



Partners for Sustainable Pollination

January 12, 2009—via E-mail

RE: **Importance of Establishing Forage for Honeybees and Native Pollinators**

Dear President-Elect Obama:

I am writing to urge your Administration to make it a priority to take actions to increase natural forage and habitat and on private and public lands for honeybees and native pollinators. In brief, PFSP recommends the following:

- ✓ **Establish a single entity responsible for oversight and implementation of policies and programs affecting honey bees, beekeepers and other ag pollinators and access to forage for nutrition.**
- ✓ **Task federal agencies with jurisdiction over public lands with providing appropriate access to forage on public lands to beekeepers and their bees.**
- ✓ **Implement Farm Bill conservation provisions to help farmers and ranchers enhance bee forage on their lands.**

Partners for Sustainable Pollination (PFSP) is collaboratively working with beekeepers, scientists and growers to improve the health of honey bees and also support native pollinators. Many key specialty crops are almost totally reliant on the services provided by beekeepers. Our nation's honey bees are seriously threatened, and there are increasing indications that native pollinators are also at risk. Honey bees are succumbing in record numbers, jeopardizing the continued viability of our commercial pollination industry and predictable and affordable services to the U.S. agricultural community.

This issue goes beyond the bees 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. Many key specialty crops are almost totally reliant on the services provided by beekeepers. Unfortunately, the commercial beekeeping businesses that provide such services are struggling to remain viable, with a significant contributing factor being lack of suitable forage between pollination contracts.

Historically, beekeepers have had access to bee forage after their bees finish pollinating crops for the season. Over the decades, urbanization, changes in agricultural practices, including agrochemical choices, and at times restoration projects, have decreased the amount of acreage or sites available to beekeepers. Beekeepers are not in a position to own outright the necessary lands needed to provide forage for their colonies. Therefore, beekeepers must seek permission to find suitable and safe areas to "pasture" their bees. The impact of the lack of availability of natural forage and resulting poor nutrition on the health of honey bees is well documented.

Unlike other sectors in agriculture, most beekeepers do not have control over the land they need to nourish and manage and nourish their bees. They are essentially ‘guests’ of other landowners and dependent on others to provide safe habitat and practices needed for bee forage and healthy honey bees. Even their “right to farm” is at risk. For example seedless mandarin growers in California seek to treat bees as pests and are advocating regulations under legislation passed by the California legislature (AB 771) to create honey bee exclusion zones that extend broadly to neighboring farms.

PFSP RECOMMENDATIONS

Designate a single entity responsible for ag pollination services and access to forage. As crucial and as at risk as ag pollination services are, there is currently no single entity in the federal government designated with oversight responsibility for the wellbeing of honey bees, beekeepers and other ag pollinators. The potential adverse consequences of continued neglect are too great. Therefore, PFSP urges your Administration to designate a specific entity in the federal government—arguably within USDA—charged with the important oversight and leadership responsibility to undertake and accomplish the following:

- ✓ Determine the acreage of habitat needed to nourish honey bees and actions needed to provide access to beekeepers and their hives.
- ✓ Develop and oversee implementation of policies and programs to ensure sufficient available acreage to nourish bees and facilitate access to beekeepers and their hives
- ✓ Convene a “task force” with qualified individuals dedicated to the following recommendations, including but not limited to evaluating and monitoring for bee forage acreage sufficient to support the number of colonies needed to meet pollination services in the U.S. For example, such a task force could:
 - Identify CRP and other private lands currently utilized by beekeepers and develop recommended policies and incentives to ensure their sustainability as honey bee forage for the future.
 - Identify and encourage additional CRP lands that could be suitable or enhanced with proper seed blends, to provide bee forage to beekeepers.
 - Identify incentives for land owners who will manage their lands with intention to provide bee forage and pollinator habitat. (Creating a federal tax incentive is one possibility outside the Farm Bill).
 - Prioritize appropriate incentives for landowners who provide bee habitat to increase CRP enrollment in California, currently the lowest in the nation (\$22/acre).
 - Begin to overcome the disparity of insufficient "within state" colonies for needed specialty crops pollinations services.
 - Explore bee habitat possibilities in other Farm bill conservation and related programs.

Increase access to honey bee forage on public lands. PFSP urges your Administration to aggressively identify and pursue opportunities to increase access to forage on public lands through improvements in policies and actions by federal agencies.

