



## Appendix One: Submission Analysis Qualitative Findings

### Introduction

This report provides a **qualitative**<sup>1</sup> 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 Two).

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).

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<sup>1</sup> 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 questions<sup>2</sup> 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).

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<sup>2</sup> 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

### C. METHOD

A qualitative<sup>3</sup> 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’.<sup>4 5</sup>

The approach of a qualitative method is to ‘focus on learning the meaning that the participants hold about the problem or issue ...’.<sup>6</sup> It is driven by *what is said* in the written submissions and not by the views of the researcher<sup>7</sup> 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.

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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<sup>3</sup> 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).

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

<sup>5</sup> 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.

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

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

## Review of AFB Pest Management Plan, Round Two Consultation Findings

Table 2: Summary of topics and theme areas

Summary of topic areas and themes
<p><b>Topic:</b> <i>Views about proposed changes to strengthen education and training</i></p> <p><b>Themes</b></p> <ol style="list-style-type: none"> <li>1. Training courses could be targeted to meet the needs of different groups of beekeepers</li> <li>2. Content, value, and accessibility of training could improve, including by providing on-line training.</li> </ol>
<p><b>Topic:</b> <i>Views about proposed changes to enhance surveillance and prevention</i></p> <p><b>Themes</b></p> <ol style="list-style-type: none"> <li>3. Loss of privacy, costs, and misinterpretation of test results are potential risks</li> <li>4. Notifying transfers of beehive ownership within seven days is a tight time frame</li> <li>5. Requirement to provide registration numbers could be extended to other situations, and clarity is needed about requirements for new unregistered beekeepers</li> <li>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</li> <li>7. Additional prevention and surveillance measures are needed, including independent inspections, hive movement controls, targeting high-risk and non-compliance, and cost-effective testing tools.</li> </ol>
<p><b>Topic:</b> <i>Views about proposed changes to enhance enforcement powers and penalties</i></p> <p><b>Themes:</b></p> <ol style="list-style-type: none"> <li>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 hives</li> <li>9. Offences and penalties need to 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.</li> </ol>
<p><b>Topic:</b> <i>Overarching concerns about proposed changes</i></p> <p><b>Themes:</b></p> <ol style="list-style-type: none"> <li>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.</li> <li>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 costs</li> <li>12. Non-compliance is a key concern and there is a risk non-compliant beekeepers won't be affected by the proposed changes</li> <li>13. The Pest Management Plan, its management, and the review process can improve.</li> </ol>

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### a) Views about proposed changes to strengthen education and training

Most submitters supported the proposed changes:

- 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

##### 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

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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<sup>8</sup>

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.

When working full time, refresher training is not required as you should know what AFB looks like. It would just be another forced requirement by another agency and another cost - really you guys !!

Ridiculous waste of time and effort, once you have a DECA you know what to look for...

There are too many DECA holders who are incompetent and shouldn't be allowed to hold a DECA..We need to tighten up the regulations around DECA holders and I'm happy to pay more in subs each year to enable you to employ more staff to manage this.

I think it's great that beekeepers don't become complacent and regularly attend refresher courses. I've seen beekeepers in the past leave inexperienced beekeeper's juniors on site unsupervised and 30 hives in need of destruction because of hive to hive transfer of AFB.

... I worked for a beekeeper with 6500 hives at the time and the owner of the hives held the DECA but his beekeepers didn't have DECAs at the time. All beekeepers even employees should hold a DECA.

Employees need to be held more responsible for their work out in the field. It should be an absolute minimum requirement to have completed an AFB Recognition Course if you are inspecting hives for AFB.

As a hobbyist I like to do a refresher AFB annually. I've never seen AFB in my hives so prefer to do the refresher only (no exam) each year if possible. Online training would be good with good visual aids to show how to identify AFB.

I am concerned about the number of hobby beekeepers who get hives and have no idea about keeping bees I would love to see every bee keeper do some training before getting bees not just around AFB but also hive management (wishful thinking).

This training is not dealing with the issue, which is NON-DECA holders. This training is great for new beekeepers, however the AFB issue relates more to rogue hives and beekeepers and no amount of

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training (or investment in training) will deal with this.

