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President's Report

American Foulbrood National Pest Management Strategy (AFB NPMS)

This month's journal is once again being sent to all registered beekeepers. Some of you may realise that it has come out a month earlier than it has in the past. This is to allow for sufficient time for submissions on the AFB NPMS levy rate and operational budget and to allow the Management Agency the time to get the levy rate notice into the *New Zealand Gazette* by 20 January. As the Management Agency we are mindful of our obligations to consult with all beekeepers.

You will note that this issue of the magazine includes a discussion document on the American Foulbrood National Pest Management Strategy Five Year Review. Please take the time to read through this document carefully, and respond to it if you feel the desire to do so. All responses will be taken into consideration before a proposal will be formulated to either continue with the AFB NPMS in its current form, or make amendments to the strategy and put these forward for ratification by the stakeholders.

The NBA sees huge benefits in eliminating AFB from our hives, and we believe that this is now achievable in the medium term. As a country we want to decrease the likelihood for the need to use drugs for treating diseases, and one way of ensuring this is to eliminate the disease altogether. Freedom from AFB is proving to be essential for market access for our bee products. This needs to be recognised if we are to keep all our market options open and thereby get export revenue and maintain domestic prices.

Executive Council

By now many of you will know that we have met for the first time as an Executive Council to give some direction to the Association. This was carried out at the strategic planning meeting held in Auckland.

I am very pleased to say the council is working well together and has identified several common goals that have become our priorities for this year. This will be reported elsewhere in this issue. [Editor's note: refer to the article 'Executive Council sets strategic direction' on page 6.]

Apimondia 2005: Dublin, Ireland

I had the pleasure this year of being able to attend some of the sessions at Apimondia, coupled with some time spent visiting relatives that I had not previously met. A substantial NZ contingent was present at Apimondia.

It is true that the Irish are a very hospitable people and many a fond memory will be stored to look back upon.

Apimondia has, like the NBA, undergone some considerable changes in its structure and is now looking at how to best meet the needs of its members. In addition to the main biennial World Beekeeping Congress, other symposia are now being hosted by member countries on specific topics of interest. Argentina hosted a symposium last year focusing on how associations and co-operatives can work to benefit

the members. In Dublin, four or five sessions were running concurrently, so that something of interest was offered to everyone. Sessions were offered for developing countries and on topics such as therapeutic goods, and bee physiology.

While in Dublin a couple of the new Executive Council members talked with the President and General Secretary of Apimondia as to the possibility of the NBA rejoining the organisation. It came up during discussion that they are interested in New Zealand one day hosting a symposium to look at some of our unique aspects to our industry and to the innovations in bee product research being carried out at the Honey Research Unit. This of course would be a great opportunity to showcase the New Zealand apicultural industry to the world. We have the resources and the people that could make this a reality if our members want this to happen.

One of the consequences of attending Apimondia 2005 was appreciating how much we have here in New Zealand: the high-calibre speakers we have on our doorstep, and how well up with the play we are on the research front.

Also of interest on our travels was to look for New Zealand product and see how it rated in the price per unit that it sold for. Invariably it was difficult to find New Zealand product labelled as such. From what we had seen on the shelves, the local product receives a superior price differential simply because it is local. Also the honey that had been blended really did not identify where the constituents of that batch were derived from: the labelling simply gave information like 'EU' or 'non-EU honey', rather than identifying the country of origin.

- Jane Lorimer



Deadline for Publications

November 2005 edition: 21 October 2005

December 2005 edition:

21 November 2005

NB: No issue in January 2006 — Happy Holidays!

All articles/letters/photos to be with the Editor via fax, email or post:

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Secretarial snippets

This month I will deviate from the norm and write about one of my other beekeeping-related roles. It seems a good time to do this as the latest NBA activities are well accounted for elsewhere in this issue.

It is spring and therefore the time of year when I start the manufacture of queen candy and protein substitute. Queen candy manufacture takes place in my kitchen, following the recipe originally published by Murray Reid in Buzzwords many years ago. His recipe was for a vast quantity — I have adapted it to a more realistic level.