Implement Farm Bill conservation provisions to increase bee forage on private lands. Pollinator conservation provisions newly enacted in this year’s Farm Bill are timely. While there may be other opportunities in the Farm Bill, PFSP urges the U.S. Department of Agriculture’s Natural Resources Conservation Service (NRCS) and Farm Service Agency (FSA) to work together in ensuring that

rulemaking and administrative decisions adopted with regard to the Conservation Reserve Program (CRP) and the Environmental Quality Incentives Program (EQIP) prioritize providing (1) forage for honey bees on CRP lands; and (2) cost-share assistance to help producers with the costs of purchasing appropriate seed and establishing honey bee forage.

PFSP recommends the following strategies regarding CRP management as critical “must haves” in contributing to addressing the health issues of honey bees in the U.S.—

- 1) Encourage and provide incentives such as CRP rental premiums to producers who include quality bee forage on their CRP acreage and make such acreage available to beekeepers.
- 2) Develop and provide information about appropriate seed mixes and best management practices necessary to provide quality bee forage on CRP lands, on a regional basis.
- 3) Provide cost-share assistance to producers wishing to establish or upgrade bee forage on CRP or other private lands.

Entomologists agree that bees require a mixing of pollens throughout the year to acquire the necessary proteins, lipids, vitamins, minerals and micronutrients required by bees to be at their healthiest, or another way to view it, their most resistant to pests and pathogens. Proper nutrition is also essential for the physiological development of bees to live their intended life span. The colony's survival is contingent on a sufficient adult population to retain viability coming out of winter. Currently there is no man made supplement that can be substituted and provide for the complete dietary needs of healthy bees. Studies conducted by ARS in 2006 confirmed that artificial feeds negatively impacted the longevity of adult honey bees. Leading researchers, including Judy Chen, Eric Mussen, and Jeff Pettis, indicate that a substandard diet is the greatest “stressor” to honey bees because subsequent causes of stress such as viruses, pests, or pesticides can be exacerbated when the robustness of the bee has already been compromised by insufficient nutrition.

During Congressional hearings held in response to the current Colony Collapse Disorder (CCD) crisis, both in 2007 and 2008, witnesses for the beekeeping industry referred to bee forage as a limiting factor for both the health of honey bees and the pollination industry. Zac Browning, President of the American Beekeeping Federation, has identified the critical role CRP land contributes to play in providing valuable forage, as highlighted in the attached exhibit. It is estimated that 40% of colonies managed by commercial beekeepers are utilizing available CRP lands for forage.

As demands to meet needs of a growing population and biofuels continue, pressure on CRP lands for intensive development will surely follow. Beekeepers require access to safe sites to allow their bees to forage after their bees finish pollinating crops for the season. It is imperative that individuals and agencies in a position to take action, such as USDA and FSA, make it a priority to seek incentives which will encourage land owners to embrace providing honey bee and other pollinator beneficial practices. The newly enacted Farm Bill has leveraged consensus surrounding this critical issue by calling for conservation actions to benefit pollinators—both native and managed honey bees:

“Administrative Requirements for Conservation Programs
(h) ENCOURAGEMENT OF POLLINATOR HABITAT DEVELOPMENT
AND PROTECTION. – In carrying out any conservation program
administered by the Secretary, the Secretary may, as appropriate,
encourage (1) the development of habitat for native and managed pollinators;
and (2) the use of conservation practices that benefit native and managed
pollinators.”

The health of honey bees can no longer be only a beekeeper problem. As humans, we want to use the bees to meet our needs, but do take ownership for the responsibility for ensuring their well being and their right to thrive. This is a problem requiring attention and actions by implementing agencies such as USDA, NRCS, and FSA to help protect this essential resource.

PFSP looks forward to your Administration's active leadership regarding efforts to improve pollinator habitat and access to adequate forage for the nation's hardworking and caring beekeepers. Agricultural producers and natural ecosystems who need their pollination services, and ultimately consumers of the food produced, will benefit.

Respectfully Submitted,

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Kathy Kellison, Executive Director
Partners for Sustainable Pollination
1828 Beaver Street
Santa Rosa, CA 95404
(707) 321-4711
k.kellison@earthlink.net

CC: Obama Transition Team