



# **Proposal to set the American Foulbrood Beekeeper Levy for 2021/22**

## **Consultation Findings**

**FINAL REPORT**  
**November 2020**

Undertaken for The Management Agency National American Foulbrood Pest Management Plan

Jan Mackay

## **Disclaimer**

We will accept no responsibility for any reliance that may be placed on our Report and it should not be used for any purpose other than that for which it was prepared.

The Report has been prepared with care and diligence and the statements and opinions expressed in the report have been made in good faith. On this basis, and to the knowledge of the authors of this report, all relevant information for the purposes of preparing this Report is true and accurate in material aspects, and not misleading by reasons of omission or otherwise.

Accordingly, Logic Partners accept no responsibility or liability for such information being inaccurate, incomplete, unreliable or not soundly based; or for any errors in the analysis, statements and opinions provided in this Report resulting directly or indirectly from any circumstances; or for any assumptions upon which this Report is based proving unjustified.

The information contained in this Report was produced solely for the Management Agency, American Foulbrood Pest Management Plan (AFB PMP), and Logic Partners accepts no duty to or accepts any responsibility to any third party who may rely upon this Report.

## **Acknowledgements**

We acknowledge the assistance of the AFB PMP Management Agency and Board in the preparation of this report, and the beekeepers for submitting survey responses, letters and emails.

## Contents

Executive summary

Introduction

A. Consultation Process

B. The Respondents

C. Survey Findings

D. Thematic Analysis

- a. Overview
- b. Theme areas
- c. Comments, suggestions and questions.

## Executive Summary

1. There were 95 responses entered on Survey Monkey (survey respondents) and nine letter submissions (letter submitters).
2. The response rate was low at one percent (that is 104 out of 9513 registered beekeepers). As such, findings should be interpreted with caution.
3. The majority of survey respondents (68%) agreed that honey surveillance should be increased to 1,000 samples per year.
4. The majority of survey respondents (69%) agreed that default inspections should be conducted on the apiaries of those beekeepers who default on their annual Certificate of Inspection obligations.
5. The majority of survey respondents (76%) agreed that the National American Foulbrood Pest Management Plan should be reviewed.
6. There were 43 survey respondents (47%) who agreed that the rate of levy for 2020/22 should be set at \$1.70 (\$1.96 including GST) per bee colony and \$40 (\$46 including GST) per beekeeper.
7. There were 34 survey respondents (36%) and nine letter submitters who disagreed with the proposed rate of levy for 2020/22, bringing the total to 43 beekeepers expressing disagreement.
8. Overall, amongst the one percent of all beekeepers who responded to the consultation, the agreement and non-agreement for the proposed rate of levy for 2020/22 was the same.
9. Just over half of survey respondents provided a comment, and a small number made several points that related to a number of areas. All nine letter submitters made several points.
10. The comments of survey responders and letter submitters were analysed and theme areas were identified. The main theme areas are summarised below.
  - a. Fee increase is unaffordable, unfair and/or unjustifiable
  - b. Consultation information or process not good enough
  - c. Target non-compliant beekeepers (but don't always assume the worse)
  - d. Improvements could be made by the Agency
  - e. Current funds are sufficient
  - f. AFB can't be eliminated
  - g. Benefits of enforcement are worth the cost
  - h. Need more beekeeper education
  - i. Increasing honey surveillance won't work, or hasn't been justified
  - j. Proposed Review is required anyway and/or should be led by independents not the Agency
  - k. Cost recovery items are included in the Budget
  - l. Levy should reduce

- m. The minority of beekeepers own the majority of colonies and levy increases affect their livelihood
- n. Beekeepers might not declare all their hives
- o. General support for the proposal and/or Agency.

11. Some survey respondents and letter submitters provided comments, suggestions or questions that could not be grouped into theme areas as they weren't raised by more than one other respondents. These are listed in the report.

.....

