



RD 1, Ashburton 7771
Email info@nzbeekeeping.co.nz
www.nzbeekeeping.co.nz

SUBMISSION:
FROM NEW ZEALAND BEEKEEPING INCORPORATED.

TO THE CONSULTATION: Review of the National
American Foulbrood Pest Management Plan.
Round 1 Consultation Questions, due 11th July 2021.

Firstly NZ Beekeeping consider the National American Foulbrood Pest Management Plan (AFB PMP) review should not be undertaken by the group that is the Management Agency or its Board, or contracted parties. The review should be undertaken by a group of Industry personnel, with Terms of Reference to meet the requirements as set out by the Minister.

NZ Beekeeping are concerned that there has been very little time to fully consider the implications of the Review. The Webinar consultation finished last Thursday evening, 8th July 2021 – leaving only 3 days for considered discussion and input.

1. How many hives do you own – Not Applicable

2. What do you think about Beekeeper legal obligations to eliminate AFB?

Having gone through the Order in Council, NZ Beekeeping think there are some areas that do need to be changed that will require changes in some clauses of the order, and one new clause added.

a. Clause 6 – The Management Agency.

NZ Beekeeping are of the opinion that the beekeeping Industry would be better served by an Independent Industry Wide Incorporated Society to act as the Management Agency. The members of this Agency would need to be appointed/elected from across the industry, as we see that this is more likely to get good skillsets, and less conflict of interest – to be focused on the job at hand – to work towards the elimination of AFB from New Zealand.

There are currently several beekeeping organisations, and more importantly numerous beekeepers who do not belong to any organisation. We must open the doors to allow any beekeepers or associated Industry people who have the required skill set and the desire to be part of this Agency to enable them to participate.

b. Clause 6 (A) There should also be an additional clause added:

“An annual independent audit of the Management Agency shall be undertaken to ensure that it is meeting its obligations, and outline areas for improvement” etc.

In this manner the Levy Payers (beekeepers) would be able to gauge whether they are getting value for money. Failure to perform in three audits would result in changes to the Management Agency personnel.

c. Clause 39 - Review of the Certificate of Inspection Exemption.

This clause we think needs to be re-written.

A cancellation of this exemption results in the cancellation of your Disease Elimination Conformity Agreement (DECA). The DECA, while being a written agreement between the Beekeeper, and the Management Agency as to how the Beekeeper is going to conduct themselves to achieve a zero AFB

status, NZ Beekeeping see it as a great educational tool as well. It is no good taking the DECA off a beekeeper who has an apparent AFB problem – they will not learn how to deal with suspect AFB material, acquire better skills to sterilise affected material, nor learn how to quarantine, track and trace to minimise the likelihood of spread.

The DECA should only be amended with consultation between the beekeeper and the Management Agency who needs to get beside the beekeeper to help them learn from their mistakes improving skills etc.

An exemption should only be removed if the beekeeper continually has increasing levels of AFB. (Say over 3 years).

d. New Clause – Education – Mandatory Training

A beekeeper – owner operator or employee in charge of disease control, is required to attend either a refresher course, or a field day run by the Management Agency (or its contractor) on a bi-annual basis (every 2 years).

Failure to do so will result in an infringement notice with a fine (\$50?) payable to the Management Agency.

These refresher courses and field days should be free to all DECA holders, or their employees who are responsible for overseeing disease control. The Beekeepers attendance would need to be recorded. The field days could have AFB related activities, but most importantly have renowned beekeepers talk at the field days about their methods **to eliminate AFB from their business**. **These field days need to be fun and allow plenty of time for beekeepers to talk and interact.**

Refresher courses could also be run “in house” by larger companies who have an accredited trainer.

The purpose of these free days is to ensure that as many beekeepers, whether owner operators or employees get the chance to attend these days to ensure that they know what they are doing to keep AFB at manageable and decreasing levels.

e. Clause 27 (3)

Failure to furnish an ADR shall result in an infringement notice (\$50?) fine.

Failure to furnish an ADR on three consecutive occasions is an offence under section 154N of the Biosecurity Act.

Other areas where infringement notices and fines could be used are for failing to furnish a COI, failure to notify an Apiary.

