The Native Irish Honey Bee, *Apis mellifera mellifera, (A.m.m.),* also called the Black Bee or the Dark European Honey Bee was originally widespread throughout the whole of northern Europe but sadly is no longer prevalent there now, due to hybridisation with other sub-species.

Status in Ireland: Scientific research and DNA analysis has confirmed the Irish *A.m.m* strain to be both pure and distinct in the paper 'A significant pure population of the dark European honey bee (Apis mellifera mellifera) remains in Ireland (tandfonline.com)' https://doi.org/10.1080/00218839.2018.1433949

Thankfully the black bee is still very much alive in Ireland and is the one kept by most beekeepers (1) but it is severely threatened due to hybridisation with imported non-native sub-species as well as the effects of diseases that may be imported with non-native bees.

Along with other bees and pollinators generally, it is struggling due to habitat loss, pesticide use and intensive agriculture – **sadly, 1/3rd of all Ireland's bees are at risk of extinction**.

So the future of *Amm* is under threat of extinction due to increasing importations of non-native honey bees subspecies. Unlike other animals like cattle or pigs, honey bees fly freely and mate openly so the native bee cross-breeds with the imported one - resulting in hybridisation. When this happens, the resulting bee can be aggressive and loses the valuable characteristics and behaviours that have allowed it to thrive in our particular climate for thousands of years.

The other problem with importing honey bees is the danger of also importing pests, diseases and pathogens. A prime example of this was the Varroa mite which was brought into Ireland on imported honey bees and which then decimated honey bee populations, from which we are still suffering. One of the most distressing new pests is the Small Hive Beetle which has spread into some parts of Italy and which would have a devastating effect if it arrived here – many bees are already imported from Italy and at the moment there is a major risk due to some bee importers trying to circumvent the Brexit rules and the Northern Ireland protocol.

The importance of protecting local honey bees is now being recognised throughout Europe (2).

NIHBS is a member of the **Irish Native Rare Breeds Society**, **INRBS**. We very much support their non-intensive methods of farming and feel that native honey bees would happily complement their ethos of working with breeds most suited to maintaining wildlife habitats, biodiversity and generally being kinder to and working with nature.

Instead of being penalised, farmers must be incentivised to protect and improve biodiversity e.g. they should be encouraged to keep excellently maintained hedgerows which are essential corridors and habitats for a healthy wildlife population and they must be dissuaded from ripping out corners of fields which are essential to the survival of solitary and bumble bees.

When farmland was a dense mosaic of thick hedgerows, species rich grassland and pollinator-friendly plants like Dandelion, Clover, Gorse, Hazel, Willow, Holly, Blackthorn, Hawthorn, Bramble, Knapweed, Rosebay Willowherb, Dandelion, Sycamore, Lime, Chestnut and Cherry beekeepers produced much more honey - we could do that again.

For many years now we watch thousands of acres of gorse and other vegetation being removed - this is a valuable source of pollen and food for bees which should be valued.

On the other hand farmers have been paid to create artificial habitats which may never mature in the time span of some of the environmental schemes, usually five years.

We are fighting for the native honey bee NOT to become a rare breed but we want it to be recognised as a 'livestock unit', with the same status afforded to it as to the other 'native rare breeds' and therefore to also be entitled to those supports and protections. We suggest:-

- Support for hives of native *A.m.m.* bees would be a natural inclusion to the Biodiversity Enhancement part of EU strategies.
- It should be included in Pillar 1 as an Eco Scheme option
- As regards eligible livestock species, 1 hive of native honey bees would represent a livestock unit, the first 4 units would be entitled to €500 per LU and subsequent LUs to €250 each.
- We suggest a maximum of 6 livestock units (hives) per apiary site would be eligible for payment as we are conscious of the need to also look after wild pollinators.
- Farmers who provide a secure site for native honey bees should be incentivised

Premiums should also be payable for any farmer contributing towards

- Conservation of Solitary & Wild Bees, including Bumbles
- Proper maintenance and Laying of existing Hedgerows,
- Planting new or regenerating existing hedges,
- Leaving field margins beside hedges for wildlife, encouraging wildlife corners
- Low Input Permanent Pasture,
- Traditional Hay Meadows
- Planting Native Trees,

The All Ireland Pollinator Plan has excellent initiatives which the CAP should include e.g:-

- Incorporate relevant evidence-based pollinator-friendly actions and prescriptions into agricultural and agri-environment schemes.
- Encourage the responsible and sustainable use of pesticides (insecticides, herbicides and fungicides) in RoI.

Ireland has a duty and responsibility to conserve its native honey bee which is part of our genetic natural heritage; native beekeepers need help to do that.

Appendix.

(1) Two recent studies, one by NUI Galway and one by IBA (Irish Beekeepers Association) both showed there is significant support for the native bee, the majority of beekeepers in Ireland work with *Amm*, NUIG study found approx. 90% and IBA 82% keeping native honey bees.

(2) In March 2018, an EU Report on **Prospects and challenges for the EU apiculture sector** (2017/2115(INI)) "Calls on the European Commission and Member States to put in place measures to increase legal protection and financial support for **local honey bee ecotypes and populations** throughout the European Union, including by way of legally protected locally endemic honeybee conservation areas. Reiterates concerns that increased mortality and the decline in honeybees and wild pollinators, including wild bees, in Europe will have a profound negative impact on agriculture, food production and security, biodiversity, environmental sustainability and ecosystems.."