



North American Invasive Species
Management Association
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Milwaukee, WI 53202

April 22, 2021

To the Administrator of the Animal and Plant Health Inspection Service:

The North American Invasive Species Management Association (NAISMA) is the largest organization dedicated to protecting North America's natural heritage from the threat of invasive species. NAISMA's mission is to support, promote, and empower invasive species prevention and management in North America. NAISMA advocates for an integrated pest management (IPM) approach to addressing the threat of invasive species. IPM is a holistic strategy that evaluates and selects the most effective, practical, and low-risk control methodology (cultural, pesticide, mechanical, biological, or any combination thereof) while posing the least possible risk to people, property, resources, and the environment, and preventing intolerable levels of pest damage.

After a careful review of the USDA APHIS Environmental Assessment "Field Release of the Insects *Bikasha collaris* (Coleoptera: Chrysomelidae) and *Gadirtha fusca* (Lepidoptera: Nolidae) for Classical Biological Control of Chinese Tallow Tree in the Contiguous United States" (April 2020) and consultation with members of the NAISMA Classical Biocontrol Committee, NAISMA supports the APHIS determination that releasing the biocontrol agents for Chinese tallow tree (*Triadica sebifera*, hereafter tallow) will not have a significant impact on the ecosystem nor human quality of life.

The Environmental Assessment clearly articulated the state of tallow in the US and the threats associated with its invasion.

- Tallow is native to China and is one of the most aggressive and widespread invasive weeds in the southeastern United States.
- Tallow was estimated to cover nearly 185,000 hectares (ha) of southern forests in 2014.
- Since its introduction, tallow has been reported primarily in 10 states including North Carolina, South Carolina, Georgia, Florida, Alabama, Mississippi, Louisiana, Arkansas, Texas, and California.
- Tallow is now a prohibited noxious weed in Florida, Louisiana, Mississippi, and Texas.
- As the existing range of tallow is expected to increase, the projected timber loss, and survey and control costs will also increase.
- Cost estimates for controlling tallow infestations in forestlands of eastern Texas, Louisiana, and Mississippi range from \$200 million to \$400 million by 2022.
- Tallow is spread by birds, water, and until recently, by commercial sales.
- Tallow outcompetes native plant species, and infestations negatively affect microfauna, such as nematodes and small arthropods, that break down leaf litter.
- Tallow is suspected of altering the amphibian habitat in wetlands impacting populations of various frog species.
- Tallow bark and seed oil contain a poisonous alkaloid, exposure to the sap can cause skin reactions similar to poison ivy; allergic reactions have been reported in people sensitive to tallow pollen.

The Environmental Assessment determined that existing options for management of tallow, such as herbicides, physical, and mechanical control, provide only temporary solutions that require retreatment and are harmful to non-target species associated with the weed.

The release of *Bikasha collaris* and *Gadirtha fusca* is expected to directly impact tallow growth and survival of seedlings and will decrease the growth and competitive ability of this invasive weed. Release of these two classical biological control agents would reduce (but not eliminate) the presence of tallow as a nectar source for honeybees, or as a source for other beneficial uses. Tallow would not be eliminated as a nectar/pollen source for beekeepers, even in the long term because biological control agents have never completely eliminated their target. *Bikasha collaris* and *Gadirtha fusca* are expected to impact seedlings only, not established plants, and any reductions in tallow populations would occur gradually, over five or more years. The gradual reduction would allow time for alternative, native nectar sources to recover or be planted by beekeepers, land managers, environmental groups, and other stakeholders. Restoration of native nectar sources would be beneficial to nonmigratory honeybees and native pollinators that were negatively impacted by the reduction in native nectar plants caused by tallow invasions.

In closing, NAISMA supports the introduction of *Gadirtha fusca* and *Bikasha collaris* to control Chinese tallow tree and reduce the ever growing negative ecological, economic, and human health risks that it poses.

Sincerely,

A handwritten signature in cursive script that reads "Belle Bergner". The signature is written in black ink and is positioned above the typed name and contact information.

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