



Proposal to set the American Foulbrood Beekeeper Levy for 2022/23 Summary of Submissions, November 2021

Executive Summary

1. There were 86 submitters, including five submitters who provided letters.
2. Most submitters (65%) supported the proposal for the rate of levy to remain the same.
3. For beekeepers who owned less than 251 hives, most supported the proposal. However, for the eight submitters with more than 501 hives, seven disagreed with the proposal.
4. Fifty-six submitters agreed with the proposal, and reasons given included:
 - Increasing the levy would be too hard in this tough financial time
 - Levy should reduce.
5. Twenty-four submitters disagreed with the proposal, and reasons given included:
 - Lack of detail and accountability, and some budget items were queried. Issues raised included:
 - AFB recognition courses are cost recovery and not funded by levy payers
 - Honey surveillance is costly and/or unnecessary
 - AFB PMP review cost is too high
 - Apiary registration budget should have reduced with the implementation of Hive Hub
 - Extension and communication budget should be increased or maintained. Research should be removed as it is not part of the AFB PMP
 - Administration, governance, and staffing costs are too high.
 - Levy should reduce as many beekeepers are experiencing financial hardship, and some budget items are too high.
 - Consultation process was inadequate. There was insufficient information to make an informed decision about the proposal and surveys are not consultation.
6. Some common issues were raised by submitters, irrespective of their level of agreement with the proposal. These included:
 - Levy should reduce
 - Management Agency is unable to control or eradicate AFB
 - Commercial beekeepers should pay more than hobby beekeepers - and an opposite view, that hobby beekeepers should pay more than commercial beekeepers
 - Levy on per hive basis is appropriate - and an opposite view, that the levy should be based on site registrations
 - Levy should increase to pay for research, and/or insurance, and/or for more AFB elimination efforts.



7. The most expressed view was that the levy should not go up and/or should reduce, irrespective of the level of agreement with the proposal.

A. Consultation Process

The Management Agency for the American Foulbrood Pest Management Plan (the Agency) invited submissions from beekeepers to seek their views about a proposal for the American Foulbrood (AFB) Beekeeper Levy to remain the same.

Beekeepers were invited to make submissions by:

- responding to consultation questions using the SurveyMonkey online submission tool, or
- sending a submission by email or post mail to the Management Agency.

The period to make submissions was two weeks and opened on 23 September 2021 and closed on 8 October 2021.

B. The Consultation Questions

The Consultation Document contained three questions:

1. How many hives do you own?

Respondents were asked to select an answer from one of eight provided checkboxes.

2. Do you agree that the rate of levy for 2022/23 should remain the same as the rate of levy for 2021/21 at \$1.70 (\$1.96 including GST) per bee colony and \$40 (\$46 including GST) per beekeeper?

Respondents were asked to choose from one of five responses which were set on a Likert scale¹: strongly disagree; disagree; neither agree or disagree; agree; or strongly agree.

3. Do you have any comments on the proposal that the rate of levy should remain the same? This was an open-ended question inviting comment.

C. Method

Beekeepers and other stakeholders were invited to respond to the consultation questions using the SurveyMonkey online survey platform.² Beekeepers could provide their responses through SurveyMonkey, or by emailing or posting their response.

The responses to the first two consultation questions were analysed using SurveyMonkey software, which calculated the number and percentage of respondents that chose each of the respective answer options. The responses to the third consultation question were analysed using a qualitative method, whereby similar categories of text are grouped together as themes (referred to as thematic analysis) to present common areas of feedback.³

¹ The scale is known as a Likert scale. Likert scales are often used in survey research in which people express attitudes or other responses in terms of ordinal-level categories (e.g., agree, disagree, etc) that are ranked along a continuum (Neuman, W.L., 2006, 'Social Research Methods, Qualitative and Quantitative Approaches', p.207).

² The SurveyMonkey platform helps design, send, collect, and analyse responses to surveys.

³ Thematic analysis involves segmenting text into categories and labelling them with a descriptive term (referred to as coding). In this way a growing list of categories is developed, and similar categories are grouped together as themes. The categories and themes are not predetermined by the researcher but created from the bottom up 'working back and forth between the themes and the database' until a set of themes has been

The analysis of submissions, and the reported findings, are solely the work of the researcher. The researcher is employed by the Management Agency to provide research and policy services.

D. Previous national consultations

The number of submissions received for this 2022/23 levy consultation is lower than the number received in the previous year for the 2021/22 levy consultation, as shown in table one below.