## Proposal to set the American Foulbrood Beekeeper Levy for 2021/22

### Consultation Process and Findings

October 2020

#### Introduction

#### A. CONSULTATION PROCESS

The Management Agency for the American Foulbrood Pest Management Plan (the Agency) conducted a consultation amongst beekeepers to seek their views about a proposal to increase the American Foulbrood (AFB) Beekeeper Levy.

The levy increase was proposed to help enable the Agency to increase its investment in AFB elimination.

The consultation period was for two weeks and three days, and opened on 9 September 2020 and closed at 5pm on 25 September 2020.

#### The Consultation Questions

The Consultation Document contained six questions for beekeepers to answer:

1. How many hives do you own?
2. Do you agree that honey surveillance should be increased from 500 to 1,000 samplers per year?
3. Do you agree that default inspections should be conducted on the apiaries owned by all beekeepers that default on their annual Certificate of Inspection obligations?
4. Do you agree that the Management Agency should review the National American Foulbrood Pest Management Plan to ensure that AFB continues to be under legislative control after 1 April 2023?
5. Do you agree that the rate of levy for 2021/22 should be set at \$1.70 (\$1.96 including GST) per bee colony and \$40 (\$46 including GST) per beekeeper?
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.

## B. THE RESPONDENTS

### Survey responses

There were 95 responses entered on Survey Monkey (referred to as survey respondents) and nine letter submissions (referred to as letter submitters) were also received.

Most registered beekeepers did not respond to the survey and the response rate was one percent (that is 104 out of 9513 registered beekeepers).

This is a low response rate and lower than other national consultations undertaken by the AFB Management Agency. For comparison, the number of responses to national consultations undertaken by the Agency in recent years is shown in the table one below.

**Table 1: Number of responses to national surveys**

Year	Survey	Responses
2019	Proposal to Replace the AFB Apiary and Beekeeper Levy with a Hive and Beekeeper Levy	466*
2018	Proposal to increase the AFB Apiary and Beekeeper Levy	828**
2018	Budget Consultation	11***
2017	AFB PMP – 5 Year Plan	39*
2016	AFB PMP – 5 Year Plan	404*
2016	Consultation Survey to Beekeepers	597*

Note not all consultations have been conducted using the Survey Monkey tool

\*Figures taken from Survey Monkey surveys

\*\*Figures taken from relevant consultation findings report

\*\*\*Figures provided by the Agency

Just over half of survey respondents provided a comment.

Almost half of all survey respondents owned less than six hives, and this group of beekeepers makes up 61% of all beekeepers nationally.

**Table 2: Number and percentage of Survey Monkey respondents (95) and letter submitters (9), and number and percentage of beekeepers nationally, by number of hives owned**

Number of hives	no of respondents	% all beekeepers	no beekeepers nationally <sup>^^</sup>	% of beekeepers nationally
1-10	56	-	7098	74.5%
11-250	24	-	1846	19.4%
251 or more	14	-	569	6%
Non applicable	1	-	-	-
<b>TOTAL</b>	<b>104</b>	<b>1.0%*</b>	<b>9513</b>	<b>100%*</b>

\* total may not be exactly 100% due to rounding up

<sup>^^</sup> registered beekeepers as at 24 April 2019 (Asure Quality, February 2018)

### C. SURVEY FINDINGS

The findings of the survey represent a small minority of views and the vast majority of beekeepers did not put forward a view on the proposals. Given these low response numbers, the findings should be interpreted with caution.

#### ***Do you agree that honey surveillance be increased from 500 to 1,000 samples per year?***

This question was answered by 94 survey respondents.

The majority of respondents (68%) agreed that honey surveillance should be increased to 1,000 samples per year.

A minority of 13 respondents (13%) disagreed.

