



Proposal to replace the American Foulbrood Apiary and Beekeeper Levy with a Hive and Beekeeper Levy

Consultation Findings

FINAL REPORT

June 2019

Undertaken for The Management Agency National American Foulbrood Pest Management Plan

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Executive Summary

1. There were 477 unique submissions received in response to the consultation document.
2. 466 submissions were entered on Survey Monkey (referred to as survey respondents) and fourteen letters were sent to the Agency (referred to as letter submitters). Three survey respondents also submitted letters.
3. 49% of survey respondents owned less than eleven hives. This group of beekeepers makes up 72% of all beekeepers nationally.
4. Thirteen percent of survey respondents owned more than 500 hives. This group of beekeepers makes up 4% of all beekeepers nationally.

Survey question responses

5. 61% of survey respondents agreed or strongly agreed with the proposed approach to American Foulbrood (AFB) monitoring and auditing.
6. 63% of survey respondents agreed or strongly agreed with the proposed approach to AFB compliance and enforcement.
7. 70% of survey respondents agreed or strongly agreed with the proposed approach to charging non-compliant beekeepers to recover the costs of compliance and enforcement actions.
8. 46% of survey respondents agreed with the proposal to replace the existing apiary and beekeeper levy with a hive and beekeeper levy and 43% opposed the proposal. There was a split in views with strong opposition from the majority of owners with more than 51 hives, and strong support from the majority of owners with less than 51 hives.
9. 53% of survey respondents opposed the proposed hive and beekeeper levy charges.
10. The proposed hive and beekeeper levy charges were supported by the majority of respondents who owned less than six hives, and strongly opposed by the majority of respondents who owned more than 51 hives.

Thematic analysis

11. More than half of all the 466 survey respondents provided comments.
12. The majority of comments were provided by beekeepers owning less than 50 hives, and as such, the thematic analysis largely reflects the views of small beekeeping operations.
13. The key themes are briefly summarised below.
 - a) Proposed levy charge is too expensive and cost recovery should be sufficient
 - Levy charge is too expensive and further levy increases over time are not justified
 - Cost recovery should provide sufficient additional funds, and compliant beekeepers should not have to pay a higher levy.
 - b) Industry is struggling and commercial beekeepers cannot cope with an increased levy charge

- Incomes have reduced with falling honey prices and bad seasons
 - Industry is in a slump, morale is low, this is not the time for a levy increase.
- c) Proposed levy structure is unfair and will increase non-compliance
- A per hive levy structure will increase non-compliance and hasn't worked in the past
 - Levy structure is unfair for a variety of beekeeper groupings and exceptions, tiers or caps are needed.
- d) Proposed cost recovery plan could be too punitive and should focus on co-operation
- Punitive approach will encourage non-compliance, be difficult to enforce, and could result in legal challenges
 - Treating well-intentioned beekeepers as criminals is unfair and will not help the problem
 - Focus should be on co-operation and education and punitive cost recovery should be a last resort.
- e) Lack of confidence in the AFB Pest Management Plan and/or aspects of the proposed approach
- Plan isn't needed as AFB cannot be eliminated and the current funding levels are sufficient
 - Proposed plan doesn't go far enough and/or doesn't address the problem and/or isn't properly informed or researched and/or isn't properly costed
 - Lack of hive movement control.
- f) Support for the Proposal and/or the Agency
- Support cost recovery, strong penalties and/or enforcement plans
 - Support the proposed levy system and/or funding distribution
 - Support other new ideas or changes
 - New plan is fair and/or creates good incentives
 - Support with reservations.
- g) Lack of confidence in the Agency
- No trust in Agency competency, motivations or intentions
 - Beekeepers should have more control and self-management.

Solutions, suggestions and questions

14. There were 93 survey respondents who proposed solutions to concerns they raised in their survey response. These largely related to specific actions they wanted the Agency to consider and/or questions about which they sought an Agency response.
15. The solutions, suggestion and questions were grouped under key topic areas:
- Solutions to ensure the levy is fair, equitable, affordable, and is decreased when possible
 - Changes to cost recovery measures to prevent it being overly punitive to the unintentionally non-compliant, and to reduce the need for punitive measures

- Improve compliance, inspection and testing accuracy, and efficiency
- Agency to improve its own communication and co-operation with beekeepers, and to promote understanding and co-operation between different beekeeper groupings
- More interventions targeting non-compliant beekeepers and stronger penalties
- Inadequate controls and regulations regarding hive movement, hive testing, and elimination of infected hives and gear
- Need for an evidence based approach to prevention and elimination of AFB
- Seek government funding.

Letter submissions

16. Fourteen letters or emails were sent as submissions and key theme areas included:

- Levy cost is too high and lack of confidence money will be used wisely
- Beekeepers are in financial crisis and cannot afford this increase
- Non-compliance may increase and it has in the past under a hive levy
- Education, training, support, mentoring, assistance and early detection are key for reducing AFB
- Many have little beekeeping knowledge and education is urgently needed
- Cost recovery penalises compliant beekeepers
- Need for best practice guidelines, including taking account of new technologies
- Need to combat practice of seasonal movement of hives to temporary sites by some beekeepers which creates risks for permanent apiaries
- Paying per hive is pointless as hives die and hives swarm
- Need for goals and implementation strategies to be set in consultation with beekeepers
- Proposal should be in two parts, one about funding, and one about way AFB is controlled, and should be subject to a separate consultation.

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Proposal to replace the American Foulbrood Apiary and Beekeeper Levy with a Hive and Beekeeper Levy

Consultation Process and Findings

June 2019

Introduction

In August 2018, the Management Agency for the National American Foulbrood Pest Management Plan (the Agency) conducted a consultation amongst beekeepers to seek their views about a proposal (the proposal) to increase the American Foulbrood (AFB) Apiary and Beekeeper Levy (referred to as '2018 Levy Consultation'). Over 828 submissions were received and the majority strongly disagreed that the levy should be increased as proposed.

In response to the submissions, the Agency Board revised the proposal to replace the existing apiary and beekeeper levy with a hive and beekeeper levy. The Board also decided to fund its compliance and enforcement activities through cost recovery charges under section 135 of the Biosecurity Act 1993.

The Agency took the revised proposal back to the beekeeping community for consultation in 2019. This report summarises the consultation process and findings.

An appendix listing problems encountered by respondents in relation to the consultation document and completing the survey is also attached (Appendix One).

A. CONSULTATION PROCESS

The Agency conducted a consultation amongst beekeepers to seek their views about a proposal to increase the AFB Apiary and Beekeeper Levy.

The levy increase was proposed as the Agency has not been able to fully implement the AFB National Pest Management Plan (NPMP) due to a lack of funding.

The consultation period was for three weeks and opened on 4 March 2019 and closed at 5pm on 22 March 2019.

Communications

A new levy proposal web page went live on 4 March 2019. The Consultation Document, along with information about how to make a submission, was emailed to all registered beekeepers with a valid email address (approximately 8,100 beekeepers) on 4 March 2019. For those beekeepers without a valid email address (approximately 900 beekeepers), the levy proposal and information was posted via regular mail on 1 March 2019.

The consultation questions were placed in an online survey using the SurveyMonkey¹ platform. The online survey opened for submissions on 4 March 2019 and closed on 5pm 22 March 2019.

¹ SurveyMonkey is an online survey platform using cloud-based software.

Frequently Asked Questions (and answers) were emailed out to all registered beekeepers with valid email addresses on 19 March 2019.

The Consultation Questions

The Consultation Document contained six key questions for beekeepers to answer:

1. Do you agree to the Management Agency proposed approach to AFB monitoring and auditing?
2. Do you agree to the Management Agency proposed approach to AFB compliance and enforcement?
3. Do you agree that the Management Agency should charge non-compliant beekeepers to recover the costs of compliance and enforcement actions?
4. Do you agree that the existing 'apiary and beekeeper' levy should be replaced with a 'hive and beekeeper' levy?
5. Do you agree for the beekeeper levy to be set at \$40 per beekeeper, and the hive levy to be set at \$1.35 per hive increasing to a maximum of \$2.55 per hive over a five year period?
6. Do you have any feedback about the proposed American Foulbrood Hive and Beekeeper Levy?

Respondents were asked to select one of five responses to each the first five questions from the following options: strongly disagree; disagree; neither agree or disagree; agree; or strongly agree.

Method of response

Beekeepers were invited to make submissions online through Survey Monkey or to complete a paper version of the survey and post it to the Agency. The paper submissions were uploaded to Survey Monkey by the Agency. This method was used by the majority of submitters and these responses are referred to as 'survey responses or survey findings' in this report. As an alternative, submitters were also able to make a submission by way of a letter or email to the Agency instead of participating in the online survey.

B. THE RESPONDENTS

Survey responses

There were 466 submissions entered on Survey Monkey. This includes submissions that were mail posted to the Agency and then entered into Survey Monkey by the Agency (these submitters are referred to as ‘survey respondents’).

Not all submitters answered all the questions and/or provided comments.

Fourteen letters were sent to the Agency (these submitters are referred to as ‘letter submitters’).

Three people responded to the Survey Monkey questionnaire and also submitted a letter or email to the Agency.

Altogether the Agency received 477 unique submissions. This compares with 828 unique submissions recorded in Survey Monkey in response to the 2018 Levy Consultation.

Almost half of all survey respondents owned less than eleven hives, and this group of beekeepers makes up over 70% of all beekeepers nationally.

