



Appendix One: Submission Analysis Qualitative Findings

Introduction

This report provides a **qualitative¹** analysis of submissions received in the Round Two consultation on the AFB Pest Management Plan (AFB PMP).

The qualitative analysis reports on the findings of the open-ended consultation questions and written submissions. A separate quantitative analysis reports on the findings of the close-ended consultation questions (see Submission Analysis Quantitative Findings, Appendix 2).

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.

This report contains the following sections:

- A. Submission process and consultation questions
- B. Number of submissions and responses by question
- C. Method
- D. Findings.

A. SUBMISSION PROCESS AND CONSULTATION QUESTIONS

Submission Process

Registered beekeepers were invited to make a submission by:

- completing the consultation questionnaire online using SurveyMonkey, or
- mailing a submission to the Management Agency by email or post.

SurveyMonkey, an online survey tool, was used as the main way of making a submission. It was seen as a relatively easy and time-effective way for many beekeepers to express their preferences and views. Submissions were also welcomed in different formats (e.g., emails and letters).

¹ Qualitative data is nonnumerical (e.g., the text provided in comments and letters), and quantitative data is numerical (e.g., the count of preference options selected for each recommended change). (Refer Neuman, Social Research Methods, 2006, p.8)



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SurveyMonkey is also a cost-effective tool for conducting the consultation and analysing submissions, and it includes software for analysing close-ended questions.

Consultation Questions

The consultation questions were based on the findings of the Round One consultation which canvassed the views of beekeepers about what, if any, changes should be made to the current AFB PMP. These findings guided the development of a suite of recommended changes for the new AFB PMP by the Management Agency and formed the basis for the Round Two consultation questions. The three key areas identified for further consultation were: education and training; surveillance and prevention; and enforcement and penalties.

For each of the three key areas, consultation questions were developed and set out in a questionnaire format. There were 18 questions: 14 close-ended questions and four open-ended questions (shown in Table 1). The analysis of responses to the 16 close-ended questions is provided in a separate report (see quantitative analysis in Appendix 2), although some of the high-level findings are also included in this report to give context to the qualitative findings.

The four open-ended questions² invited submitters to make comment on any of the three areas of proposed changes, and to provide comment on other matters they wished to raise.

B. NUMBER OF SUBMISSIONS AND RESPONSES BY QUESTION

There were 342 submissions in the Round Two consultation.

- a. 315 were made using the on-line consultation questionnaire posted on SurveyMonkey (referred to as ‘questionnaire submissions’). Two of these submitters also sent a written submission.
- b. 20 were posted or emailed with a completed questionnaire, and these submissions were manually entered into SurveyMonkey by the researcher (referred to as ‘questionnaire submissions’).
- c. Nine were provided as an email or letter (referred to as ‘letter submissions’). Two of these submitters also used the consultation questionnaire and posted on SurveyMonkey.

The overall response rate was three percent of all registered beekeepers (that is 342 out of 9855 registered beekeepers).

While most submitters using the consultation questionnaire responded to the close-ended questions, the number of responses to the open-ended questions was lower. This is shown in Table 1 (see open-ended consultation questions 6, 11, 17, 18).

² An open-ended question asks people to answer in any way they want, and a closed-ended question asks people to choose from a fixed set of answers (Neuman, 2006, 286-287).

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Table 1: Number of responses to each consultation question, for submitters who used the consultation questionnaire

Note: open-ended questions are shaded for easy reference

Consultation questions	number on-line responses
1. How many hives do you own?	335
2. Do you support requiring beekeepers to complete <u>AFB Refresher Training</u> as a condition of retaining a DECA?	333
3. Do you support requiring DECA holders to ensure their employee beekeepers complete and pass an <u>AFB Recognition Course</u> , as a condition of retaining their DECA?	330
4. Do you support requiring DECA holders to ensure their employee beekeepers complete <u>AFB Refresher Training</u> , as a condition of retaining their DECA?	333
5. How often do you think AFB Refresher training should be required to retain a DECA?	330
6. Do you have any comments about the proposals to strengthen education training and support requirements for DECA holders and their beekeeper employees? (open-ended question)	196
7. Do you support requiring diagnostic laboratories to provide all AFB test results to the Management Agency?	332
8. Do you support requiring beekeepers to notify any transfers of beehive ownership within 7 days?	333
9. Do you support requiring Beekeeper Registration Numbers to be provided when declaring beehive transfers, as part of an Annual Disease Return?	331
10. Do you support AP2s having the authority to use detector dogs (if in the future, detector dogs are recognised as effective by the scientific community)?	331
11. Do you have any comments about the proposals to enhance surveillance and prevention? (open-ended question)	184
12. Do you support the Management Agency having the power to destroy AFB infected hives and take actions to prevent the spread of AFB?	332
13. Do you support the Management Agency having the authority to issue infringement fines for failure to keep honeybees in moveable frame hives?	333
14. Do you support the Management Agency having the authority to issue infringement fines for failure to register an apiary?	334
15. Do you support the Management Agency having the authority to issue infringement fines for failure to submit an Annual Disease Return (ADR)?	333
16. Do you support the Management Agency having the authority to issue infringement fines for failure to complete a Certificate of Inspection (COI)?	334
17. Do you have any comments about the proposals to enhance enforcement powers and penalties? (open-ended question)	192
18. Do you have any other comments, questions, or concerns? (open-ended question)	166

