

Proposal for the American Foulbrood Beekeeper Levy for 2024/25 to remain the same at \$40 per beekeeper and an increase of 25 cents from \$1.70 to \$1.95 (\$2.24 incl GST) to the colony levy.

Context

The Management Agency for the American Foulbrood Pest Management Plan (the Agency) invited submissions from beekeepers to seek their views about a proposal for the American Foulbrood (AFB) Beekeeper 2024/25 Levy to remain the same at \$40 per beekeeper and an increase of 25 cents (from \$1.70 to \$1.90) to the colony levy rate.

Beekeepers were invited to submit their views via:

- SurveyMonkey, or
- email or post to the Agency.

A total of 9,057 beekeepers were contacted. 8,883 beekeepers were emailed and 174 beekeepers were contacted by post.

The period to make submissions was two weeks; from 06 October 2023 to 20 October 2023.

A. The Consultation Questions

The Consultation Document contained the following four questions.

1. *Please tick any of the following that apply to you (tick as many as apply).*

Respondents were asked to select all applicable answers from four provided checkboxes and one textbox labelled 'Other (please specify)'. The four checkboxes were: DECA holder; non-DECA holder; Māori business; or not applicable.

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

2. *How many hives do you own?*

1 – 5; 6 – 10; 11 – 50; 51 – 250; 251 – 500; 501 – 1000; 1001 or more; Not applicable

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

3. *Do you agree that the rate of levy for 2024/25 should be set at \$1.95 (\$2.24 including GST) per bee colony and \$40 (\$46 including GST) per beekeeper?*

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

4. *Do you have any feedback on the proposed rate of levy and its role in supporting the implementation of the AFB PMP changes for 204/25?*

This was an open-ended question/free-text box inviting comment.

B. Method

Beekeepers were invited to respond to the consultation questions using the SurveyMonkey survey platform.² or by emailing or posting their response.

The responses to the first two consultation questions were analysed using SurveyMonkey software, which calculated the number and percentage of respondents that chose each of the respective answer options. The text responses to the third consultation question were analysed by the General Manager.

C. Previous national consultations

The number of submissions received for this 2024/25 levy rate consultation is higher than the number received in the previous year for the 2023/24 levy rate consultation (Table 1). This is due to the fact the current consultation asked for feedback on a levy *raise* vs a status quo levy rate between 2020 and 2022.

Table 1: Number of responses to national consultations

Year	Survey	number submitters
2023	Proposal to set the AFB Levy for 2024/25	78
2022	Proposal for the American Foulbrood Beekeeper Levy for 2023/24 to remain the same as for 2022/23	19
2021	Proposal to set the AFB Levy for 2022/23	86
2020	Proposal to set the AFB Levy for 2021/22	104
2019	Proposal to Replace the AFB Apiary and Beekeeper Levy with a Hive and Beekeeper Levy	466
2018	Proposal to increase the AFB Apiary and Beekeeper Levy	828

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

D. Respondents

Of the 8,883 beekeepers who were emailed about the proposal:

- 6,223 beekeepers opened the email;
- 334 of those beekeepers clicked on the link to the levy consultation page, and;
- 68 completed the online survey.

Of the 174 beekeepers contacted by post with the SurveyMonkey questions, 6 responded. Therefore, the Management Agency received 78 submissions in total, as below:

- 74 completed either an online (68) or postal submission (6) of the SurveyMonkey;
- 2 sent letters, and;
- 2 sent emails.

Over 75% of those who completed SurveyMonkey were DECA holders as shown in Table 2. In terms of hive numbers, 60% of respondents owned ten or fewer hives (Table 3)

Table 2: A breakdown of beekeeper status (DECA/non-DECA) received through submissions

Status	number submitters	% submitters
DECA holder	59	75.7
Non DECA holder	15	19.2
Māori Business	0	0
Not Applicable or skipped	4	5.1
Total	78	100%

Table 3: Number and percentage of submitters, by number of hives owned

number of hives	number submitters	% submitters
0*	3	3.8
1 – 5	46	59
6 – 10	6	7.7
11 – 50	5	6.4
51 – 250	5	6.4
251 – 500	6	7.7
501 – 1000	3	3.8
1001 or more	4	5.2
Total	78	100%

* New beekeeper/sold all hives/recovering from injury

E. Findings

1. *Do you agree that the rate of levy for 2024/25 should be set at \$1.95 (\$2.24 including GST) per bee colony and \$40 (\$46 including GST) per beekeeper?*

The number of submitters who agreed or disagreed with the proposal was evenly split (Table 4) and has been analysed based on hive numbers each submitter owns. Forty two percent of submitters did not support the proposal for the rate of colony levy to increase, which also includes one email and two letter submissions. Forty two percent of submitters supported the proposed levy rates, and 11 neither agreed nor disagreed with the proposal.