Table 1: Number and percentage of Survey Monkey respondents, and number and percentage of beekeepers nationally, by number of hives owned

Number of hives	2019 no of respondents	2019 % all respondents	2019 % all beekeepers	no beekeepers nationally ^{^^}	% of beekeepers nationally
1-5	180	39%	3%	5479	61%
6-10	44	10%	4%	999	11%
11-50	68	15%	6%	1148	13%
51-250	72	16%	10%	752	8%
251-500	30	7%	14%	211	2%
501-1000	26	6%	13%	191	2%
1001 or more	32	7%	17%	193	2%
Non applicable	10	2%		-	-
TOTAL	466	100%*		8973	100%*

* total slightly higher than 100% due to rounding up

** a small number of respondents skipped at least some of the questions so totals can be less than x

^{^^} current registered beekeepers as at 24 April 2019, provided byASURE Quality, February 2018

As shown on table one, the majority of hives are owned by beekeepers with more than 1001 hives and the majority of beekeepers own less than four hives. This is an important distinction as the majority of respondents to the consultation are small beekeepers. The benefits and costs of the proposed hive levy may have greater effect on owners with higher numbers of hives.²

² Non-commercial beekeeping operations (fewer than 251 colonies) comprise 93.5% of the beekeeping operations and manage 14.2% of the colonies, while commercial beekeeping operations (over 250 colonies) comprise 6.5% of the

The distribution of respondents across the beekeeper ownership categories is similar for both the 2018 and the 2019 Levy Consultation, as shown in table two. The comparison is shown by apiary number as this was the unit of analysis for the 2018 Levy Consultation.

Although the number of submitters owning 20 or more apiaries was small, the response rate from this cohort of beekeepers was much higher compared to the cohort of beekeepers owning three apiaries or less.

Table 2: Number and percentage of survey respondents in 2019 compared with percentage of respondents in 2018, and percentage beekeepers nationally, by number of apiaries owned

Number of apiaries	2019 % of respondents	2018 % of respondents	2019 % of all beekeepers	2018 % of all beekeepers	Number of beekeepers nationally^^	% beekeepers nationally
1-3	59% (271)	76% (546)	3%	8%	7119	83%
4-6	9% (41)	4% (35)	9%	8%	455	5.3%
7-19	11% (52)	7% (59)	10%	12%	500	5.8%
20-33	6% (28)	6% (41)	15%	21%	192	2.2%
34-57	4% (20)	4% (48)	14%	34%	142	1.6%
58 plus	7% (34)	5% (73)	21%	44%	163	1.9%
Non applicable	3% (15)	3% (22)			-	-
TOTAL	100%* (458)	100%* (828)			8571	-

* note not all respondents answered this question

^^ data provided by Asure Quality

beekeeping operations and manage 85.8% of the colonies. (from Biosecurity New Zealand, Report on the 2018 New Zealand Colony Loss Survey).

C. SURVEY FINDINGS

a. Views about proposed approach to AFB monitoring and auditing

This question was answered by 463 respondents.

The proposed approach was:

- supported by the majority of respondents who owned less than 51 hives (green shaded cells show support from 50% or more from this group); and
- opposed by the majority of respondents who owned between 251 and 1000 hives (pink shaded cells show opposition from 50% or more from this group).

Overall the proposed approach was supported by 61% of all respondents.

Reasons cited for opposing the approach included: approach relied too exclusively on visual inspections; need for updated inspection and testing methods; and the need to incorporate best practice and research.

Table 3: Respondent responses to question: do you agree to the Management Agency’s proposed approach to AFB monitoring and auditing, by number of hives owned?

	Strongly agree		Agree		Neither agree or disagree		Disagree		Strongly disagree	
	%	no	%	no	%	no	%	no	%	no
1-5 hives	33%	58	47%	83	8%	15	5%	9	7%	13
6-10 hives	16%	7	47%	20	16%	7	7%	3	14%	6
11-50 hives	22%	15	46%	31	10%	7	7%	5	14%	10
51-250 hives	11%	8	32%	23	14%	10	18%	13	25%	18
251-500 hives	3%	1	23%	7	20%	6	17%	5	37%	11
501-1000 hives	8%	2	27%	7	12%	3	12%	3	42%	11
1001 hives or more	22%	7	16%	5	22%	7	6%	2	34%	11
not applicable	10%	1	40%	4	10%	1	0	0	40%	4
Total	22%	99	39%	181	12%	57	8%	39	19%	87

b. Views about proposed approach to AFB compliance and enforcement

This question was answered by 459 respondents.

The proposed approach was supported by the majority of respondents who owned less than 51 hives (green shaded cells show support from 50% or more from this group).

Overall the proposed approach was supported by 63% of all respondents.

While there was majority support for this proposed approach, a range of views were expressed by respondents. Some considered penalties for non-compliance should be high and registration strictly enforced. Others considered the approach too expensive and punitive.

Table 4: Respondent responses to question: Do you agree to the Management Agency’s proposed approach to AFB compliance and enforcement, by number of hives owned?

	Strongly agree		Agree		Neither agree or disagree		Disagree		Strongly disagree	
	%	no	%	no	%	no	%	no	%	no
1-5 hives	30%	53	48%	84	10%	18	6%	10	7%	12
6-10 hives	29%	12	43%	18	7%	3	12%	5	10%	4
11-50 hives	18%	12	52%	35	10%	7	6%	4	13%	9
51-250 hives	17%	12	27%	19	17%	12	14%	10	25%	18
251-500 hives	7%	2	33%	10	23%	7	13%	4	23%	7
501-1000 hives	4%	1	42%	11	8%	2	8%	2	38%	10
1001 hives or more	28%	9	19%	6	9%	3	9%	3	34%	11
not applicable	10%	1	40%	4	10%	1	0	0	40%	4
Total	22%	102	41%	188	12%	54	8%	37	17%	78

c. Views about proposed approach to charging for non-compliance to recover costs

This question was answered by 457 respondents.

There was strong support for this proposed approach from the majority beekeepers, regardless of how many hives they owned. The exception were owners of between 501-1000 hives, the majority of whom either didn't express a preference or disagreed with the proposed approach.

Overall the proposed approach was supported by 70% of all respondents.

There was majority support for this proposed approach which many described as fair. At the same time, many cautioned that punitive cost recovery should only be considered to be a last resort and the focus should be on beekeeper education and co-operation.

Table 5: Respondent responses to question: do you agree that the Management Agency should charge non-compliant beekeepers to recover the costs of compliance and enforcement actions?

	Strongly agree		Agree		Neither agree or disagree		Disagree		Strongly disagree	
	%	no	%	no	%	no	%	no	%	no
1-5 hives	48%	85	31%	54	7%	13	8%	14	6%	11
6-10 hives	42%	18	37%	16	14%	6	5%	2	2%	1
11-50 hives	37%	25	37%	25	6%	4	9%	6	11%	7
51-250 hives	30%	21	36%	25	12%	8	9%	6	14%	10
251-500 hives	23%	7	33%	10	23%	7	7%	2	13%	4
501-1000 hives	16%	4	28%	7	20%	5	8%	2	28%	7
1001 hives or more	41%	13	16%	5	12%	4	9%	3	22%	7
not applicable	10%	1	40%	4	10%	1	10%	1	30%	3
Total	38%	174	32%	147	11%	49	8%	36	11%	51

d. Views about the proposed hive and beekeeper levy

This question was answered by 460 respondents.

The proposed approach was:

- supported by the majority of respondents who owned less than 51 hives (green shaded cells show support from 50% or more); and
- strongly opposed by the majority of respondents who owned more than 51 hives (pink shaded cells show opposition from 50% or more).

Overall the proposed approach was supported by 46% of all respondents, and opposed by 43%.

Reasons cited for opposing the approach included a view that a per hive levy structure will increase non-compliance and under-reporting of hive numbers, and that this approach hasn't worked in the past. A per hive system was considered a significant additional cost for larger owners, many of whom stated that the industry is in a slump and their businesses cannot afford higher levies at this time.

Reasons cited for supporting the approach included a view that it is fairer than an apiary levy, particularly for those who only own a few hives.

Table 6: Respondent responses to question: Do you agree that the existing 'apiary and beekeeper' levy should be replaced with a 'hive and beekeeper' levy?

	Strongly agree		Agree		Neither agree or disagree		Disagree		Strongly disagree	
	%	No	%	no	%	no	%	No	%	no
1-5 hives	26%	45	38%	67	14%	24	11%	20	11%	19
6-10 hives	21%	9	33%	14	7%	3	19%	8	21%	9
11-50 hives	21%	14	34%	23	15%	10	6%	4	25%	17
51-250 hives	10%	7	12%	8	8%	6	17%	12	54%	39
251-500 hives	3%	1	13%	4	3%	1	23%	7	57%	17
501-1000 hives	4%	1	15%	4	8%	2	19%	5	54%	14
1001 hives or more	22%	7	16%	5	6%	2	9%	3	47%	15
not applicable	0	0	20%	2	20%	2	10%	1	50%	5
Total	18%	84	28%	127	11%	50	13%	61	30%	138

e. Views about the proposed hive and beekeeper levy charges

This question was answered by 460 respondents.

The proposed approach was:

- supported by the majority of respondents who owned less than six hives (green shaded cells show support from 50% or more); and
- strongly opposed by the majority of respondents who owned more than 51 hives (pink shaded cells show opposition from 50% or more).

Overall the proposed approach was opposed by 53% of all respondents.

A key reason cited against the proposed increase included that the cost is not affordable. Some commercial beekeepers commented that they are financially struggling due to successive falling honey prices.

Table 7: Respondent responses to question: do you agree for the beekeeper levy to be set at \$40 per beekeeper, and the hive levy to be set at \$1.35 per hive increasing to a maximum of \$2.55 per hive over a five year period?

	Strongly agree		Agree		Neither agree or disagree		Disagree		Strongly disagree	
	%	no	%	no	%	no	%	No	%	no
between 1-5 hives	16%	29	42%	75	9%	17	15%	27	17%	31
between 6-10 hives	10%	4	31%	13	14%	6	19%	8	26%	11
between 11-50 hives	14%	9	26%	17	12%	8	12%	8	35%	23
between 51-250 hives	8%	6	8%	6	4%	3	15%	11	64%	46
between 251-500 hives	0	0	3%	1	7%	2	17%	5	73%	22
between 501-1000 hives	4%	1	4%	1	4%	1	19%	5	69%	18
1001 hives or more	19%	6	6%	2	6%	2	12%	4	56%	18
not applicable	0	0	10%	1	30%	3	0	0	60%	6
Total	12%	55	25%	117	9%	42	15%	69	38%	177

D. THEMATIC ANALYSIS

a. Overview

More than half of all the 466 survey respondents provided comments (269).

