



**U.S. Canola Association**  
**600 Pennsylvania Ave., SE, Suite 320**  
**Washington, DC 20003**  
**Phone (202) 969-8113**

November 8, 2018

David Epstein, PH.D.  
 Senior Entomologist  
 USDA Office of Pest Management Policy  
 1400 Independence Avenue SW  
 Washington DC 20250-0314

Dear Dr. Epstein:

On behalf of the US Canola Association (USCA), I write to request a revision to correct an error regarding Rapeseed (including canola) on page 18 in the EPA publication entitled “Attractiveness of Agriculture Crops to Pollinating Bees Report.”

Specifically, the revision would differentiate hybrid canola seed production from commercial canola seed production for crush. The line for hybrid seed production should contain the following revised information, highlighted in yellow:

Crop	Description	HB Poll.	HB Nex	Bumble Bees	Solitary Bees	Requires Bee Pollination	Uses Managed Pollinators	Ref No.	US Bearing Acreage	Seed Production	Harvest Prior to Bloom	Notes
Rapeseed (including canola)	Brassica napus var. oleifera	++	++	+F2	++ Megachile	No	No	1, 3, 5, additional submitted documentation?	Canola - 1,990,500 Rapeseed - 5,400 (2018)	9,000 (2018)		Managed bees needed only for hybrid seed prodction; commercial seed production is grown using self-pollinating hybrids.

The acreage total included in the table for the US Bearing Acreage for canola is from the USDA-NASS Oct 2018 crop production report –

<http://usda.mannlib.cornell.edu/usda/nass/CropProd//2010s/2018/CropProd-10-11-2018.pdf>.

The total for rapeseed is from the June 29, 2018 USDA-NASS planted acres report –

<http://usda.mannlib.cornell.edu/usda/current/Acre/Acre-06-29-2018.pdf>. The seed production acreage total is an approximate estimate obtained from an industry source as canola hybrid seed production acreage is not reported publically and is tightly held proprietary information.

Attached find documentation from Dr. Michael Stamm, Canola Breeder, Kansas State University that justifies this requested change.

Regards,

Dale Thorenson  
 Assistant Director  
 US Canola Association

April 2, 2019

From: Crop Attractiveness Review Board  
To: Dale Thorenson, Assistant Director  
U.S. Canola Association  
600 Pennsylvania Ave., SE, Suite 320  
Washington, DC 20003

RE: Request for changes to document, *Attractiveness of Agricultural Crops to Pollinating Bees for the Collection of Nectar and/or Pollen*

Dear Mr. Thorenson,

Upon receiving your letter on November 8, 2018 requesting a reconsideration of information published for “canola” and for “sunflower” in the USDA document, *Attractiveness of Agricultural Crops to Pollinating Bees for the Collection of Nectar and/or Pollen*, the Crop Attractiveness Review Board (CARB) met on several occasions from November 2018 to February 2019 to consider the information you provided on behalf of the U.S. Canola and Sunflower producers. Upon careful consideration of the published literature provided in support of your request, and communications between CARB members and both canola/sunflower and honey bee extension specialists in the US, the CARB agrees with your request and will make the following edits to the pollinator attractiveness list with respect to canola and sunflower:

1. CARB has made changes in the tables to reflect “No” for both requires and uses pollinators for both Canola (p. 18) and Sunflowers (p. 20), followed by an asterisk (\*) indicating the reader should see information included in the notes column.
2. The “Notes” column for both crops now reads, “Only a small % of acreage grown for hybrid seed production requires managed pollination. However, canola/ sunflower producers may allow commercial beekeepers access to canola for honey production.”
3. Regarding recording the average acreage for hybrid seed production, USDA NASS is due to release the most recent Agricultural Census in 2019. We have sent a request to NASS for seed production acreage for both crops and will update acreage information following the release of the Agricultural Census.

Please let me know if the changes made to the document are satisfactory, and if there is anything further you care to pursue.

Respectfully,

David Epstein, on behalf of The Crop Attractiveness Review Board

**CARB Members:**

David Epstein, USDA Office of Pest Management Policy  
Douglas Cameron, EPA EFED Biologist, Potomac Yards  
Jay Evans, ARS Bee Research Lab, Beltsville, MD

Gloria DeGrandi-Hoffman, ARS Carl Hayden Bee Research Center, Tucson, AZ

Keith Sappington, EPA EFED Senior Advisor, Potomac Yards  
Thomas Steeger, EPA EFED Senior Advisor, Potomac Yards

