



Partners for Sustainable Pollination

January 26, 2010-by *E-mail* to Attention of Jane Levy, Chief of Staff, jane.e.levy@aphis.usda.gov

The Honorable Cindy Smith, Administrator
Animal and Plant Health Inspection Service
U.S. Department of Agriculture
1400 Independence Avenue, SW, 312-E
Washington, DC 20250

**RE: Support for Expeditious Completion of Pathogen and Pest Survey on Honey Bee Imports
Support for Ban on Honey Bee Package Imports
Support for Petition to Regulate Interstate Movement and Health of Commercial Bumble Bees**

Dear Administrator Smith:

Partners for Sustainable Pollination (PFSP) strongly supports the position being advocated by the Honey Bee Coalition, a broad coalition of the beekeeping industry in opposition to imports of honey bee packages from Australia and other nations. PFSP urges the U.S. Department of Agriculture (USDA) Animal and Plant Health Inspection Service (APHIS) to protect American agriculture from invasive pests and diseases by banning imports of honey bee packages. PFSP urges USDA to move forward expeditiously in conducting and completing the required pest and pathogen survey and developing the requisite findings, now that funding is available.

PFSP also supports the January 12, 2010 petition submitted by The Xerces Society, the Natural Resources Defense Council, Defenders of Wildlife and eminent bee scientist Dr. Robbin Thorp to regulate the interstate movement and health of commercial bumble bees to help prevent the spread of disease to wild bumble bees.

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.

The importance of honey bees, bumble bees and other animal pollinators and the reality that they are at risk is increasingly recognized. Honey bees, bumble 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.

Based on studies conducted by Dr. Robbin Thorp and other researchers, at least four species of formerly common North American bumble bees have experienced declines over the past decade, with two species on the brink of extinction. There are strong indications that a major threat to the survival of these wild bumble bee pollinators is the spread of disease from commercially produced bees that are transported throughout the country.

PFSP shares deep concerns being voiced by both beekeeping and native pollinator interests regarding harmful effects of pollinator imports from other countries and across regions in the U.S. The Honey Bee Coalition is opposing imports of bee packages from Australia and expressing concerns about imports of contaminated pollen.

This concern is reinforced by the results of a recent study reportedly to be published soon in [Apidologie](#)—the leading journal devoted to bee science—about new types of *Varroa destructor* that represent a new threat to world apiculture. The authors caution against the free movement of honey bees and signal the need for strict and proper quarantine for the trade of live honey bees between countries. Yet it is our understanding that APHIS, in carrying out its critical animal and plant health oversight mission, is currently unable to provide even an estimate of the number of bee packages imported from Australia since 2005.

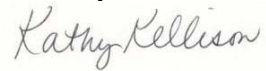
The major forage deficit in California has compelled beekeepers and growers to import honey bees from other regions of the U.S., import bee packages from Australia and import contaminated pollen for honey bee feed supplements that are being purchased to help meet California agriculture's pollination needs. Bumble bee packages have also been imported to pollinate greenhouse crops in California, with at least one company petitioning about two years ago to import non-native packaged bumble bees from other regions. 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 hives and packaged 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.

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. One critical action is to stop importing bee packages that can be vectors for invasive pests and diseases. Another is to prohibit the movement of packaged bumble bees beyond their native ranges.

Thank you in advance for your actions to protect pollinators as vital partners in American agriculture and healthy ecosystems from imported and trans-regional pests and pathogens.

Sincerely,

A handwritten signature in cursive script that reads "Kathy Kellison". The signature is written in black ink on a light-colored background.

Kathy Kellison, Executive Director
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