As shown in table eight below, the majority of comments were provided by beekeepers owning less than 50 hives. As such, the thematic analysis predominantly reflects the views of small beekeeping operations.

Table 8: Number and percentage of respondents who provided comment, by number of beehives owned

no beehives owned	1-5	6-10	11-50	51-250	251-500	501-1000	1001 plus	n/a
	no	no	no	no	no	no	no	no
Survey Monkey respondents	98	28	36	32	20	18	19	7
Letter submitters	2	1	0	2 (plus 1)*	2	2 (plus 2)*	0	2
Total	100	29	36	34	22	20	19	9

*the number in the bracket refers to the number of letter submitters who also provided a response in Survey Monkey. This number has been subtracted from the total to prevent double counting, however some comments are included in the thematic analysis.

The comments from the survey and the letters were analysed and reported in two parts:

- Theme areas
- Solutions, suggestions or questions raised by respondents.

The theme areas represent common topics and areas of concern that emerged from the comments, and these are described in section b.

Many of the comments also contained specific ideas, suggestions or questions for consideration by the Agency, and these are summarised in section c.

b. Theme areas

The theme areas emerging from the analysis are summarised in table nine below and described more fully in the body of this section.

The sub-themes provide insight into the views of respondents who provided more detail. However many respondents did not elaborate on the reasons for their view.

Table 9: Key themes and sub themes

Themes and sub themes
1. Proposed levy charge is too expensive and cost recovery should be sufficient
1a. Levy charge is too expensive and further levy increases over time are not justified
1b. Cost recovery should provide sufficient additional funds and compliant beekeepers shouldn't have to pay a higher levy
2. Industry is struggling and commercial beekeepers cannot cope with an increased levy
2a. Incomes have reduced with falling honey prices and bad seasons
2b. Industry is in a slump, morale is low, this is not the time for a levy increase
3. Proposed levy structure is unfair and will increase non-compliance
3a. A per hive levy structure will increase non-compliance and hasn't worked in the past
3b. Levy structure is unfair for a variety of beekeeper groupings (e.g. nucs and queen rearers) and exceptions, tiers or caps are needed
4. Proposed cost recovery plan could be too punitive and should focus on co-operation
4a. Punitive approach will encourage non-compliance, be difficult to enforce, and could result in legal challenges
4b. Treating well-intentioned beekeepers as criminals is unfair and will not help the problem
4c. Focus should be on co-operation and education with punitive cost recovery as a last resort
5. Lack of confidence in the AFB Pest Management Plan and/or aspects of the proposed approach
5a. Plan isn't needed as AFB cannot be eliminated, and the current funding levels are sufficient
5b. Proposal doesn't go far enough and/or does not address the problem and/or is not properly informed or researched and/or is not properly costed.
5c. Lack of hive movement control
6. Support for the Proposal and/or the Agency
6a. Support cost recovery, strong penalties and/or enforcement plans
6b. Support the proposed levy system and/or funding distribution

6c. Support other new ideas or changes
6d. New plan is fair and/or creates good incentives
6e. Support with reservations
7. Lack of confidence in the Agency
7a. No trust in Agency competency, motivations or intentions
7b. Beekeepers should have more control and self-management

Brief description of each theme

This section provides a brief description of the main themes and sub themes. Each theme is highlighted by a sample of quotes taken from survey respondent comments, and a few from letter submitters.

1. Proposed levy charge is too expensive and cost recovery should be sufficient

1a. Levy charge is too expensive and further levy increases over time are not justified

These respondents considered the increased cost is unaffordable, particularly for small or unprofitable beekeepers not drawing an income, and for retired people. Several noted that beekeeping is expensive and that the beekeeper levy is too high.

Some respondents were concerned that the high cost would disincentivise beekeeping and reduce registration compliance in order to avoid paying the levy. They considered this would increase disease risk and reduce Agency revenue. It was considered that the Agency should be interested in encouraging beekeeping as an environmental benefit to the country.

Others considered that further levy increases over time were unfair, unaffordable and had the potential to continue to rise beyond the time-frame outlined. One respondent was concerned that a steadily increasing levy would lead to Agency inefficiency. Another commented that if the Agency's AFB plan is effective, it should be possible to decrease the levy over time rather than increase it.

Quotes

Small beekeepers

I think the levy of \$40 per beekeeper is too expensive. As a retired person I would struggle to find this amount each year. In fact I would probably give up beekeeping.

The beekeepers wear all the cost and receive minimal reward. By continually raising taxes you are only driving skilled people away. It is universal knowledge that bees are extremely important to the sustainability of most of our farms, flowers...simply sit down with any beekeeper and ask them to break down the costs for hive upkeep, disease prevention and Tutin checks plus many more.

The \$40/beekeeper is still a lot of money for hobbyist beekeepers. [For instance] someone with one hive currently pays \$35 + GST - this appears to be going up to \$42.55 + GST - which may put people off being honest about how many hives they have.

Medium beekeepers

Been in bee keeping for 4 years, slowly growing hive numbers. Not yet made a profit as putting all money back into hives, and it's been some crap years. Increasing costs to beekeepers will put additional financial strain on them, ok for those already established, but for those growing like me it's just another cost.

I simply can't afford that...there are beekeepers out there not taking their honey off because the buyers aren't paying enough to cover their costs...If beekeepers can't manage through lack of money and they can't sell their bees and beehives to reclaim some money, they will just be left to die and go wild, possibly making AFB worse.

Large beekeepers

The proposal will result in a huge increase in our fees. At \$1.35 we're looking at a nearly 50% increase and at \$2.55 per hive we are paying 278% more than at present. We and many others cannot afford these increases.

1b. Cost recovery should provide sufficient additional funds and compliant beekeepers should not have to pay a higher levy

Some respondents considered that the increased levy unfairly penalises compliant beekeepers who are being asked to subsidise non-compliant and irresponsible beekeepers. They noted that as responsible beekeepers, they comply with regulations, maintain healthy hives and burn infected hives at their own cost, thereby representing the lowest AFB risk. Several also stated the cost-recovery from non-compliant beekeepers should be sufficient to fund the Agency without the need for increased levies.

Quotes

Small beekeepers

I have been a hobbyist in town for over thirty years on permanent sites and I have never had AFB, probably because I keep healthy hives that are not pushed to a stress level, and I suppose that good luck is on my side too...I think that you should be getting your funding from the uncompliant beekeepers and not draining the compliant beekeepers once again just because you know how to get hold of them easily.

Large beekeepers

For decades I have paid increasing sums to the Agency and have scrupulously registered all my hive sites. At the same time it is glaringly obvious that there is widespread under-reporting of hives and sites by unscrupulous operators who seem to be immune from any consequences. Some years ago I experienced an outbreak of AFB in my operation, which I successfully dealt with by conventional means and extreme quarantine measures, all with no help from the AFB Agency...In short, those with the problem, or who under-report should bear the costs of the AFB elimination programme, not those who manage their own affairs well.

I am a commercial beekeeper who is struggling to keep in business after several bad seasons and reduced value of non-manuka honey. Any more costs with running a beekeeping operation will cause significant strain on my business. I think it is a very good idea to make those who have AFB pay for the costs of compliance and enforcement.

This proposal is poorly thought out; the Agency is asking for further funding from beekeepers and also asking for powers to recover costs from beekeepers for inspections, I believe you only need one or the other, not both.

2. Industry is struggling and commercial operations cannot cope with an increased levy

Large and medium sized beekeepers expressed concerns that the industry is struggling and that they are unable to cope with increased levies from the Agency.

2a. Incomes have reduced with falling honey prices and bad seasons

These respondents considered that the levy increase was too high when combined with the recent reduction in income, drop in honey prices, and an increasingly competitive market.

Quotes

Medium beekeepers

Because of the new Manuka grading and compliance, they have dropped the prices they are paying for bulk honey by 80% plus ... This places massive pressure on all non-exporting beekeepers liquid assets. Many are just walking away and leaving their hives to rot.

Beekeeping industry is struggling as beekeepers cannot sell honey. A levy of an extra \$400 for a couple hundred hives is excessive, as things are only getting more expensive. Everybody wants more money, but in the industry's current state there is no money to be had... Other larger businesses are loaning money in bad seasons to keep themselves afloat, I think it's unrealistic at this current time to have such a big increase of levies.

Large beekeepers

The increase of the levy over the 5 years is too much. The fees are killing the industry. The price of honey is going down, it's getting harder to sell and the cost and number of fees is going up. We don't have many good honey seasons anymore and with more and more beekeepers setting up there is less honey to go around. I don't know the solution, but personally we have dealt with AFB and if you deal with it before a hive dies from it, it can be eradicated from your operation.

We are continually seen as the cash cow, where in reality many businesses are suffering or failing because of unrealistic promotion to grow the industry.

2b. The industry is in a slump, morale is low, this is not the time for a levy increase

This group of respondents expressed a lack of confidence in the future of the industry and a general low morale among beekeepers. They stated that the industry is in a slump and now not the time to increase the financial stress on commercial beekeepers.

Quotes

Large beekeepers

I have the feeling everybody wants to jump on the money train, but nobody noticed that it is already down and broken. A lot of beekeepers are going to sit on their honey, the market is completely over flooded with non-Manuka honey and no one is prepared to buy it. There is not much future for little beekeepers in this country.

We have sites with 5 to 10 hives which cover a given area, and give us surplus honey 3 out of 4 years. Then along came a corporate outfit and put 100 or more hives within 100 meters of our hives. Our hives starve, new diseases introduced, corporate hives starve, aren't protected against varroa etc. After 3 years of this nonsense we are having to shut down sites we established 40 to 50 years ago. The industry is a shambles and AFB is proliferating in some areas, no controls.