Queen Candy Recipe

The ingredients are:

Sugar syrup made from 2 cups white sugar and 1 cup water 2 x 1kg packs icing sugar 1/4 teaspoon tartaric acid 2 teaspoons glycerine

First I make the sugar syrup by bringing the white sugar and water to the boil and ensuring all the sugar has dissolved, then allow to cool for half an hour or so. Put the icing sugar (a well known brand from the supermarket is best as not as 'dusty' as some) in a very large mixing bowl. Add tartaric acid (from supermarket, usually in baking/spices section) and glycerine (also from supermarket in medicines/toiletries). Make a well in the middle of the icing sugar and gradually add enough of the syrup (I always seem to have some left over) and mix with a spoon.

Then I roll up my sleeves and knead the gluggy mess with my hands until it is the desired consistency. It is darned hard work: the icing sugar dust gets up my nose, and a full-scale wash of me and the kitchen bench is required at the end. When the candy looks and feels right, store in a suitable, beekeeperfriendly container. The best we have come up with is an old lamb milk powder bucket. Use something that can be easily opened and the candy removed with a hive tool. We previously used preserving jars, then tried old 1kg honey pots, but the bucket surpasses these.

Queen candy can sometimes go hard and brittle. I think this is caused by insufficient glycerine. More often it absorbs moisture and goes too soft and wet and it pays to supply the beekeeper with a packet of icing sugar, he can mix this in if needed.

I am told that a mix of candy is sufficient for 300–400 queen cages (Rob, our queen breeding manager, was a bit vague about this).

Protein supplement recipe

Making protein supplement is a much larger 'cooking' operation and takes place in the honey house. We use a commercial cake mixer and the following recipe:

- 1 part sodium caseinate
- 2 parts yeast
- 5.2 parts sugar syrup 67%

This is mixed by weight. The sugar syrup is as delivered by bulk tanker. The sodium caseinate is branded as NZMP Alanate 191 and is presumably available from Fonterra (our last purchase was from another beekeeper). The yeast is USRD inactive dried yeast from NZ Food Industries Ltd, freephone 0800 60 70 90. I am not sure if NZ Food Industries deal directly with beekeepers and an alternative supplier may be Superior Foods in Auckland, phone 09 272 0049.

The protein substitute mix should be of a fairly thick yet damp consistency: able to be 'blobbed' with a plastic spatula (or hive tool), but not so wet that it runs everywhere. We pack it in paper pie bags as small patties. Each bag is folded at the top and secured with a staple (an alternative use for the office stapler); we then pack the patties in buckets and store them in the freezer. When needed the beekeepers can take a bucket to the hive site. One patty per hive placed on top of the brood nest, tear the top of the bag and fold the paper back so that the actual patty is still sitting on paper but the bees have access to it from above.

This season we have not needed (so far) to make protein substitute as there has been adequate pollen coming in to the hives. Perhaps that is just as well as I understand that the dried yeast will not be available until the end of September. As I write this there is a deep depression approaching New Zealand — let's hope it does not have a bad effect on our bees.

- Pauline Bassett, Executive Secretary

Management Committee appointed

As required in the Association's rules, the Executive Council appointed a Management Committee at its first formal meeting on Sunday 11 September 2005. While the rules provide for members to be appointed from outside the Executive, it was decided that for the first year, Executive Council members would commit to this work.

NBA President Jane Lorimer will chair the Management Committee and Neil Farrer will be the Treasurer. The other appointed members are Brian Alexander, Arthur Day and Gerrit Hyink. Jim Edwards also is an ex officio member in his capacity as the Executive Officer.

The Management Committee plans to meet by teleconferencing once per fortnight. The quorum for a meeting will require that at least three of the five appointed members are present.

- Jim Edwards, Executive Officer

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Executive Council sets strategic direction

The Executive Council met at Auckland Airport on Sunday 11 September to determine the strategic direction for the NBA. All members were present and they brought with them the information they had received from the Wards they represent.

The priorities (in no particular order) and the Councillor responsible are:

Increase membership by 10% over the next year: The aim is to increase membership, looking at the subscriptions and the benefits of belonging to the NBA (Arthur Day).

Training: The goal is to develop educational support for beekeepers, and will include investigating recruitment and training opportunities, employment-related matters, mentoring schemes and continuing education (Frans Laas).

Marketing: determine whether to establish branding (country of origin) of products from NBA members/New Zealand within six months (Jane Lorimer and Neil Farrer).

Lobbying: immediately establish and actively maintain communication with central and regional Government, and

other bodies (Jane Lorimer).

Communication: lift awareness of the NBA through the media, email, website, *The New Zealand Beekeeper* magazine, field days and promotion, and report back within two months (Gerrit Hyink).

