

3 March 2016

Committee Secretary  
Senate Standing Committees on Environment and Communications  
PO Box 6100  
Parliament House  
Canberra ACT 2600

**Submission to Senate Committee inquiry into the use of Tasmanian  
bumblebees for commercial pollination purposes**

Dear Secretary,

The attached fact sheet about the proposal to use bumblebees in Tasmania for pollination is self-explanatory.

The Invasive Species Council believes that it is already well established that bumblebees are efficient pollinators of tomatoes, as has been demonstrated in many other countries.

We believe that this proposal is a 'foot in the door' strategy to remove impediments to introducing and using bumblebees on mainland Australia. If the ban on using illegally imported species is removed, this will create a strong incentive to shift the bees illegally to the mainland and to introduce new varieties of bumblebees. This may also have the flow-on effect of stimulating the illegal release into Australia of other harmful invasive species.

We strongly urge the Senate committee to reject any changes to the status of bumblebees in Australia due to the likely significant environmental impacts.

The fact sheet and associated references address most of the inquiry's terms of references.

I would be happy to elaborate on this submission in person.

Yours sincerely

Andrew Cox  
CEO

# Bumblebees in Tasmania - pollination push

fact sheet

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## In summary

**The proposal:** Australian senator Jacqui Lambie has been calling for the federal government to allow a 'trial' of bumblebee pollination of tomatoes in Tasmanian glasshouses.

**The bee:** The large earth bumblebee (*Bombus terrestris*) is a large social bee native to Europe. It has formed a large feral population in Tasmania after arriving accidentally or being illegally introduced in 1992. It is recognised as a serious threat to Australian biodiversity and also potentially to some primary industries.

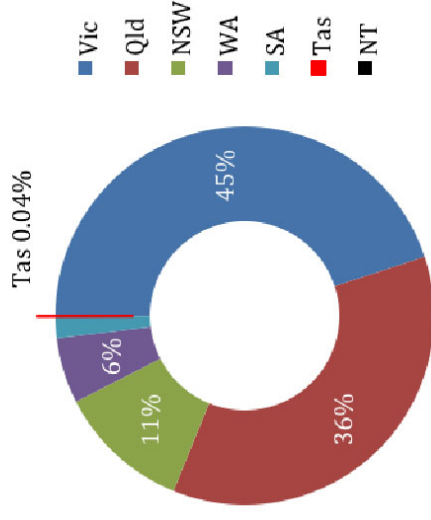
**The law:** Under the Environment Protection and Biodiversity Conservation (EPBC) Act, it is illegal to possess or use bumblebees because they were not legally imported. In 2008, the federal environmental minister rejected an application by the Australian Hydroponic and Greenhouse Association to add the large earth bumblebee to the list of legal imports. To allow the proposed glasshouse trial therefore will require amending the EPBC Act.

**The problems:** If the EPBC Act is amended to allow the possession and use of illegally or accidentally imported species, that will create a huge perverse incentive to illegally introduce bumblebees to the mainland (and also other invasive species that may have commercial value). It will also create more pressure to import new bumblebee varieties.

## What is the real reason for this proposal?

**No need for trials:** It is already well established that bumblebees are efficient pollinators of tomatoes, as has been demonstrated in many other countries.<sup>1</sup> A trial will yield no new information.

## Tomato production (hectares)



**No benefit for Tasmania:** Tasmania has an extremely small tomato industry. According to the Australian Bureau of Statistics, in 2011-12 there were just 18 tomato growers in Tasmania and just 3 hectares of tomatoes grown commercially (presumably all in glasshouses).<sup>2</sup> Other glasshouse crops that might use bumblebees for pollinators are also very small in Tasmania.<sup>3</sup> Because Tasmanian glasshouses are small there is no great productivity gain in using bumblebees instead of current methods (a vibrating wand).

## Conclusion

The proposal is a 'foot in the door' strategy to remove impediments to introducing and using bumblebees on mainland Australia. If the ban on using illegally imported species is removed, this will create a strong incentive to shift them illegally to the mainland and to introduce new varieties of bumblebees.

## Legal background

**Illegal to possess:** Under the EPBC Act, the use of bumblebees in Tasmania is illegal. This is because it is an offence under section 303GN to possess a live non-native specimen that was not lawfully imported or is the progeny of specimens that were not lawfully imported.

