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## **Response to the Consultation on Class Licence WML-CL22: To permit the release of non native subspecies of the bumblebee (*Bombus terrestris*) in commercial glass-houses or poly tunnels for crop pollination and research.**

### **Summary**

- *The Bumblebee Conservation Trust welcomes Natural England's consultation on its proposal to amend the licensing regime under the Wildlife and Countryside Act 1981 for the release of non-native bumblebees for crop pollination.*
- *This change to the licensing regime is seen as an essential step towards minimising the environmental and disease risks posed by the release of commercially reared non native bumblebees which are imported into this country.*
- *The Bumblebee Conservation Trust believes that this change in licensing will support actions articulated in the Government's National Pollinator Strategy for England, to be launched this autumn.*
- *The Bumblebee Conservation Trust considers that this change is needed in order to bring England in line with the licensing policies in Scotland, Wales and Northern Ireland. It would also advocate for a UK-wide approach to the importation of non-native bumblebees for commercial purposes.*
- *Of concern to the Bumblebee Conservation Trust is the amount of resource Natural England will have to effectively police licence growers and create better awareness amongst growers about the importance of protecting our native species.*
- *The Bumblebee Conservation Trust has invested in research to investigate the risks posed by the importation of commercial bumblebees and would advocate for increased investment in research to improve understanding about the hazards non native bumblebees cause to our own native species.*
- *The Bumblebee Conservation Trust supports the development of an industry for the breeding and sale of native species and subspecies of bumblebees within the UK.*

## Introduction

The Bumblebee Conservation Trust welcomes the consultation on the Class Licence WML-CL22: To permit the release of non native subspecies of the bumblebee (*Bombus terrestris*) in commercial glass-houses or poly tunnels for crop pollination and research. The Trust believes that this change will play an important role in helping to protect native bumblebees and the invaluable ecosystem service they provide through the pollination of crops.

The importation of bumblebees for commercial purposes is one of the Bumblebee Conservation Trust's key policy areas. It has been pleased to support research into this important area, for example: Graystock et al (2013) The Trojan hives: pollinator pathogens, imported and distributed in bumblebee colonies. Journal of Applied Ecology. Doi 10.1111/1365-2664.12134. During the development of the National Pollinator Strategy for England (NPS), the Trust strongly advocated for the need for further evidence on the risks posed by commercially produced bumblebees and other pollinators. This is now listed as an action within the NPS, under evidence gathering.

The BBCT was established in 2006 to address the decline of the UK's bumblebees. There are 25 bumblebee species native to the UK (approximately 10% of the world's species), although two species become nationally extinct during the twentieth century (*Bombus cullumanus* in 1941 and *B. subterraneus* in 1988), although this latter species is currently the subject of a reintroduction project. Many of the remaining species have declined in their geographical range and abundance, including two species listed as 'vulnerable' on the IUCN's 2013 European regional assessment. The BBCT is addressing these concerns with a mixture of direct conservation measures and advice (to businesses, farmers & landowners, and the general public), scientific monitoring (the BBCT run the only British standardised survey of bumblebee abundance and distribution), and public outreach (aimed at raising public awareness of, and engagement with, bumblebee species).

As stated in the *BBCT's Strategic Plan, 2014 – 2019*,

“The BBCT's vision is to ensure that our communities and countryside will be rich in bumblebees and colourful wildflowers, supporting a diversity of wildlife and habitats for everyone to enjoy”.

“The BBCT's strategic aims are to:

- support the conservation of all bumblebees, rare or abundant;
- raise awareness and increase understanding about bumblebees and the social, economic, environmental and cultural benefits which they and other pollinators provide; and
- ensure that the BBCT is sustainable, fit for purpose, and able to respond quickly to challenges and change”.

### Question 1

**Do you agree with Natural England's proposal to make the release of non-native bumblebees subject to individual licence applications from 1<sup>st</sup> January 2015, rather than being covered by a class licence? (This will have no impact on the use of native commercial bumblebees: for these pollinators, which are being increasingly used on English farms, no licence is required).**

The Bumblebee Conservation Trust agrees with Natural England's proposal for the following reasons:

- Bumblebees are part of a guild of pollinating insects which contribute over £400 million to the UK economy every year. From a UK perspective the Trust recognises the necessity of commercial bumblebee colonies for the pollination of horticultural crops. Currently bumblebee importation means fruit can be produced locally, more cheaply and with a longer shelf life. With the widely accepted view that our pollinator populations need help and that the threats posed by parasites, disease, competition and genetic introgression are contributing factors to declines in abundance and distribution of our native species, the Bumblebee Conservation Trust advocates that a sustainable and integrated approach to how we manage this pollination service is required. Natural England's proposal to change the licensing regime to minimise threats to our native bumblebee species is therefore an important step forward. It is one that we believe should be embraced by growers as an essential step towards minimising any further ecological damage to our own UK species.
- We know that commercial bumblebees have been entering the UK in large numbers for over twenty years and that they pose a number of potential threats (or hazards) to wild populations of bumblebee (as stated above). Whilst we can do little about what has happened in the past 'closing the door now' will help to reduce any further impacts.
- From 2009-2013 Bumblebee Conservation Trust has worked with Professor William Hughes (University of Sussex) as the CASE partner on a NERC Open CASE studentship investigating the threat of pathogen spillover from commercially-produced bumblebees. This research<sup>1</sup> which was published on 18 July 2013 demonstrates that, contrary to the claims of producers, commercially produced bumblebee colonies may carry with them multiple parasites that are viable and infectious to other bumblebees and other bees as well. The Trust is now supporting further research with Professor Hughes (University of Sussex) and Natural England to research the *Development and verification of a standardised protocol for the detection of parasite infection levels in commercially-produced bumblebee colonies*. The Bumblebee Conservation Trust would urge NE to continue to support further research into this area to improve knowledge and encourage this to be shared between scientists, producers, growers and the public.

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<sup>1</sup> Graystock et al (2013) The Trojan hives: pollinator pathogens, imported and distributed in bumblebee colonies. *Journal of Applied Ecology*. Doi 10.1111/1365-2664.12134.

- The Bumblebee Conservation Trust exists to protect our native bumblebee populations. Much of our current conservation activity focuses on protecting the very rarest bumblebee species, in particular *Bombus sylvarum*. The Trust is concerned to learn that 72% of the recorded sites where *Bombus sylvarum* are found in England are within non native queen flight distance from high risk release sites. Given the perilous status of *Bombus sylvarum*, and the ecological impacts and disease risks posed by the releases of non native bumblebees it is essential risks imposed by the current system are removed and that the new measures proposed are policed by Natural England. For this reason we would insist that individual licence applications should apply to all species and subspecies of bumblebee which are not native to the UK/England. This is to avoid any attempts by the industry overseas to start to cultivate and then export the non-native subspecies of another native bumblebee species so as to endeavour to circumvent this new licensing system which applies only to *Bombus terrestris* and its subspecies.
- Furthermore we would advocate the need for unannounced inspections of glass houses and poly tunnels, where a licence has been issued, should this be a condition of the licence. This is to ensure growers respect and follow the guidance on doors and windows. Non compliance should be treated seriously with fines imposed, training in correct procedures and in the event of serial offenses – a complete ban from importation.
- This consultation provides no information about the financial resources required for the effective policing of this licensing or the necessary awareness raising needed to increase growers' awareness about the threats the importation of non native bumblebee species have. The Bumblebee Conservation Trust would consider discussing with Natural England ways it could assist in raising awareness as it sees this as critical to reducing any further long term risks.
- We would advocate very strongly for more bumblebees to be raised in the UK instead of importing them. (This is articulated below and should be included in the BEA).
- With the launch of DEFRA's National Pollinator Plan for England this Autumn, increasing local wild bee populations through sympathetic management of the countryside will help reduce growers dependency on the need to import commercial bumblebees. We would urge Natural England to explore options for growers who continue to import non native colonies to place a proportion of their land aside for wild pollinators.
- This proposal brings England in line with Scotland, Wales and Northern Ireland. As insects do not respect boundaries, we would urge NE to work with the other country agencies to develop a unified UK wide approach to this issue.

## Question2

**Natural England has produced a Business Engagement Assessment (BEA). The BEA is included as Annex 1 of the consultation document and describes how we think this change will impact on businesses in England. Do you have comments on the BEA?**

We believe the BEA could be strengthened by including options and incentives for business development through the establishment of small scale enterprises to rear native British bumblebees.

The Trust is fully supportive of the feasibility project Leeds University is developing in partnership with the Yorkshire Dales Millennium Trust. This project complements actions under the NPS and involves research into the feasibility of setting up a small scale enterprise in Yorkshire where native bumblebees are reared for commercial use within the Yorkshire area. The aims of the project are to:

- Bring together the knowledge, science and best practice for commercially rearing native bumblebees in the UK.
- Create the highest quality facilities for rearing native Yorkshire strains of *Bombus terrestris audax*;
- Provide a viable UK alternative to imported bumblebees for crop pollination
- Reduce the risk of pathogens and disease transferring to UK wild populations
- Reduce the risk of native populations interbreeding with continental strains of imported bumblebee
- Highlight the importance of native bumblebee populations and encourage good husbandry of commercial bumblebees and best practice by producers.

We hope that this proposal will encourage an industry for the breeding and sale of native species and subspecies within the UK. This we believe will reduce the risk of releasing further diseases and parasites because the bumblebees are bred locally rather than being imported from abroad.

Lucy Rothstein  
Chief Executive  
16 September 2014.