Given the state of the industry right now in March 2019, the lack of foreseeable movement in the honey market place for generalised bush blend or pasture blend NZ ...those of us who are prepared to hold out are counting costs closely...I'm not sure the industry as a whole has learned much from all the historical (and now current) in-fighting. I had hoped APINZ would become the vehicle for meaningful liaison with MPI, but this is once again splintered by a lack of faith that anything other than large corporate bee businesses will be catered for, and the belief that the focus is pretty much only on manuka honey.

3. Proposed levy structure is unfair and will increase non-compliance

3a. A per hive levy structure will increase non-compliance and hasn't worked in the past

These respondents expressed concern with charging the levy on a per hive basis. It was noted that a previous per hive levy was abandoned as it was too easy to under-report true hive numbers, and hive numbers are difficult to count due to seasonal changes and hive movement. Respondents stated that the per hive levy plan would again result in under-reporting of hive numbers and reduced compliance. These respondents generally suggested maintaining the per apiary levy, while one suggested a combination of per hive and per apiary (see solutions and suggestions in table 11).

Quotes

Small beekeepers

I have strongly advocated a number of the changes now being proposed. So, I should be happy. However, I am concerned that the changes go too far and are changing one problem for another problem. I think there is a place for an apiary levy as well as a hive levy and beekeeper levy. ...This allows mechanisms to charge large commercials fairly as well as removing the current unfairness to single hive apiaries that pay \$15 per hive currently. In summary the new proposal is too extreme in the other direction and I would suggest might be set up so as to make it fail.

Paying per hive is pointless. Hives die, hives swarm.

Large beekeepers

A move to a levy on a per hive basis, will only cause beekeepers to under report their hives resulting in lower revenue for the Agency. The New Zealand beekeeping industry is based on frequent hive movements between apiaries. The Agency could not verify or audit at any one time

the quantity of hives an individual has in their apiaries... It will cause beekeepers to combine hives prior to the date of counting for the levy only to split them again post that date.

I can remember the levy moving to an apiary levy rather than a per hive levy for reasons such as apiaries are registered, and exact hive numbers may not be, and are probably less likely to be registered under a hive levy. You cannot export honey from an unregistered apiary site...Hive numbers at apiary sites will vary throughout the year increasing compliance costs for keeping records updated... I think it would be better to set the apiary levy at an average hive numbers level to achieve the other aspects of the proposed changes.

3b. Levy system is unfair for a variety of beekeeper groupings and exceptions, tiers or caps are needed

Some small beehive owners considered that the levy increase was unfair on them because they already bear the cost of disease prevention and hive destruction and they do not draw any income from beekeeping. They considered larger owners could afford the increase as they earn money from their hives and that the cost of compliance checks is higher for commercial operations due to their remote hive locations.

Commercial beekeepers expressed concern that the levy structure unfairly places the largest cost burden on them, falling heaviest on smaller operations and non-manuka businesses who are not earning enough to make the cost affordable. A few responders also noted that the system was unfair for nuc and Queen producers and for single-brood hives. Some suggested alternative systems, or introducing exceptions, tiers or caps, to accommodate the circumstances of different beekeepers (see solutions and suggestions in table 11).

Quotes

Small beekeepers

The commercial beekeepers can recover their compliance costs with the programme by selling their product which will be a minimal addition to their running expenses. Their locations are often remote and therefore have greater costs for compliance. Domestic hives do not produce a product for sale and cannot recover these costs. They are often located in urban areas and are easy to check compliance for. The proposed costs of \$40 per year may be more expensive than the honey retrieved from the hive (In my case anyway).

There has been no exemption put in place for nucs and queen rearing and breeding and mating units etc. for those who supply and support our industry... I will only support a set fee per beekeeper based on whether they are a hobbyist like myself or commercial keepers should pay based on incremental levels based on honey producing hive numbers ... This is the only fair way of doing things.

I think it is worthwhile separating out commercial beekeepers from hobbyist keepers as the level of management for domestic/backyard hives is easier. The levy would more than double my fees for the single hive I have in my front yard. I can't see it as justified so I would recommend the following 1) keep the proposed fee for commercial keepers 2) define a commercial keeper as someone or company with more than three hives or more than one apiary (I.e. more than domestic needs) 3) have a single set fee for all non-commercial keepers.

A beekeeper and hive levy could be quite punitive to large operations. Could a cap be put on this? There may be some danger of beekeepers not registering.

Large beekeepers

Hobbyists have by far the most hives in New Zealand, but the commercial sector of the industry is being expected to indirectly to cover the cost of looking after their hives and the impact AFB has on people who rely on bees for the livelihood of themselves and their staff. We are continually seen as the cash cow, where in reality many businesses are suffering of failing because of unrealistic promotion to grow the industry,”

4. Proposed cost recovery plan could be too punitive, the Agency should focus on cooperation

These respondents expressed concern that the plan could be too punitive and should focus instead on education and cooperation (see solutions and suggestions in table 11). Harsh penalties were considered a last resort.

4a. Punitive approach will encourage non-compliance, be difficult to enforce, and could result in legal challenges

These respondents stated the cost-recovery penalties were too severe and would encourage non-compliance and under-reporting on the part of beekeepers to avoid the penalties. Some were also concerned that the Agency had not outlined how cost-recovery powers would be checked in order to avoid abuse. Several also noted that harsh penalties may be met with expensive legal challenges and that many of those who are penalised will not have the funds to pay.

Quotes

Small beekeepers

I strongly believe that a penalty, cost recovery model for AFB elimination will lead to under reporting of AFB (beekeepers hiding AFB, making neighbouring beekeeper vulnerable).

What is the incentive to report AFB hives if the beekeeper is going to slapped with a fine they may not be able to pay? Would this encourage more beekeepers to keep quiet about AFB in their hive?

Along the lines of enforcement, I find what is written sounds rather draconian and I hope conversation will be undertaken before any enforcement action is undertaken. What happens if the inspector is wrong with his/her appraisal of a hive and the hive is destroyed? Can costs be recovered from the inspector / national association for the loss of that hive. I also am concerned that if the approach of enforcement is negative then hives may be hidden, not reported etc. causing further issues.

Relying on penalties/recovery costs to cover this is also unrealistic. Those that are non-compliant are likely to be the beekeepers where cost recovery will be difficult.

Large beekeepers

The Agency is proposing to amend their enforcement powers but have not outlined any checks and balances or methods of appeal that one would expect when needing to assure the public that these powers will not or cannot be abused.

Cost collection is a good idea, but a lot of the people you are dealing with will not have any money. Blood and stones. We cannot charge beekeepers more \$\$ for anything. We do not have any money.

The direct costs of compliance and enforcement actions is variable but could be considerable for a beekeeper with a large amount of hives. The proposed cost recovery actions for compliance and enforcement will end up with the Agency spending more in legal proceedings when challenged.

Beekeeper Organisation

The beekeeper with AFB is the victim and should be treated that way...The Management Agency's first job is to assist the beekeeper control and then eradicate the disease from his hives. Only when these measures fail over a number of visits, do they take remedial action to stop the disease spreading outside the beekeepers hives to other hives and that's when these new measures come in.

4b. Treating well-intentioned beekeepers as criminals is unfair and will not help the problem

These respondents noted that the majority of beekeepers who have AFB infections are well-intentioned, doing their best, and have the disease at no fault of their own. Harsh penalties are therefore unfair and will not help address the AFB problem.

Quotes

Small beekeepers

In our region, we have a good culture of self-reporting AFB and sharing amongst our fellow beekeepers so as to all keep vigilant. We understand that having AFB detected in your hive is most likely not a reflection of your bee keeping skills/practice - your bee's may have robbed an abandoned infected hive. I would hate to see a good beekeeper, through no direct fault of their own, get financially punished for AFB in their hives. This may result in the opposite beekeeper behaviour. I would hate to see a bee keeper financially punished for an adjacent unregistered bee keeper abandoning hives - this sends the wrong message.

Large beekeepers

The current proposal is too draconian and potentially targets beekeepers who have become a victim of a neighbours who have poor beekeeping practices. If a neighbouring beekeeper comes down with a robbed out hive in several apiaries, every beekeeper and every hive within 2 km has the potential to be infected ... If an AP2 inspector finds more than 1% AFB in those neighbouring hives in the next 12 months, it is totally unfair and abuse of registration to charge for those inspections... Funds need to be spent wisely looking for people who have poor management practices, not harassing people who have already suffered financially through no fault of their own...I feel my levy payments have let me down because the detection programme didn't find this earlier, now the management wants the ability to punish me further for basically being in the wrong area at the wrong time.

4c. Focus should be on co-operation and education with punitive cost recovery as a last resort

These respondents considered that the Agency should focus on educating beekeepers and assisting them with AFB management, using penalties and cost-recovery only as a last resort. They believed that this approach would increase the likelihood that beekeepers will report AFB infections.

Quotes

Small beekeepers

AFB management ...needs to work with and assist beekeepers to eliminate AFB. A beekeeper should not be penalised for reporting/having AFB, but given assistance to get on top of it. No beekeeper willingly allows AFB to spread and the Agency needs be supportive ... to ensure reporting of AFB continues. Inspections need to be carried out in hotspots without penalties, assistance given and management strategies where needed, put in place. The following year repeat visits/inspections need to be carried out to ensure AFB reduction and beekeeper compliance. This is the point where penalties/cost recovery for serious non-compliance in relation to AFB management can be issued if needed, but penalties really should to be a last resort.

Large beekeepers

Education and counselling is far more effective and the Agency should only use a stick as a last resort.

5. Lack of confidence in the AFB Pest Management Plan and/or the proposed approach

These respondents expressed specific concerns with the AFB plan. Some respondents stated the plan was not necessary while others stated it would not work.

5a. Plan isn't needed as AFB cannot be eliminated, and the current funding levels are sufficient

This group of respondents stated that the plan was unnecessary, either because the goal of AFB elimination is impossible to achieve, or because the current system and funding is sufficient to manage the disease. One respondent queried why additional funds are needed when the Agency has reported a surplus.