Promote beekeeper compliance with Risk Management Programmes, the AFB NPMS, food safety, OSH and ACC requirements (Jane Lorimer).

Encourage research into issues of importance/benefit to beekeepers, especially NBA members. Look at ways to encourage research into issues of importance to beekeepers and especially NBA members, and how funding will come into this area (Frans Laas and Barry Foster).

Biosecurity. Concentrate on the AFB NPMS but also consider border controls, MAF surveillance, and liaise with the Varroa PMS in the South Island (Neil Farrer).

- Jim Edwards and Neil Farrer

EXECUTIVE COUNCIL STRATEGIC PLANNING MEETING, 11 SEPTEMBER 2005.



Left to right: Neil Farrer, Arthur Day, Pauline Bassett, Jane Lorimer, Brian Alexander.



Left to right: Gerrit Hyink, Frans Laas, Roger Bray, Barry Foster, Neil Farrer, Arthur Day.

Photos: Jim Edwards

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Executive Council member profiles

At the NBA's Annual General Meeting in Christchurch, the following were elected as Ward delegates, thus forming the Executive Council:

Northern Brian Alexander Waikato Jane Lorimer Bay of Plenty Gerrit Hyink East Coast Barry Foster Southern North Island Neil Farrer Upper South Island Arthur Day Central South Island Roger Bray Lower South Island Frans Laas

Jane Lorimer was re-elected as President, and Neil Farrer was elected as the new Vice President of the Executive Council.

The new members of the Executive Council have supplied the profiles that follow.

Brian Alexander

I live in a place called Tahekeroa, about 10 kilometres from Puhoi where the early Bohemians first settled in this country. Puhoi is about one hour north of the Auckland Harbour Bridge.

I learned my early beekeeping from Ivan Dickinson in South Otago and I have always been most grateful that I got an extremely good training from him. After more than four years working with Ivan, we shifted north to where we now live.

Twenty-five years ago, we managed to fit 26 hives and most of our worldly possessions on the back of an old Bedford. These hives formed the basis of our present beekeeping business, and all of my hives originated from these 26 hives.

I am at present expanding our business from 800 hives to 1200 hives. I employ one person full time and another part time.

Arthur Day

I started beekeeping with Gavin White in Takaka about 35 years ago. I now live and work in Blenheim with 1000 hives requiring 1.5 labour units. We concentrate on the production of Manuka honey.

I was disappointed when the industry split, so I want to work to unify our industry again by improving the quality of service that the National Beekeepers' Association can provide our industry through team leadership. I have accepted the Executive Council portfolio on membership and the challenge to increase NBA membership by 10 percent over the next year.

Jane Lorimer

I have been involved in the beekeeping industry since 1985. When I left school I spent three years at the University of Waikato, gaining my BSc degree in Biology and Earth Science. It was while I was at university undertaking a physiology paper that I became interested in bees. During one of the lectures,

the lecturer was telling us about the compound eye, and how insects that have this compound eye can 'see colours'. Then later, I met this beekeeper Tony, who dared me to look into a nucleus colony, and my fascination with bees began.

Between university and entering the beekeeping profession, I worked at Ruakura Research Station as a technician. While there, I worked for the Animal Management Group and had several different areas of research involvement. I initially worked with the sheep and goat unit on breeding programmes, production and growth stimulants. I also spent time learning semen processing for artificial insemination work.

My first task when I began beekeeping (while I still worked part time at Ruakura) was to raise queen cells. Tony gave me instructions as to what to do and basically left me to it. After several days of frustration, I finally learnt the technique to transfer young larvae to the queen cell cups. That spring, I managed to raise 1000 queen cells. I now have the knowledge to undertake all facets of beekeeping, other than the rendering of old combs — and that is one job I never want to learn!! The only misgiving is that I entered beekeeping as a commercial beekeeper, never having the time to just sit and observe the bees at work, as a hobbyist does.

Since my beekeeping involvement, I have served time on the marketing committee, and I am still interested in getting further generic research carried out on all bee products, so that more companies can become involved in niche marketing, and have a wider range of products that can be marketed in this category.

Last year Tony and I were fortunate enough to be asked to address a symposium in Chile that was then extended to include Argentina. This year we decided to attend Apimondia. Through attending these conferences it helps to broaden your perspective and appreciate what we have here in New Zealand.

