

Improving Honey Bee Health: Responses to the Bee Health Policy Review

by Kim Chadwick and Marie Holmes, Defra Policy

Summary

Defra and the Welsh Government would like to thank the number of beekeeping associations, beekeepers and others that took the time to respond to the consultation. As a result of these responses, the objective of the bee health programme has now been broadened to put more focus on other pests and diseases, such as varroa. The NBU is working with beekeeping associations on an implementation plan for measures to be included in the programme and a timetable for their introduction. A number of these measures build on the existing work of the NBU and will benefit beekeepers by: raising the profile of varroa and improving the management of the pest; developing guidance and advice and training on nosema; increasing the chances of early detection of the Small hive beetle and Asian hornet and providing advice on effective management; raising awareness of AFB and EFB outbreaks and risks; formalising and developing DASH (Disease Accreditation Scheme for Honey bees). This scheme is intended to recognise and reward good practice, mainly for commercial and semi-commercial beekeepers, subject to specific criteria being met. There are still a number of elements arising from the consultation which are under review, such as the control policies for EFB, the introduction of sanctions for poor beekeeping and the possibility of charging for training events. These will be taken forward with the Bee Health Advisory Forum.

Kim Chadwick, Policy Advisor, Defra

The bee health review

In 2009, Defra commissioned the National Bee Unit (NBU) to undertake a survey of honey bee pests and diseases with the aim of using the results to inform a review of current policies on managing these risks. The NBU carried out this Random Apiary Survey between 2009 to 2011, visiting and sampling around 5,000 apiaries selected from our BeeBase database of beekeepers in England and Wales (See *BBKA News*: 2012, June, p21 for more details). When results started to become available in the second half of 2011, Defra initiated a review of its pest and disease control policy. The review considered how best to manage pests and diseases in the future so that: the optimum policies and interventions are in place; priorities for future collective action (partnership working) by Government and beekeepers are clear, and we are making the best use of current public funding/resources for this programme in order to sustain a healthy honey bee population for pollination. The review was undertaken by the Food and Environment Research Agency (Fera), on behalf of Defra and the Welsh Government (WG), with the NBU, representatives from commercial and amateur Beekeeper Associations (BKAs) and an independent scientist over the twelve months from July 2011. You can read detailed documentation produced during the review at: <https://www.gov.uk/government/consultations/improving-honey-bee-health>. The review generated a number of proposed changes to current bee health policy which were subsequently presented for Public Consultation in January 2013.

The consultation period closed on 9 March 2013. Defra and WG were pleased with the high response rate, not just from stakeholder groups but also from individual beekeepers, which has allowed really helpful feedback to be collated. Summarised below are the proposed policy changes and respective public responses obtained through consultation.

Proposed policy options

The review set out three options for future policies:

- Refine and build on current policies with a renewed commitment to collective action by Government, beekeepers and BKAs.
- Maintain current policies with no change.
- Do the minimum required to meet current EU obligations, which would include:
 - Removing European foul brood (EFB) from disease control programmes in England and Wales.
 - Stopping registration of beekeepers on BeeBase.
 - Stopping the NBU's targeted surveillance programme.

Defra and WG recommended the first option, which seeks to build on current pest and disease control policies and set the future direction for these policies. This includes a renewed commitment for collective action by Government, beekeepers and Associations to manage and reduce serious pest and disease risks and

colony losses. A 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 exotics become established in the UK. The review team estimated that if the new policies highlighted under the first option could be effectively delivered between now and 2020, the total economic benefit, i.e. the reduction in economic losses by beekeepers and improved crop pollination, would be ~£68m per annum over the current policies and practices; a significant improvement. By contrast, it was considered that the third option 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 cease.

Proposals under the preferred option

- Enabling beekeepers and improving their self-reliance, e.g. by sharing data and analysis on pest and disease risks with beekeepers; by planning, coordination and delivery of education and training.
- Tackling causes of problems, not just the symptoms, e.g. improving the response by Government, supported by BKAs, 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. Income generated would provide additional resources for Government's renewed commitment to improving beekeepers' management of varroa to reduce colony losses.

The consultation process

Through the process of consultation a total of 184 responses were received. These comprised 34 from national and local BKAs; fourteen from other Government departments, non-government organisations (NGOs) 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 two individuals simply commented on the format of the consultation rather than the specific issues raised in the documentation. You can find the full list of responders at: <https://www.gov.uk/government/consultations/improving-honey-bee-health>. The following paragraphs summarise the responses made in favour of, and against each of the questions raised in the consultation document. Additional 'general responses' are also provided at the end.

Summary of responses

Question 1: The review proposes that the overall objective of the Bee Health Programme should be revised: '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'. There was significant support from all responders for this revision. Two responses also highlighted the role of bumble bees and other pollinators, suggesting 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.'

QUESTION 1. Do you agree with the proposed revision to the objective for the overall programme?

