

The Honorable Tom Vilsack  
Secretary,  
United States Department of Agriculture  
1400 Independence Ave., S.W.  
Washington, DC 20250-1300

Ms. Cindy Smith  
Administrator,  
Animal and Plant Health Inspection Service  
4700 River Road  
Riverdale, MD 20737-1234

Ms. Rebecca Bech  
Deputy Administrator,  
Animal and Plant Health Inspection Service  
Plant Protection and Quarantine  
1400 Independence Ave., S.W., Room 302E  
Washington, DC 20250

Cc: Kevin Shea, Alan Green, Robyn Rose, Wayne Wehling, Colin Stewart

February 10, 2010

The undersigned conservation organizations respectfully request that the USDA-APHIS take action to regulate the movement and health of commercial bumble bees in order to safeguard wild, native bumble bee pollinators.

The ecological services that pollinators provide are necessary for the reproduction of approximately two-thirds of the world's flowering plants. In natural ecosystems, bumble bees and other native bees are essential pollinators of a number of rare and endangered plant species. In fact, a decline in the abundance of certain plants has been observed in Britain and the Netherlands where multiple bee species have gone extinct.

At least four species of formerly common North American bumble bees have experienced declines over the past decade; two of those species – the rusty patched bumble bee (*Bombus affinis*) and Franklin's bumble bee (*Bombus franklini*) teeter on the brink of extinction. 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.<sup>1</sup>

In order to prevent the spread of disease to wild bumble bees, the following conservation organizations respectfully request that APHIS use its regulatory authority, outlined in a petition submitted on January 12, 2010 by The Xerces Society, Natural Resources Defense Council, Defenders of Wildlife, and Dr. Robbin Thorp, to regulate the interstate movement and health of commercial bumble bees. Specifically, the signatories of this

---

<sup>1</sup> National Research Council of the National Academies, Status of Pollinators in North America, (2007).

letter request that APHIS create rules prohibiting the movement of bumble bees outside of their native ranges and regulate interstate movement of bumble bee pollinators within their native ranges by requiring permits that show that bumble bees are certified as disease-free prior to movement.

Thank you for your consideration of this matter.

Sincerely,

Scott Hoffman Black, Executive Director  
**The Xerces Society for Invertebrate Conservation**

Andrew Wetzler, Director, Wildlife Conservation Project  
**Natural Resources Defense Council**

Laurel Hopwood, Pollinator Protection Campaign Coordinator  
**The Sierra Club**

Bill Snape, Senior Counsel  
**The Center for Biological Diversity**

Kathy Kellison, Executive Director  
**Partners for Sustainable Pollination**

Nicole Rosmarino, Ph.D., Wildlife Program Director  
**WildEarth Guardians**

Bethany Gravell, Executive Director  
**Center for Native Ecosystems**

Steve Pedery, Conservation Director  
**Oregon Wild**

George Sexton, Conservation Director  
**Klamath Siskiyou Wildlands Center**

Alex P. Brown, Executive Director  
**Bark**

Michael Closson, Executive Director  
**Acterra**

Dave Werntz, Science and Conservation Director  
**Conservation Northwest**