I have led the Association since it became a voluntary organisation at the end of 2002. We have made strong progress since then and have just completed the restructuring of the organisation with the employment of Jim Edwards as our Executive Officer. Jim's previous skills will add to our already wide skills base on the new Executive Council. Together we will continue to move the Association forward—it will, however, need commitment of our members to fund the organisation at an appropriate level to their commitments in the industry.

I believe that we have an exciting future ahead of us:

- building our industry profile so we receive the recognition the industry deserves
- working to help facilitate exports

- developing a long-term research strategy with all the key stakeholders involved: researchers, funding organisations and our Association
- continuing to manage the American
 Foulbrood National Pest Management
 Strategy and work to reach the goal of
 eradicating the disease from New Zealand
- increasing education and training for beekeepers
- · building benefits for our members

The above points are just some of the areas we will be working on during this year. So come and join the National Beekeepers' Association and help to build an exciting future for our industry, one in which people will queue to join.

Gerrit Hyink

I was raised and educated in the Netherlands. I have a degree in electronics and telecommunications. I worked for twelve years in computer research as a silicon chip designer, and also had some beehives as a hobby.

I emigrated from the Netherlands to New Zealand in 1982, where after a short initial period I took up beekeeping, which until now provides for an income. I am based in Katikati, where pollination and honey production are the main sources of income.

I have been intensively involved in Bay of Plenty Branch matters, five years of which has been as president, and currently still hold the secretarial position.

Barry Foster

I was born and grew up in Gisborne and started my beekeeping career here at an early age with my father as a hobby. Indeed beekeeping runs in my family, as my grandfather was also a beekeeper and farmer in Tolaga Bay in the early part of the twentieth century. Twenty-five years ago I took my father's hobby and built it into the business I have today. I have my own factory and process my own honey and contract extract for others. Before varroa came I produced honey to BioGro standards for export and since then have altered the factory to process honey for medical grade. Pollination of various crops provides additional income.

I have been active in our local branch as secretary for many years and involved in most of its activities, including staging the 2000 conference in Gisborne. On a national scene I was involved in the NBA submission on Genetic Modification to the Royal Commission on GM and in work following that process.

I believe that we as beekeepers need a strong viable national body to represent us, giving a collective voice that encourages beekeepers to work more closely together and share information where practical. This is why I have put my name forward to act on the NBA Executive Council and am

prepared to play my part in making this ideal become reality even more so than it is now.

Neil Farrer

I am currently a semi-commercial beekeeper with 200 hives. I have been beekeeping as a hobbyist for approximately 20 years, growing to my current hive level over the last five years.

I have had 42 years' experience in the banking, finance and legal sections, and spent the last 10 years until 2000 as a consultant manager to law firms, specialising in staff training, legal software, and management of the professional office. I am now retired.

Apart from beekeeping activities and my NBA involvement, I am very interested in vintage cars and involved with the New Zealand Vintage Car Club, both at branch level and national level. I'm a keen participant in rallies in the lower North Island, either with wife Jennie, or other members of VCC Wanganui Branch. I am currently running five vehicles dating from the era 1954 to 1958 (Vanguards and Hillman/Humbers). My other main spare time involvement is at a small farm holding of 35 acres, cutting down gorse and planting trees.

I have an extended family of eight, plus grandchildren and two great-grandchildren.

Roger Bray

I have been a passionate beekeeper since 1965 and my wife Linda and I presently run approximately 1000 hives in mid Canterbury.

My acceptance of a position on the Executive in 2002 was as a desire to see the AFB NPMS continue under effective management. The NBA as Management Agency has come a long way in addressing its role and I see there is still further work to be done.

I see many areas where the NBA can assist the beekeeping industry — particularly in the health of bees and the sustainability of beekeeping. These include a proactive stand on agricultural chemicals to ensure bee safety, as well as promoting awareness that many so-called weeds (gorse and broom) have benefits to the sustainability of bees in providing pollen.

I also see a role for the NBA in assisting with the information flow from the various regulatory bodies to the beekeepers, and most importantly the flow from beekeepers back to those organisations which may impose controls that are not practical or workable (i.e., NZFSA, MAF etc).

To achieve these sorts of ideals there is a need for support for those who wish to dedicate their time and energy for the greater benefit of beekeepers. I urge beekeepers to think about the future of their industry. Do you wish to sit back and accept 'your lot' or do you wish to play a part in the decision-making process? The NBA is moving ahead with a new team on the Executive through the ward system. It will now be up to

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beekeepers to support and assist as well as speaking up on issues that have a general industry benefit.

