

Honorable Steve Crocker  
Minister of Fisheries and Land Resources  
Government of Newfoundland & Labrador

March 23, 2017

Dear Minister Crocker,

I am writing on behalf of the Xerces Society for Invertebrate Conservation to express concerns about the merits of importing the common eastern bumble bee (*Bombus impatiens*) – or any other commercially available bumble bee – into Newfoundland and Labrador (NL) for pollination services.

The common eastern bumble bee (and to my knowledge all available species of commercially available bumble bees) is not native to NL. While bumble bees are important pollinators, commercially producing and distributing a bumble bee, especially outside of its native range, can pose significant unintended consequences and pose consequential threats to native wild pollinators through competition, the potential for becoming established outside of their native range, and the spread of diseases. Diseases spread through commercial bumble bees may already be the cause of the population declines seen in several North American bumble bees, including the rusty patched bumble bee (*Bombus affinis*), which was just added to the U.S. Endangered Species Act as an endangered species. Protecting native pollinators from these threats is an essential component to healthy bee populations and a healthy ecosystem. A more sustainable route than importing commercial bumble bees would be to encourage local farmers in need of pollination services, as well as other land managers, to foster habitat that supports wild pollinator assemblages (including native bumble bees). You can find a set of habitat management guidelines for bumble bees on our website:  
[www.xerces.org/wp-content/uploads/2012/06/conserving\\_bb.pdf](http://www.xerces.org/wp-content/uploads/2012/06/conserving_bb.pdf).

As a member of the International Union for the Conservation of Nature Bumble Bee Specialist Group (IUCN BBSG), we have developed the following policy statement about the use of commercial bumble bees – developed in partnership with bumble bee experts from all over the world. You can find more information about the BBSG here:  
<http://bumblebeespecialistgroup.org>. The annotated bibliography and scientific justification for the following statement is available upon request.

### **Commercial Bumblebee Policy Statement**

#### **The IUCN BBSG issues the following statement addressing the serious risks posed by transport of bumblebees for commercial pollination**

The global trade in bumblebee colonies for crop pollination, most notably of the European species *Bombus terrestris* and the North American species *Bombus*

*impatiens*, has resulted in the establishment of bumblebee species far from their native ranges, for example in Japan, parts of Australasia, Chile and Argentina. Invasive, non-native bumblebee species pose multiple risks to native species, including: competition, hybridization resulting in loss of locally adapted ecotypes, and introduction of non-native bee diseases. There is evidence that parasites from commercial bumblebees may have been irreversibly introduced or spread in Japan, North America and South America, with potentially profound impacts on native bumblebees.

The IUCN BBSG considers that the commercial movement and deployment of bumblebees for pollination should be governed by the precautionary principle to prevent unintended harm. **Only local bumblebee species and subspecies should be grown for commercial development and employed within their native ranges. All commercial bumblebees should be thoroughly screened for parasites by both producers and independent regulators.** If commercial bumblebees, as opposed to (or in combination with) habitat management to support wild pollinator assemblages, are to be used in open field settings, only native species (or geographically appropriate sub-species) of commercial bumblebees should be used. All use within greenhouses should be controlled to eliminate risk of escape.

Should you have any questions about the above statement, or the potential risks of importing non-native bumble bees into NL for pollination services, please do not hesitate to contact me – or anyone else in the IUCN BBSG. I appreciate your concern for, and attention to this matter.

Sincerely,



Rich Hatfield  
Senior Conservation Biologist  
IUCN BBSG Red List Authority

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Conserving Bumble Bees – available at: [www.xerces.org/wp-content/uploads/2012/06/conserving\\_bb.pdf](http://www.xerces.org/wp-content/uploads/2012/06/conserving_bb.pdf)

IUCN BBSG Commercial Bumble Bee Statement – available at: <http://bumblebeespecialistgroup.org/policy/>

Potential threats of commercial bees to native bee populations – available at:

[http://www.xerces.org/wp-content/uploads/2016/09/Xerces\\_policy\\_statement\\_HB\\_Final.pdf](http://www.xerces.org/wp-content/uploads/2016/09/Xerces_policy_statement_HB_Final.pdf).