

To the Minister of Biosecurity

Biosecurity (National AFB Pest Management Plan) Order 1998
Submission on the Current Review

Southern North Island Beekeeping Group Inc recommend to the Minister that the current objectives of the plan due to expire 31 March 2023 be amended as follows.

- 1 – To redefine the objectives of the plan and create a meaningful measure of the plan meeting the goal of eradication of AFB in New Zealand.
- 2 – To create an independent and dedicated entity to manage the National AFBPMP.

Management Agency - We are aware that NZ Beekeeping has written to you suggesting that the Management Agency be an elected independent body corporate responsible for implementing the plan. We support this proposal.

Other Beekeepers may have also recommended this change. We believe that all Levy Payers should be able to participate in the election of any Board Members of the Management Agency, by vote.

We propose therefore that:

The management agency be an elected independent body corporate responsible for implementing the Biosecurity NAFBPMP plan.

- (a) It shall be made up of an agreed number of people from within the beekeeping industry.
- (b) It should also have an agreed number of people with specialised skills (not necessarily from within industry) to ensure that all statutory regulations are met in the required timeframes.
- (c) The Minister may make Orders to provide for the establishment of this body.
- (d) The management agency must, in implementing the plan, work towards achieving the objectives of the plan working towards achieving the eradication of AFB from New Zealand.

SNIBG are concerned over the apparent change of direction in the management of AFB. The current primary objective of the plan is the aim for complete eradication of AFB from New Zealand and we agree with this policy.

The present APINZ - appointed Management Agency have proposed that AFB policy be one of containment and reduction but not eradication. We request that the Minister continue to enforce the original objectives of the plan.

SNIBG have prepared a Biosecurity Code of Compliance that we will be submitting to the minister shortly and this will address many aspects of the operational requirements of all beekeepers and will enhance the direction of the AFB Management Agency. This code of compliance is a direct result from our last discussion with the minister.

Please Note: Amendment 2 has been developed by NZ Beekeeping. SNIBG acknowledge their intellectual property associated with this amendment and support a proposal to change the entity that manages the PMP but acknowledge that such an entity does not yet exist.

The above change makes the intention to change the entity of the management agency clear. The change will enable a 'fit for purpose' entity to be set up by the beekeeping industry under the Ministers direction and guidance.

9(2)(a)

Secretary

Southern North Island Beekeeping Group Inc.