Quotes

Small beekeepers

As far as I know, the strategy of national AFB eradication has not been proven to work. The main issue being the spores are pervasive, impossible to destroy and long-lived. I am not aware of any science presented by APINZ or AFBMB to counter this concern. The appropriate management strategy is not eradication but suppression or control, as practiced in in countries similar to New Zealand.

Waste of time based on views of people without serious science qualifications. AFB is endemic and will remain so. Only a fraction of hives which test positive for AFB actually develop to full blown AFB.

You will not control AFB just because you are collecting more money. I have my DECA certificate and can and will identify any AFB I find. What is wrong with the present system?

Medium beekeepers

If the current system is already running at a profit, why the need to charge beekeepers more money?

5b. Proposed plan doesn't go far enough and/or does not address the problem and/or is not properly informed or researched and/or is not properly costed.

Respondents in this group had issues with specific components of the plan including lack of up-to-date research, unrealistic costing, insufficiently harsh penalties, ineffective testing and inspection methods, an excessive focus on compliance, and lack of confidence in the hive destruction plan. Several stated that the plan does not address beekeepers' concerns and one respondent stated that the industry is already over-regulated.

Quotes

Small beekeepers

Recent research in Sweden throws doubt on all present theories as to how AFB control might best be handled. Do your homework.

I don't think we will ever make headway with this disease until more funding is available, I mean the aerial surveillance funding is a joke, It must be terribly frustrating for the people who are running this program, one day one of our exporting countries is going to ask what we are doing to control AFB in NZ and the proverbial will hit the fan when they start to prohibit our exports, god forbid.

Industry want to see more research and surveillance regarding the disease batch extracted honey is not an appropriate sample for determining AFB infection. Sampling diseased larvae ...honey and even testing adult bees has many complexities not yet understood even by scientists...Basing your approach on honey sampling is flawed. I refer you to the numerous research on AFB and appropriate sampling protocols. Batch extracted honey is from multiple sources and traceback is near impossible with the current beekeeper climate in New Zealand. Thus the information you plan to gather is useless.

In my opinion the destruction of hives is only a short term solution (and to date seems to have been less than effective), the losses involved in hive destruction appear to deter some keepers from reporting infections. Therefore personally I'd like to see funding directed to towards research identifying preventive treatments and/or a cure that does not rely on destruction.

Medium beekeepers

Administrative cost estimates are optimistic. The proposed use of funds is either unconnected to the concerns of potential levy payers, and/or would be duplicating existing provision by the government or commercial enterprises... We simply disbelieve the extraordinarily low administrative budget proposed by Apiculture NZ. The proposal is seriously flawed and not at all in the interests of potential levy payers.

Large beekeepers

When we did the five year planning session... we had discussed why all tutin samples were not automatically sampled for AFB, I understand modern image profiling means this could actually be automated, regardless wouldn't it make sense given RMP holders already send these samples for testing! We also discussed the potential role of dogs which we have been having a separate discussion on. Yes, they may not work today but that is a symptom of the lack of a scientific approach and lack of investment in tools.

The whole premise of the proposal is based on visual inspections. If we rely on this method alone we will miss too much AFB. We need to investigate and use the testing proposed by Mark Goodwin et al and use of dogs.

Your approach is too compliance-centric. Compliance, when done properly, will cost a lot more than the forecasted \$1.6million. Please consult with central and local government on compliance costs - I think you will be surprised. Because of this, this model is set up to fail from the outset. Cost recovery, while it has its place for smaller administration costs and the like, is not a sustainable source of income.

5c. Lack of hive movement control

Several beehive owners also considered that their AFB risk is increased by large operations who move hives around the country and overcrowd their apiaries. They asserted that they should not be required to pay for AFB which is spread by this practice.

Quotes

Large beekeepers

In a small community near us, helicopters use a public access to fly large numbers of hives to inaccessible coastal areas then return them to this collection site at the end of the season...the local residents are outraged by this behaviour...how can anyone including the relevant authorities gauge the extent of this behaviour as unknown quantities of hives are whisked in un-announced and they later they are whisked out again in the same manner, leaving their mess behind.

6. Support for the Proposal and/or the Agency

These respondents expressed support for the new proposal or for the Agency. Some comments were general statements of support for the proposal without specific reasons given. The remaining comments have been organised into subthemes.

6a. Support cost recovery, strong penalties and/or enforcement plans

These respondents were supported passing the cost of managing disease on to non-compliant beekeepers who they believe are the most responsible for the AFB problem. They also supported strong penalties to deter non-compliance and/or strong and consistent enforcement of those penalties.

Quotes

Small beekeepers

Legislation is needed to compel beekeepers to be registered. An operator who knowingly evades registration or fails to inspect hives as agreed, is one who is willing to mistreat livestock in their care. This is unacceptable... Mistreatment of a bee colony should have consequences... I'm delighted to see we might have a task force to deal with non-compliance and unregistered cowboy operators who in effect wilfully mistreat their livestock.

Many people who live in this area don't seem to think that any kinds of rules apply to them. Because of this general characteristic, I think that the charges for non-compliance and compliance costs are the only way that people like that will follow the rules. They will either end up following them or give up beekeeping, either of which are desirable results. ... I don't know how to get through to these kinds of people outside of requiring them to pay for the damage and danger that their non-compliance causes.

Hopefully this will allow non-compliant beekeepers to be called to account. An example needs to be made of a non-compliant beekeeper, and well publicised, to show the legislation has "teeth". Maybe the word will get around the beekeeping fraternity that the Agency means business!

Large beekeepers

I like that the non-compliant beekeepers will have to pay the costs that their non-compliance creates. This will bring a fairness to the compliant beekeeper and a financial incentive encouraging compliance for those who are otherwise.

6b. Support the proposed levy system and/or funding distribution

The majority of these respondents were in favour of the per hive levy structure with several specifically stating that it distributes cost more fairly between large and small operations. The other respondents in this group specified support for planned distribution of funds into research and/or education.

Quotes

Small beekeepers

We need to act now and quickly if AFB is to be managed. Costs should be shared by the industry and big business and hobby beekeepers should not be unfairly made to pay a big levy. I am strongly in favour of cost per hive - it's much fairer.

I really appreciate the support via education and information I am given by the AFBO, this education eradicates ignorance, and thus, excuses.

Medium beekeepers

Levels of AFB are increasing and in the past through various factors enforcement has not been followed up and always implemented. We need this levy increase to get on top of non-compliance and poor management practices that has led to the increase in AFB.

6c. Support other new ideas or changes

These respondents expressed particular support for other parts of the proposal including the development of additional resources such as ApiWeb, the establishment of an AFB focussed team, the alert grading system, honey spore testing, and the move away from yearly inspections.

Quotes

Small beekeepers

The work on clusters of AFB sounds good, my address comes up as red - I am within 3 Km of AFB but don't know how close or where. Any chance of more information on our local AFB situation would be useful...The use of web is great for the future. Thanks for the chance to input here.

Large beekeepers

The Alert grading system makes good sense and will be a useful measure for the level of enforcement action. The idea to establish, train and fund a focussed and dedicated team is what the AFB problem needs. Great to also develop the added resources needed such as an upgrade of the Apiweb system and smart phone apps. In my opinion the proposal as outlined is what industry requires to bring AFB under control.

I am pleased to see the emphasis going away from a once yearly inspection which, as we all know, is an almost total waste of time. I fully support the use of honey samples but would to see a trial set up to test all honey from an area and if it works really well this could be used throughout the entire country.

6d. New plan is fair and/or creates good incentives

This group of beekeepers stated that the new proposal is fair, incentivises smaller apiaries, and encourages people to take up hobby beekeeping. One respondent noted that the Agency has responded well to feedback from the 2018 consultation.

Quotes

Small beekeepers

I am very impressed you guys have taken the feedback provided and come up with a new proposal that addresses the two biggest problems with the old one. 1) Fairness - this is much fairer to the small bee keeper with just a few hives spread out in different locations, who would have been hit hard by the original proposal. 2) Providing financial incentive for having less/bigger apanies. Good work, I hope there is not too much push back from the few very large operations who will pay more under this scheme and who unfortunately have the resources to lobby against it.

I am pleased to see an encouragement from the board towards small-scale bee keeping. Individuals are more likely to comply with measures to control AFB, than large corporates with endless funds and an attitude created by this power. This means a far greater likelihood that AFB may possibly be eradicated.

6e. Support with reservations

These respondents supported the Agency and/or the proposal but expressed concern with specific aspects of the plan. Several agreed the levies needed to increase but that planned increases were too high with and should not be allowed to continue to rise, and others opposed to the per hive cap of 3600 for large operations.

There was also concern that the proposal relies too much on self-reporting and that the Agency has not explained how it will ensure that hive numbers are accurately counted. There was also concern about the ability of Agency workers to effectively carry out the proposal, and one respondent was concerned about a conflict of interest if beekeepers also serve as inspectors. Several others were concerned about resistance to the plan from commercial operations, older beekeepers, and those who have not had any problems with AFB.

Quotes

Small beekeepers

I really like this plan except for the actual amount of the levy. As a beekeeper with a few hives, the cost of equipment and the levy makes beekeeping an expensive hobby rather than an activity that covers its cost. I would suggest that the cost per beekeeper be around \$30. I agree with the amount per hive.

I am concerned that the financial increases do not get expanded going forward, these things have a way of continually going up and getting out of hand. This being said I understand the need to fund proper monitoring of AFB. We must also be aware that we don't price it to an extent where we encourage people to keep unregistered bee hives.

This has to happen, just a shame many other older beekeepers won't comply.

Of course, it is everyone's interests to protect the industry from infective/ infectious disease. So, who would dissent? But, as we have seen with the debate about vaccinating children there will be some who think (those who have the luxury of never having to see a case of smallpox) that somehow infective/infectious disease will just go away from our insect population.

Large beekeepers

Why is the cost going to triple over 5 years, when the plan should be wiping out AFB and the costs should be less and the recovery of costs should be funding enough. I agree with the plan but the costing structure is not right.

