controlling Aedes aegypti in California. We are encouraged by earlier results from Oxitec’s release of Friendly™ Aedes aegypti mosquitoes in the State of São Paulo, Brazil in 2019. The potential to reduce populations of Aedes aegypti without the use of conventional pesticides has enormous advantages and we encourage the EPA to approve Oxitec’s EUP amendment to expand the use of its technology to California.

Sincerely,

Ryan Clausnitzer, General Manager, Alameda County Mosquito Abatement District

Jeremy Wittie, District Manager, Coachella Valley Mosquito and Vector Control District

Steve Mulligan, District Manager, Consolidated Mosquito Abatement District

Mustapha Debboun, District Manager, Delta Mosquito and Vector Control District
J. Wakoli Wekesa, District Manager, East Side Mosquito Abatement District

Truc Dever, General Manager, Greater Los Angeles County Vector Control District

Rick Howard, District Manager, Orange County Mosquito and Vector Control District

Gary Goodman, District Manager, Sacramento-Yolo Mosquito and Vector Control District

Peter Bonkrude, District Manager, Shasta Mosquito and Vector Control District

Michelle Brown, District Manager, West Valley Mosquito & Vector Control District