**Table 3: Do you agree that honey surveillance by increased from 500 to 1,000 samples per year?**

Number of hives	Strongly agree		Agree		Neither agree or disagree		Disagree		Strongly disagree	
	no	%	no	%	no	%	no	%	no	%
1-10 hives	15	-	22	-	12	-	2	-	4	-
11-250 hives	7	-	13	-	1	-	1	-	2	-
251 or more hives	1	-	6	-	3	-	3	-	1	-
not applicable	0	-	0	-	1	-	0	-	0	-
<b>Total</b>	<b>23</b>	<b>24%</b>	<b>41</b>	<b>44%</b>	<b>17</b>	<b>18%</b>	<b>6</b>	<b>6%</b>	<b>7</b>	<b>7%</b>



***Do you agree that default inspections should be conducted on the apiaries owned by all beekeepers that default on their annual Certificate of Inspection obligations?***

This question was answered by 94 respondents.

The majority of respondents (69%) agreed that default inspections should be conducted on the apiaries of those beekeepers who default on their annual Certificate of Inspection obligations.

A minority of 12 respondents (13%) disagreed. Of these, 8 were beekeepers who owned more than 11 hives.

**Table 4: Do you agree that default inspections should be conducted on the apiaries owned by all beekeepers that default on their annual Certificate of Inspection obligations?**

Number of hives	Strongly agree		Agree		Neither agree or disagree		Disagree		Strongly disagree	
	No	%	No	%	No	%	no	%	no	%
1-10 hives	19	-	22	-	10	-	3	-	1	-
11-250 hives	9	-	9	-	2	-	3	-	1	-
251 or more hives	4	-	2	-	4	-	3	-	1	-
not applicable	-	-		-	1	-	-	-	-	-
<b>Total</b>	<b>32</b>	<b>34%</b>	<b>33</b>	<b>35%</b>	<b>17</b>	<b>18%</b>	<b>9</b>	<b>10%</b>	<b>3</b>	<b>3%</b>

***Do you agree that the Management Agency should review the National American Foulbrood Pest Management Plan to ensure that AFB continues to be under legislative control after 1 April 2023?***

This question was answered by 94 respondents.

The majority of respondents (76%) agreed that that National American Foulbrood Pest Management Plan should be reviewed.

A minority of 13 respondents (13%) disagreed.

**Table 5: Do you agree that the Management Agency should review the National American Foulbrood Pest Management Plan to ensure that AFB continues to be under legislative control after 1 April 2023?**

Number of hives	Strongly agree		Agree		Neither agree or disagree		Disagree		Strongly disagree	
	No	%	no	%	no	%	no	%	no	%
1-10 hives	13	-	30	-	7	-	3	-	2	-
11-250 hives	8	-	12	-	1	-	2	-	1	-
251 or more hives	4	-	4	-	2	-	2	-	2	-
not applicable	-	-	-	-	-	-	-	-	1	-
<b>Total</b>	<b>25</b>	<b>27%</b>	<b>46</b>	<b>49%</b>	<b>10</b>	<b>11%</b>	<b>7</b>	<b>7%</b>	<b>6</b>	<b>6%</b>

***Do you agree that the rate of levy for 2021/22 should be set at \$1.70 (\$1.96 including GST) per bee colony and \$40 (\$46 including GST) per beekeeper?***

This question was answered by 93 survey respondents.

There were 43 survey respondents (47%) who agreed that the rate of levy for 2020/22 should be set at \$1.70 (\$1.96 including GST) per bee colony and \$40 (\$46 including GST) per beekeeper.

There were 34 survey respondents (36%) who disagreed.

All nine letter submitters indicated opposition to this proposal in their text. Combining the number of letter submitters and survey respondents who disagreed with this proposal, gives a tally of 43 beekeepers expressing disagreement.

Overall, amongst the one percent of all beekeepers who responded to the consultation, the support and non-support for this proposal was the same.

**Table 6: Do you agree that the rate of levy for 2021/22 should be set at \$1.70 (\$1.96 including GST) per bee colony and \$40 (\$46 including GST) per beekeeper?**

Number of hives	Strongly agree		Agree		Neither agree or disagree		Disagree		Strongly disagree	
	No	%	No	%	no	%	No	%	no	%
1-10	9	-	19	-	10	-	4	-	12	-
11-250	3	-	10	-	3	-	1	-	7	-
251 or more	1	-	2	-	2	-	1	-	9	-
not applicable	0	-	0	-	0	-	0	-	1	-
<b>Total</b>	<b>13</b>	<b>14%</b>	<b>31</b>	<b>33%</b>	<b>15</b>	<b>16%</b>	<b>6</b>	<b>6%</b>	<b>28</b>	<b>30%</b>

## D. THEMATIC ANALYSIS

### a. Overview

Nearly half of all the 95 survey respondents provided comments (53).