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C. METHOD

A qualitative³ analytical method - a way of analysing words - and was used to analyse responses to the four open-ended consultation questions and to analyse the letter submissions.

Using the qualitative method, the researcher carefully reviews and interprets the written text to create categories or themes. This process is known as ‘thematic analysis’ and is a way of organising text into themes ‘to present a coherent, consistent picture’.^{4 5}

The approach of a qualitative method is to ‘focus on learning the meaning that the participants hold about the problem or issue ...’.⁶ It is driven by *what is said* in the written submissions and not by the views of the researcher⁷ or the commissioning agency.

The researcher focus was to identify criticisms, questions and suggestions raised by submitters to help develop the detailed proposal for the new AFB PMP for the Round three consultation.

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.

Separate from the researcher analysis, submissions were independently read and considered by the Management Agency.

D. FINDINGS

This section outlines the findings of the thematic analysis of the open-ended questions. Thirteen themes were identified under four topic areas. The topics are:

- a) views about proposed changes to strengthen education and training
- b) views about proposed changes to enhance surveillance and prevention
- c) views about proposed changes to enhance enforcement powers and penalties
- d) over-arching concerns about proposed changes.

Each theme is summarised in a table, showing key issues, suggestions, and questions.

³ Qualitative research analyses words (also images, observations, and transcripts) to ‘capture and discover meaning. In contrast, quantitative research analyses numbers, typically to test a predetermined hypothesis (adapted from Neuman, 2006, p157).

⁴ Neuman, W.L., 2006, ‘Social Research Methods, Qualitative and Quantitative Approaches’, p.157.

⁵ 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 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.

⁶ Creswell, J., 2009, ‘Research Design, Qualitative, Quantitative, and Mixed Methods Approaches’, p.175.

⁷ Qualitative research is also a form of interpretative inquiry in which the researcher makes an interpretation of what is meant by the submitter.

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Each theme area is introduced with relevant findings from the quantitative analysis of closed-ended questions (see Appendix 2) to provide context to the thematic analysis findings.

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Table 2: Summary of topics and theme areas

Summary of topic areas and themes
<p>Topic: <i>Views about proposed changes to strengthen education and training</i></p> <p>Themes</p> <ul style="list-style-type: none">1. Training courses could be targeted to meet the needs of different groups of beekeepers2. Content, value, and accessibility of training could improve, including by providing on-line training.
<p>Topic: <i>Views about proposed changes to enhance surveillance and prevention</i></p> <p>Themes</p> <ul style="list-style-type: none">3. Loss of privacy, costs, and misinterpretation of test results are potential risks4. Notifying transfers of beehive ownership within seven days is a tight time frame5. Requirement to provide registration numbers could be extended to other situations, and clarity is needed about requirements for new unregistered beekeepers6. Dog use will need to subject to clear guidelines and safeguards. They may be costly and unreliable, and a risk to livestock and pets7. Additional prevention and surveillance measures are needed, including independent inspections, hive movement controls, targeting high-risk and non-compliance, and cost-effective testing tools.
<p>Topic: <i>Views about proposed changes to enhance enforcement powers and penalties</i></p> <p>Themes:</p> <ul style="list-style-type: none">8. 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 hives9. 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.
<p>Topic: <i>Overarching concerns about proposed changes</i></p> <p>Themes:</p> <ul style="list-style-type: none">10. 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.11. 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 costs12. Non-compliance is a key concern and there is a risk non-compliant beekeepers won't be affected by the proposed changes13. The Pest Management Plan, its management, and the review process can improve.

a) Views about proposed changes to strengthen education and training

Most submitters supported the proposed changes:

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- 72% supported requiring beekeepers to complete AFB Refresher Training as a condition of retaining a DECA (see Table 4, Appendix 2)
- 79% supported requiring DECA holders to ensure their employee beekeepers complete and pass an AFB Recognition Course, as a condition of retaining their DECA (see Table 6, Appendix 2)
- 73% supported requiring DECA holders to ensure their employee beekeepers complete AFB Refresher Training, as a condition of retaining their DECA (Table 8, Appendix 1).

