

Response of the Scottish Beekeepers' Association to the Consultation on the Honey Bee Health Strategy in Scotland.

Following consideration of the draft document 25/09/2008, the Scottish Beekeepers' Association (SBA) would like to draw the attention of the SGRD to the following:

1. The Strategy document should demonstrate clear recognition in the opening section of the Executive Summary and in the Background section to Part 1 that, in addition to disease threats, bees face threats from pesticides. In particular, systemic neonicotinoid pesticides such as imidacloprid, fipronil and clothianidin, which are used in agriculture, horticulture and in the domestic setting, pose unquantified risks due to long term low dose exposure of brood, queens and drones, as well as worker bees. However, it should be noted that there are equal concerns about possible toxicity of pesticides used by beekeepers. Research in these areas is urgently needed.
2. In the case of the neonicotinoids, pending the results of toxicity research, Scotland should follow the lead of some other European countries and suspend use of these chemicals. If this is not a devolved matter, SG should work towards achieving a UK-wide solution. Suspension of systemic neonicotinoid pesticides use should be a clear outcome pending clarification of the risks they pose to bees and beekeeping.
3. The strategy should demonstrate recognition in the opening section of the Executive Summary and in the Background section to Part 1 that, in addition to disease and pesticide threats, bees face threats from environment/climate change. Wet summers negatively impact collection of pollen and nectar, while warmer winters prolong the period when brood is available for *Varroa* increase.
4. The strategy should demonstrate clear recognition in the opening section of the Executive Summary and in the Background section to Part 1 that, in addition to other threats, bees face threats from habitat loss. This is primarily due to changes in land use practices in some areas of the country, and has been exacerbated recently by the abandonment of "set-aside" in agriculture. SG should work towards reversing this loss of habitat, and this should be identified as a clear outcome.
5. Outcome 1: The SBA welcomes the intention to improve communications and strengthen relationships. The proposed annual meeting would ideally occur shortly before DEFRA's Annual Meeting with Beekeepers (which the SBA attends). Improving communications and strengthening relationships at all levels is probably the most important outcome of the Strategy, and one which is an absolute requirement for success. The annual meetings would ensure sharing of information originating with all stakeholders. Note: the annual meeting should be in addition to interim meetings of a smaller Working Group (see 26. below), which would serve an executive function with respect to implementation of the strategy and monitoring of progress.
6. Outcome 1: There is no significant research effort in Scotland, although opportunities exist for research to be developed. This is particularly the case a.) for epidemiological studies, because of the absence of *Varroa destructor* in some areas, and b.) for genetics research, both because Scotland has a world-leading research base in livestock genetics and is also

still home to the native black honey bee *Apis mellifera mellifera*. These constitute clear comparative advantages for Scotland in terms of livestock/bee research.

7. The title of Outcome 2 should be altered to “Improved disease and pest control” to reflect the fact that surveillance and monitoring alone will not achieve the desired results.
8. Outcome 2: The SBA strongly endorses provision of a rapid and responsive diagnostic service. This should be modelled on that available to keepers of other species of livestock by the SAC’s.
9. Outcome 2: The SBA strongly supports the development of a database of beekeepers in Scotland and believes that compulsory registration of all beekeepers is required for development of a meaningful record. Registration should not involve costs to beekeepers and should come with practical incentives. It would also be important to make clear to beekeepers the advantages of registration and of the database.
10. Outcome 2: The SBA together with the University of Strathclyde conducts biennial surveys of beekeeping in Scotland, the results of which are widely promulgated in the beekeeping and scientific literature. This covers all aspects of the craft but has a focus on disease. Government support for this effort would help to make it more effective, and SGRD input into the design of the surveys would be welcome. This could become a cornerstone of a successful Strategy and an important means of measuring progress.
11. A major problem among beekeepers is poor record-keeping. Development of a standardised form for recording would help, and could possibly be developed around the legally-required record of use of authorised treatments. Record-keeping should include information on colony movements and acquisitions of bees (including queens) by gift /purchase and swarm capture.
12. Outcome 2: Bee inspectors need to be trained and routinely active in the field at the level of individual apiaries. A mechanism through which to place them in the field could be random testing for notifiable diseases. A beekeeper database would be invaluable here. The objective should be a bees inspection service akin to that provided in England and Wales.
13. Outcome 3: Beekeeper education is a key area for improvement. While SGRD plays a valuable and appreciated role, the SBA and local associations (LA’s) are the principal educators in Scotland. The SBA provides recognition of achievement through a formal structured examination programme. Government endorsement of, and possible input into this programme would be welcome.
14. Outcome 3: To complement the examination programme, a standardised structured teaching programme should be developed and implemented through the LA’s, with the SBA providing quality control. Funding would be required for this for manuals, teaching aids and materials and travel for monitoring purposes.
15. Outcome 3: Everything possible should be done, including provision of funding and guidance, to encourage and facilitate the establishment of training apiaries by LA’s.