As shown in table six below, 30 comments were provided by beekeepers owning less than 50 hives. A further 23 comments were provided by beekeepers with more than 11 hives.

**Table 7: Number 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 of respondents	23	7	8	7	1	3	4	0

In addition, nine letter submissions were received and these have also been included in the thematic analysis.

### b. Theme areas

The theme areas represent common topics that emerged from the comments, and are summarised in Table 8 below.

Most of the survey respondents who made comments did so in relation to one theme area (n=43), and a small number, along with letter submitters (n=15), made several points that relate to a number of theme areas. As such, the theme analysis is skewed towards the views of respondents who made several points.

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

Some provided comments, suggestions or questions that could not be grouped into theme areas as they weren't raised by other beekeepers. Some of the main points raised are shown in Table 9.

Comments grouped into a theme area pertain to at least three beekeepers.

**Table 8: Key themes and sub themes**

Themes, sub themes and quotes	
<b>a. Fees increase is unaffordable, unfair and/or unjustifiable</b>	
Financially hard for business	“The levy increasing year after year is making the financial viability of small commercial operations harder”.
Too high for hobbyists	“As a hobby beekeeper the cost is getting too high for virtually no gain”
Fees shouldn’t increase so soon/or keep increasing	“I am concerned there is going to be a relentless piling on of new fees and a relentless increase in these fees”.
<b>b. Consultation information or process not good enough</b>	
Not enough information provided to properly consider the proposal	“Your requests for further funding are not backed up by sufficient data to enable Beekeepers to make an informed decision”.
Survey is not appropriate for a consultation	“This is called a push poll where those that respond are pushed to supporting the proposal”. “Using a survey to conduct consultation on a levy and what it is used for is not an appropriate mechanism”. “...the use of a survey, as generally conducted by the agency, does not appear to be the consultation process, provided by the regulations”.
Levy consultation process being undertaken is not aligned with Management Agency policy	“There does not appear to be scope for the agency to run a survey or poll as part of the submission process”. ... the agency on this occasion have deviated from their own (inadequate) policy and appear to be running the current consultation under an ad hoc basis. The Levy Order (cl 10) provides for the agency to set the levy rate AFTER consulting with beekeepers”.
Not enough time to consider and discuss	“Very few beekeeping groups have had an opportunity to discuss the proposed increase in levy at face to face meetings”. “The current consultation process adopted by the management agency does not allow time for levy payers to obtain information necessary for them to submit their informed view”.
<b>c. Target non-compliant beekeepers (but don’t always assume the worse)</b>	
Beekeepers who don’t submit certificate of inspection should be charged a fee or inspected at their cost	“I agree that beekeepers' apiaries who don't send in an ADR should be checked, however as it is a breach of the agreement, they should be personally billed for it. We shouldn't all be liable for the costs of beekeepers who are negligent”.
Beekeepers who don’t submit a certificate of inspection should get a warning first	“the owner may have carried out the inspection, but just failed to return the form. So I believe that some warnings should be given before default inspections are undertaken”.