There will always be beekeepers who refuse to do courses.

Good education is key to ensuring that everyone understands why elimination is the goal for the industry, these proposals support that. Ongoing education and certification is a normal requirement in most industries.

Education and training are important, but ongoing compliance is key to elimination.

### 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-athons.

#### Quotes<sup>9</sup>

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.

Such refresher courses should be taken by experienced beekeeper/ educators who have a sound knowledge of the disease including its biology and how this bacteria is spread. This is not emphasised

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today and full use of the latest research papers should be incorporated into the format.

I believe the courses are very important to continue educating and refreshing their knowledge which human have tendency to drift to “norm” attitude. So, I strongly support this but also wished that there was an online refresher to complete for convenience purpose as well as update everyone with new findings of managing the AFB and varroa.

Education is a big thing, but it depends on how that is delivered. Although there is definitely a need for more contact from the Management Agency to the beekeeper, i.e., used to have Apiary Advisers once.

In the old days a beekeeper could call an Advisory Officer and get advice, but this sort of thing is not offered today. Gone is the personal knowledge of how a beekeeper can farm his way out of AFB especially with apiaries now only 500 metres apart.

The training is too simplistic. Same photos from yellow book and then same photos used in exam ... Biggest fear of hobbyists [is that a clinical case won't look like the cases in the yellow book.

AFB disease recognition courses are a bit of a joke. Just watching the AFB video series at home and then doing the test will achieve the same result. For anyone that puts in the preparation prior to the course, they will feel they wasted their time, I certainly felt that.

I attended an official refresher course in AFB, which did not even meet health and safety requirements.... AFB training is very much a practical experience, not something to be done on-line. Varroa has now made detection of AFB a lot more difficult.

Some find the cost of the courses a barrier to taking them. In view that AFB is an industry problem mostly associated with smaller beekeepers, perhaps it should be part funded by the industry through the Levy.

...the exam needs to be open book. Memorising answers for a test does not help beekeepers to know where to look to find an answer to a problem out in the field.

I'd like to see everyone pass because [it will] help our industry to improve AFB education nationwide. There are many beekeepers with learning issues so finding solutions to help them achieve DECA would be admirable.

I believe it would be a good idea for people to pass the AFB Recognition exam before they are allowed to become a beekeeper. As a firearms license holder I had to pass an exam before I was eligible for a license. This is very similar in my opinion.

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### *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)
- 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).

#### 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 qPCR techniques for surveillance, provide inexpensive test kits.
- AFB laboratory testing should be compulsory for all, or for honey extracted for sale.

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- 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 qPCR testing?
- Will hobbyists be required to undertake, and pay for, diagnostic testing?

### Quotes<sup>10</sup>

Testing is fine but it can be yet another cost to the beekeeper and the Management Agency should be required to contribute or subsidise the cost if they want access to the results.

It will not produce representative statistics, as only "suspect" hives are sampled, and at different rates by different operations.

Why all results, this could create a bias towards those that are doing surveillance above the required standard and finding non-clinical hives.

Requiring diagnostic laboratories to provide AFB test results to the Management Agency will discourage participation in a very effective method of detection.

We test for AFB in the honey no brainer.

Spore testing is a valuable tool to indicate to the beekeeper that there is potentially a problem. However, DNA testing does have its drawbacks in that it can indicate the presence of AFB spores but doesn't necessarily indicate whether the spores are viable or not. Just to repeat, the Agency should be providing free testing of suspect samples to encourage early detection of the disease.

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

### 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.

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- Failure to file should trigger mandatory inspection at beekeeper expense.
- Make it an easy process.

### Quotes<sup>11</sup>

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.

**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 -*

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- 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

- When supplying hives to a beekeeper, who does not have a registration number or who does not supply a registration number, what would happen?
- How would a new hobbyist know they were required register?

### Quotes<sup>12</sup>

Registering an Apiary before legally allowed to put colonies on to the site would be of benefit for the agency. And that could be enforced with instant fines if the site is not registered. And only 7 days' time to register an unregistered site plus the instant fine of let's say \$200 per site.