16. Outcome 3: While minimising inbreeding of honey bees is an important objective, it should be recognised that home-rearing of queens and even exchange of stocks will not necessarily achieve this. Moreover, a related objective should be an improvement in the gene pool in terms of the potential for all aspects of production (contributing traits being pollinating effectiveness, honey production, temperament, disease resistance etc.). Scotland is home to some of the best livestock genetics research in the world, and, with appropriate funding, this could be leveraged in support of genetic improvement of honey bees and conservation of their diversity. Note: Scotland holds the greatest honey bee genetic diversity in the UK.
17. Linked to the preceding point, uniquely in the UK, parts of Scotland are still home to the dark northern European honey bee *Apis mellifera mellifera*. Conservation of this threatened gene pool should be an outcome of the Strategy.
18. The SBA is opposed to the importation of honey bees on grounds of disease risk and genetic erosion. An objective of the Strategy should be a ban on importations other than for research purposes under carefully controlled conditions, with transitional arrangements and financial encouragements to queen-rearing enterprises.
19. Outcome 4: There is no evidence at the present time that CCD requires special attention in Scotland, although ongoing vigilance is required.
20. Given that some areas of Scotland are varroasis-free, efforts should be made to ensure this remains so for as long as possible. In the case of some of the islands there is no reason why this status should not be maintained indefinitely. To that end changes embodied in the 2007 legislation that lifted restrictions on bee movements from varroa-infested areas into varroa-free areas should be reversed. **This is an urgent matter.** [See also 6. relating to research benefits of *Varroa*-free stock).]
21. Roles and Responsibilities of Stakeholders. This section could usefully include the Scottish Beekeepers' Association and Local Beekeeping Associations, emphasising their role in setting standards through examinations (SBA), in education, in dissemination of notices and information (in part on behalf of Government) and in assisting in control of new diseases and imported pests.
22. An additional outcome should be an increase in numbers of practising beekeepers (and managed colonies) in Scotland. This is required in order to reduce the impact on the national honey bee population of the ongoing loss of feral bees due to varroasis.
23. Given the vital role of the national and local associations in achieving objectives, an increase in the proportion of beekeepers who are members of the associations should be an outcome of the Strategy.
24. There is a notable lack in the draft strategy document of measurable indicators of success/failure and means of verification with respect to achieving Outcomes. These are essential for success. Stakeholder discussions could assist in identifying them.
25. It is suggested that Government is seen to recognise in the Strategy that the SBA serves as the usual representative of the amateur beekeeping community in Scotland. This will have

two positive effects. First, it will encourage beekeepers to become members of the SBA, and second, it will give formal recognition to the fact that the SGRD regards the SBA as the voice of amateur beekeeping in Scotland.

26. In order to ensure timely action, it is vital that a Steering and Oversight Committee is formed at the earliest opportunity. This should have representation of all stakeholders. To be effective it should meet at least twice per year following an initial series of meetings to develop a workplan/milestones /measurable indicators etc..

End.