Non-compliant beekeepers should be fined or have their bees removed or hives burnt or shut down	<p>“Shut down businesses that repeatedly break the rules and are responsible for big outbreaks and prosecute the individuals”.</p> <p>“It is not money from registered beekeepers that will fix the situation in NZ. Unregistered hives in my opinion should be burnt. Don’t preach to the converted as they say”.</p>
There are a growing number of responsible beekeepers	“We are getting more and more hobbyists asking us to check their hives for AFB. It shows there are responsible people out there and those who are not should be made to pay”.
<b>d. Improvements could be made by the Agency</b>	
Agency should respond to complaints of poor practices and give feedback following investigations	“Twice now I’ve called on your services to investigate poor practices. And both times nothing was done nor any investigation take place”.
Agency is ineffective and bureaucratic	“I have never seen a government-run process be successful in eliminating something like AFB”.
New methods to fight AFB needed	“Apiary inspections – my opinion is that the battle over AFB is not being won, so if the board continues with more of the same procedures we will never achieve eradication. New constructive methods are required and I am unable to see in the budget where this is going to happen”.
Operational arm of the Agency not good enough	“I’ve been paying the levy for years but find the PMP organisation less than helpful. Instead I’ve had to resort to sorting out abandoned hives and cowboy operators with AFB on my own terms where possible”.
<b>e. Current funds are sufficient</b>	
Funds for the 2020 Review should come from funds in audited accounts	“Funds for the Review in 2020 should come from accumulated funds already available in the audited accounts”.
More than sufficient funding reserves are being held	“Accumulated funds up to \$50,000 are sufficient to meet unexpected costs, but to have \$272,000 just for a rainy day is unacceptable. This surplus should mean that there is no necessity for an increase in the levy for the coming financial year”.
<b>f. AFB can’t be eliminated</b>	
AFB probably or definitely can’t be eliminated	“You will never eradicate AFB unfortunately but it can be managed”.
<b>g. Benefits of enforcement are worth the cost</b>	
A necessary cost but money needs to be spent wisely and prudently	“All these AFB monitoring activities will cost, but the cost to the New Zealand honey industry as a result of a widespread AFB outbreak is significantly higher”.
<b>h. Need more beekeeper education</b>	
Beekeepers need to be aware of their obligations	“With the ever increasing numbers of hobby beekeepers, it is vital that the message of AFB is widely promoted so that all existing and new hobbyist entrants are made aware of their obligations and do comply with the rules, that the

	program of monitoring of hive sites to identify unregistered sites is robust”.
Help beekeepers help themselves	“There is no way you can inspect all the hives in NZ but if you can better educate people on what they are supposed to do then they can check their own hives confidently”.
Educate beekeepers not to sugar feed bees	“You must educate beekeepers as to not sugar feed bees in the winter - give and leave enough of their own honey in the hives to give them food for the winter”.
<b>i. Increasing honey surveillance won’t work, or hasn’t been justified</b>	
Not enough information to assess whether cost-effective	“I have not been provided sufficient information regarding the proposal to sample 1,000 honey samples for AFB, to enable me to assess if this cost is a worthwhile investment for levy funds”.
Honey testing doesn’t work	“From my past experience, and I have a lot of it, honey testing is just a waste of money, as Packers like ourselves blend honey from many different sites and different beekeepers...”
Hobbyist beekeepers will be missed by the Proposal	“You will miss most if not all of the small scale "hobbyist". Who through ignorance or neglect could be affecting others close by”.  “I consider honey samples to be only a general indicator of AFB levels. If RMP operators are being targeted it looks like hobby beekeepers are being ignored”.
<b>j. Proposed Review is required anyway and/or should be led by independents not the Agency</b>	
Review is required under legislation so agreement from beekeepers not required	“The proposed review is required under existing legislation. So there is no need to specifically request permission”.
The Management Agency should not lead the Review	“The management agency has a conflict of interest as a service provider to the PMP therefore I do not agree that the management agency should lead a review”.  “It is not appropriate Apiculture NZ should lead the review process”.  “The PMP is an initiative of all beekeepers and the review should be led by an independent group of knowledgeable people that understand the review process, with the aim of improving efficiency, eradicating AFB in New Zealand at the lowest possible cost”.
<b>k. Cost recovery items are included in the Budget</b>	
Budget includes funding for items previously advised as cost recovery items	“The budget proposal includes items that the agency have previously informed the levy payers are cost recovered”.
Course costs should be recovered from participants	“The Agency appears to have listed the AFB recognition course and default inspections as an expense to all levy payers, whereas these items are cost recovered items”.
<b>l. Levy should reduce</b>	
Cost saving initiatives should reduce the proposed levy rate for the 2021/22 levy year	“The budget proposal included items that the agency have previously informed the levy payers are cost covered ... Funds for the Review in 2023 should come from

