



Department  
for Environment  
Food & Rural Affairs

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# **Consultation on improving bee health: proposed changes to managing and controlling pests and diseases**

## **Summary of responses**

**July 2013**



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Welsh Government

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# Background

1. The purpose of the consultation was to seek views on proposed changes in England and Wales to managing and controlling bee pests and diseases that are already present in the UK

- American and European Foulbrood (AFB and EFB)
- Varroa
- and *Nosema*

and those exotic pests and diseases which are currently absent but may be a future threat

- Small hive beetle
- Tropilaelaps mites
- and the Asian hornet

2. A number of specific questions were posed throughout the consultation document and a separate response form was provided for ease of completion.

3. The proposals included in the consultation emerged from a review of policies on honey bee pests and diseases undertaken by the Food and Environment Research Agency (Fera), on behalf of Defra and Welsh Government (WG), with the National Bee Unit (NBU), representatives from the Bee Farmers' Association and the British Beekeepers' Association, an independent scientist and others. This was completed over 12 months from July 2011. Other endemic and exotic pests and diseases were considered by the review team but the 7 above were recommended as the priorities for action. Further details on the policy review including background, members of the review group, terms of reference and a brief summary of their discussions and conclusions were provided in the consultation document.

4. The focus of the review was on honey bee pest and disease control policies including beekeeping practices and husbandry, and on making the best use of the current resources available to government, beekeeping associations and beekeepers to optimise honey bee health (reduce colony losses) for pollination and honey production. The consultation document set out three options for the future policies. These were:

**Option 1:** refine and build on current policies with a renewed commitment to collective action by government, beekeepers and beekeeping associations

**Option 2:** maintain current policies (no change): and

**Option 3:** do the minimum required to meet current EU obligations. This would include removing EFB from disease control programmes in England and Wales, stopping registration of beekeepers on BeeBase and the NBU's targeted surveillance programme

5. Defra and WG recommended **Option 1**. This option sought to build on the current pest and disease control policies and set the future direction for these policies. These included a renewed commitment for collective action by Government, beekeepers and beekeeping associations to manage and reduce serious pest and disease risks and colony losses. The prioritisation exercise undertaken by the review team highlighted the substantial costs (e.g. colony losses) to beekeepers and pollination services that are due to endemic pests and diseases and would result if the exotics became established in the UK. The review team estimated that if the new policies and practices highlighted under Option 1 could be effectively delivered between now and 2020, the total economic benefit (i.e. reduction in economic losses by beekeepers and improved pollination of crops) would be around £68m p.a. over the current policies and practices (**Option 2**: no change). A significant improvement.

6. It was considered that **Option 3** (minimum required to meet EU obligations) would significantly undermine the health of honey bees in England and Wales, reversing the improvements made over many years from the current programme, which included active surveillance for endemic and exotic pest and disease risks which would not continue.

7. Proposals under Option 1 included:

- Enabling beekeepers and improving their self reliance, for example by sharing data and analysis on pest and disease risks with beekeepers, and by planning, coordination and delivery of education and training
- Tackling the causes of problems (not just symptoms), for example improving the response by government, supported by beekeeping associations, to recurrent outbreaks of serious diseases such as EFB
- Formalising and extending better regulation approaches for the control of AFB and EFB specifically by recognising and rewarding good practice (by reducing inspection burdens) which the NBU already has in place for some commercial and semi-commercial beekeepers
- Broadening and shifting the focus of government's role to cover other pests and diseases including refocusing on Varroa management to reduce colony losses
- Proposed strategic goals shared by Government and beekeepers for policies on each pest and disease risk and intended outcomes for each policy
- A proposal for beekeepers to pay a contribution towards their attendance at NBU training events and for local association to contribute towards the costs of training provided by NBU representatives. The income generated would provide additional resources and impetus for government's renewed commitment to improving beekeepers' management of Varroa to reduce colony losses

## Summary of responses

8. The consultation period ran between 10 January and 9 March 2013. During this period, 184 responses were received. These comprised 34 from national and local beekeeping associations; 14 from other Government departments, non-government organisations or companies (others); and 136 from individuals. Of the responses, 146 used the response

form or responded to the questions raised in the consultation document. Four organisations/companies and 34 individuals replied in general terms. One reply in the organisation category and 2 individuals simply commented on the format of the consultation rather than the specific issues raised in the documentation. A list of responders is at Annex A.

9. The following paragraphs note the responses made in favour and against each of the questions raised in the consultation document. A summary of the general responses received is at para 32.

## Q1. Do you agree with the proposed revision to the objective for the overall programme?

This was: To protect stocks of honey bees needed for the pollination of agricultural and horticultural crops, as well as wild plants, and for the production of honey and wax; by preventing the introduction of serious exotic bee pests and diseases into the country, and limiting the spread and impact of serious pests and diseases that are already present, including by enabling bee farmers and hobby beekeepers to be self-reliant in minimising pest and disease risks and in keeping pest and disease levels low.