I agree in principle with the changes being suggested but don't have confidence in the current AFB management to implement the proposal. In particular I have an issue with AP2 inspectors being current, past or future commercial beekeepers. Beekeeping has become a competitive industry and the situation where beekeepers are inspecting their competitors hives in my opinion is unacceptable. I have personal knowledge of where this has actually occurred in the past and it is deplorable.

Beekeepers Club

[We] are supportive of the new 'hive and beekeeper' levy. However, we have some concerns around the capping of the 'per hive' levy at a maximum of 3600 hives. It would appear that the very large beekeeping operations are paying a proportionately reduced levy, despite large numbers of hives that will also need monitoring and auditing... The other area of concern is around how the Agency proposes to ensure that actual hive numbers are reported and paid for. We are encouraged by the Agency's move to recover costs from non-compliant beekeepers. However, we are still uncertain how the Agency will discover these non-compliant beekeepers.

7. Lack of Confidence in the Agency

Respondents in this group expressed a lack of confidence that the Agency can effectively manage AFB. Many respondents stated that the Agency was too incompetent or self-interested to carry out an effective AFB plan, while others stated that AFB is a problem which can only be solved by beekeepers. The majority of these respondents expressed an overall lack of trust in the Agency.

7a. No trust in Agency competency, motivations or intentions

These respondents expressed a lack of trust and confidence in the Agency. Many respondents stated that the Agency has done a poor job of managing AFB to date and has not used its existing funds effectively.

Others stated that the Agency has been unresponsive when asked for help, has not worked hard enough on compliance enforcement, and spends too much on bureaucracy.

Several expressed a general lack of confidence and suspicions that the Agency is working for its own benefit and to keep people in work rather than for the benefit of bees and beekeepers.

Quotes

Small beekeepers

That's a huge amount of money! It will probably be consumed by admin and overhead. Prove otherwise.... please.

I do not think that the Management Agency has done anything productive with the money that it has got in the past from me and other beekeepers. Until it pays back that debt I have no trust that it will do anything really productive with any increase in levy.

I know that the AFBPMP needs more money to do their job than they are proposing but in the past they haven't done much about the unregistered hives and apiaries even when they have been told about them.

I have had five AFB outbreaks [and have had] no response from you. A simple phone call would make a difference. Note these have been 3 different beekeepers.

Medium beekeepers

I firmly know, understand and believe that the AFB Management organisation is completely incapable to follow through with these plans ... it so grandly proposes to the beekeeping society. Through personal experience this organisation is inept. ... This organisational is not mature enough

or responsible enough to have more money given to it for free. It's historical management thus far is extremely wanting.

The Management Agency -- ApiCulture NZ -- has been unable to get beekeepers to manage their hives well enough to defeat the disease. We don't think ApiCulture NZ is competent to manage large levy programmes, on this basis.

Commercial beekeepers aren't opposed to a well-managed, fair and well-targeted levy, but beekeepers ...just don't trust ApiCulture NZ to manage a levy effectively and fairly.

Large beekeepers

I do not have any trust or respect for you, you have been proven to have hidden agendas in the past. You have had 100 years to eradicate AFB and have failed.

You have no mandate whatsoever to do this, or even apply to have the status quo changed. As a levy payer, I have no voting rights on electing board members, voting rights on policy changes or how money is spent. It is my intention, and that of others, to stop this going ahead.

The AFB PMS was put in place to 1) protect me from my neighbours and 2) eliminate the disease from the country, both goals which I fully support. This is a beekeeping disease and the only way to eliminate it is if commercial beekeepers are in control of the strategy as they ... have an understanding of the disease, how it is spread and how to reduce, then eliminate it from individual outfits.

7b. Beekeepers should have more control and self-management

Respondents stated that AFB can only be managed by beekeepers, not by the Agency, and there is no reason to give additional funds to the Agency for the purpose of AFB control. Several stated that beekeepers are already doing what they can to control disease and advocated for cheap or free education to support self-management. Some suggested the formation of a beekeeper-run council to address disease management.

Quotes

Small beekeepers

You will not control AFB just because you are collecting more money... I check my hives and other beekeepers hives on a regular basis. I think there are beekeepers who are not being honest about how many and where they have hives, and others who want the honey, but know nothing about bees or how to keep them... Do you know where all hives are located in New Zealand? I don't think so. You will only know where the honest bee keepers have them. How will you or anyone else, control AFB in our country when this is the case?

Scrap all fees and levies and do public education at no cost. Been a bad honey year and don't believe fees do anything to stop AFB.

Medium beekeepers

I strongly recommend that the AFB PMP is taken out of the hands of ApiNZ... A new group of beekeepers need to be formed to run it. AFB PMP should be run by beekeepers for beekeepers and

should be taking note of Mark Goodwin's recommendations. Some of the proposals are very unclear and highly dangerous for the family beekeeping businesses (Charges and Spores).

Large beekeepers

We as beekeepers need to sort it out, should have to do refresher courses every two years... Every frame in every hive should be checked as the honey is being taken off...There are so many simple things we can do to get on top of it and paying more money over 5 years isn't going to solve the problem. I've had it and dealt with it. Seen it in my last job for another commercial beekeeper, dealt with it there too. I'd rather burn hives and work closer together with beekeepers around me than chuck good money after bad. It would be cheaper in the long run.

c. Solutions, suggestions and questions

There were 93 survey respondents who proposed solutions to concerns they raised in their survey response. These largely related to specific actions they wanted the Agency to consider and/or questions about which they sought an Agency response. A high level overview is provided in table 10 below.

Table 10: Overview of survey respondent proposed solutions and suggestions

Problem/need areas	Some suggested responses
Solutions to ensure the levy is fair, equitable , affordable, and is decreased when possible.	Take account of variables such as: number of hives; commercial or non-commercial; history of compliance; and proactive behaviours
Changes to cost recovery measures to prevent it being overly punitive to the unintentionally non-compliant, and to reduce the need for punitive measures.	Agency to be co-operative, fair and differentiate between reasons for non-compliance. Set a cost recovery limit. Help beekeepers understand how to be compliant and why compliance is important, especially for new beekeepers.
Improve compliance, inspection and testing accuracy, and efficiency	Proposals included: phone help line and hot line, cheaper disease detection kits, free sampling service, tools to self-monitor, issuing information updates, web based facility for monitoring, providing and advertising educational and refresher courses.
Agency needs to improve its own communication and co-operation with beekeepers, and to promote understanding and co-operation between different beekeeper groupings.	Agency needs to be more effective at communicating and building relationships with beekeeping community, and work to improve understanding between small and large beekeeping operations.
Need more interventions targeting non-compliant beekeepers and need for stronger penalties	Heavy fines, deregistration, prevention of selling honey.
Inadequate controls and regulations regarding hive movement, hive testing, and elimination of infected hives and gear	Implementation and enforcement of regulations.
Need for more evidence based approach informed by research	Research new options for prevention and control, and for elimination that does not include destroying hives. Adopt newer approaches which have worked in other countries/areas.

The main solutions, suggestions and questions from survey respondents are shown in table 11 below and listed under topic areas.

Table 11: Survey respondent proposed solutions, suggestions and questions, by number of respondents

Topic Areas	Specific solutions, suggestions and questions
<p>Changes to the levy structure or cost</p>	<p>Higher levy; higher levy on keepers who have AFB/don't look after their hives properly</p> <p>Increased per hive levy, decreased beekeeper levy</p> <p>Keep apiary levy with higher fees to account for inflation</p> <p>Higher beekeeper levy and lower hive levy would be fairer to commercials while still requiring them to bear most of the cost</p> <p>Cap on max levy paid for those with very high hive numbers</p> <p>There should not be a cap on the maximum number of hives levied</p> <p>Lower beekeeper levy for those with <5 hives; No cost increase for those with <5 hives; Flat rate levy for small operations</p> <p>Levy based on quantity of honey produced</p> <p>Different levy system for commercial and non-commercial beekeepers</p> <p>Later levy increases may be unnecessary due to non-compliance cost-recovery; Minimise levy increase via recuperation from non-compliant keepers</p> <p>Phase in levy increase over a number of years</p> <p>Reduced levy for those who self- test regularly (negates need for expensive inspections etc)</p> <p>Levy increase per year must be allowed only by beekeeper vote</p> <p>Per hive levy resulted in non-compliance in the past - must figure out why so mistakes aren't repeated</p> <p>Single industry levy</p> <p>Remove all levies, provide free education</p> <p>Why is the cost going to triple over 5 years, when the plan is to reduce AFB and therefore reduce cost over time, and costs will be recovered from non-compliant keepers?</p> <p>What is the definition of a hive? (needs to be defined for per hive system to work)</p> <p>Why is there a cap on maximum number of hives levied?</p>
<p>Changes to cost-recovery measures in order to avoid the plan becoming unfairly punitive</p>	<p>Cost-recovery for non-compliance should differentiate between non-compliance, and a lack of information/education on the part of the beekeeper</p> <p>Do not fine people for being unregistered as this will only lead to reduced compliance</p> <p>Fines and penalties should be a last resort</p> <p>Non-compliance penalties should focus strictly on AFB - there are many small, innocent mistakes which keepers should not be penalised for</p> <p>Should set a maximum cost recovery amount</p>