Require all suppliers of bee keeping equipment (retail and personal sales) to provide information on registration and AFB unless a beekeeper number is supplied. [Too] many people catching swarms that aren't registered and have no idea.

In order to provide a registration number for hives transferred perhaps make it an offence to transfer hives without receiving the registration number up front.

How would a new hobbyist who brought a new hive know to register? Maybe places that sell hive products are required to ask if they are new beekeepers and offer a pamphlet of beekeeping requirements.

If you require registration numbers to be recorded when a transfer is made then you will have to be prepared to issue registration numbers to people who DONT yet have any bees.

[Apiary] registration should be to a title to stop over stocking/ theft in areas where they are getting boundary stacked for financial gain i.e., using the neighbour's land/assets/trees for your financial gain.

Registering an Apiary before legally allowed to put colonies on to the site would be of benefit for the agency. And that could be enforced with instant fines if the site is not registered."

"If registrations are notified at the transfer of a hive, it shouldn't be necessary to repeat this at the end of the year.

[People] should not be permitted to swap hive ware. If you went to hospital, would you be happy getting a second-hand bandage?

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## Review of AFB Pest Management Plan, Round Two Consultation Findings

Theme 6: 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.

### 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<sup>13</sup>

Use of dogs, yes, but on what basis? entry to a farmer's paddock with lambing ewes? Support in principle but I'd want more detail about rights of entry with a dog.

Some areas are dog free, any areas like that... [whether]... by choice or land use are to be excused from using dogs, otherwise in full support.

I will never allow dogs on my property and if you think you can force this intrusion on my livestock then think again.

There will need to be some sort of formal training course for both the dog and dog handler (it's not just the dog's nose - the handler capabilities and practices are very important...

... with regard to detector dogs, these should be under the control of certified dog handlers and not AP2 approved beekeepers.

Working AFB detector dogs should be certified first, to prove that the individual animal can in fact detect

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## Review of AFB Pest Management Plan, Round Two Consultation Findings

the disease. This should eliminate people with poorly trained animals.

...to be effective, the dog trainers need to have on hand protected vials of spores as these dog need training every other day to keep them tuned to the scent of AFB.

Dogs are used so widely now in detecting various drugs etc, certainly would help in the bee industry.

**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.**

### 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 qPCR 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.

## Review of AFB Pest Management Plan, Round Two Consultation Findings

### Quotes<sup>14</sup>

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.

No bees should be able to cross regions for pollinating or manuka production if we are serious about elimination of AFB. Also we must plug out every tree hole, shed, under bridges and any other place a swarm could nest.

There is no mention in this survey to address the movement into and overwintering of hives in Taranaki that has been proven that AFB has been introduced to Taranaki from other areas by outside Taranaki operators. Until you address these issues you will not eliminate or control AFB in New Zealand. You ignore this at your peril.

Track and trace" policy around hive movements, with an application submitted to the governing body for approval prior to moving hive, with a type of beekeeper declaration. As an added incentive spot checks could also be introduced.

You focus on a real problem. A major cause of AFB is in hives being transported from AFB hot spots to non-AFB regions. If you do not stop hives being moved you will never eradicate AFB.

Self-certification is allowing AFB to run rampant. This, coupled with a lack of powers to act means that honest beekeepers are suffering all the consequences of renegade behaviour. This has to stop. Please do consider the need to have an outside DECA holder do the certification. At least every second year!

Having seen commercial apiaries in a terrible state of neglect, I think that beekeepers shouldn't be able to inspect their own hives, even if they hold a DECA cert. I think another beekeeper should need to check the hives for AFB.

[I] would consider that it would be good practice for a hive owner to also feel safe that no pathogens were introduced as part of the inspection process.

...inspectors who have had AFB in their own apiaries should be stood down for 2 years to ensure they are not carrying the disease unwittingly to their clients.

Those who undertake inspections should always have sufficient experience in Beekeeping. Hobbyist's do not usually have the depth of knowledge when dealing with commercial sites. Improvements to training the trainers is required.

