**Pennsylvania State Beekeepers Association**
**www.pastatebeekeepers.org**

November 9, 2026

To Whom it may concern,

On Saturday, November 7, the Pennsylvania State Beekeepers Association held its annual fall conference in State College. During the afternoon business and membership meeting, the proposed Pennsylvania Farm Bureau policy recommendations were presented and read aloud to more than 100 members in attendance. Following discussion, a motion to formally oppose all the proposals was introduced and unanimously passed, with the reasons for our opposition noted under each policy recommendation. At the direction of our Executive Committee, I am writing on behalf of our Association to formally communicate our position and explain our concerns.

The grassroots policy development process is both a foundational principle and a defining characteristic of Pennsylvania Farm Bureau and one of the organization's greatest strengths. This process allows individual members to raise concerns and influence policies regardless of their agricultural interests or the size of their operations. We respect this approach and believe that open discussion, even when opinions differ, provides valuable opportunities to educate members about issues affecting other agricultural industries. However, beekeepers remain largely underrepresented at the county and state levels. While Farm Bureau has several knowledgeable and respected beekeeper members who advocate for our industry, their voices are not always heard in local policy discussions. Consequently, proposals affecting beekeeping can advance without a full understanding of their broader implications for agriculture, including fruit and vegetable production, pollination services, and local honey markets.

The Pennsylvania State Beekeepers Association values the influence and importance of Pennsylvania Farm Bureau and welcomes the opportunity to strengthen our relationship. We conservatively estimate that more than 12,000 individuals across Pennsylvania's 67 counties maintain and manage approximately 80,000 honey bee colonies. These beekeepers represent a diverse agricultural community, ranging from backyard hobbyists to large commercial operations. Their contributions extend well beyond beekeeping, as honey bee pollination directly supports fruit and vegetable producers and other agricultural operations represented by Pennsylvania Farm Bureau. The health and sustainability of our beekeeping industry are therefore shared agricultural interests. We believe there is considerable opportunity to increase beekeeper involvement in Farm Bureau and collaborate on policies that support beekeepers, protect pollinators, and benefit Pennsylvania agriculture as a whole. A stronger partnership would allow our organizations to share expertise and advance common legislative priorities.

The Pennsylvania State Beekeepers Association formally and unequivocally opposes all the proposed resolutions identified in the attached resolution sheet, as we believe their adoption would have significant negative consequences for beekeepers throughout Pennsylvania. Our concerns focus on the potential impact of these proposals rather than the intentions of those who submitted them. We see no meaningful benefit to

backyard, hobby, sideline, or commercial beekeepers, nor any demonstrated improvement to honey bee health and welfare. Instead, these proposals appear to address problems that have not been clearly established while potentially imposing unnecessary restrictions and additional burdens on beekeepers. These consequences could also extend to other agricultural producers who depend on healthy honey bee populations for pollination.

Our members are actively engaging at the county level to share their perspectives, provide meaningful input, and explain the potential consequences of these proposals for Pennsylvania beekeepers. We remain committed to working constructively with Pennsylvania Farm Bureau to strengthen communication, increase beekeeper representation, and advance policies that protect honey bees while supporting the broader agricultural community we both serve.



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**G-11 (Butler): "We recommend including honeybees in the definition of livestock."**
*Oppose.* Bees are animals under state and federal law, so calling them livestock solves no problem. It creates one. Nearly every municipality restricts livestock on small lots and requires it to be fenced in. Bees fly, and no beekeeper can fence them. About 98% of beekeepers are hobbyists with a few hives, and a livestock label would hand towns a reason to ban them. Our policy says bees should be allowed in all local zones and opposes local hive regulation. States that call bees livestock use the label only for taxes or fees, and federal programs like ELAP list bees separately.

**G-12 (Butler): "We recommend the Department of Agriculture's Bureau of Animal Health and Diagnostic Services control the management of honeybees and beekeepers under the supervision of an entomologist."**
*Oppose.* Pennsylvania's bee program is already supervised by entomologists. It sits in the Department of Agriculture's Entomology Program, within the Bureau of Plant Industry, and is staffed by the State Apiarist and seven inspectors. The Bee Law assigns apiary inspectors to Plant Industry, so this change would require new legislation. At least 30 states run their bee programs through plant or entomology units, and USDA handles bee imports on its plant side. Neither the Department's plant division nor its animal health division supports this move. It would disrupt a working program and gain nothing.

**(122) G-13 (Butler), as amended by Group 4: "We recommend the State of Pennsylvania define the term 'raw honey' and include the terms 'unpasteurized' and 'unfiltered' in the definition."**
*Oppose.* Our current policy already asks the state to define raw honey and include "unpasteurized." That matches the National Honey Board's definition. Adding "unfiltered" creates confusion. No state uses that word to define raw honey, and Pennsylvania law does not define it. USDA defines "filtered" honey as honey with most of its pollen removed. Most raw honey is strained to remove wax and bits of comb, and every existing definition allows that. Read loosely, "unfiltered" could disqualify the strained raw honey most beekeepers sell.

**(123) G-14 (Butler): "We recommend honey that has been pasteurized and/or filtered be labeled as pasteurized and/or filtered."**
*Oppose.* Farm Bureau policy opposes required labels on production practices that do not affect nutrition or safety (AFBF 345, no. 2). Pasteurizing honey does not make it safer; the Department of Agriculture notes that even pasteurized honey can carry botulism spores. "Filtered" is not defined in state law, and nearly all honey is strained before bottling, so this could force a label onto almost every jar sold in Pennsylvania. That would confuse consumers, not inform them.

**(124) G-15 (Butler): "We recommend apiary inspections required for the issuance of a permit or permits to sell or rear queens, sell nucleus colonies or package bees, or sell used beekeeping equipment be performed with prior notification and consent of the beekeeper."**
*Oppose.* Selling queens, nucleus colonies or package bees already requires a separate permit, and the beekeeper starts that process by applying. The inspection happens because the beekeeper asked for it, so requiring prior notice and consent adds nothing. Current Bee Law also requires inspections of queen-rearing apiaries and forbids anyone from blocking an inspector. This language conflicts with that law and potentially puts the industry in jeopardy.

**G-18 (Butler): "We oppose continued management of honeybees and beekeepers under the Department of Agriculture's Bureau of Plant Industry."**
*Oppose.* This resolution opposes Plant Industry management but offers nothing in its place. The Bee Law places apiary inspectors in the Bureau of Plant Industry, so adopting it would put our policy against current law. If passed, it would leave beekepers with a policy opposing the only legal home for the program. Honey bees are tied to plant agriculture: they pollinate crops, USDA lists honey as a specialty crop, and USDA handles bee imports on its plant side. At least 30 states manage bees the same way.

**(125) G-19 (Butler): "We oppose any change from the current requirement of registering apiaries to a licensing requirement of beekeepers or beekeeper operations."**

*Oppose.* The current law already requires beekeepers to register their apiaries, and that system works. It has served our industry well and gives inspectors what they need to find hives when disease strikes. Farm Bureau policy should address real problems, not hypothetical ones. Adopting this would add clutter to our policy book without helping a single beekeeper.

**(126) G-23 (Mercer): "We recommend that honey be added to the PA food voucher program."**

*Neutral.* This would let seniors use Pennsylvania's farmers market food checks to buy local honey. Federal rules have allowed states to add honey to the Senior Farmers Market Nutrition Program since 2009, but Pennsylvania's current farmer agreement lists honey as an ineligible processed food. While this also fits our existing policy promoting Pennsylvania agricultural products, it will likely create an avenue for commercial producers to exclude local beekeepers and increase competition against them in this market.