

**From:** [Beesrus Limited](#)  
**To:** [Hon Damien O'Connor](#)  
**Subject:** American Foul Broad (AFB) review proposal  
**Date:** Sunday, 26 March 2023 10:32:43 PM

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## To the Minister for Biosecurity.

### REQUEST for the REVIEW of the Biosecurity (National American Foulbrood Pest Management Plan) Order 1998

The PMP is to terminate on 31 March 2023.

The provisions of s100D (4) of the Biosecurity Act 1993 provide for the Minister to review the PMP if a person submits a proposal.

I submit the following proposal for the National American Foulbrood Pest Management Plan.

#### My Proposal.

My proposal as a person quoted in the Act seeks the Minister revoke the plan at the earliest convenience.

Reasons for the proposal;

1. AFB incidence has increased despite the aim of the PMP to reduce incidence by 5% each year. The aims have not been met therefore the plan must be revoked.
2. The aims are unlikely to be met whilst the current management of the PMP continues.
3. The Aim of the PMP is to eliminate AFB from beehives. The PMP has been in force for 24 years and it has failed to eliminate AFB. Without a major change in direction of the PMP elimination is Not Achievable. Therefore, the current plan must be revoked.
4. The Management agency allows its officers to publish information that can lead to the identification of beekeepers who have reported AFB. This shows that the management agency is not fit organisation to manage such information.

I have consulted with my fellow beekeepers by attending beekeeping field days, social media conversations and other beekeeping event . The Management agency refused to allow the use of the beekeeper's data base to contact all registered beekeepers.

The consequence of the proposal.

1. Control of AFB would become a choice of the beehive owner.
2. AFB can be controlled very cheaply with antibiotics in a similar manner used in overseas countries.
3. New methods of controlling AFB have become available since the introduction to the AFB PMP 24 years ago.

I do not consider the provisions of s 61 are relevant to my proposal.

I am available to assist in the review process going forward if the Minister so desires.

Thanking you for your consideration of my proposal.

9(2)(a)



Copy of 100D for your info.

## **100D Review of plans**

### *Reasons for reviews*

(1)

The Minister or council must initiate a review of a plan as a whole if—

(a)

the plan is due to terminate in less than 12 months and the Minister or council proposes to extend the plan's duration; or

(b)

the plan is due to terminate in less than 12 months and a person submits a proposal to the Minister or council to extend the plan's duration; or

(c)

the plan was last reviewed as a whole more than 10 years previously.

(2)

The Minister or council may review the whole or part of a plan if the Minister or council has reason to believe—

(a)

that the plan or part is failing to achieve its objectives; or

(b)

that relevant circumstances have changed since the plan or part commenced.

(3)

The Minister or council must review a plan or a relevant part of a plan if—

(a)

circumstances occur that are circumstances in which the national policy direction requires a review to be conducted; or

(b)

any other requirement of the national policy direction requires a review to be conducted.

### *Proposal for review*

(4)

A review is initiated by a proposal made by the Minister or council or any other person.

(5)

The proposal—

(a)

must state whether the proposal is to amend, revoke, revoke and replace, or leave unchanged the plan or part of the plan; and

(b)

must give reasons for the proposal; and

- (c) must,—
- (i) if the proposal is to amend the plan or part of the plan, set out any proposed amendments in full; or
- (ii) if the proposal is to revoke and replace the plan or part of the plan, set out the replacement plan or part; and
- (d) must **comply with section 61, 70, 81, or 90** to the extent to which the **sections are relevant** and reading in any necessary modifications; and
- (e) may propose that a pest or pathway, as appropriate, be added to the plan, whether or not the review is of the whole plan.

*Provisions applying to reviews*

(6) Reviews are conducted under the following sections to the extent to which they are relevant and reading in any necessary modifications:

- (a) [sections 59 to 67](#), for a national pest management plan;
- (b) [sections 68 to 78](#), for a regional pest management plan;
- (c) [sections 79 to 87](#), for a national pathway management plan;
- (d) [sections 88 to 98](#), for a regional pathway management plan.

*Action after review*

(7) Following the review, the Minister or council may approve—

- (a) the amendment of the plan or part of the plan; or
- (b) the revocation and replacement of the plan or part of the plan; or
- (c) the revocation of the plan or part of the plan; or
- (d) the leaving unchanged of the plan or part of the plan.

(8) A plan that reaches its termination date during a review that has begun continues in force and its future is determined by the action that the Minister or council approves under subsection (7).

*Consequence of not complying with section*

(9) A plan does not cease to be in force only because it is not reviewed as required by this section.