Key theme areas were:

- Training courses could be targeted to meet the needs of different groups of beekeepers (Theme 1)
- Content, value, and accessibility of training could improve, including by providing on-line training (Theme 2).

Theme 1: Training courses could be targeted to meet the needs of different groups of beekeepers

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Theme Description

Commercial and experienced beekeepers have different training needs, compared with hobbyists and less experienced beekeepers. Those completely new to beekeeping may need training before owning hives.

Issues

- Early AFB detection is essential to successful commercial beekeepers, so for this group, refresher courses are an unnecessary compliance cost. If courses are required, content should be relevant, and trainers should have commercial experience.
- New and inexperienced beekeepers need training and refresher courses, and many will have never seen AFB except during training.
- New beekeepers need access to expert advice, inspectors, and support (including closer engagement with beekeeping clubs). People may need training before becoming beekeepers.
- Refresher training isn't needed. AFB is easily recognisable and doesn't change. Courses may be seen as a way of generating revenue.
- Refresher training is unlikely to improve compliance. Non-compliance is the biggest problem, including unregistered beekeepers and abandoned hives. Some won't attend courses or take the time to inspect hives.
- Refresher courses may be justified if there is new information or to prevent complacency. On-going training is a normal expectation in most industries.
- Employee beekeepers should be trained but it's up to their employer, not the Agency. An alternative view was that all employee beekeepers should hold a DECA.

Suggestions

- A Learner DECA may be needed as some still can't recognise AFB after training.
- Focus education on hobby hive owners (and landowners) who don't understand dangers of AFB.
- Passing AFB recognition exam to be requirement before eligible to be a beekeeper (could also include passing an eye test).
- Agency could randomly check whether employee beekeepers are trained.
- Encourage beekeeping clubs to assist new beekeepers to comply.

Questions

- Within what time-period would you require an employee to attend AFB training?
- Clarify whether refresher training is the issue, or AFB recognition training?

Quotes

"I am a commercial beekeeper with 20 years' experience. My staff are all well trained and experienced. As a result, we identify AFB immediately in our hives and destroy them the same day... I believe for commercial beekeepers this 5 year refresher is totally irrelevant, we know if we don't eliminate AFB our business will suffer... You need to identify hobbyists and at risk beekeepers and they need to be focussed on..."

"I can see where this would be of assistance to hobby beekeepers, however those in the commercial sector with over 300 hives is probably un-necessary as anybody in commercial beekeeping is seeing the equivalent of thousands of hives a year and can detect when something is wrong with a hive well before visual symptoms are evident."

"The training depends upon whether or not it is for a complete hobbyist or someone who has had the training previously (i.e. AP2) who knows what the expectations are."

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Theme 2: Content, value, and accessibility of training could improve, including by providing on-line training

Theme Description

Training courses could be improved through updated content and more user-friendly exams. Courses should also be free or low cost, and on-line (with options for those who don't use the internet).

Issues

- Content can improve by updating information on prevention and detection (including use of dogs, smartphone apps, contact tracing, record keeping, ways of preventing AFB, and bee health). The video, photographs, and manual need updating.
- Field-based training works best. Beekeepers need to see AFB in a real beehive, photos aren't the same.
- Courses could be free or low cost, and on-line. Some supported the proposals based on training being free and/or online. However, not everyone uses computers, so online training isn't possible for everyone.
- Exams can improve. They should be user-friendly and on-line. Need to recognise that people learn in different ways (and may find tests challenging). Multiple attempts should be allowed (without extra cost). Follow-up could be provided to support retention of information.
- On-going support could be provided, including webinars and videos, and access to expert advice.

Suggestions

- Courses could include two parts, an on-line part, and face-to-face instruction that includes inspecting frames and opportunities to discuss problems.
- Workshops and disease-a-thons.

Quotes

"Taking a course in a classroom situation or online will never succeed in training beekeepers to recognise AFB. What is presented in slides and pictures can be totally different from how AFB presents itself in a real beehive situation. Sac brood, chalk brood and even scale can be completely missed by beekeepers unless they are totally familiar with bees and bee diseases in the real world."

