



Partners for Sustainable Pollination

January 27, 2010-by Fax to 202-720-9776

Hearing Clerk
Office of the Administrative Law Judge
Room 1031-S
1400 Independence Avenue SW, Stop 9203
Washington, D.C. 20250-9203

RE: Post-Hearing Brief, Docket No. AO-FV-09-0138; AMS-FV-09-0029; FV09-970-1

Partners for Sustainable Pollination (PFSP) submits this post-hearing brief to the U.S. Department of Agriculture (USDA) regarding the Agricultural Marketing Service Proposed Marketing Agreement No, 970, "*Leafy Green Vegetables Handled in the United States*" (74 FR 45565-74, September 3, 2009).

PFSP is a volunteer-based nonprofit headquartered in Santa Rosa, California that is dedicated to improving the health of honey bees through a collaborative approach involving beekeepers, growers, scientists and land management agencies with a concurrent objective of contributing to restoring native pollinator populations.

PFSP supports and endorses comments and recommendations presented by groups such as the Wild Farm Alliance and other groups representing sustainable and organic agriculture and wildlife interests, in particular about (1) excessive destruction of habitat for wildlife and beneficial insects not justified by food safety science; and (2) the need to include experts on wildlife, habitat and environmental issues on national and regional committees formed to implement the leafy greens marketing order.

PFSP recommends that experts on forage for honey bees and native pollinators be included on these national and regional committees. While PFSP did not see any specific mention in the hearing records about the importance of pollination services and the need to factor in impacts on habitat for honey bees and native pollinators, the same concerns are valid. Habitat established for wildlife and beneficial insects, cover crops, and related conservation practices represent critical potential habitat and forage opportunities for honey bees and native pollinators that provide essential pollination services for many crops and in healthy wildlife ecosystems.

According to a number of witnesses, third party "super metrics" arbitrarily imposed by purchasers to date related to the California Leafy Greens Marketing Order have resulted in excessive losses of habitat for wildlife and beneficial insects, including bees, in California. Growers should not be forced to choose between ill-founded mandates to destroy all living things and good conservation practices they have worked to establish. If a final national marketing order is adopted, PFSP urges that it be science-based and include wildlife, conservation and other important needs, including forage for the bees that pollinate many of our crops. PFSP also urges AMS to take the lead in bringing an end to "super metrics" that don't improve food safety but do destroy critical forage for bees and wildlife.

The importance of honey bees, native bees and other animal pollinators and the reality that they are at risk are increasingly recognized. Honey bees and native bees are vital partners in agricultural production and in healthy wildlife ecosystems. About one of every three bites we eat is from crops pollinated by bees and other pollinators. Pollination of many specialty crops is almost totally reliant on the services provided by beekeepers and their managed honey bees. It is conservatively estimated that over \$15 billion in crops are pollinated by managed honey bees in the U.S., with an additional \$3 billion in crops pollinated by native bees. Direct and indirect value could total \$30 billion annually.

Our nation's honey bees are seriously threatened by a complex of pest and disease challenges, including Colony Collapse Disorder (CCD). There are increasing indications that bumble bees and other native pollinators are also at risk. Honey bee losses have been heavy, jeopardizing the continued viability of our commercial crop pollination industry and reliable and affordable pollination services to the U.S. agricultural community.

The threat goes beyond pollinators to include the beekeepers that manage honey bees and deliver essential pollination services to specialty crops that are vitally dependent on honey bees for pollination. Unfortunately, the commercial beekeeping businesses that provide essential crop services are struggling to remain viable. These threats jeopardize the continued viability of our commercial pollination industry and predictable and affordable services to the U.S. agricultural community.

The major forage deficit in California has compelled beekeepers and growers to import honey bees from other regions of the U.S., import bee packages from Australia and import contaminated pollen for honey bee feed supplements that are being purchased to help meet California agriculture's pollination needs. Bumble bee packages have also been imported to pollinate greenhouse crops in California. These interregional movements and imports present continuing vectors for more diseases and pathogens negatively impacting colony health.

PFSP is working to increase forage and bee pasture in California and across the nation to reduce the need for imported bees, produce healthier and more sustainable local pollinator populations, reduce the potential for pests and diseases brought in through imports that can devastate honey bees and other pollinators, and increase valuable ecosystem services benefiting both production agriculture and wildlife. Working with growers of specialty crops is an important part of this stewardship effort.

Yet at the same time bees and their beekeepers are losing access to traditional forage areas due to adverse forces such as seedless Mandarin bee exclusion zones and growers being forced to tear out buffers and other bee forage in misguided food safety efforts. It would be a tragedy if marketing orders in the name of food safety unnecessarily destroy the very habitat needed by agricultural pollinators.

Ag pollination services are critical to the future of agriculture in California and across the nation. PFSP believes pollination services are clearly at risk if we do not take decisive action to protect and sustain honey bees, beekeepers and native pollinators. Addressing major bee forage deficits in California represents a vital part of the solution.

Respectfully Submitted,



Kathy Kellison, Executive Director
Partners for Sustainable Pollination
828 Beaver Street
Santa Rosa, CA 95404
(707) 321-4711 k.kellison@earthlink.net
<http://pfspsbees.org>