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EPN Comments on Proposed Registration of Pesticides Containing Vadescana dsRNA

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The Environmental Protection Network (EPN) harnesses the expertise of more than 650 former Environmental Protection Agency (EPA) career staff and confirmation-level appointees from Democratic and Republican administrations to provide the unique perspective of former regulators and scientists with decades of historical knowledge and subject matter expertise.

On May 28, 2025, EPA announced its proposed decision to register pesticide products containing the new active ingredient, Vadescana dsRNA (Varroa destructor-Specific Recombinant Double-Stranded Interfering Oligonucleotide EP15). EPA posted several documents explaining its proposed decision in the public docket and invited comments by June 12. The products would be used to control Varroa mites, a serious parasite affecting many commercial honeybee operations.

EPN generally supports the registration of products containing Vadescana dsRNA. We consider the risk assessment to be very thorough, evaluating the full range of potential adverse effects and all potential routes of exposure. In particular, we agree with EPA's reasoning that the active ingredient's mode of action, along with its use pattern, makes it very unlikely these products will pose a risk to humans and non-target wildlife. The labeling of the end-use products is short and straight-forward.

Although beyond the scope of the decision on the pending applications, EPN recommends that the agency include information on the use of this product line as part of an Integrated Pest Management (IPM) program to protect honeybees. The appropriate location for such information would be the IPM website mandated by PRIA 5. In addition, EPN thinks the introduction of this line of products may make it possible for EPA to reconsider the registrations of more-broad spectrum insecticides that are currently being used for Varroa mite control. Therefore EPN recommends that, during registration review, the agency revisit its risk/benefit determinations for such active ingredients.