"DECA training needs to include actual AFB infected frames at all times. Photos are one thing, but actual experience is much better. Most DECA holders I know have never seen AFB."

b) Views about proposed changes to enhance surveillance and prevention

Most submitters supported the proposed changes:

- 69% supported requiring diagnostic laboratories to provide all AFB test results to the Management Agency (Table 12, Appendix 1)
- 72% supported requiring beekeepers to notify any transfers of beehive ownership within seven days (Table 14, Appendix 1)
- 83% supported requiring beekeeper registration numbers when declaring beehive transfers, as part of an Annual Disease Return (Table 16, Appendix 1)

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- 78% supported AP2s having the authority to use detector dogs in the future (Table 18, Appendix 1).

Key theme areas were:

- Loss of privacy, costs, and misinterpretation of test results are potential risks (Theme 3)
- Notifying transfers of beehive ownership within seven days is a tight time frame (Theme 4)
- Requirement to provide registration numbers could be extended to other situations, and clarity is needed about requirements for new unregistered beekeepers (Theme 5)
- Dog use will need to subject to clear guidelines and safeguards. They may be costly and unreliable, and a risk to livestock and pets (Theme 6)
- Additional prevention and surveillance measures are needed, including independent inspections, hive movement controls, targeting high-risk and non-compliance, and cost-effective testing tools (Theme 7).

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Theme 3: Loss of privacy, costs, and misinterpretation of test results are potential risks

Theme Description

There are potential risks associated with this requirement, and more clarification about costs, accuracy, and definitions is needed.

Issues

- Test results are private information unless the Agency covers or subsidises the cost of testing. A requirement for laboratories to provide test results to the Agency may strain relationships.
- Requirement to provide test results may discourage testing and participation in AFB research.
- Test results may be inaccurate, imprecise, difficult to collect and potentially open to abuse.

For instance, honey extraction can be contracted to a third-party provider who may be reluctant to disclose client beekeepers. Testing may be on blended honey batches from more than one beekeeper. There could be a bias towards those undertaking surveillance above the required standard and those who detect non-clinical AFB. Results may be skewed as beekeepers may be more likely to sample hives with suspect AFB. There is potential for false or tampered samples.

Suggestions

- Provide free testing of suspect samples, or provide inexpensive test kits, to encourage early detection of the disease.
- Explore use of Q-pcr techniques for surveillance, provide inexpensive test kits.
- AFB laboratory testing should be compulsory for all, or for honey extracted for sale.
- Sampling to be attributable to specific marked hives.
- Undertake randomised testing.
- Annual honey sampling would solve the problem of AFB.

Questions

- How will proposals be funded, and who will pay for laboratory testing?
- How can you be certain people are submitting true samples?
- What is the threshold for defining clinical infection from PCR testing?
- Will hobbyists be required to undertake and pay for diagnostic testing?

Theme 4: Notifying transfers of beehive ownership within seven days is a tight time frame

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Theme Description

Seven days may not be enough time to notify transfers. The timeframe needs to align with related registration and sales processes, and it may take longer than seven days to complete the paperwork.

Issues

- Proposed requirement doesn't align with the allowance of 30 days to register an apiary.
- There can be clauses in sales agreements that provide periods of up to 30 days for hive inspection prior to finalising sale.
- Ability to register may be slowed by lack of internet access or slow paper mail.

Suggestions

- Ten days, 14 days, and 30 days are alternative time-periods.
- Notification only required over a specified minimum quantity of hives.
- Refer to regulations with respect to livestock movements and sale as a model.
- Failure to file should trigger mandatory inspection at beekeeper expense.
- Make it an easy process.

Quotes

"7 days is a bit tight if you are rural and don't have great internet access. 14 days would be more reasonable."

"Some of your questions require un-nuanced answers. I support beekeepers providing information of transfer of hives but for some 7 days may be difficult so I'd [maybe] say 10 days."

"7 days not enough time for mail to go from sent to received now 2 days. It takes 3 weeks for mail to come from Wellington. 10 days from Auckland. 7/8 days Christchurch. If you used our full address this would be on time. "

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Theme 5: Requirement to provide registration numbers could be extended to other situations, and clarity is needed about requirements for new unregistered beekeepers.

Theme Description

Registration numbers should be provided at the time of transfer or purchase of hives. This requirement could be applied to the sale of hives and hive-ware, retail and private sales, and hive splits and swaps. Clarification is needed in relation to new unregistered beekeepers seeking to purchase hives.

