USDA United States Department of Agriculture
Research Education Economics
Office of the Under Secretary
Room 216W
Jamie L. Whitten Building
Washington, DC 20250-0110

June 25, 2026

Commissioner Sid Miller
Texas Department of Agriculture
P.O. Box 12847
Austin, TX 78711

Dear Commissioner Miller:

Thank you for your June 23 letter with regard to U.S. Department of Agriculture (USDA, Department) technical strategies to address the management and eradication of the New World screwworm (NWS). You have provided a thoughtful proposal with technical suggestions to consider, and I am happy to provide a response as USDA Chief Scientist on behalf of Secretary Rollins and the Animal and Plant Health Inspection Service (APHIS) NWS Directorate. While we may have different perspectives and rationale on the technical strategy, I know we are all equally committed to the same goal—which is to eradicate this devastating pest from the U.S. and permanently protect our livestock, companion animals, wildlife, and the livelihood of our ranchers.

There are several assertions in your letter that I do not concur with based upon the history of our success with this pest and our current knowledge and technology:

***(1) "USDA did not eradicate the New World Screwworm with sterile files alone"***

This is not factually true. In 1954, USDA's pilot test of the Sterile Insect Technique (SIT) successfully eradicated NWS from the island of Curaçao (off the coast of Venezuela) using only the SIT method. This pilot provided information and data to eradicate the NWS from Florida and the entire southeastern U.S. using only the SIT method, leading to complete elimination in that area by 1959 and a declaration that the continental United States was free of indigenous NWS in 1966. In cases where there were re-introductions of NWS in certain areas, the SIT was again successfully utilized to re-eradicate NWS, including in the 1970s. For chronological reference, the legacy SWASS technique was not developed until the 1970's.

***(2) "SWASS, which is applied prior to SIT, works by attracting and killing adult screwworm flies before they can reproduce."***

Following eradication in the southeastern U.S., USDA did develop a supplemental tactic known as the Screwworm Adult Suppression System (SWASS) to support the southwestern U.S. eradication program, and it was temporarily deployed in Texas and other States during the earliest phases of that eradication campaign while fly production was ramping up. The concept is good in principle and today our researchers are actively developing a "modern" SWASS to utilize a lure specific for NWS, with the ultimate goal being development of a synthetic attractant specific for trapping only

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female NWS flies without the need for a toxicant. As I write, our researchers have isolated several promising leads for field validation in Panama. So, we do indeed share the belief that SWASS can be a useful tool and help create an integrated system. However, we do not agree that the legacy SWASS is viable today.

As you noted, the legacy product must be used prior to the use of SIT because the sterile flies will be equally suppressed and the efficacy of SIT will be reduced if legacy SWASS and SIT are used simultaneously. The Department has current sterile fly production at the Panama-United States Commission for the Eradication and Prevention of Screwworm (COPEG) facility in Panama and has redeployed these sterile flies to the U.S. Therefore, using legacy SWASS in Texas at this point would slow the eradication process. Moreover, legacy SWASS, as the name implies, is a suppression method and our strategy is full out eradication in the U.S. and, as our sterile fly production permits, further south to the original containment zone at the Darién Gap.

***(3) Pesticide Availability for legacy SWASS Use Patterns.***

The U.S. Environmental Protection Agency (EPA) and the U.S. Food and Drug Administration (FDA) have been incredibly helpful and supportive in our whole-of-government approach to respond to NWS, as well as many other challenges. In my consultations with EPA, I continue to believe that the legacy SWASS application would not be viable as today's science used in the risk assessment did not exist in the 1970s and the standards for approving a new use pattern today are quite different. You have rightly noted that DDVP retains a label and legal right to sell for certain use patterns, but a broadcast bait in the open environment (e.g., legacy SWASS) is not one of those use patterns. Risk assessments combine the inherent "hazard" of a product with the "exposure" for that product and the legacy SWASS use pattern would require extensive modern studies before a determination could be made. Incorporating a fly bait will indeed attract flies, but the exposure risk will extend to numerous non-target species, including humans. A Section 18 emergency use permit to directly treat an animal with an organophosphate (OP) is dramatically different than a Section 18 emergency use permit to broadcast an OP across the state of Texas. New use patterns would need to address, at a minimum, the following:

- Dietary Assessments: EPA would need to conduct a dietary assessment for all new proposed use patterns for DDVP to determine if any new uses would pose any dietary risk through food or through drinking water.