<p>Need for cooperation between beekeepers and the Agency</p>	<p>Beekeepers will self-monitor and be proactive if they have the tools to do so</p> <p>Initial response to non-compliance should be education and support; Focus on cooperation rather than punishment; Incentivise compliance rather than punish for non-compliance</p> <p>Be careful not to be unfair with cost-recovery - e.g. if an inspector is wrong and a hive is destroyed there should be a plan</p> <p>Provide financial support to keepers who lose hives in the process of compliance with regulations (e.g. hive destruction)</p> <p>0800 number to support keepers who are struggling to manage their hives</p> <p>Cheaper disease testing; Cheap AFB kits; Free sampling service with strong marketing to make beekeepers aware of it</p> <p>Return of diseasathons</p> <p>Help hobbyists understand how to sell their excess honey - the additional funds might help with compliance</p> <p>Morale is low among beekeepers; Agency needs to help boost confidence</p> <p>Need more consultation with beekeepers</p> <p>Ensure hobbyists and commercial operators are in alignment</p> <p>Need to get beekeepers on board for cost recovery to work</p>
<p>Ways the Agency can help beekeepers to monitor each other</p>	<p>Anonymous hotline to report unregistered hives</p> <p>Website for beekeepers to upload info and track AFB themselves and/or showing beekeepers' compliance/registration status</p> <p>Unify APIWEB and AFB PMP system to make reporting and tracking easier</p> <p>Beekeepers need to be able to check whether hives in their area are compliant</p> <p>Agency should provide more detailed information about AFB clusters</p>
<p>Improved or additional educational measures</p>	<p>Agency should focus on education</p> <p>Adjustments to compliance/DECA conditions to reduce risk of AFB spread</p> <p>More refresher courses</p> <p>Compulsory AFB detection course; Compulsory Apiculture level 3; Compulsory DECA</p> <p>Advertise education for new keepers at beekeeping supply shops</p>
<p>Changes regarding compliance and enforcement, hive inspections and disease testing</p>	<p>There needs to be a way of controlling and recording the movement of hives to prevent overcrowding and "boundary dumping" practices</p> <p>Inspections should target large operations as they cause the most AFB problems and have under-trained staff; Inspections should target new, inexperienced beekeepers; Inspections should target those known to have AFB problems; There should be more inspections and random audits</p> <p>Agency should focus on compliance and registration; There should be a stronger response when AFB is detected</p>

	<p>Agency should focus on honey testing; All honey lots should be tested; Samples should be tested twice a year</p> <p>How will hive numbers be policed?</p> <p>How will you keep track of moving hives?</p> <p>How will non-compliant keepers be found?</p> <p>How much investment is going into targeting non-compliant keepers?</p> <p>When will the levy be charged? The number of hives change and move throughout the season?</p> <p>There needs to be an easy update or opt-put process when hives die or swarm. Possibly a beekeeper could buy an annual non-refundable license for a number of hives within a specified range (e.g. 1-5 hives)</p>
<p>Changes to penalties for non-compliance</p>	<p>Heavy fines for non-compliance; Instant fines for non-compliance; No grace period when unregistered hives are discovered</p> <p>Revoke registration of non-compliant keepers so they cannot sell</p> <p>Destroy unregistered apiaries</p> <p>Automatic prosecution of noncompliant keepers</p> <p>Treat non-compliance as a criminal offense rather than imposing cost-recovery</p>
<p>New regulations or changes to existing regulations</p>	<p>Isolate infected apiaries until they're safe; All infected hives should be burned; Abandoned/feral apiaries and their gear should be burned</p> <p>What is the legal definition of an 'abandoned apiary'?</p> <p>All extracted honey must be tested; Agency should focus on testing regulations</p> <p>Improve border security to stop diseases entering the country</p> <p>Regulate hive movement and hive concentration</p> <p>Require a licence to buy gear</p> <p>Require self-auditing</p>
<p>New, evidenced-based approaches to AFB management, ideas and examples from other regions, and areas for further research</p>	<p>More research needed</p> <p>Research into prevention</p> <p>Research into keepers' ability to detect AFB in their hives</p> <p>Research into methods which don't require hive destruction</p> <p>Fundamental review of best way to reduced AFB levels</p> <p>Waikato beekeepers project 18-19</p> <p>Testing proposed by Mark Goodwin</p> <p>Use AFB sniffer dogs</p> <p>Why is the Agency reluctant to use dogs?</p>

<p>Funding sources</p>	<p>Look for third party funding</p> <p>Seek funding from other organisations/government - industry cannot afford levy at the moment</p> <p>There should be more government support for a struggling industry</p> <p>There should be more government support for an industry which other sectors rely on (bees needed for pollination in agricultural/horticultural sectors)</p> <p>There should be more government support for an industry which the general public benefit from and rely on</p> <p>Proposed levy leads to a massive increase in funds - where will this be spent?</p>
<p>Other suggestions</p>	<p>Agency should find ways to incentivise beekeeping - (e.g. important for farms, environment); Agency should want to incentivise beekeeping as an environmental benefit</p> <p>Beekeeping industry is too fragmented, needs to be one governing body with representation from all groups</p> <p>Changes to the biosecurity act - beekeeper/apiary register should be primary register for all apiculture purposes</p> <p>Cost should be borne by border control as this is the source of the problem</p> <p>How does the board feel about the proposed change to election rather than appointment?</p>

E. LETTER SUBMISSION ANALYSIS

In addition, 14 letters or emails were sent as submissions. These are briefly summarised and analysed separately from the survey responses, and are referred to as 'letter submissions' in this report. Three of these submitters were also respondents to the Survey Monkey Survey.

The submissions were from:

- large (6) and
- medium (3) beekeepers.
- small (3) beekeepers.
- beekeeping organisation (2)

Table 12: Brief summary of submissions received by email or letter

	Beekeeper category	Brief summary/key points of submission
1	Large owner	<p>Beekeepers are in financial crisis and struggling to survive and make a living. Honey buyers are paying very little and not covering the costs of producing the honey and making a living. <i>'We simply can't afford extra fees'</i></p> <p>AFB can't be eradicated and would have been a long time ago if this was possible.</p> <p>Good beekeepers will work to keep their bees healthy in order to maintain a living.</p> <p>Risk that some beekeepers will abandon their bees and beehives due to financial strain, and their bees will go wild or die, and potentially make AFB worse.</p>
2	Small owner	<p>Paying per hive is pointless as hives die and hives swarm.</p> <p>Suggests that beekeepers be able to purchase an 'annual non-refundable license' that relates to the number of hives they own in that year.</p>
3	Large owner	<p>Need to combat the seasonal movement of hives to temporary sites by some beekeepers. This practice creates risks for permanent apiaries at these sites, dislocates bees from their hives when they are moved again, and leaves a <i>'mess behind'</i>.</p> <p>Suggests there is a need to control and record the movement of all hives to combat <i>'overcrowding and boundary dumping practices that are a scourge our industry'</i></p>
4	Large owner	<p>The beekeeping sector has not had sufficient time to consider and discuss the proposal, and the proposal should be discussed at the upcoming conference. The time period for submissions should have been longer, and the Survey Monkey questions were not fairly weighted.</p>

The proposal emphasises a compliance rather than supportive approach. *‘There needs to be a culture change where a beekeeper is not penalised for having AFB...Its only when all actions fail that the Management Agency needs to use the law...’* The Management Agency’s *first job is to assist the beekeeper control and eradicate the disease from his hives.*”

Issues raised for consideration, include:

- any downsides of a hive levy, noting that it may increase non-compliance as has happened in the past
- protecting near-by beekeepers when contaminated hives have been identified/destroyed (including turning the soil in front of contaminated hives)
- impact on business profitability, particularly commercial beekeepers who will incur the highest levy increase under the proposal
- justification for regular levy increases over five years
- criteria for determining when to take action against a beekeeper
- best practice guidelines for Management Agency after AFB infection is identified
- potential impact of, and Management Agency response to, new technologies in AFB detection and elimination
- ownership and use of the database, and database upgrade
- preventing the spread of AFB when some beekeepers are moving hives around the country to produce manuka honey
- management of hives under notice for beekeepers to clean up, and are being cleaned up, but too slowly
- removing beekeepers DECA is very punitive.

Questions raised include:

- how will the levy be spent each and every year, for the next five years?
- what research does the Management Agency intend to commission, taking into account the work and findings of international bee scientists?

Suggestions include:

- levy increase per year should only be allowed on a vote by the beekeepers
- red, amber and yellow alert hive percentages are not realistic as infection levels differ relative to the number of hives e.g. beekeeper that owns one hive, and it is infected, has 100% infection
- sale or gifting of hives, nucs and swarms should be reported to the Management Agency

		<ul style="list-style-type: none"> • restricted place notices' should have a very short life-span to minimise and negative impacts on bee health • Management Agency to adopt international best practice guidelines.
5	Small owner (also submitted on Survey Monkey)	<p>Supports increase to implement the AFBPMP but not confident the money will be used wisely, or that it has the teeth to address non-compliant beekeepers</p> <p><i>"Fees should be adjusted for larger operations otherwise they will hide their hives and apiaries, and not declare them."</i></p> <p>Random testing of honey at local markets should be undertaken amongst wide spread of beekeepers, and not focus on just a few</p> <p>High risk are corporate beekeepers who move hives frequently without checking for AFB before they are moved. <i>'We get a rush of AFB alerts as soon as the corporates bring their hives back into town for winter feeding'</i>.</p> <p>Suggestions include:</p> <ul style="list-style-type: none"> • Phone app to report abandoned hives or non-compliant beekeepers • All honey sent to the labs for any test at all, are also tested for AFB • Every corporate beekeeping team should include a DECA holder.
6	Medium owner (also submitted on Survey Monkey)	<p>Beekeepers should not be treated as a criminals when AFB is detected in their hives, and not all beekeepers with AFB infected hives are non-compliant. The focus should be on finding the source of the infection and working together with affected beekeepers.</p> <p>Beekeepers with fewer than five hives should be registered at no charge, to ensure they are registered and <i>"will be inspected every year as insurance for commercial hives nearby"</i>.</p> <p>Many beekeepers have little beekeeping knowledge and there is an urgent need for qualified staff to educate the beekeeping community.</p>
7	Beekeeping organisation	<p>The proposal is misconceived and should be separated into two parts, one about funding, and one about the way AFB is controlled. The latter should be subject to a separate consultation.</p> <p>The proposal to look at spore levels in honey to identify areas for inspection and audit, is a big shift and has not been subject to proper consultation.</p> <p>The Management Agency needs to set AFB management goals and implementation strategies in consultation with beekeepers, and as a separate process prior to increasing the levy.</p> <p>Recent AFB outbreaks indicate current beehive surveillance policies and activities are failing. Apiculture NZ should review this situation.</p> <p>Supports a beekeeper and apiary levy, not the proposed hive and beekeeper levy. The latter was in place in the past and there was large scale non-compliance. A hive levy is particularly advantageous to businesses renting</p>