Your membership and subscription will enable the NBA to maintain a strong independent profile. Members' funds will progress beekeeping issues.

Frans Laas

My involvement in the beekeeping industry was purely accidental, as is the case of many beekeepers. My son was interested in keeping bees as a hobby and my brother-in-law gave us a hive to start off with. Eventually we needed new queens for the three hives we had, so I rang Neil Walker from Milburn Apiaries to enquire about where I could obtain mated queens. At the time I was between jobs, after being made redundant from AgResearch after 16 years at Invermay Research Centre and a stint with possum trapping. Anyway, the next day Neil rang back and offered me a job.

After two years there I had to make some decisions about where I was going and decided that I would like to go teaching but as I didn't have a University degree I was not accepted into the course. I then undertook five years at Otago University where I completed a BSc (Zoology), a postgraduate diploma in Wildlife Management and an MSc in Wildlife Management. At the same time I had built up my hive holdings to around

100. This was an immense help in helping with the family finances, as a student allowance didn't go far in maintaining three teenage boys.

After I finished my stint at university I took a fill-in job at the new Southex extraction plant at Momona. In June 2004 I was appointed as Project Manager for the newly formed company Betta Bees Research Ltd. This is a bold initiative from a group of southern beekeepers. I also have my own company Wildlife Solutions Ltd, which is involved in ecological consulting and research on a small scale, and also my beekeeping assets.

Being a new member on a newly formed Executive Council presents me with many challenges as well as a sharp learning curve. With membership of the Executive comes the inevitable portfolios and statutory responsibilities in the form of the AFB NPMS. My major responsibilities are research and training and my academic background will be an asset to carrying out these responsibilities.

My outside interests are in outdoor activities and I am currently president of the Otago Branch of the New Zealand Deerstalkers' Association.

[Editor's note: Jim Edwards, in his capacity as the new NBA Executive Officer, is an ex officio member of the Executive Council. Jim's wife, Pam Edwards, will assist with Executive Officer duties. Jim and Pam were profiled in the August 2005 issue.]

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BK174

Manager's Report on AFB National Pest Management Strategy



Welcome to spring, to another season and to a new American Foulbrood National Pest Management Strategy (AFB NPMS) operational year (1 June 2005 to 31 May 2006). The Management Agency looks forward to a year of continued strengthening of our industry's goal, the elimination of AFB from New Zealand.

As I see it, the following tasks are important this year:

- the further consolidation of the AFB NPMS
- the continued development of a positive industry culture that sees beekeepers as 'the owners' of the AFB strategy
- lifting the level of Annual Disease Returns (ADRs)
- getting beekeepers to report and destroy AFB within seven days
- fixing the Certificate of Inspection (COI) noncompliance issue
- · increasing the level of beekeeper education.

In this report I will focus on operational issues and the complexities we face to ensure that the strategy, as a system, works well for us all.

Last year NBA branches, the Bee Industry Group (BIG), and Authorised Persons (AP1s and AP2s), on behalf of the Management Agency, inspected over 500 apiaries as part of a national AFB audit programme. The current AFB levels in New Zealand are sitting close to 0.26% (AgriQuality Limited report 2005). This is a great result and sets our focus on getting 'our system' working to ensure that the reported incidence of AFB cases in the year beginning on 1 July 2007 is 0.1% or less. To do this, we need to continue to work hard to achieve AFB strategy objectives:

- (a) locating all places where beehives are situated and ensuring that each honey bee colony is inspected at least once each year for AFB
- (b) identifying AFB cases in beehives
- (c) eliminating AFB in beehives by destroying any AFB cases and associated bee products, and destroying or sterilising associated appliances.

To meet the above objectives we have a number of tools available to us. Some of the more useful processes are:

- the Annual Disease Return (ADR)
- the Certificate of Inspection (COI)
- the Disease Elimination Conformity Agreement (DECA)
- an AFB audit inspections process (Clause 40 of the strategy)
- AFB spore testing

- beekeeper education and the AFB competency testing programme
- a seven (7) day AFB reporting and destruction requirement
- default inspections.

ADRs

To date, we have an 81% compliance with our ADRs. That is, most beekeepers got their paperwork back as asked and this is fantastic! The information received allows us to target resources into areas that need the greatest assistance. And, while 81% is a great result, we still need to aim for the magical 100% return. This might sound tough but it is achievable.

