

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

Dear Secretary Vilsack, Administrator Smith, and Deputy Administrator Bech:

The undersigned agricultural 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.

Healthy populations of native bees, including bumble bees, are essential for the reproduction of many flowering plants. The value of the pollination service that native bees provide to agriculture is estimated to be \$3 billion per year in the United States alone. For many high value crops, such as cranberries, blueberries, and tomatoes, bumble bees and other native bees are, on a bee-for-bee basis, more effective pollinators than honey bees.

At least four species of formerly common North American bumble bees have experienced steep declines; two of these species 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.¹

In order to prevent the spread of disease to wild populations of agriculturally significant bee pollinators, the following agricultural 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.

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

Robbin Thorp, to regulate the interstate movement and health of commercial bumble bees. Specifically, the signatories of this 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,

Wes Jackson, Ph.D.
The Land Institute

Tim LaSalle, Ph.D.
The Rodale Institute

Chris Schreiner
Oregon Tilth

Jo Ann Baumgartner
Wild Farm Alliance

Bill Duesing, Executive Director
**Northeast Organic Farming Association
of Connecticut**

Brian DeVore
The Land Stewardship Project

David Glenn
**Northeast Organic Farming Association
of New Jersey**

Carol Goland
**Ohio Ecological Food and Farm
Association**

Heather Spalding, Associate Director
**Maine Organic Farmers and Gardeners
Association**