In making changes to the Strategy, don't be constrained by the limitations of the original design - make every effort to incorporate new technology developments to enhance and strengthen the strategy in achieving the declared aims.

It is ridiculous that a costly virus has been around over 80 years, and it is/has destroyed hundreds of apiarist's businesses and Hobbyists. Money needs to be put to the biologists and laboratories to tackle this never-ending costly problem.

Provide cost-effective testing tools and make tools easy to use.

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## Review of AFB Pest Management Plan, Round Two Consultation Findings

This agency gives me the impression that they do virtually nothing to reduce AFB in the community. Big operators get away with 'murder'.

### *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)

**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.

## Review of AFB Pest Management Plan, Round Two Consultation Findings

### 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?
- If the Management Agency destroys hives, who will pay?

### Quotes

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.

With regards to having the power to destroy AFB hives, this surely should come from a court order first, after the owner of those beehives and/or equipment has been able to have their say as to why they have not complied with the AFBPMP. Going down the track of an AP1 being the judge/juror and executioner is not the role they should have.

The Management Agency is proposing new powers, they have far too much power now and can be very damaging to beekeepers' health. If you are going to destroy a person's business as well as their health, it should be done through the law courts, and you should not be picking off people who don't have the income to fight you through the courts. If the management agency secures the powers to destroy hives, then this should be at the expense of the management agency.

Destruction of any hive equipment/bees must be confirmed by either of visual inspection as currently or laboratory test for spores. Not arbitrarily burning of all boxes etc unless AFB is more than 20% of hives inspected.

To destroy a hive there should be enough proof to satisfy a judge that the hive was diseased, and that the beekeeper had failed to take action. This should include a scientific kit/ test report, all correspondence and a sample held to verify the action was warranted.

The management agency and its enforcement officers must be covered by the appropriate law and that law must be stated before actions, penalties and fines are imposed.

Hold people to account and destroy hives to prevent ongoing spread of AFB.

AFB Management should have the power to destroy infected hives. However with infected hives infecting adjoining hives etc., DECA and AP1 & 2 holders should be able to do so immediately AFB has been confirmed. Owner to be advised.

I have a real concern about the requirement to burn hives on AFB diagnosis. In particular the burning of plastics. Given the toxins produced the effects on the environment can be significant. Another solution to the disposal needs to be considered. I have heard in Australia in some locations the use

## Review of AFB Pest Management Plan, Round Two Consultation Findings

radiation to destroy AFB.

There has to be more clarity around how to burn plastic, when to burn plastic and how we can deal with so many plastic parts in the future.

Make it easy and cost-effective to destroy affected hives. Help rather than fine. How about setting up a free AFB hive destruction service for all beekeepers?

Maybe AFB funded agents could be established to destroy hives with cost covered from increase of levies. This would ensure that full destruction of hive and tools is completed using a set of defined and agreed rules.

My main concern is that beekeepers, particularly hobbyist and urban beekeepers could be inhibited from or delay reporting AFB because of the difficulty and potential cost of destroying hives. The management agency should provide direct help and facilities for burning hives. Insurance (as in the UK) or compensation for destroyed hives would provide an incentive for reporting.

**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

## Review of AFB Pest Management Plan, Round Two Consultation Findings

- Extend penalties to landowners with hives placed on their land
- A portal for reporting non-compliance
- Penalties should mirror those provided for under the Environmental Protection Agency legislation
- *Fines could be applied to other practices and suggestions included:*  
failure to display registration number; failure to remove dead out hives when found; failure to remedy weak hives to prevent risk of robbing; feeding of wet honey supers; failure to destroy AFB infected colonies and notify the agency within 7 days; using top bar hives, shook swarming, and scorching boxes (methods of managing AFB).
- *Other penalty suggestions included:*  
failure to file COIs to trigger a mandatory AP2 inspection at the beekeeper's expense; hive confiscation; and suspension or cancellation of beekeeper registration.