- Aggregate/Cumulative Exposure: Other potential products such as trichlorfon or naled, both degrade into dichlorvos (DDVP). Since a new use of trichlorfon would also then contribute to an increase in potential environmental concentrations of DDVP through degradation, EPA would need to update its risk assessments of both chemicals to ensure the degradation of trichlorfon into DDVP does not result in any aggregate dietary risks of concern for DDVP. Additionally,

since the OPs behave similarly and have a common mechanism of toxicity (CMT) – acetylcholinesterase (AChE) inhibition – EPA would need to incorporate any new use of DDVP or trichlorfon into an OP cumulative risk assessment. EPA is currently undergoing registration review of all the OPs and expects to conduct a cumulative risk assessment following these individual OP assessments. Any significant new uses could complicate this ongoing evaluation.

- Endangered Species Act – Federal courts have found that pesticide registrations are federal actions subject to the Endangered Species Act (ESA). If EPA were to evaluate a new use of a pesticide—especially one that could contribute to significant environmental exposures—the agency would need to do a full ESA assessment to ensure there are no jeopardy risks to endangered species or adverse modification risks to critical habitat. These risks could include runoff into aquatic habitats; consumption of granules by listed birds, rodents, or other species; etc. If jeopardy or adverse modification risks were predicted, significant mitigations may also potentially be required to mitigate those risks. (NOTE: you referenced that the previous studies found no adverse effects on wildlife, etc. Those studies were NOT controlled regulatory studies and would not be accepted as credible or relevant to a modern regulatory risk assessment.)

Of course, USDA does not register pesticides, but they are critical tools for American agriculture, so we do have extensive experience with these matters and understand and respect the regulatory process accordingly. That said, feel welcome to consult directly with EPA on the feasibility, conditions, and process for evaluation. However, even if legacy SWASS was registered, it would compete with and not complement current USDA eradication goals through the release of sterile flies.

***Continuous Innovation is the Key to Lasting Success …***

As you have correctly pointed out, our present temporary limitation with SIT is the availability of sterile male flies. To that end, you may be interested in a very exciting recent development. The USDA Agricultural Research Service (ARS) announced the development of a new and novel strain of NWS that produces ONLY male flies when mass produced. The new strain is called the NovoFly™ strain (Novo is Latin for "new" and root for "innovate") and it has already been approved for field trials in Panama and for immediate release in Texas once production conversion specifications are finalized. The NovoFly™ will revolutionize the SIT fly production dynamic by doubling availability of sterile males. It will also eliminate the inefficiency of releasing both male and female sterile flies.

By producing only sterile males through continued innovation alongside the "modern" SWASS goal noted previously are critical innovations supporting USDA's efforts to re-eradicate NWS. In

addition, USDA ARS is applying the most modern and sophisticated modeling tools, with AI and multiple layers of data, to precisely deploy sterile flies and anticipate the best drop zones. These are all tools and techniques the early pioneers in NWS eradication did not have.

Commissioner Miller, thank you again for your thoughtful letter. As you noted, USDA has indeed enjoyed great success in defeating this pest in the past. Today, USDA, along with various Federal Departments, Texas A&M AgriLife Partners, all of Texas (including of course your Texas Department of Agriculture), and our great ranchers and other stakeholders will no doubt collectively defeat it again. While we celebrate the success of previous approaches, this current fight will build on those legacy tools with the best science and tools to accelerate the fight and hasten the eradication in Texas … and beyond.

Sincerely,

Scott H. Hutchins, Ph.D.
Under Secretary for Research, Education, and Economics
Chief Scientist for the United States Department of Agriculture

cc:
Honorable Brooke L. Rollins
Honorable Susie Wiles
Honorable Stephen Miller
Honorable Dudley Hoskins
Ms. Tate Bennett
Rear Admiral Michael Schmoyer
Mr. John Bellinger