	accumulated funds...”. “Cumulative effects of the above points will provide cost saving initiatives ... that should be reflected in a substantial reduction in the proposed levy rate for the 2021/22 levy year.”
<b>m. The minority of beekeepers own the majority of colonies and levy increases affect their livelihood</b>	
Levy increases impact on the livelihood of commercial beekeepers	<p>“The majority of NZ beekeepers own the minority of colonies while those that own the majority of colonies are a minority of beekeepers. Because there is a difference of impact and cost for the different ownership categories those that analyse any submission process must be conversant with the makeup of the industry in order that a fair outcome is established”.</p> <p>“At no time should the views of hobbyists with 1-5 or 1-10 hives have the ability to determine the outcome for those who depend on their beehives for a living”.</p>
<b>n. Beekeepers might not declare all their hives</b>	
May lead to beekeepers not declaring all their hives/colonies	<p>“...if you increase costs, more will choose not to disclose all apiaries and the AFB problem will worsen”.</p> <p>“I believe the agency has opened the door for beekeepers to manipulate colony numbers in order that they evade cost”.</p>
<b>o. General support for the proposal and/or Agency and/or aspects of the Agency’s work</b>	



### c. Comments, suggestions and questions

There were 17 survey respondents and letter submitters who made comments, suggestions or questions which could not be grouped into themes. These could not be grouped into themes if the view was expressed by one or two beekeepers only. The main points are shown in Table 9 below.

**Table 9: Summary of comments, suggestions and questions raised by a single respondent or submitter**

Comments
The system seems onerous
Levies for hobbyists should be lower than for commercial businesses
Honey infected with AFB and sold to consumers can spread the disease to residential areas
The AFB Board and Management Agency is not truly representative of beekeepers. Levy payers should elect the Board.
The Agency is not using the best scientific methods to find and eliminate AFB and should be looking to new research knowledge and updating their training.
The Agency imposed an alternative method to fund the PMP despite disagreement from the majority of the industry participants.
The Agency does not need a monthly newsletter and should use email through existing communication channels.
A \$33,000 IT system is unlikely to make it easier to comply with AFB PMP requirements.
The Agency has opened the door for beekeepers to manipulate colony numbers to evade cost.
The Agency is employing more people to operate the AFB PMP but has not outlined the benefits and costs of doing so.
The work of Logic Partners is deficient as they don't have adequate industry knowledge that would add balance to their interpretations.
Suggestions
More staff to inspect hives
Implement proper breeding practices and selecting for hygienic stock.
Wording should be added to the NPMP to emphasise the role of beekeepers in managing AFB. The onus should rest solely with the NPMP.
Refresher courses for AFB should be free of charge
AFB investigation findings should be transparent and reported back to the industry
Beekeepers with over 50 hives should receive an AFB levy subsidy from government
If the cost of compliance continues to grow, this may lead to beekeepers going out of business. Compensation for such losses should be considered as part of the 2023 Review.
Don't charge GST
Presence or absence of AFB should not be used for Market Access

Encourage beekeepers to test their honey samples for AFB when they do their tutin testing and negotiate a collective testing contracts for all beekeepers.
AP2 should be using a test kit or taking samples during inspections.
Enable beekeepers to spread levy payments over a different time period to ease financial pressure.
<b>Questions</b>
Who is paying for the Apiary Data Base? And is MPI and Assure Quality contributing to the cost?
Can the membership fee for the APINZ and the AFB Levy be linked and discounted against one another? Such a discount would be helpful to small hobbyists.
Can we have insurance against losses resulting from AFB?
Can books by Dr M Goodwin on AFB and Varroa be provided free as part of AFB course?
Why doesn't New Zealand have a mating station?
Can default inspections be cost recovered?

.....