



PHIRA-Science,  
Ffynnongrech,  
Llandybie,  
Ammanford,  
SA18 3JX. UK.

maggie.gill@phira-science.org

6<sup>th</sup> February 2026

To whom it may concern,

I am writing on behalf of the Native Irish Honey Bee Society to draw attention to a serious and emerging biosecurity threat to honey bees and to request that the Irish and Northern Irish Government urgently review current honey bee importation policies. In particular, we ask that consideration be given to prohibiting, the importation of live honey bees as a precautionary measure to protect Ireland's beekeeping sector and native honey bee populations.

My name is Maggie Gill. I am the founder and principal researcher at PHIRA-Science, an independent, non-profit research organisation operating internationally to advance pollinator protection through applied scientific research. PHIRA-Science's work focuses on pollinator health, pest and disease detection, and ecosystem resilience, with research activities spanning multiple regions and beekeeping systems. Alongside this role, I am a Senior Entomologist at the UK Department for Environment, Food and Rural Affairs (DEFRA), and I previously worked for over ten years as a seasonal and regional bee inspector with the National Bee Unit. For the past three years, my research has focused on emerging honey bee pests, including specialist work on *Tropilaelaps* mites.

*Tropilaelaps* mites, specifically *Tropilaelaps mercedesae*, are among the most serious emerging threats to honey bees worldwide. Native to Asia, these mites naturally infest giant honey bees (*Apis dorsata*), but they have successfully jumped host species and now infest the western honey bee (*Apis mellifera*). Once established, *Tropilaelaps* reproduce rapidly, cause extensive brood damage, and can lead to swift colony collapse, making them particularly difficult to manage. Their small size (1 mm x 0.5 mm) and biology make them particularly difficult to detect in honey bee colonies, and infestations are usually only noticed when high colony losses are investigated.

In 2024, *Tropilaelaps* were confirmed in Europe for the first time, with detections in the Georgia and in two regions of western Russia near the Black Sea. However, it is increasingly clear that these confirmed reports are likely to underestimate the true extent of their spread. There are credible scientific reports from Crimea and Belarus that have not been formally acknowledged by local authorities or WOAHP but are consistent with *Tropilaelaps* infestations and indicate a distribution further north and west than previously recognised.

Experience suggests there are strong disincentives to formal reporting once *Tropilaelaps* is suspected or detected. Beekeepers may face compulsory destruction of colonies, movement restrictions, and severe financial losses, while

governments may be reluctant to acknowledge infestations due to the economic and trade implications. I receive frequent anecdotal reports from beekeepers in countries in Eastern Europe suggesting the presence of *Tropilaelaps*, yet confirmation is often avoided. Taken together, this strongly suggests that *Tropilaelaps* may already be more widespread across Europe and neighbouring regions than current official data indicate.

The movement of honey bees is a major and well-recognised pathway for the introduction of *Tropilaelaps*. The importation of queens, package bees, or entire colonies presents a clear and preventable route by which this parasite could enter Ireland. Other transmission pathways should also be considered, including used beekeeping equipment. *Tropilaelaps* mites are capable of surviving on dead adult bees and brood for up to nine days, meaning used beekeeping equipment presents a genuine risk. There is also potential for transmission via feral honey bee colonies associated with freight and shipping containers arriving at ports and docks.

In considering these risks, it is also important to acknowledge that both the Republic of Ireland and Northern Ireland currently operate with relatively limited honey bee inspectorate capacity. While inspectorates provide valuable support to beekeepers, resources are constrained, and the early detection and containment of a rapidly spreading parasite such as *Tropilaelaps* would be challenging under current arrangements. This reinforces the importance of prevention rather than reliance on post-incursion detection and control.

Ireland's island status presents a rare opportunity to take a precautionary and preventative approach to honey bee biosecurity. Once *Tropilaelaps* becomes established, eradication would be extremely difficult, if not impossible, with profound consequences for beekeepers, pollination services, and the conservation of Ireland's native honey bees.

In light of the above, the Native Irish Honey Bee Society respectfully requests that the Irish and Northern Irish Government urgently review current honey bee importation policies, with a view to introducing a ban or moratorium on the importation of live honey bees, alongside strengthened controls on other identified risk pathways such as used beekeeping equipment. Such measures would represent a proportionate and forward-looking approach to safeguarding Ireland's honey bees.

I would be very willing to provide further scientific information or evidence in support of this request.

Yours faithfully,

Maggie Gill

Founder & Principal Researcher | PHIRA-Science.

Senior Scientist | Future Farming & Countryside Programme | Department for Environment Food and Rural Affairs.