### Questions

- How will you deal with people who are no longer contactable?
- Why do hobbyists have to get registered (it should be their choice)?
- What is the problem with not having moveable frames?
- Would fines be applied for failing to register an apiary, or reserved for systemic failure to register apiaries?
- Is the concern about fraudulent returns or non- returns?
- How will penalties be enforced?

### Quotes<sup>15</sup>

Fines can lead to abuses from the authority. This is [too] much power from MPI. We do not need another group being able to impose fines. Needs court control by the court in extreme cases.

You already get paid for looking after the [AFB] this would just be another revenue option for you. just do your job with the money you are already collecting. I would be seriously annoyed with another bill from AFB.

Depending on time of year these things can easily be forgotten during the busy times of the year. I'd only support fines if appropriate warnings have been placed first.

Fines or penalties are kind of too harsh since sometimes people can forget. But maybe on strike 3, issuing them fines would be more understandable.

[L]ess fines more education, everyone is in a different situation, treat them as such, I think implementation of more education before draconian fines.

Punitive fines need to be treated carefully to avoid unnecessary bureaucracy and fines should be publicised amounts.

The management agency and its enforcement officers must be covered by the appropriate law and that law must be stated before actions, penalties and fines are imposed.

The management agency cannot seem to be heavy handed with everything, but education comes into this. After all, we, the beekeeper, pay the levy, YOU, work for us!

...I do not believe that a generally punitive regime such as what appears to be proposed is likely to yield

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## Review of AFB Pest Management Plan, Round Two Consultation Findings

better results than one of cooperation such as is typical of beekeepers.

Imposing fines is very often ineffective law enforcement. People fail to obey the law for different reasons ... They need someone they respect to encourage to do it for a reason they understand and that builds behaviour change.

I don't believe imposing fines is the answer. It would be better to offer the option to remedy the issue or then face the prospect of their beekeeper number being suspended till a remedial solution is met.

...fines for non-registered hives would be hard to enforce... they already don't care.

Education and surveillance are much more important than fines which may be difficult to collect from guilty parties.

So you are proposing a big stick! Where is the carrot? I don't see any carrot in this anywhere.

As much as it's great to enforce infringement you will only be looking at people who register not people who have no idea of what looking after a hive entails. It's hard to regulate something anyone can buy, like I could buy scuba gear and go diving without any clue.

All the above need to be discretionary, warnings first to remedy within 30 days, then definitely fines.

The best form of compliance is voluntary compliance but there needs to be some sanction available where there is repeated or deliberate non-compliance evident. An infringement regime should not be looked upon as a source of extra funding!

Danger than fines would drive beekeeping 'underground' more. Would only suggest use of stick for recidivist offenders who continue to infringe.

I'm not sure that penalising people for failure to complete an ADR or COI is helpful. I am of the opinion that providing timely reminders that these actions need to be taken would be more productive. It is very easy to forget an ADR when you are flat out!

While I support improving filing requirements, I am somewhat concerned about fines in relation to filing requirements, [as this] having the opposite effect and decreasing compliance ... In particular, imposing a fine implies that this is the cost of not filing/filing late, and that it is otherwise acceptable to do so.

I feel like the problem isn't a 'failure' to complete a disease return, rather, the fraudulent results of those returns? I'd try to address that first?

I feel as though all means of contact should be made via phone call, text and email by the management agency to the beekeeper to remind them of certification and ADR due dates and have it logged and reported to hold proof of noncompliance and if genuine reasoning is given to why they won't have the certification or ADR in on time, should be considered and active solutions made from there.

I'm worried some of the fines will be used against anyone who has a wild hive pop up in their back yard. Or would move people to destroy any wild hives...

Punitive fines need to be treated carefully to avoid unnecessary bureaucracy and fines should be publicised amounts.

Rules are only worthwhile if policed and enforced. Fees and penalties need to reflect this.

Come down hard on noncompliance. Big fines. This will stop the few that spoil it for all of us.

This will ultimately [eliminate] the beekeepers who do not follow the legal protocols who there for are a risk to other beekeepers in the area.

All good actions that make offenders accountable and punish repeat offenders. We need them to shape up or ship out.