COIs and DECAs

This year close to 600 beekeepers were sent a COI. That is, for every beekeeper that does not have a Certificate of Inspection Exemption (typically received upon the application for a DECA), the beekeeper needs to ensure that all their beehives are inspected for AFB by, for example, an Approved Person (e.g., another beekeeper with a DECA) between 1 August and 30 November each year.

The process sounds good but it is important to note that the COI subsystem of the AFB strategy has not worked that well. While we can argue why it's not an area of good compliance, we need to remember that one of our objectives is to have all managed hives inspected each year for AFB and any infected colony destroyed. Therefore compliance is critical. Yet many beekeepers find getting other beekeepers in to inspect their hives is potentially expensive, difficult to organise, and possibly embarrassing. If you are a beekeeper reading this and you have a COI to get done, it is important to understand that the AFB Management Agency must grant a Certificate of Inspection Exemption (i.e., you inspect your own hives) to any beekeeper if that beekeeper enters into a Disease Elimination Conformity Agreement (DECA) with the Management Agency. That is, if you sign up for a DECA a Certificate of Inspection Exemption will be granted and this means you will not have to get someone else to inspect your hives. You can do it as outlined within the DECA.

This is not a 'lesser' process to the COI as the DECA is a formal agreement between a beekeeper and the Management Agency. The DECA sets out a 'code of beekeeping practice' that describes how the beekeeper will manage inspections for AFB and eliminate it if the disease ever infects the beekeeper's hives.

Obtaining a DECA does involve doing some paperwork; however, it is a worthwhile process. Applying for a DECA is highly recommended and the process can be started by

Continued on page 12

Continued from page 11

phoning an apicultural officer at AgriQuality, on 0508 00 11 22.

AFB audit inspection

Clause 40 of the AFB NPMS sets out a requirement for the Management Agency to review, test, and inspect to see if the strategy is working to plan. Last year the process worked well and the majority of NBA branches, the BIG, and beekeeping clubs got involved. This year will see both targeted inspections and a percentage of random inspections occurring.

AFB spore testing

An AFB spore testing programme will be run again this year utilising the services of HortResearch. Last year saw approximately 800 samples tested before the end of the HortResearch contract (31 May 2005). However, 140 samples that came in after 31 May are to be tested through this year's programme. Therefore, we had a target of 1000 samples to be tested for last year's sampling programme and we received over 900 samples. A great effort! This year the sample kits will be sent out before Christmas to selected hobbyists, and kits will be sent early in the new year to commercial beekeepers who have been identified through the sampling process.

Beekeeper education and the AFB competency testing programme

Beekeeper education and the AFB competency testing programme are vital ingredients to the objectives of identifying AFB cases in beehives and eliminating AFB in beehives by destroying any AFB cases and associated bee products, and destroying or sterilising associated appliances. To be able to meet these objectives consistently as an industry we all need to be on the same page. Therefore, if you have not yet taken up the opportunity of participating in an AFB competency testing programme, for example through your local NBA branch, then please do. It's a rewarding experience and will allow you to be better equipped to deal with AFB.

To report AFB and destroy hives with the disease within seven days is a strategic and critical process within the strategy. By having a measurement of time (7 days) it allows us to consistently respond to problems as they occur. In some areas of the country, due to seasonal variations, AFB hives might not be easily burnt due to fire hazards; however, reporting the findings to the Management Agency is incredibly useful and required by the strategy. Having fresh information for the industry to respond to means we can work together to get on top of a potential outbreak and quickly put in place measures to offset future problems, e.g., AFB/beekeeper counselling and DECA reviews.

Seven-day requirement for AFB reporting and destruction

MAF and NZFSA audits have concluded that AFB reporting by beekeepers is not up to specification. In part, this situation is beginning to have an adverse impact on honey exports from New Zealand to some markets that require freedom from AFB certification. The NBA are working to resolve this, but please note that your reporting of AFB hives to the Management

Agency within seven days is the key and is a vital process. Inserted in this copy of *The New Zealand Beekeeper* is a 7-day AFB reporting and destruction notification form. Please use it.