	Yes	No	Undecided	No comment
Individuals	92	7	0	3
National and Local Beekeeping Associations	32	0	1	1
Others <sup>1</sup>	8	0	2	0
Total	132	7	3	4

10. There was significant support from all responders for the proposed revision to the objective of the whole programme. Two responses also highlighted the role of bumble bees and other pollinators and suggested that any management of the pests and diseases of honey bees must take these into consideration by widening the objective to ‘...protect stocks of honey bees and wild pollinators.....’.

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<sup>1</sup> Others – other Government departments, non-government organisations and companies

**Q2. Do you agree with the recommended changes to current policies as set out in section 3? These included the objectives and strategic goals for each pest and disease, the scope of the proposed changes and the case for and against.**

### **American and European Foulbrood (AFB and EFB)**

11. It was proposed that the better regulation approaches of recognising and rewarding good practice would be formalised and extended mainly for commercial and semi-commercial beekeepers (Disease Accreditation Scheme for Honey bees – DASH) subject to the bee inspectors' case-by-case assessment of the competence and ability of these beekeepers to manage and control AFB and EFB outbreaks.

12. The other proposed additional measures were:

- i. a more formalised approach by the NBU, assisted by the associations, to raise beekeepers' awareness about AFB and EFB outbreaks and risks;
- ii. an updated EFB control policy (with presumption of destruction as main response, although uncertainties about the effectiveness of destruction on recurrence of cases to be investigated by the NBU before finalising the policy);
- iii. target beekeepers with recurrent EFB outbreaks to improve their management of this disease and to eliminate/reduce its recurrence and incidence; and,
- iv. improve the ability of beekeepers to detect and manage AFB and EFB, including the causative agents/pathogens.

13. As regards other pests and diseases, it was proposed that Government and stakeholders work together on a package of additional measures as follows:

- **Varroa** - raise the profile, priority and improve beekeeper management of the pest thereby leading to reduced colony losses
- **Nosema** - develop and implement updated guidance, including on alternative treatments (if any become available), and advice and training on *Nosema* management
- **Small hive beetle** - increase the chances of early detection and eradication, and if unsuccessful in preventing establishment, provide robust advice to beekeepers on effective management
- **Tropilaelaps mites**- increase beekeepers' awareness of this pest and to test contingency plan through exercises including training of beekeepers

- **Asian hornet** - increase the likelihood of early detection and eradication, and if required to manage this pest effectively to reduce impacts on colonies
- **Colony Collapse Disorder (CCD)** -The NBU should look for opportunities to monitor viruses associated with CCD, such as Kashmir Bee Virus (KBV) and Israel Acute Paralysis Virus, as part of its existing surveillance programme, and as resources allow.

	Yes	No	Undecided	No comment
Individuals	79	14	4	5
National and Local Beekeeping Associations	29	2	0	3
Others	9	1	0	0
Total	117	17	4	8

14. The proposed recommend changes to the current policies were strongly supported with many recognising the significant impact that Varroa had on beekeeping. The lack of effective medicines was also highlighted as a concern by many responders and a number emphasised the importance of encouraging pharmaceutical companies to develop new agents for the treatment of Varroasis.

15. There was support for the proposed DASH although some stakeholders felt that the criteria to be used for accepting beekeepers into the scheme needed further consideration. It was also suggested that extending the scheme to all beekeepers should be considered providing the criteria was met.

16. Some responders had concerns about the cost effectiveness of the policy on exotic pests, considering that it would be preferable to put more effort into getting beekeepers to recognise the pests. Developing effective control methods which could be publicised to beekeepers was also highlighted as an important issue.

**Q3. If you disagree with any of the recommended changes, please identify which pest or disease and which aspect(s) and explain why you disagree.**



17. One national association and a Non Government Organisation considered there was significant and unnecessary costs associated with administration of the NBU and its policies and noted that they would be seeking to reduce such costs and effort. Another national association was concerned that the existing policies and proposed changes did not promote the concept of integrated bee health management and did not address how beekeepers should be trained to view bee health on a holistic basis rather than as separate and non-related conditions.

18. A number of responders thought that the relative merits of the various control measures for EFB still needed further assessment before the policy on the control of the disease was finalised.

19. As regards *Nosema*, there was concern from some stakeholders about the loss of Fumidil B for the treatment of *Nosema* and the need for positive action to be taken to find and authorise a suitable replacement.

20. Other comments made included a suggestion that a combined NBU/beekeeping associations initiative should be launched to optimise the use of existing knowledge and an evaluation of the data gaps in varroa control and bids for funding should be made. It was also noted that any research publically funded should be available in an Open Access format.