Table 1: Number of responses to national consultations

Year	Survey	number submitters
2021	Proposal to set the AFB Levy for 2022/23	86
2021	Consultation on the Review of the AFB PMP, Round One	434
2020	Proposal to set the AFB Levy for 2021/22	104
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

E. Respondents

There were 86 submitters and most of these made an on-line submission using the SurveyMonkey submission tool. Of the 86 submitters:

- 53 made an on-line submission (including one respondent who also sent a letter)
- 27 posted or emailed the completed consultation questionnaire and these were manually entered into the on-line consultation tool (including one respondent who also sent a letter)
- three sent an email stating their response to the proposal and these were manually entered into on-line consultation tool
- Five sent letters.

Most submitters owned less than ten hives, and this group of beekeepers makes up 76% of all beekeepers nationally.

established (Creswell, J., 2009, 'Research Design, Qualitative, Quantitative, and Mixed Methods Approaches', p.175). This process of identifying categories and themes as the researcher works through the data is a form of inductive data analysis.

Table 2: Number and percentage of on-line submitters, and number and percentage of beekeepers nationally, by number of hives owned

Number of hives	number submitters	% submitters	number beekeepers nationally	% beekeepers nationally
1-10	53	66%	7906	76%
11-250	14	18%	1861	18%
251 or more	13	16%	577	6%
Non applicable	-	-	-	-
Total	80*	100%**	10,344	100%**

* Note that not all submitters answered this question

**Percentages rounded up

F. Findings

1. Do you agree that the rate of levy for 2022/23 should remain the same as the rate of levy for 2021?

Most submitters (65%) supported the proposal for the rate of levy to remain the same.

Table 3: Do you agree that the rate of levy for 2022/23 should remain the same?

Answer choices	number of answers	% answers
Strongly agree	34	40%
Agree	22	25%
Neither agree or disagree	6	7%
Disagree	13	15%
Strongly disagree	11	13%
Total	86	100%**

**Percentages rounded

For beekeepers who owned less than 251 hives, most supported the proposal. However, for the eight submitters with more than 501 hives, seven disagreed or strongly disagreed with the proposal. This is shown in table four below.

Table 4: Responses to 'do you agree that the rate of levy for 2022/23 should remain the same' by number of hives owned

Number of hives owned	Answer choices					Number of all responses*
	Strongly agree	Agree	Neither agree or disagree	Disagree	Strongly disagree	
1-5 hives	20	7	3	6	2	38
6-10 hives	6	6	1	1	0	14
11-50 hives	2	4	0	2	1	9
51-250 hives	3	1	1	0	0	5
251-500 hives	2	0	1	0	2	5
501-1000 hives	0	0	0	1	2	3
1001 hives or more	1	0	0	0	4	5
Total						78*

* Note that not all submitters provided the number of hives owned and/or responded this question was not applicable.

2. What comments were made?

Over half of submissions provided comments, including five letter submissions.

Comments have been analysed to show the views of two groups of respondents - those that didn't agree with the proposal, and those that did agree with the proposal. In addition, some shared issues were raised by submitters irrespective of their level of agreement with the proposal.

Overall, the most expressed view was that the levy should not go up and/or should reduce, irrespective of the level of agreement with the proposal.

2a. Views of submitters who agreed with the proposal

Twenty-six of the 56 submitters who strongly agreed or agreed with the proposal, provided comments. Some expressed a general statement of support for the proposal, and some provided reasons for agreeing with the proposal. Common reasons for agreeing with the proposal were:

- Increasing the levy would be too hard in these tough financial times. Beekeeping is expensive for hobby beekeepers, and commercial beekeepers are struggling.
- Levy should reduce.

2b. Views of submitters who disagreed with the proposal

Eighteen of the 24 submitters who strongly disagreed or disagreed with the proposal, provided comments. Reasons for disagreeing with the proposal included:

- Lack of detail and accountability. The following budget items were queried as too high and/or requiring explanation:
 - AFB recognition courses are cost recovery and not funded by levy payers
 - Honey surveillance is costly and/or unnecessary
 - AFB PMP review cost is too high

- Apiary registration budget should have reduced with the implementation of HiveHub
- Extension and communication budget should be increased or maintained. Research should be removed as it is not part of the AFB PMP
- Administration, governance, and staffing costs are too high.
- Levy should reduce. Many beekeepers are experiencing financial hardship, and some budget items are too high.
- Consultation process was inadequate. There was insufficient information to make an informed decision about the proposal and surveys are not consultation.

2c. Shared issues

Some shared issues were raised by submitters, irrespective of their level of agreement with the proposal. These included:

- Levy should reduce
- Management Agency is unable to control AFB, as it does not have sufficient power to do so, or AFB can't be eradicated
- Commercial beekeepers should pay more than hobby beekeepers - and an opposite view, that hobby beekeepers should pay more than commercial beekeepers.
- Levy on per hive basis is appropriate - and an opposite view, that the levy should be based on site registrations
- Levy should increase to pay for research, and/or insurance, and/or for more AFB elimination efforts.

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