



Chair: Chris Doggett
Vice Chair: Beth Derr

400 County Road 440, Thrall TX 76578

February 5th., 2021

Sir,

I write in protest to the release of *Bikasha collaris* and *Gadirtha fusca* as a biological control for attacking Chinese Tallow Trees (*Triadica sebifera*).

Texas Honey Bee Education Association is a 501(c)3 organization separate from but part of the Texas Beekeepers Association. We are a charitable research and education organization with a mission to further knowledge in the process of protecting honey bees and establishing more informed beekeepers. THBEA exists to:

Enhance and expand the awareness of the contribution of honey bees to agriculture and society.

Create additional appreciation and interest in the profession of beekeeping through studies in technical and scientific subjects.

Strengthen beekeeper's skills through education programs.

Provide resources for continuing honey bee research particularly in areas that will

advance honey bee culture – improve understanding and awareness of activities that impact

honey bees

improve pollination

conserve biodiversity

The introduction of these non-native insects to control the Chinese tallow will result in the loss of a major forage source for honey bees and other pollinator species. This would directly affect these important pollinators, exacerbate the pollinator health crisis impacting native pollinators and honey bees, and lead to very serious economic impacts for beekeepers and farmers on a national scale. Honey bees pollinated \$12.4 billion worth of directly dependent crops and \$6.8 billion worth of indirectly dependent crops in 2010. Native pollinators are also responsible directly and indirectly pollinating nearly \$10 billion worth of crops annually.

In Texas alone, it is estimated the loss or severe damage of the Tallow tree would have a 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.

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.

Additionally, the release of two non-native species to control a non-native species that has been here in the USA since the 1700's seeks to be exceptionally short sighted. What will those non-native species do in addition to feeding on the Tallow Tree. Will the non-native insects introduce diseases to native insects, or a disease that infects another species? Will the non-native flea beetle begin to seek alternate food sources and begin to attack the very native species USDA-ARS is trying to support? While USDA-ARS research shows lab experiments that the flea beetle prefers the Chinese Tallow tree, a lab test is not the rich, diverse ecosystem in which the non-native insects will be released. Nature finds a way to enjoy diverse food sources, or to protect its eggs from predators by adapting to plants predators do not favor. With the many failed examples of the release of non-native species into just the North American landscape, why does USDA still believe it can control nature?

At this time beekeepers and their honey bees need the Chinese Tallow tree to make a honey crop and support their bees during the critical spring bee population increase. Beekeepers understand the value of a diverse landscape, more than any other farmer, but they cannot support the removal of a honey crop, invasive or not, until a restoration plan for a replacement honey crop with a spring bloom accompanies the invasive control actions.

Before making this extraordinary decision to introduce non-native insects, please refer to the article in the American Bee Journal in March of 2018 with its numerous references and intelligent discussion of the issue. I attach a copy of this article to this letter.

Please consider this issue in more depth and with serious consideration to the issues I raise in this communication. As an example, the Honey Bee is an invasive species but you would not want to jeopardize one third of our food supply by its eradication!

Yours faithfully

A handwritten signature in blue ink that reads "Chris Doggett". The signature is written in a cursive, slightly slanted style.

Chris Doggett
Chair of Texas Honey Bee Education Association