Table 4: Breakdown down of survey responses by hive numbers

Hive numbers	Agree or Strongly agree	Disagree or Strongly Disagree	Neither agree nor disagree
1001 or more		3	1
501 – 1000	1	2	
251 – 500		6	
51 – 250		4	
11 – 50	2	2	
6 – 10	4		1
1 – 5	24	12	7
¹ 0 hives	1	1	1
Total = ²77	33	33	11

¹new beekeeper/on a break due to injury/no hives

²one submitter skipped the hive numbers question.

2. *What comments were made?*

Comments have been analysed to show the views of three groups of respondents - those that agreed, disagreed, and neither agreed nor disagreed with the proposal.

2a. Views of submitters who agreed with the proposal

33 of the 78 submitters agreed or strongly agreed with the proposal, and 14 submitters provided comments, with the reasons for supporting the proposed levy rate being:

- proposed levy rate is a fair and reasonable increase at a time where extra work will be required due beekeepers exiting the industry and a future of higher AFB incidences.
- the progress being made with AFB elimination.
- current levy rate could be increased further, so that the Pest Management Plan can do more to reduce and eliminate AFB.

- the importance of controlling AFB justifies the increase in levy, provided funds are used diligently and without waste.

One submitter indicated that the levy should reduce for those owning less than five hives while another suggested levy should be raised for anyone owning less than 200 hives.

2b. Views of submitters who disagreed with the proposal

All 33 submitters who either disagreed or strongly disagreed with the proposal provided comments.

Financial strain was cited as the main reason for not supporting the proposal which came from 15 submitters who owned more than 50 hives. Twenty eight submitters (hobbyists and commercials) outlined their reasons for not supporting the proposal on SurveyMonkey or through email, as below:

- Cost of living crisis impacting hobbyists who are trying to make ends meet.
- Current economic climate unsuitable for raising levies due to rising costs in other areas (fuel, labour, equipment, and feeding costs) in addition to cost-of-living crisis.
- Costs should be cut by the Agency, as businesses are having to do the same.
- AFB is not forefront of challenges for the industry; varroa, rising costs and declining honey prices are more pressing issues.
- Not in support of levies nor an industry that promotes intensive farming of bees.
- Levy increase does not match with increase in the value of honey to fund it.
- Levy increases puts smaller size operators under financial pressure, can put them off compliance, and discourage others from entering beekeeping in future.
- No change in AFB levels has been seen and rate of increase cannot be justified with the number of careless operators who have already exited the industry.

The two submitters who sent their feedback through letters were not supportive of the proposal due to the following reasons:

- Levy consultation period of less than 14 working days is inadequate for levy payers and industry bodies to gather information and furnish submissions. Consultation should run from 1 November onward, as a series of open meetings/face-to-face discussions.
- Insufficient information provided for levy payers to fully understand where/how funding is derived and spent. Greater breakdown of forecasted expenses required, as there have been no changes from previous years in the way the proposed budget was presented.
- Considerable expense connected with maintaining an Apiary register which is inaccurate most times of the year.
- Levy payers do not understand the effectiveness of inspecting 4% of apiaries and value from honey surveillance for AFB.

- Single focus on compliance & enforcement is a poor use of funds and a poor strategy. Education and building a culture of knowledge is the best weapon for tackling AFB, and funds should not be reduced from this category.
- No measurement of how much AFB exists in uninspected hive populations, other than reliance by self-reporting by beekeepers.
- Colony numbers fluctuate and calculating levies based on colonies as at 31 March is inaccurate.
- Reluctance of The Management Agency to engage meaningfully with beekeepers to bridge gaps.

2c. Views of submitters who neither agreed nor disagreed with the proposal

11 submitters neither agreed nor disagreed with the proposed levy rates; seven of whom made the following comments on SurveyMonkey or through email:

- The current AFB elimination strategy requires a review.
- AFB problems exist due to beekeepers who are not aware of the basics of beekeeping.
- While it is unfair that commercial beekeepers pay \$46 on par with hobbyists, The Management Agency Board has an excellent programme for both beekeepers' education and AFB eradication.
- Unsatisfactory that beekeepers do not have access to exact location information of AFB cases nearby.
- Revenue from levies should be predominantly used for training and introducing more AP2s, instead of funding administrative costs.
- A 10-cent increase per hive would have been more reasonable.
- More transparency and reporting required from AP2 point of view, as beekeepers in some regions do not know who the AP2 is.

2d. Views of submitters who provided suggestions.

Four submitters also made suggestions, as below:

- charging levies on hives (dead and alive) rather than only colonies, to incentivise beekeepers to clean dead-outs.
- Better collaboration between AP2s and apiary managers is needed. Providing disposal areas for all regions would help beekeepers to get rid of hives and gear. Findings from AP2 inspections should be emailed, not left under the lid.
- More AP1s needed at the coal face dealing with AFB beekeepers.
- All DECA holders should be promoted to others so that they can assist with AFB inspections.

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