Infringement fines should have been introduced years ago to stamp out the beekeepers that are not

## Review of AFB Pest Management Plan, Round Two Consultation Findings

following the requirements. Harsher penalties should be introduced after the first infringement.

If everyone obeyed the rules and regulations we would not have this problem. So I guess enforcement powers are needed for the absconders.

Depends on how this is applied and how to deal with people who are no longer contactable.

These penalties should be of the scale provided for under the Environmental Protection Agency legislation - breaches of the HSNO Act face really tough penalties.

Should have better systems for Information re obtaining a COI and AFB recognition. e.g., it can be done electronically as an alternative, especially in these COVID times when we're supposed to limit exposure to each other.

We are a community and know where the issues come from and are also human and [don't] get it right all the time. We just need an even-handed supportive approach in the first few instance's and if we prove to be difficult or non-compliant then get tougher.

*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

**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<sup>16</sup>**

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-

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## Review of AFB Pest Management Plan, Round Two Consultation Findings

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 & 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 (e.g. 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 beekeeper to clearly point out the new rules and let them sign it that they understand. If they do not agree then they [cannot] keep bees. They need to understand that this is important to have those rules to eliminate AFB successfully...

Education to enable, provide tested tools to survey, and ease of use to comply, is key. Make it easier for all involved to survey and prevent.

If there are no consequences for failing to comply then there is no reason people will change their behaviour. Only a small minority flout the rules, and there should be meaningful consequences to them for their actions. If they have AFB others can suffer due to them spreading the disease through non-compliance.

All good actions that make offenders accountable and punish repeat offenders. We need them to shape up or ship out.

### 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.



## Review of AFB Pest Management Plan, Round Two Consultation Findings

### 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<sup>17</sup>

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. i.e. lessons learnt of practises that have not been successful.

[A]ll good ideas but [who's] going to pay for it all? [A]nother cost to bee keepers will create a up roar in the industry. [G]ood ways of prevention but [I] think a lot of colonies will be getting burnt and [beekeepers] will lose a lot.

You already get paid for looking after the AFB, this would just be another revenue option for you. Just do your job with the money you are already collecting. I would be seriously annoyed with another bill from AFB.

I suspect the above proposals would require additional work both in the office and in the field. These would need to be factored in, both availability of suitable people and the additional costs.

**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

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## Review of AFB Pest Management Plan, Round Two Consultation Findings

### 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<sup>18</sup>

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.

I fully support measures being undertaken by AFBPMP as it seems that we beekeepers that follow regulations and guidelines are being compromised by beekeepers that repetitively flout the rules.

I support these changes but as with anything it will only be the honest operators who comply with the legislation.

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<sup>18</sup> Note each quote has a line space between each submitter. A quote may contain more than one excerpt from the same submitter, and where this occurs, this is indicated by placing three dots (...) between excerpts. Minor punctuation and spelling errors have been corrected.

## Review of AFB Pest Management Plan, Round Two Consultation Findings

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

#### 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<sup>19</sup>

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 re-evaluation 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 [positive] to get rid of AFB and another approach is needed.

What about varroa? Can this not be added because there is no regulation around treatment or control ... some [beekeepers] are experimenting with treatment. This will not help the Agency with AFB elimination as uncontrolled varroa is the first step to uncontrollable AFB as it shows lack of

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## Review of AFB Pest Management Plan, Round Two Consultation Findings

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 the consultation and submission process undertaken by the agency is both inconsistent with the spirit of the regulations and thus unable to support robust regulations going forward ... It is my recommendation that a properly conducted review be carried out by an industry wide group of people in accordance with sec 100D of the Biosecurity Act.

We need a group of people driving the Survey, of practical beekeepers, preferably commercial of course. And ApiNZ should not be doing it, because ApiNZ has a lot of Packers and Hobbyist beekeepers driving their ship. This consultation should not be carried out through a tick box operation, as it is easy to get the answers you want. The results should be weighted on the number of hives owned (levy paid on).

We believe that ApiNZ has done a very poor job of running the AFB PMP. We are approached weekly by people wanting to sell their beekeeping operations because they can't pay their expenses.

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