NZ Beekeeping are not sure if this change to allow for infringement fines can be set up under the AFB PMP or would require a change in the Biosecurity Act.

f. *Other concerns:*

- (i) The AFB PMP should continue to only be for AFB. It should not extend to other pests and diseases (as had been suggested by Marco Gonzalez, Operations Manager for AFB PMP, **during one of the Webinar's to include Varroa in a New PMP**) **The plan needs to maintain its focus on AFB.** It is in part because of this Plan that we are continuing to keep Imported Honey out of New Zealand.
- (ii) Clinical (Visual) signs of AFB to remain the basis of the Order in Council.
- (iii) **Spore testing must remain a "Beekeepers' management tool".** This would be to help identify possible 'hot spots' of potential AFB where quarantining may be necessary to avoid spread to other areas or finding the "hive" in the apiary that may be likely to show clinical symptoms in the future and implement a 'nil movement' from that hive.
- (iv) Anything that is destroyed that does not show clinical symptoms must have compensation paid.
If there is a move to destroy equipment on a relatively large scale, Beekeepers would not be able to afford to pay a levy to allow enough to pay compensation – therefore the AFB PMP should only relate to Clinical signs of AFB and have no compensation paid.
- (v) Changes to the ways in which detection of AFB to be conducted
Currently only visual inspection is being used to detect AFB, but there are references that say: **"Clause 35 (2) The methods approved by the management agency must be methods generally recognised by the scientific community as effective in the detection of American Foulbrood".**
This should be amended to say that methods approved by the Management Agency should only be methods that have been recognised by the Scientific community (via peer reviewed papers) as effective in the detection of American Foulbrood.
So good, repeated, scientific evidence is required before the use of dogs or other means is used for inspection methods.

3. What do you think works well?

NZ Beekeeping think that there is not much that is "working well" other than the beekeepers themselves who are working diligently to try to eliminate AFB from their business.

The Order in Council was a well written document that had exceptional consultation and consideration when it was drafted and implemented in 1998.

If the Management Agency (now Apiculture NZ) carried out their functions as per the Order in Council, and ensured that the AFB PMP Board were carrying out their functions – with regular reporting and auditing and the Board were instructing the Operational personnel then the AFB PMP may be better reaching its goal of decreasing AFB by the 5% per annum.

4. What are we missing when it comes to eliminating AFB?

NZ Beekeeping consider that the main thing missing from the AFB PMP is:

- 1 An effective Governance structure that is separate from any organisation.
- 2 An effective Education component to the AFB PMP – it is much better to offer a carrot rather than using a big stick to encourage compliance with the PMP. That is why we think that Education needs to be improved.
- 3 New cost effective tools that the Beekeeper can use to detect AFB. New tools should never be used as detect and burn measure by the Operational team of the AFB PMP – unless compensation is paid.

5. What would you change about the current AFB PMP?

Most of NZ **Beekeeping's** changes are reflected in the areas where there needs to be legal changes to the Order in Council, and what is outlined in Clause 4 above.

Changes that need to be made in other areas is the way in which the Management Agency consults with beekeepers – **there needs to be open forum's where beekeepers get to ask questions and they** are either answered or told I do not know, or I will go away and find an answer and get back to you.

The current email out to beekeepers who have declared significantly less AFB than the average to get honey samples checked for AFB spores is a case in point. The beekeeper was not sent any information – who was doing it, at whose cost, how many samples etc. It has taken NZ Beekeeping two letters to the Manager to finally get a response and some information about the proposed sampling programme. This is bad process that needs to be improved.

6. Which changes would you prioritise?

- a) Change the Management Agency to an independent Industry Wide body
- b) Increase Education through field days or other means throughout the country

Other Comments

The current PMP has been compromised by three things:

- a) Going back to levy beehives (colonies) – beehives die and disappear continually.
- b) The Terms of Use (TOU) for the current data-base. When people disagree with the TOU they have **been told they cannot use it. Access to the Beekeepers' own data is important.**
- c) **Poorly trained AP2's. There needs to be Fit, better trained AP2's who can actually lift boxes and do the job more efficiently.**



The Webinar was a complete waste of beekeepers' time. Nothing was presented to Beekeepers as to what was currently being done (only what they had done), nor where the Management Agency could see the Plan going in the future. Just a recurring script from one webinar to the other and questions not answered fully or with a recurring – **"we want to hear from beekeepers as to what you want changed"**.

Eradication of AFB is very difficult to achieve as the spores last 60 - 70 years. But NZ Beekeeping believe that we should probably keep trying as it is a useful tool for keeping honey and bee products out of New Zealand. If we don't keep honey and bee products out of NZ, we will soon have EFB, Small Hive beetle and other bee diseases. This will have a very serious effect on honey production, but more importantly, on pollination of our food crops in NZ, which is achieved by bees. The goal of AFB eradication, probably helps with this goal.

NZ Beekeeping Inc continue to support the objective of reducing American Foulbrood displaying clinical symptoms by an average 5% each year without the use of drugs.

Thank you for considering our Submission.

A handwritten signature in black ink, appearing to read "J. Lorimer".

JANE LORIMER
PRESIDENT.