



Summary of Findings

Background

This report summarises key findings from the analysis of 342 submissions received in the Round Two consultation on the AFB Pest Management Plan (AFB PMP). The full analysis is provided in Appendices 1 and 2 attached.

The Round Two consultation is the second part of a three-part consultation being undertaken by the Management Agency Board on what, if any, new plan rules or powers are needed in the National American Foulbrood Pest Management Plan (AFB PMP).

The Round One consultation took place during June-July 2021 and the second Round Two took place during November-December 2021. Based on Round One findings, four priority areas for change were identified, and these formed the basis of the Round Two consultation questions.

It is intended that findings from the Round Two consultation will input into the drafting of a new AFB PMP. The proposed draft for the new AFB PMP will be subject to the third and final round of consultation later in 2022.

It should be noted that while submission findings are a key input into the review of the AFB PMP Plan, the preferences expressed should not be interpreted as decisions taken.

Key findings

1. There were 342 submissions and 325 of these were submitted using the consultation questionnaire. Two of these submitters also sent written submissions. A further seven submissions were provided as an email or letter.
2. Seventy percent of submitters (234) completing the consultation questionnaire owned less than 11 hives; 23% (78) owned 11-500 hives; and 6% (20) owned 500 or more hives.
3. All the proposed changes were supported by at least 69% of submissions using the consultation questionnaire (see Table 3, Appendix 2).¹
4. The proposed changes that received the highest overall level of support were for:
 - the Management Agency having the power to destroy AFB infected hives and take actions to prevent the spread of AFB? (89% supported)
 - requiring Beekeeper Registration Numbers to be provided when declaring beehive transfers, as part of an Annual Disease Return? (83% supported)
 - requiring DECA holders to ensure their employee beekeepers complete and pass an AFB Recognition Course, as a condition of retaining their DECA? (79%)
5. The proposed changes that received the lowest overall level of support were for:
 - the Management Agency having the authority to issue infringement fines for failure to keep honeybees in moveable frame hives (69%)
 - the Management Agency having the authority to issue infringement fines for failure to submit an Annual Disease Return (ADR) (69%)

¹ Note all the quantitative findings shown in this report relate to the 325 submissions using the consultation questionnaire, and the qualitative findings related to all 342 submissions.



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- requiring diagnostic laboratories to provide all AFB test results to the Management Agency? (69%).
6. Overall, the level of support for the proposed changes did not appear to vary by hive ownership, except in respect to the following:
- Submitters owning more than 251 hives were more likely to oppose (14) rather than support (12) requiring beekeepers to complete AFB Refresher Training as a condition of retaining a DECA (see Table 5, Appendix 2)
 - Submitters who owned 251-500 hives were equally divided between supporting (5) and opposing (5) requiring DECA holders to ensure their employee beekeepers complete AFB Refresher Training, as a condition of retaining their DECA (see Table 9, Appendix 2)
 - Submitters who owned more than 251 hives were divided between supporting (15) and opposing (12) requiring diagnostic laboratories to provide all AFB test results to the Management Agency (see Table 13, Appendix 2).

Views about changes to strengthen education and training

7. Most submitters supported the proposed changes to strengthen education and training.
- 72% supported requiring beekeepers to complete AFB Refresher Training as a condition of retaining a DECA
 - 79% supported requiring DECA holders to ensure their employee beekeepers complete and pass an AFB Recognition Course, as a condition of retaining their DECA
 - 73% supported requiring DECA holders to ensure their employee beekeepers complete AFB Refresher Training, as a condition of retaining their DECA.
8. The most popular preference for the frequency of AFB Refresher training to retain a DECA was once every five years (38%) followed by once every three years (15%) and once every two years (14%). Ten percent of submitters considered AFB Refresher training should never be required to retain a DECA (see Table 10, Appendix 2).
9. Key theme areas emerging from the analysis of comments (see Appendix 2) were:
- Training courses could be targeted to meet the needs of different groups of beekeepers
 - Content, value, and accessibility of training could improve, including by providing on-line training.

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Views about changes to enhance surveillance and prevention

10. Most submitters supported the proposed changes to enhance surveillance and prevention:
 - 69% supported requiring diagnostic laboratories to provide all AFB test results to the Management Agency
 - 72% supported requiring beekeepers to notify any transfers of beehive ownership within seven days
 - 83% supported requiring beekeeper registration numbers when declaring beehive transfers, as part of an Annual Disease Return
 - 78% supported AP2s having the authority to use detector dogs in the future.
11. Key theme areas emerging from the analysis of comments (see Appendix 2) were:
 - Loss of privacy, costs, and misinterpretation of test results are potential risks
 - Notifying transfers of beehive ownership within seven days is a tight time frame
 - Requirement to provide registration numbers could be extended to other situations, and clarity is needed about requirements for new unregistered beekeepers
 - Dog use will need to be subject to clear guidelines and safeguards. They may be costly and unreliable, and a risk to livestock and pets
 - Additional prevention and surveillance measures are needed, including independent inspections, hive movement controls, targeting high-risk and non-compliance, and cost-effective testing tools.

Views about changes to enhance enforcement powers and penalties

12. Most submitters supported the proposed changes:
 - 89% supported the Management Agency having the power to destroy AFB infected hives and take actions to prevent the spread of AFB
 - 69% supported the Management Agency having the authority to issue infringement fines for failure to keep honeybees in moveable frame hives
 - 74% supported the Management Agency having the authority to issue infringement fines for failure to register an apiary
 - 69% supported the Management Agency having the authority to issue infringement fines for failure to submit an Annual Disease Return (ADR)
 - 70% supported the Management Agency having the authority to issue infringement fines for failure to complete a Certificate of Inspection (COI)
13. Key theme areas emerging from the analysis of comments, were:
 - Powers to destroy infected hives need to be subject to clear and fair decision-making processes, with safeguards in place that prevent abuse and support beekeepers to destroy infected hives

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- Offences and penalties need to be well defined, and not all offences are equally serious, and penalties need to be proportionate. Fines are a last resort against beekeepers who keep breaking the rules.

Over-arching concerns about proposed changes

14. While all the proposed changes were supported by most submitters, there were overarching concerns about the need for increased regulation and the associated costs. The way changes are implemented will be important.
15. Key theme areas emerging from the analysis of comments, were:
 - Increased regulation was seen as heavy-handed by some, while it was welcomed by others. It is important that any new requirements are well communicated, and fairly and carefully applied.
 - Clarity about the benefits, costs, and risks is needed. This includes advice about how these costs will be met, the impact on levies, and the impact on beekeepers who may struggle with increased costs.
 - Non-compliance is a key concern and there is a risk non-compliant beekeepers won't be affected by the proposed changes
 - The Pest Management Plan, its management, and the review process can improve.

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