



Docket No. APHIS-2014-0056
Regulatory Analysis and Development, PPD
APHIS, Station 3A-03.8
4700 River Road Unit 118
Riverdale, MD 20737-1238

May 19, 2017

**Re: Cornell Permit Application 59728—USDA Environmental Assessment
for Diamond Back Moth Field Trials**

The National Association of Wheat Growers (NAWG) appreciates the opportunity to provide comments on the Animal and Plant Health Inspection Service's (APHIS) notice on the environmental assessment for Diamondback Moth field trials, genetically engineered (GE) moths to reduce population of the moth known to be plant pest in certain vegetable crops.

NAWG is a farmer-led organization of wheat growers in the United States comprised of 20 state wheat grower associations. GE technology can be a very valuable tool in combating disease and also expanding food production to achieve global food security. GE also reduces the reliance on pesticides, which help reduce green house gas emissions. Without the consistent acceptance by agencies, the benefit of GE technology as a tool becomes blurred to consumers and hinders research, as seen with food products.

Cornell University is seeking the authority to conduct a very limited trial to control the diamondback moth by utilizing a self-limiting insect technology. According to Cornell's application, "Successful pest control will rely upon strong performance of released males, in terms of female-seeking behavior and mating competitiveness. We will seek to measure relevant performance traits in one or more mark-release-recapture field experiments. We will also conduct caged trials to support information about relevant performance traits, including release rates."

Diamondback moth is one of the most serious insect pests of Brassica crops (including cabbage, broccoli, etc) in the US and worldwide, with costs associated, including crop losses, estimated at \$4 billion-\$5 billion annually. The GM diamondback moth currently under development and testing, if successful, will

provide a new technology to fight this hard-to-control agricultural pest and demonstrate its potential to be applied to other similar insect plant pests, including those that impact wheat. Moreover, this tool will help reduce the use of less efficacious controls for this pest such as insecticides.

We, therefore, support this Cornell permit application in order to assess this potential innovation for pest management in agriculture. Now is the time for the USDA and other government agencies to encourage, not hinder, safe reliable technology that can specifically target threats against global food security such as pests and diseases in food crops.

Thank you for your consideration.

Sincerely,

A handwritten signature in black ink, appearing to read "David Schemm", followed by a long horizontal line extending to the right.

David Schemm, President
National Association of Wheat Growers