	Yes	No	UD	NC
Individuals:	92	7	0	3
National & Local BKAs:	32	0	1	1
Others*:	8	0	2	0
Total:	132	7	3	4

UD = Undecided; NC = No comment;
*Others = other Government departments, NGOs and companies

Question 2: Although the review team considered a variety of endemic and exotic pests of honey bees, seven organisms were identified as priorities for action (see <https://www.gov.uk/government/consultations/improving-honey-bee-health>): American and European foul broods (AFB & EFB), varroa, nosema and those exotic pests and diseases which are currently absent but may be a future threat; specifically Small hive beetle, *Tropilaelaps* mites and the Asian hornet. The review makes a series of recommended changes to current policies regarding the objectives and strategic goals for these seven priority species, detailing the scope of the proposed changes and the case for and against. These changes are:

- **AFB and EFB.** It was proposed that the better regulation approaches of recognising and rewarding good practice would be formalised and extended mainly for commercial/semi-commercial beekeepers (Disease Accreditation Scheme for Honey bees; DASH) subject to Bee Inspectors' case-by-case assessment of the competence and ability of these beekeepers to manage and control AFB and EFB outbreaks. Additional proposed measures were:
 - A more formalised approach by the NBU, assisted by the BKAs, to raise beekeepers' awareness about AFB

and EFB outbreaks and risks.

- 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.
- Target beekeepers with recurrent EFB outbreaks to improve their management of this disease and to eliminate/reduce its recurrence and incidence.
- Improve the ability of beekeepers to detect and manage AFB and EFB, including the causative agents/pathogens.

Regarding 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 and 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, plus 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 the contingency plan through exercises including the 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

QUESTION 2. Do you agree with the recommended changes to current policies?

	Yes	No	UD	NC
Individuals:	79	14	4	5
National & Local BKAs:	29	2	0	3
Others*:	9	1	0	0
Total:	117	17	4	8

UD = Undecided; NC = No comment;
*Others = other Government departments, NGOs and companies

monitor viruses associated with CCD, such as Kashmir Bee Virus (KBV) and Israel Acute Paralysis Virus, as part of its existing surveillance programme as resources allow.

Recommendations were strongly supported with many recognising the significant impact that varroa had on beekeeping. 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. 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 were met. 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.

Question 3: If responders disagreed with any of the recommended changes, they were invited to identify for which pest or disease and which aspect(s) and explain why they disagreed. One national association and a NGO 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. 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. 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. Other comments made included a suggestion that a combined NBU/BKAs 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.

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QUESTION 4. 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?

	Yes	No	UD	NC
Individuals:	60	36	3	3
National & Local BKAs:	21	9	3	1
Others*:	6	3	0	1
Total:	87	48	6	5

UD = Undecided; NC = No comment;
*Others = other Government departments, NGOs and companies

Question 4: Responders were asked if they would support 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. 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 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. Administrative and enforcement costs involved were also raised as an issue.

Questions 5 and 6: Responders were asked whether associations or beekeepers, respectively, both nationally and locally, covering bee farmers and hobby beekeepers, are prepared to pay a realistic contribution towards the costs of lectures and training events delivered by NBU staff and Bee Inspectors and, if so, how much would be realistic. The majority of local BKAs 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. 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 BKAs 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. It should be noted that two national BKAs 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.

QUESTION 5. Are associations prepared to pay a realistic contribution towards the costs of lectures and training events delivered by NBU staff and bee inspectors?

	Yes	No	UD	NC
Individuals:	60	14	4	23
National & Local BKAs:	26	6	2	0
Others*:	4	2	1	3
Total:	90	22	7	26

UD = Undecided; NC = No comment;
*Others = other Government departments, NGOs and companies

QUESTION 6. 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?

	Yes	No	UD	NC
Individuals:	73	21	4	4
National & Local BKAs:	25	6	1	2
Others*:	3	4	0	3
Total:	101	31	5	9

UD = Undecided; NC = No comment;
*Others = other Government departments, NGOs and companies

Question 7: Responders were asked: 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? 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.

Question 8: Responders were asked: 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?

It was suggested that more formal discussions with a wider remit and dialogue between the national BKAs 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. 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. There were over sixty other suggestions noted, including:

- More/better education is necessary.
- Beekeeper trainers should be registered with the NBU.
- Government should work with BKAs 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 YouTube.
- Landowners should be encouraged to increase forage for bees. Countryside stewardship schemes should be broadened to give farmers more incentives to plant wild flowers.
- Free nosema testing/Lateral Flow Device (LFD) kits should be available for beekeepers.

Question 9: Responders were asked: Do you have any comments on the preliminary draft impact assessment? There were a very limited number of respondents which made any comments on the impact assessment.

Question 10: 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?

Associations had mixed views regarding the introduction of compulsory registration. Although there was a good level of support for registration and 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. 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

As noted earlier, four 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

Defra and the WG 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>

Actions

Question 1: The objective of bee health policy will be amended as agreed.

Question 2: The NBU will work with the BKAs on an implementation plan for the proposals detailed in the review, including the development of DASH and consideration of its availability to all beekeepers. A working protocol is currently under development and training in the accreditation/assessment has already begun with an initial group of bee farmers, with whom baseline apiary inspections are scheduled for April 2014. The NBU will, as noted in the consultation, undertake further consideration of the control policies for EFB on the proposal that destruction is the first option.

Question 3: The NBU is working with the BKAs through the BHAF to provide transparency regarding budgets and expenditure. The results of all Defra-funded research is already available on the main Government website www.Gov.uk.

Question 4: The possible introductions of sanctions to address poor beekeeping will be considered further and proposals will be discussed with the BKAs. 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: The views of respondents to compulsory registration and controls on suppliers will be passed to Defra colleagues with responsibility for negotiations on the new animal health law. ✚

Further information

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 which can be found on Defra's website at: <https://www.gov.uk/government/consultations/improving-honey-bee-health>. Any enquiries regarding this document should be sent to us at:

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