**Q4. Would you support the introduction of new sanctions to address beekeepers' poor management of disease risks at their apiaries and/or lack of cooperation to address these risks? Whether to introduce such sanctions would be subject to further analysis and a separate consultation and would also require new legislation.**

	Yes	No	Undecided	No Comment
Individuals	60	36	3	3
National and Local Beekeeping Associations	21	9	3	1
Others	6	3	0	1

Total	87	48	6	5
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21. Although many supported the introductions of sanctions to address poor beekeeping, it was recognised that this could lead to problems, such as non-reporting of disease. There was also concern that such sanctions would have a negative effect on beekeeping and deter people from taking up the craft particularly if beekeepers are affected by an adjacent disease problem over which they have no control. The administrative and enforcement costs involved were also raised as an issue.

**Q5. Are associations (nationally and locally covering bee farmers and hobby beekeepers) prepared to pay a realistic contribution towards the costs of lectures and training events delivered by NBU staff and bee inspectors. If so, how much would be realistic?**

	Yes	No	Undecided	No Comment
Individuals	60	14	4	23
National and Local Beekeeping Associations	26	6	2	0
Others	4	2	1	3
Total	90	23	7	26

**Q6. Are beekeepers (bee farmers and hobby beekeepers) prepared to pay a realistic contribution towards the costs of training events organised and run by the NBU. If so, how much would be realistic?**

	Yes	No	Undecided	No Comment
Individuals	73	21	4	4
National and Local Beekeeping Associations	25	6	1	2
Others	3	4	0	3
Total	101	31	5	9

22. The majority of local associations responded that they were willing to pay a reasonable rate for training, etc provided by NBU staff and also thought that individuals should make a contribution towards their training. When asked for a suggested rate, the responses varied considerably with some referring to a daily rate and others per hour or by type of event. Although £50 was the most common response, it is likely that any charges, if introduced, would be based on the type and location and hence costs associated with the event rather than a flat fee.

23. Similarly, a clear majority of individuals indicated that they were willing to pay a contribution towards the cost of training events organised and run by the NBU and also considered that it was reasonable for local associations to contribute towards the cost of training events. The level of the suggested contribution ranged between £10 and £100 but the most popular amount was £20.

24. It should be noted that two national beekeeping associations did not support the introduction of charging. They cited the contribution that beekeepers made to the economy through pollination services and the input made by bee farmers by both supplying substantial numbers of members to the Inspectorate, by being educators in BBKA associations and by supplying bees and mentoring in the amateur sector. It was also commented that the NBU was already funded from the public purse and received funding under the EU Apiculture programme for the provision of training and education events and therefore the proposal to introduce charges was not appropriate.

**Q7. Do you have any other suggestions on how we might change or re-focus current pest and disease control policies and actions to improve health outcomes for honey bees?**

25. Some responders noted that there was good scientific evidence that many pest and disease problems had been caused by international trade and considered there was strong justification for a ban on the import of honey and bumble bees.

## Q8. Do you have any other suggestions on how government can work more closely with national and local associations to improve pest and disease control of honey bees?

26. It was suggested that more formal discussions with a wider remit and dialogue between the national beekeeping associations would be beneficial. An agreed list of priorities on an annual basis making it clear where beekeepers should be addressing their principle efforts would also be useful. There was a comment expressed regarding the availability of NBU advisory leaflets with concern that these had been restricted under the Government's marketing policy.

27. Another responder would like to see a re-focussing of the current pest and disease policies to take account of the disease relationships between different insect groups. In particular, a more joined up approach on the regulations controlling bumble bee imports with more user friendly information for importers and suppliers.

28. There were over 60 suggestions other suggestions noted under these headings. These included:

- More/better education was necessary. Beekeeper trainers should be registered with the NBU
- Government should work with beekeeping associations to develop standards and protocols
- There should be more focus on domestic queen rearing
- Imports of bees should be banned or better controlled. Similar controls should be introduced for honey.
- There should be more bee inspectors. There should be an annual presentation to every local association by a bee inspector
- Pesticides should be banned/more pesticide research on the effect on bees was needed
- More use should be made of social media. NBU should produce training clips for You Tube

- Landowners should be encouraged to increase foraging. Countryside stewardship schemes should be broadened to give farmers more incentives to plant wild flowers
- Free Nosema testing/LFD kits should be available for beekeepers

## Q9. Do you have any comments on the preliminary draft impact assessment (see separate document)?

29. There were a very limited number of respondents which made any comments on the impact assessment.

## Q10. To help Defra prepare for discussions and negotiations from autumn 2012 to 2014 on changes to the EU's animal health legislation, what are your initial views on possible additional regulatory controls on beekeepers/suppliers, such as compulsory registration of beekeepers, or specific requirements for nucleus or queen suppliers to reduce risk of disease spread?