		<p>hives.</p> <p>Beekeepers are facing lower honey prices and most beekeepers cannot afford the proposed level of levy increase. The proposal loads large fixed costs onto beekeepers without explanation or justification.</p> <p>Cost recovery proposals will financially penalise beekeepers, even if their management practices are not at fault. Red alert beekeepers with 800 hives are at risk of being broke after 2 or 3 years due to inspection costs. <i>“Our biggest concern is the open-ended ability to charge the beekeepers for non-compliance issues ... more emphasis should be put onto education and assistance, not the heavy handedness...”</i></p> <p>Inspections by inexperienced persons may be time-costly compared with experienced beekeepers. Beekeepers should not pay for inefficient inspections. <i>“Increasing the number of traffic police has not brought down the road toll down – increasing funding for the AFB PMP exponentially will not bring the level of AFB down. Education and mentoring are the key”.</i></p> <p>Questions raised about the proposal include:</p> <ul style="list-style-type: none"> • Where in the supply chain, will honey samples be collected? • What level of spores would trigger an inspection? • Will the beekeeper be charged with full cost recovery of inspections, or only charged if the findings result in red or amber alert categories? • What is the process of inspection of the geographic clusters of AFB, and who will be targeted (e.g. beekeepers with notified diseased and/or those who don't, beekeepers with history of compliance/non-compliance and/or history of AFB or no AFB)? • What is a fair cost of inspections and will the beekeeper be able to question whether the job has been carried out efficiently, and initiate a grievance process if necessary? <p>Suggestions include:</p> <ul style="list-style-type: none"> • Offering a levy discount for complying beekeepers who have very low levels of disease.
8	Large owner (also submitted on Survey Monkey)	<p>The proposal introduces operational aspects of the PMP, covered by '98 Order in Council, that should be subject to a separate consultation.</p> <p>It is unclear how the legislation and PMP Orders could be changed to implement the proposals. <i>“It appears Apiculture NZ are acting or exceeding the limits of what is provided by the Biosecurity Act and PMP Orders”.</i> <i>“I believe it is time that there is a formal review of the performance of Apiculture NZ in its role as management agency for the AFB PMP.”</i></p> <p>The Management Agency is failing to address operational shortfalls with the</p>

		<p>money already provided. The PMP fails to identify beekeepers with increasing AFB levels early enough, and to assist those beekeepers implement better AFB controls in hive management. Some beekeepers are making unauthorised inspections of neighbouring beehives in default of the Management Agency.</p> <p>Beekeepers should be presented and consulted on all options to eliminate AFB, including alternatives to the present system such as antibiotic feeding.</p> <p>The proposal <i>'fosters non-compliance and an increasing unhealthy culture of intervention into some beekeepers operation where suspicion and mistrust becomes the outcome of Apiculture NZ's proposals.'</i></p> <p>A hive levy was rejected as a preferred method of funding in 2003 due to enforcement issues regarding non-compliance. It appears the Agency has been influenced by the views of hive rental operators.</p> <p>Funds should be spent on operational aspects of the PMP rather than endless consultation and bureaucracy.</p> <p><i>"The consultation has been incompetently thought through..."</i>. Proposed initiatives lack sufficient detail and raise questions. There is no validity in the consulted cost of AFB at \$50m over 10 years</p> <p>Questions raised about the proposal include:</p> <ul style="list-style-type: none"> • How will the Management Agency address non-compliance? <p>Suggestions include:</p> <ul style="list-style-type: none"> • Operational aspects of the PMP should be subject to a separate consultation • Formal review of the performance of Apiculture NZ it its role as management agency for the AFB PMP
9	Large owner	<p>A hive levy was in place some years ago, but it was costly to verify that beekeepers were registering hives. Suggests support for this current proposal is mainly from <i>'hobby beekeepers who are not the main part of the industry just as the life style farmers are not the sheep and beef industry'</i>.</p> <p>Education and training is a key mechanism for reducing AFB however the current proposal reduces the education spend from 9.8% to 5.4%. There has been little education activity in recent years despite an increase in beekeeper numbers. There are DECA courses by few field days. The cost of attending conferences is too high for many beekeepers.</p> <p><i>"Training/education are the key components to recognising and reducing AFB incidence not penalties which should only be resorted to after all avenues have been pursued."</i></p> <p>Appears to be assumption that beekeepers are dishonest in their reporting. Spore testing is not indicative of clinical signs of AFB, and without clinical signs, destruction of hives is not warranted. Spore testing and cost recovery fees will not reduce AFB and may potentially drive reduced reporting.</p>

		<p><i>“Introducing a system whereby reporting AFB will then automatically cause close scrutiny, and potentially additional cost is likely to reducing reporting. This is not what anyone wants.”</i></p> <p>Questions raised about the proposal include:</p> <ul style="list-style-type: none"> • What constitutes a hive (several definitions)?
10	Opposed Large owner	<p>A hive levy will not work as beekeepers under-declare their hive numbers and move their hives to another site ahead of an inspection. This has been a long-standing problem with a hive levy since 1904.</p> <p>Supports cost recovery from those who are blatantly flouting the law and uncooperative, but against using a heavy hand on everyone with AFB.</p> <p><i>“Charging people lots of money under the hive levy system and then treating them like criminals for getting AFB is never going to solve the problem, it is more likely to drive more non-reporting and non-compliance”.</i></p> <p>APINZ does not represent the beekeeping industry.</p> <p><i>“Although I have been a commercial beekeeper and a levy payer for many years, I have never had the opportunity to vote for AFB PMP board members, nor been able to have a say or vote on major policies regarding AFB. As a levy payer I demand these rights be given to me as well as the other 9000 levy payers”.</i></p> <p>Questions raised about the proposal include:</p> <ul style="list-style-type: none"> • What constitutes a hive – a nuc, poly mating nuc, breeding unit with 4 to 8 queens? • How will you work out the number of hives per beekeeper? Hive numbers can fluctuate month to month. <p>Suggestions include:</p> <ul style="list-style-type: none"> • Different levels of payment for larger hive numbers on an apiary site i.e. up to 50 hives, one fee; 51-100 a higher fee; 101-150 higher again and so forth. • <i>Formal review of the performance of Apiculture NZ in its role as management agency for the AFB PMP</i>
11	Medium owner	<p>In the past the levy payment was based on hive numbers but did not work with many beekeepers not fully declaring hive numbers. Apiaries are required to be registered and is a more workable basis for the levy.</p> <p>The proposed penalty system is a step in the right direction.</p> <p>The Management Agency has adequate finances. Over the last two years most beekeeping businesses have experienced poor harvests, low honey payments and increasing costs. The current proposal would triple the levy payment of many businesses.</p> <p>The AFB PMS Board have not complied by developing and advising of the five</p>

		<p>year plan or review.</p> <p><i>“The current Board has not been elected by the levy payers and is not representative of the bee industry. As such the Board does not have mandate to proceed with the proposed method or increases.”</i></p> <p>The timing of this consultation is poor as February and March are two of the busiest months for beekeepers. <i>“It would be difficult for most to find the time to adequately consider the implications and send in a submission”.</i></p>
12	Large owner	<p>The governance of the AFB PMP should be run by an independent group appointed by levy payers.</p> <p>A hive based levy is unworkable. Hive numbers fluctuate and defining a hive is almost impossible.</p> <p><i>“Bully boy tactics”</i> send AFB reporting underground, and incite mistrust and bullying from uneducated beekeepers. <i>“You must show it is the correct thing to report AFB”.</i></p> <p>Suggestion:</p> <ul style="list-style-type: none"> • A tiered system of fees for hive numbers on site, with a different fee applying to each tier.
13	Small owner**	<p>Supports the hive levy, however the proposed base charge is too high for small beekeepers who will be paying well beyond their share.</p> <p>Proposes the “base charge just adequately covers the cost of the Apiary register and a fee for each individual hive operated by the beekeeper. Using this basis, the levy can be readily adjusted to produce the desired funds for the forthcoming AFB programme. There would be few that could argue that this would not be a fair and equitable levy, and one would hope that it would produce a greater willingness to pay into. This would be fair and equitable.</p>
14	Beekeeper organisation**	<p>Supports the hive levy, however the proposed base charge is too high for small beekeepers who will be paying well beyond their share.</p> <p>Proposes the “base charge just adequately covers the cost of the Apiary register and a fee for each individual hive operated by the beekeeper. Using this basis, the levy can be readily adjusted to produce the desired funds for the forthcoming AFB programme. There would be few that could argue that this would not be a fair and equitable levy, and one would hope that it would produce a greater willingness to pay into. This would be fair and equitable.</p>

** note submissions 13 and 14 were from different submitters, but the same text was used.

APPENDIX ONE

Complaints on the survey were recorded by 20 survey respondents.

Table 13: Summary of survey respondent complaints about the survey

Complaints
1) Questions do not adequately address beekeeper's concerns
2) Not enough time to respond. Beekeepers are in the middle of extraction and haven't been able to respond
3) Plan is unclear and/or not detailed enough
4) Agency's approach to AFB monitoring and auditing was not explained well
5) More detail needed about how much will be spent on administration and governance
6) More detail needed about approach to inspections
7) Document doesn't explain how AFB problem will be fixed
8) Document doesn't sufficiently break down where money will be spent
9) Agency hasn't sufficiently explained why the plan needs a levy increase of this magnitude
10) Conclusions/discussion point from 5 year planning session not evident in document/plan (e.g. cost recovery, automatic testing of tutin samples, use of dogs)
11) Agency needs to meet keepers face to face
12) Survey is the same as the last
13) Survey is hard to read (white on yellow, red on black)