**Applications to import:** There have been three applications to import bumblebees into Australia – 1995, 1997 and 2005. All were refused because of high invasive risks.<sup>4</sup> The most recent was refused in 2008 under the EPBC Act.<sup>5</sup>

## Perverse incentive for illegal introductions

**Circumventing the import ban:** Probably the main reason bumblebees have not been illegally introduced to the mainland is the ban under the EPBC Act of using species that have not been approved for import. This proposal can be regarded as a way of circumventing that ban if it results in a change to the EPBC Act allowing use of species not permitted for import.

**Risks of illegal introductions:** A 1997 application to import bumblebees to the mainland stated that there was a high risk of illegal importation: 'there is a good chance of illegal importation and release by impatient tomato growers who would wish to enjoy the obvious benefits of bumblebee pollination'.<sup>6</sup> The NSW scientific committee also noted the risk of 'deliberate introduction as a pollinating agent'.<sup>7</sup>

**Pressure for new variants:** The Tasmanian bumblebee population is inbred, probably because it is descended from a single fertilised queen.<sup>8</sup> If it is approved for commercial use, there is likely to be considerable pressure on the government to allow the

importation of new varieties and it would create an incentive to illegally introduce new variants that are likely to exacerbate environmental impacts.

**Broader implications:** Amending the EPBC Act to allow use of illegally or accidentally introduced species would raise expectations more generally that illegally introducing a species would lead eventually to its use being permitted.

## Environmental risks

*'[It] is clear that B. terrestris is an invasive species wherever it has been introduced and studies have been made (New Zealand, Israel, Tasmania, Japan, Chile, Argentina).'<sup>9</sup>*

**Broad recognition:** The bumblebee is listed as a key threatening process in NSW and as a potentially threatening process in Victoria.<sup>10</sup> More than 80 scientists worldwide have authored or co-authored peer-reviewed papers that express environmental concerns about the large earth bumblebee, mostly based upon their own field research.<sup>11</sup>

**Invasive features:** The large earth bumblebee can form colonies of more than 1000 individuals.<sup>12</sup> It has high dispersal ability (it spread 25 km/year in Tasmania)<sup>13</sup>, high reproductive capacity, early seasonal emergence and long activity periods, high adaptability (as shown by generalist foraging habits and broad environmental tolerances), and probably few natural enemies in its invasive range.<sup>14</sup>

## Demonstrated or potential impacts:

- competition with native bees and other insects, and birds for floral resources<sup>15</sup>



Bumblebees have been viewed as an invasive species wherever they have been introduced. Photo by johan, available under a Creative Commons Attribution-Noncommercial license

- weed spread (weeds that have become more invasive in Tasmania since *B. terrestris* arrived but are not serious weeds on the mainland include *Rhododendron ponticum*, *Solanum marginatum*, *Buddleja davidii*, and *Agapanthus praecox*)<sup>16</sup>
- displacement of local bee species<sup>17</sup>
- less effective pollination and reduced seed set and fruit quality of native plants<sup>18</sup>
- Invasion and spread of parasites and pathogens<sup>19</sup>

## Risks to primary industries

**Weed spread:** The introduction of novel pollinators is likely to lead to increased seed production of some

weeds that currently lack an efficient pollinator.<sup>20</sup> Bumblebees could be an ideal pollinator for weeds that currently occur in low densities or haven't yet escaped from gardens. Some weeds likely to benefit are poisonous or prickly, and problematic for the dairy and grazing industries (eg *Datura* species).

**Reduced honey production:** The Australian Honeybee Industry Council opposes the introduction of the bumblebee.<sup>21</sup> It could compete for nectar and pollen with the honeybee, and because it can forage at lower temperatures and start foraging earlier in the morning, it would have a competitive advantage over managed honeybees. It could host new parasites and pathogens of other bees (a particular concern if there is incentive for illegal imports).

## Alternative pollination options

**Native bee options:** Much progress has been made to develop a native bee pollinator for glasshouse tomatoes. Two species of blue-banded bees, *Armegilla holmesi* and *A. chlorocyanea*, are as effective as bumblebees in pollinating greenhouse tomatoes.<sup>22</sup> There are still a few impediments to using these species in glasshouses (eg. glasshouse designs, pesticide use) but funding for the project ceased in 2009.<sup>23</sup> Instead of agitating to introduce a harmful invasive species, tomato growers should be funding research to develop this safe alternative.

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