



## Texas Beekeepers Association

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February 17, 2021

Colin D. Stewart, Assistant Director  
Assistant Director Pests, Pathogens, and Biocontrol Permits  
Plant Protection and Quarantine  
Animal and Plant Health Inspection Service  
U.S. Department of Agriculture  
*Via electronic submission, with attachment*

Re: Docket Number APHIS-2020-0035

Dear Mr. Stewart:

Thank you for the opportunity to share our comments and concerns during this comment period regarding the April 2020 Environmental Assessment (EA) on the proposed release of two non-native insects, *Bikasha collaris* and *Gadirtha fusca*, for the biological control of the Chinese Tallow tree in the U.S.

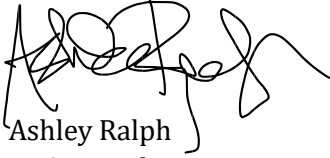
The Texas Beekeepers Association (TBA) is one of the largest state beekeeping associations in the U.S. with over 1,100 members and more than 50 local beekeeping associations from all parts of the state. TBA strives to represent the interest of Texas beekeepers of all sizes, from large commercial migratory beekeepers with thousands of hives under management, to the small-scale “backyard” beekeepers and those in between.

TBA and its membership have followed the progress of the application for permits to release *Bikasha collaris* and *Gadirtha fusca* with trepidation as the release will have a significant impact on the environment, ecology, agriculture, beekeeping industry, beekeepers, honey production, honey bees, and pollinators in Texas and other southern states where Tallow is prevalent. After reviewing the EA, we believe the EA is lacking in substantive areas and fails to address many significant and critical issues. Therefore, we are submitting the attached response detailing some of our concerns and why we believe the release of *Bikasha collaris* and *Gadirtha fusca* should not go forward.

We join with the American Honey Producers Association, American Beekeeping Federation, Louisiana Beekeepers Association, and beekeepers and beekeeping

organizations from other southern states, as well as many other interested parties that oppose the release of these two non-native pests. We hope you will seriously consider our comments and concerns.

Sincerely,

A handwritten signature in black ink, appearing to read 'Ashley Ralph', with a stylized flourish at the end.

Ashley Ralph  
TBA President

cc: Texas Department of Agriculture  
Members of the 87<sup>th</sup> Texas Legislature  
Texas Agriculture Council  
Texas Farm Bureau  
American Farm Bureau Federation