Issues

- Registration numbers should be required before transfer.
- Registration numbers will need to be issued to intending beekeepers.
- Hive swapping should not be allowed or should be notified.
- There can be clauses in sales agreements that provide periods of up to 30 days for hive inspection prior to finalising sale.

Suggestions

- Registration should be required before legally allowed to put colonies on site.
- Lower the time for registering sites from 30 days to one week.
- Failure to collect registration numbers should be offence.
- Hive swaps and hive splits should also be notified.
- Swapping hive ware should not be permitted.
- Registration should be a choice for hobbyists.
- Notification of transfers should avoid repeat notifications required at end of year.
- Hive identification could potentially be modelled on the Cattle/Deer NAIT system.
- Apiary registration should be to a title to stop over stocking.

For unregistered beekeepers seeking to acquire hives -

- Supply of name and address should be sufficient when purchasers are not registered.
- New or intending beekeepers should be issued registration numbers before they have bees.
- New beekeepers could be required to obtain registration within month of purchase.

Questions

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Theme 6: Dog use will need to subject to clear guidelines and safeguards. They may be costly and unreliable, and a risk to livestock and pets.

Theme Description

Specification of when and how dogs would be used, and by whom, will be needed. This should include permissions and safeguards for entering properties, and actions on the findings of dog inspections.

Issues

- Dogs will not be welcomed on some properties and may be a risk to livestock and pets
A clear operating model for dog use will be needed, covering right of entry to properties and any impact on farms (e.g., impact on lambing ewes and other animals; verification of dog vaccinations).
- Dogs and their handlers would need to be properly trained.
Dogs need to be certified as effective at detecting disease and dog handlers need to be certified. AP2's are not certified dog handlers. Dogs are expensive to train, have a limited effective lifespan, can be inconsistent, and are subject to distraction.
- Identification of AFB by dogs needs verification by another method.
Detection by dogs may give false positives, so results should be verified by another method. Dogs could also be used to verify positive AFB infections detected through other methods.

Suggestions

- Random spot checks with dogs.
- If and when dogs are used in the future, there should be a discussion as to how they are used, for instance, before hive movement between provinces.

Questions

- Would hives be destroyed based solely on AFB identification by a dog?
- Are dogs more capable than a human to detect AFB?
- When and how would AP2s use detector dogs?
- Can they enter a property at will? Who are they authorised by?
- Isn't the evidence for using dogs already there?

Quotes

"Use of dogs, yes, but on what basis? entry a to a farmer's paddock with lambing ewes? Support in

Theme 7: Additional prevention and surveillance measures are needed, including independent inspections, hive movement control, focus on high-risk sites and non-compliance, and cost-effective testing tools.

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Theme Description

A range of additional prevention and surveillance activities were raised by submitters, outside the scope of the consultation questions. These included removing reliance on self-inspections and requiring independent inspections, implementing hive movement controls, and cost-effective testing tools.

Issues

- Relying on self-inspections isn't working and independent inspections are needed. These could be every five years to validate prior findings and check management practices.
- Inspectors and trainers need to be experienced and senior beekeepers and use best practices.
- Hive movement controls needed, and all hives should be verified AFB free before moving.
- More action needed to address abandoned hives, unregistered hives, rogue hives, and swarms. There were many suggestions for additional actions.
- Beekeepers who report incidence of non-compliance need feedback about action taken, otherwise it appears none was taken.
- Investigate and provide cost-effective testing tools, and destruction methods.

Suggestions

- New power to check hives on third party land.
- *Suggestions for controlling hive movement included:*
hives to be confirmed AFB free by independent inspection prior to moving; hives moved more than 50kms to have AFB inspection before and after movement; movement records to be lodged and spot checks implemented; movement controls on non-compliant beekeepers; number of hives in a 3km radius should be limited.
- *Suggestions for new or increased activities included:*
annual random surveillance testing; surveillance testing in urban areas and for hobby beekeepers; mandate annual testing for every hive; use of drones; removal of abandoned hives; mandate inspection and removal of dead or failing hives; plugging spaces swarms could nest; disclose location of nearby infected apiaries; mandatory numbering of hives for tracing; circulate map of affected areas annually; place at-risk beekeepers on watch list and follow-up; disease-athons; build AFB free zones.
- *Suggestions for cost-effective testing tools included:*
inexpensive AFB tests such as the new Otago Bee Test; Foster Method; and Q-pcr techniques.
- *Suggestions for new technologies and methods to investigate included:*
electronic nose-based methods (which may replace need for dogs); Irradiation machines; sprays to kill virus. Incorporate new technology developments in the elimination strategy.

