



Texas Beekeepers Association

July 23rd, 2020

To Whom It May Concern:

We wanted to take a moment to share our concerns with you on a pressing issue regarding the pending release of a non-native type of flea beetle (*Bikasha collaris*) as a biological control for attacking Chinese tallow trees (*Triadica sebifera*). The intent of the release is to eliminate or severely damage the Tallow tree. As you may be aware, the tallow tree is a non-native species, which has been in the USA since the late 1700s. In the past several decades it has rapidly spread along the Gulf Coast, providing one of the most valuable and relied upon nectar sources in the country for bees and beekeepers. Damage to this vital nectar source is of upmost concern to the US Beekeeping Industry, and of critical concern to the Texas Beekeeping Industry.

In Texas alone, it is estimated the loss or severe damage of the Tallow tree would have an devastating impact on over 1,000 beekeepers, representing 135,000 beehives, producing an estimated 6 million pounds (75%) of the 8 million pounds of honey produced in the entire state. Texas would go from one of the highest honey producing states in the country, to one of the worst. And, Texas is just one out of 10 states in which Tallow is a major nectar source. The Tallow flow is used for more than just honey production. Thousands of beekeepers along the Gulf Coast also use the tallow flow to build up their hive strength before moving bees to pollinate various crops or for a summer honey flow. The loss of this essential, and increasingly rare source of nourishment for the bees would have a crippling impact on bees and beekeeping companies.

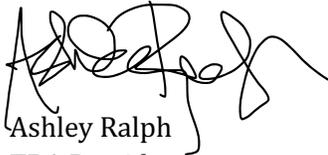
A few argue that the Tallow tree is damaging to the environment, native plant species, and crowding out natural forests. In some regions, that is true. However, we believe that preserving the health of bees and other pollinators, which provide or contribute to the majority of food production, outweighs those risks. We need to look at the big picture. Many do not understand the severity of the US honeybee health crisis, and the importance of such a major source of nectar and pollen for nationwide bee health. We are also concerned about purposely releasing a highly invasive foreign insect species.

An estimated 15% of all domestic honey in the country is produced from Tallow trees. Yet, the value of that honey dwarfs in comparison to the estimated value of the 25-35% of all US

hives that travel to Gulf Coast states to take advantage, in part, of the tallow flow. With nowhere else left in the USA to go, many of these operations would be forced to go out of business, or travel to already overcrowded areas. Either option would have a severe impact on already poor national bee health and national food production.

The American Honey Producers Association, American Beekeeping Federation, Louisiana Beekeepers Association, Texas Beekeepers Association, and other coastal states are opposing the release of the Chinese Flea Beetle. We hope you will seriously consider our concerns for bees, beekeepers, and the national food supply.

Sincerely,

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

Ashley Ralph
TBA President