

## **Carbaryl Use, Citrus, and Bees**

Date: Tuesday, Aug. 5, 2003  
To: EPA  
From: Joel Nelsen  
President, California Citrus Mutual  
Subject: Carbaryl Use, Citrus, and Bees

Without going into great detail, citrus does not need bees to pollinate. Each spring the trees do it on their own. But, once the blossoms are out, beekeepers like to locate their hives adjacent to groves so that the bees can access the honey. This disrupts our cultivation and pest protection schedules, or we just kill the bees which the keepers don't like.

There were major range wars in the 70's and 80's whereupon a law and regulation was passed specific to the San Joaquin Valley and specific to citrus which established rules, regulations and a truce. Bees are allowed to trespass for a specific period of time, but once agricultural commissioners deem it appropriate, they declare "petal fall" and our growers are allowed to resume farming. Not too many years ago, EPA had issued a rule to the effect that a label will designate whether a material is harmful to be bees and if so, the material should not be applied when foraging. The language went on to state: either follow this statement or adhere to local rules designed to mitigate bee kills.

That policy must remain in effect; otherwise citrus producers lose the opportunity to farm effectively, which results in cosmetically damaged fruit and lower revenues while bee keepers maximize their revenue opportunities. Our state law equalized the opportunity for both and should not be usurped by a federal change.

Joel Nelsen  
President, California Citrus Mutual  
[Contact CCM](#)  
Web site: <http://www.cacitrusmutual.com/>

California Citrus Mutual (CCM) is a nonprofit grower-based trade association formed in 1977 by citrus growers, for citrus growers. Goal: to work on issues and programs that will improve members' bottom line. CCM represents more than 800 growers who farm more than 110,000 acres of citrus.