Quotes

"There has been nothing said about movement [control]. At present a Beekeeper can legally move a hive or site containing any number of hives with a known history of AFB cases anywhere he or she likes. I don't think this should be able to happen."

"...a more pressing issue in my view is the behaviour of predatory beekeepers - predominantly large corporates and their cohorts - who come into an area at a specific time with pallets of hives. Skim off the main honey flow and then disappear, leaving small beekeepers with nothing but dust in their mouths!"

"Commercial beekeepers moving their hives in and out is what is really causing all of this spread."

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c) Views about proposed changes to enhance enforcement powers and penalties

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 (Table 20 in Appendix)
- 69% supported the Management Agency having the authority to issue infringement fines for failure to keep honeybees in moveable frame hives (Table 22 in Appendix)
- 74% supported the Management Agency having the authority to issue infringement fines for failure to register an apiary (Table 24 in Appendix)
- 69% supported the Management Agency having the authority to issue infringement fines for failure to submit an Annual Disease Return (ADR) (Table 26 in Appendix)
- 70% supported the Management Agency having the authority to issue infringement fines for failure to complete a Certificate of Inspection (COI) (Table 28 in Appendix).

Key theme areas 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 (Theme 8)
- 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. (Theme 9)

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Theme 8: Powers to destroy infected hives need to be subject to clear and fair decision-making process, with safeguards in place that prevent abuse and support beekeepers to destroy infected hives.

Theme Description

There was concern that the decision-making process should be fair and properly authorised. Services and support should be available to help beekeepers destroy infected hives, including an environmentally friendly option for destroying plastic hives.

Issues

- General powers, and powers to issue fines, are open to abuse and misinterpretation. These powers need to be used carefully, and only when beekeepers are refusing to comply with rules.
- Verification that hives are infected should be based on visual and laboratory tests, and destruction should be issued by court order. Alternative views were for immediate destruction following confirmation of AFB if near other hives and that hive burning had failed as a strategy to eliminate AFB.
- Needs to be easy to destroy infected hives. Some beekeepers may be inhibited from destroying hives due to the cost and challenges of finding an effective and easy way to do so.
- Concern about how to destroy plastic hives safely.

Suggestions

- Infected hives that are close to other hives, should be destroyed by the Agency as soon as AFB is confirmed.
- Services and support are needed to help beekeepers destroy hives, including a hive destruction service.
- If the Agency orders hive destruction, it should pay the costs.
- Proof of destroying AFB infected hives should be required by way of photos or AP2 viewing.
- Suggestions for hive destruction criteria:
- hives confirmed as infected; sub-clinically infected hives; all hives in apiaries exceeding a specified percentage of infected hives.

Questions

- Who will hold the authority to direct hives and gear destruction?
- Are there penalties for non-compliance?

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Theme 9: Offences are not all equally serious and need to be well defined. Fines are a last resort against beekeepers who keep breaking the rules.

Theme Description

Offences, and the size of the fine, need to be clearly defined, and fair and proportionate. Fines are a last resort that are used after warnings have failed. Education and communication are most important.

Issues

- Offences, and the size of the fine, need to be clearly defined, and communicated to beekeepers. Definitions are needed for ‘colonies’ and ‘wild and feral hives’. Fines not to be used against anyone who has a wild hive pop up in their backyard.
- Some offences are less serious than others (e.g., failure to use movable frames). Issuing fines for not meeting reporting requirement is unhelpful and it can be relatively easy to forget to file a return during busy periods, and timely reminders would be more helpful. Also, there is a difference between providing a fraudulent return and providing a late return.
- User-friendly system, understanding approach, and good communication needed to help beekeepers comply. This includes making allowance for lack of internet and busy times and improving the COI process. Make it easy to comply.
- Fines won’t work or are a last resort that should be reserved for serious issues after warnings have been issued. It is more effective to work co-operatively with beekeepers, provide support, and incentivise people to comply.
- The success of this approach will depend on how it is implemented. Issuing fines and enforcing payments, and fines may be difficult to enforce on the non-compliant and when beekeepers are struggling.
- Fines are just a way of generating revenues.