30. Associations had mixed views regarding the introduction of compulsory registration. Although there was a good level of support for registration and a recognition of the benefits that this would achieve, there were also a number of concerns. It was considered that compulsory registration would have a negative effect on beekeeping and act as a deterrent to people wishing to take up the craft. Some stakeholders considered that it was difficult to see what compulsory registration would achieve over the current voluntary system and were concerned about the costs involved.

31. There was significant support for more controls on the sales of bees either through the registration of suppliers or the certification of bees prior to sale. Again, costs of enforcement were highlighted as a concern by some responders.

### Other responses

32. As noted earlier, 4 organisations replied in general terms rather than responding to the consultation. One thought the Government should introduce a guaranteed compensation scheme for hives lost similar to agricultural losses due to TB. Another recognised the general principles on which the proposed changes for bee health management are based but emphasised the need for more skilful beekeepers if the objectives are to be achieved. A greater focus on queen rearing skills and queen introduction would enable imports to be minimised with a commensurate reduction in the risk of the introduction of exotic pests and diseases. Evidence concerning the impact of pesticides on bees and other pollinators was also provided by one company.

## Next steps

33. Defra and the Welsh Government are grateful to the number of respondents who took the time to provide their comments on the consultation. We are pleased that there was significant support for many of the proposals. The next steps will be taken forward with the guidance of the Bee Health Advisory Forum (BHAF). Information about the BHAF is available on the NBU's BeeBase website at

<https://secure.fera.defra.gov.uk/beebase/index.cfm?pageid=339>

### Question 1

- The objective of bee health policy will be amended as agreed.

### Question 2

- The NBU will work with the beekeeping associations on an implementation plan for the proposals detailed at paras 11-13.
- This will include the development of criteria for DASH and consideration of its availability to all beekeepers.
- The NBU will, as noted in the consultation, undertake further consideration of the control policies for EFB as regards the proposal that destruction is the first option.

### Question 3

- The NBU is working with the beekeeping associations through the BHAF to provide transparency regarding budgets and expenditure.
- The results of all Defra funded research is already available on the Gov.uk website

### Question 4

- The possible introductions of sanctions to address poor beekeeping will be considered further and proposals will be discussed with the beekeeping associations. Depending on the outcome of these discussions, a separate consultation will be issued if it is decided to take these proposals forward.

### Questions 5 and 6

- This will be considered further in collaboration with the BHAF.

### Questions 7 and 8

- Defra and the NBU will consider the suggestions made and discuss whether any should be taken forward with the BHAF.

## Question 10

- Compulsory registration and controls on suppliers: The views of respondents will be passed to Defra colleagues with responsibility for negotiations on the new animal health law. Stakeholders will continue to be kept informed of these and other developments in this area.

## Consultation responses

### Beekeeping Associations

Andover Beekeepers' Association

Barnet and District Beekeepers' Association

Basingstoke and District Beekeepers' Association

Bedfordshire Beekeepers' Association

Bee Farmers' Association

Bee Improvement and Bee Breeders' Association

Brighton and Lewes Beekeepers

British Beekeepers' Association

Carlisle Beekeepers' Association

Chesterfield and District Beekeepers' Association

Cumbria Beekeepers' Association

Enfield and District Beekeepers' Association

Epsom division of Surrey Beekeepers' Association

Furness Beekeepers' Association

Hampshire Beekeepers' Association

Kendal and South Westmoreland Beekeepers' Association

Keswick Beekeepers

Lincolnshire Beekeepers' Association

Meon Valley Beekeepers

Meridian Beekeepers' Association

New Forest and District Beekeepers' Association

North London Beekeepers' Association

Petersfield and District Beekeepers' Association



Romsey and District Beekeepers' Association  
Somerset Beekeepers' Association  
Surrey Natural Beekeeping  
Sussex Beekeepers' Association  
Weybridge Division of Surrey Beekeepers' Association  
Wimbledon Beekeepers' Association  
Winchester and District Beekeepers' Association  
Worcestershire Beekeepers' Association  
Wokingham and District Beekeepers Association  
Yorkshire Beekeepers' Association

## Government Departments/Non-Government Organisations/Companies

Arcadian Apiaries Ltd  
Beckys Beezzzs  
Bee Diseases Insurance Ltd  
Blue Planet Hydrogen Ltd  
Board for the National Diploma in Beekeeping  
Camberley Garden Apiaries  
Cornwallhoney.co.uk  
Hampshire County Council  
Happy Bees  
International Bee Research Association  
Natural England  
National Farmers Union of England and Wales  
Sazini Associates  
Scottish Natural Heritage  
+ 137 individuals