Suggestions

- Remove hives, confiscate hives, and/or sell confiscated hives
- Level of fines to depend on a beekeeper’s situation and ability to pay
- Need a warning system before issuing a fine.
- Send reminders about reporting requirements
- Improve systems to make it easier to meet reporting requirements
- Extend penalties to landowners with hives placed on their land
- A portal for reporting non-compliance

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d) Overarching concerns about proposed changes

While all the proposed changes were supported by most submitters, there were a range of overarching concerns.

Key theme areas 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 (Theme 10)
- 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 (Theme 11)
- Non-compliance is a key concern and there is a risk non-compliant beekeepers won't be affected by the proposed changes (Theme 12)
- The Pest Management Plan, its management, and the review process can improve (Theme 13).

Theme 10: 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 are fairly and carefully applied

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Theme Description

A diversity of views about increased regulation was expressed in the comments, with some welcoming more action to combat non-compliance, while others were opposed. Some considered the focus should be on supporting rather than regulating beekeepers. Others noted that regulations should be easy to understand and comply with, and application should be fair and supportive.

Issues

- Amongst those who did not support increased regulation, concerns included:
current regulations are already sufficient; some of the proposed new powers already exist; the industry can regulate itself; beekeepers need support not more regulation; beekeepers may be discouraged from reporting AFB; and changes are a waste of money.
- Regulations should be carefully applied:
making sure it is easy and simple to comply; there is good communication and education about the new requirements; and powers are exercised with an even, fair, and supportive hand.
- Rather than regulation, some considered the focus should be on, training, support, and monitoring. Some considered a wider approach to bee health should be taken.

Quotes

"You will do what you like anyway. It's what [bureaucrats] do. We are paying for this in our levies. I support a total removal of anything that inflicts more costs on business. Start working with the people instead of against us we have had a guts full. "

"These statements are too open to abuse of power and [misinterpretation]. The objective of the Act when initially set up was to help beekeepers farm their way out of an AFB problem, not shut them down and put them out of business by destroying everything. I have no problem if beekeepers are refusing to co-operate and blatantly disregarding the Act. But it seems some beekeepers are not being given the opportunity to deal with AFB themselves."

"Some of these questions are too vague or broad in the way they are put (i.e. the potential extent to which these fines could be applied to situations), such that I cannot say that I support them. I do not believe that a generally punitive regime such as what appears to be proposed is likely to yield better results than one of cooperation such as is typical of beekeepers."

"Not enough is known to make such broad changes, regarding AFB & [sic] there is a lot of misinformation out there."

"The enforcement provisions as per the Order are already in place and to my knowledge untested by the Agency during the complete term of the PMP."

Care should be taken in creating a Management Agency that has expanded powers and regulatory control. Agencies tend to grow out of proportion to the task set."

Now that honey is being tested for AFB the industry will regulate itself. AFB devalues your honey so you don't want AFB. We do not want another govt dept becoming police. Other industries have proven that value reduction for inferior products will clean up the industry (eg Dairy payments are based on quality). This will happen with honey.

"I have kept bees since the mid-1970s and before varroa came we didn't need a ticket but now many hobbyists have arrived and others and now manuka rush is on. I am fully for tightening up regulations as some are not all passionate and think about the big dollar! "

"We need to get tougher to protect our bees and get rid of the cowboys out there who don't care."

"As long as the use of these enhanced powers is above board, i.e., not get politicized or to gain unfair advantages it'll be OK."

"If any of this comes into force it would be great to have a letter delivered to every registered

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Theme 11: Clarity about the benefits, costs, and risks is needed

Theme Description

There were concerns about the costs of the changes, how these would be paid for, and whether any benefits were worth the costs. Clarity is needed about the impact on levies, and the impact on beekeepers who may struggle with increased costs.

Issues

- Benefits and costs of increased regulation need to be clarified, justified and evidence based. Evidence and overseas experience could be reviewed for learnings.
- The cost of the changes, and how these would be paid for were key questions. Matters raised included that:
cost recovery would be necessary, but on the other hand, shouldn't be exorbitant; beekeepers may find it hard to continue beekeeping if their costs increased; some beekeepers would experience losses; and the Agency would need more resources and staff to implement the changes.
- More regulation is a means of generating revenue for Agency, and lack of confidence that the Agency spends money wisely.

Questions

- What is the cost of these proposals and how will they be funded? Will government contribute?
- How will cost recovery be managed?
- Will the proposals result in higher levies?
- How will regulations be policed and enforced?
- How will enforcement costs be recovered?

Quotes

"Provide strong scientific based evidence that these approaches work. Sometimes a bigger stick is not the best method of assisting people - your job is to support an industry and community, not hammer it out of existence."

"Have overseas examples of disease [been] studied to understand the regulations in countries where AFB prevails. ie lessons learnt of practises that have not been

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Theme 12: Non-compliance is a key concern and there is a risk non-compliant beekeepers won't be affected by the proposed changes

Theme Description

Non-compliance is the big problem. There is concern that non-compliant beekeepers will ignore regulations, and that only already compliant beekeepers will be affected

Issues

- Non-compliant beekeepers will not be affected by the changes, only the already compliant beekeepers.
- Increased regulation may reduce AFB reporting due to fear of negative consequences and some may be discouraged away from beekeeping.

Quotes

“I think you face the usual situation that those who are abiding by the rules will continue to do so and those who are flouting them will not be affected by the changes.”

“It seems that we beekeepers that follow regulations and guidelines are being compromised by beekeepers that repetitively flout the rules.”

“If you [overregulate] then beekeepers will go [underground] when they find it (like in Australia). A lot are now too scared to come forward to the Agency and report it, let alone when you are more controlling. Positive Education is the answer not negativity with infringement fines!”

“These interventions are not enough to address the more concerning issue of recurrent AFB in certain locations due to rogue hives/unregistered hives/wild populations. Using dogs and centralised reporting of test results will not impact the above issues at all. All these mechanisms do is enhance existing - and [it's] not addressing the primary issue. Other targeted interventions focusing on the above are required - not minor tweaking that inconveniences good beekeepers more than currently ...”

“The biggest problems seem to be unregistered and abandoned hives, and more unethical commercial operators who under-declare the number and locations of their hives to reduce their AFB levies.”

“Our main concern is the number of uninspected hobby apiaries. We have come across numerous people (mostly in or near Christchurch) who are not aware of the requirements for inspection or not even registered or aware of AFB. They usually only have 1-4 hives ”

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Theme 13: The Pest Management Plan, its management, and the review process can improve.

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Theme Description

There was a view that the PMP wasn't needed and/or that AFB elimination wasn't achievable. The management of the PMP was seen as poor and levies should be based on hive numbers not apiaries. The PMP review consultation process was seen as flawed.

Issues

- Elimination is not achievable and is not a realistic strategic objective. The definition of elimination is unclear.
- This consultation process has been inadequate, and the Review should be led by the Minister or a whole of industry group. Submissions should be weighted on the number of hives owned.
- Levy structure should be based on number of sites not the number of hives.

Additional suggestions that would broaden and strengthen the scope of the AFB PMP

- Value of beehives as a free pollination service should be recognised.
- Bees to be classed as animals.
- Management Agency to cover varroa management as well as AFB management.

Questions

- Is the Operational Plan consistent with the Biosecurity Act in the requirement for beekeepers to report up to 10% infected hives, when the aim of the PMP is reduction of 5% per annum?
- What is the response if EFB enters New Zealand?

Quotes

"In my view the current consultation process is flawed as it is based on an assumption that the strategic goal of elimination of AFB in NZ is a given. This assumption is embodied in the title of the consultation itself. I believe that a reevaluation [*sic*] of that strategic goal is long overdue... Blindly pushing forward with an aspirational, but not achievable, strategic objective is a recipe for ongoing perceived industry failure."

"Elimination strategy is a hopeless task. Every region and area has it somewhere and it can live on in soils for years."

"You will lose beekeeper support if you continue down this route. Support needs to be voluntary not imposed by fear of fines! The last 10 years has seen little change in AFB. Your stated intention of elimination is impossible as proved by the science. The AFB PMP should be allowed to cease on 1 April 2023."

"I think that you should instead propose to the government that AFB cannot be treated in isolation. AFB in NZ needs to be looked at in the wider context of bee health and wider horti/agriculture. The whole cost model is wrong. And say that your organisation has really done nothing +ve [*sic*] to get rid of AFB and another approach is needed." (

"What about veroa? [*sic*] Can this not be added because there is no regulation around treatment or control, veroa [*sic*] is already becoming an issue and some [beekeepers] are experimenting with treatment. This will not help the Agency with AFB elimination as uncontrolled veroa [*sic*] is the first step to uncontrollable AFB as it shows lack of understanding and compliance."

"Instead of providing a meaningful consultation process where facts and proposals are clearly communicated and comments invited, the agency solicits support to its ad hoc management via an electronic survey, seeking on the spot responses from levy payers that appear ill informed to offer considered comment. I have submitted my views that

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