Default inspections

Default inspections are pending for those who are unable to respond to the AFB strategy's requirements. Compliance is important if we are to eliminate AFB from New Zealand. Eradicating AFB is achievable. On an individual basis, many beekeepers have no AFB and a great number of beekeepers have a very small incidence of infections (one or two cases per year). When beekeepers get AFB in their operations they often work to get 'rid of it' and, following good practice, are successful! Therefore we are only limited by the actions and practices of those less able to identify and control AFB; e.g.; robbed-out hives or the sale of infectious hive equipment. Therefore, when beekeepers do not meet their responsibilities with respect to the AFB NPMS, the strategy needs to be able to pick up and maintain the AFB elimination objectives. For ADR defaulters and COI defaulters, this means that inspections will be made by the Management Agency and the costs associated will be billed back to the defaulting beekeepers. This process is to start this year with ADR defaulters and I will be working with these beekeepers over the coming months to ensure we get the information we need to allow us to meet the objectives of the AFB strategy. Beekeepers with COIs who do not have their hives inspected by a beekeeper who has a COI before the end of November 2005 will be scheduled to have their hives to be inspected by Authorised Persons at the beekeeper's cost.

Hard-line compliance processes are the tough end of the strategy but it is a required process. As for any system, the AFB NPMS has varying levels of adherence to the objectives we have set for ourselves. We need to understand that all systems are, in practice, perfectly designed to produce the results they get and that people tend to be always working with good intent. If the results of that system are other than what is desired, then the cause is with the system and not the people. Performance is an attribute of the way the system is collectively conceived, understood and managed, and the tougher aspects of the compliance process are just one part of the AFB strategy but it is an important part if things are not going as desired. Therefore, let's work together, support each other, meet the objectives of our strategy, aim to lessen the need for hard-hitting compliance measures, and eradicate AFB.

- James Driscoll

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BK257

Biosecurity (American Foulbrood—Apiary and Beekeeper Levy) Order 2003

2006-2007 levy rate

The Management Agency has recommended that the rate for 2006-2007 levy will be the same as 2005-2006 levy

The rate of the 2006–2007 levy (excluding goods and services tax) will be calculated at-

- (a) \$20 per beekeeper for the base levy; plus
- (b) \$8.00 per apiary for the apiary levy.

Noting that for the purposes of subclause (3), the sum of the number of registered apiaries owned by a beekeeper will be treated as 1 if, as at 31 March 2006 of the previous levy year, the beekeeper-

- owned fewer than 11 beehives; and (a)
- (b) had fewer than 4 apiaries.

Determination of levy

Section 7. Basis of calculation of levy-

- (1) The levy must be calculated on the basis of
 - a base levy; plus
 - (b) an apiary levy.
- (2) The base levy for each beekeeper is a fixed amount.
- (3) The apiary levy for each beekeeper is the sum of the number of registered apiaries owned by the beekeeper, as at 31 March of the previous levy year, multiplied by a fixed amount.

- (4) For the purposes of subclause (3), the sum of the number of registered apiaries owned by a beekeeper must be treated as 1 if, as at 31 March of the previous levy year, the beekeeper-
 - (a) owned fewer than 11 beehives; and
 - had fewer than 4 apiaries. (b)

Section 8. Maximum rate of levy-

The maximum rate of the levy (excluding goods and services tax) is-

- (a) \$20 per beekeeper for the base levy; plus
- \$15.17 per apiary for the apiary levy.

Submissions sought

The Management Agency is seeking submissions from beekeepers on the levy rate as part of its consultation on the AFB NPMS operating budget. If you wish to make a submission on the recommended 2006-2007 levy please do so in writing by 1 December 2005 to:

James Driscoll AFB NPMS Manager PO Box 9098, Hamilton James@driscoll.pn



LANDWARD MANAGEMENT LTD on behalf of LAND INFORMATION NEW ZEALAND NOXIOUS WEED SPRAY PROGRAM 2005-2006

Beekeepers and other users of the riverbeds in the Canterbury Region listed below, are advised that herbicide spraying (Grazon™, Tordon™, Roundup™ and Trounce™) is to be carried out to control gorse, broom and old man's beard. The work to be carried out will commence no earlier than the 3 October 2005 and will continue intermittently as weather permits until 30 April 2006, excluding the period from 20 December 2005 to 10 January 2006.

The river channels involved are:

(g) = ground spraying, (a) = aerial spraying, (ga) = both

- Pahau River (g)
- Ashley/Whistler Rivers (g)
- Leader River (g)
- Okuku, Grey, Karetu, Makerikeri, Waipara Rivers, (g) Upper Waiau River (ga)
- Boyle River (ga)
- Hurunui River N. and S. branch (g)
- Clarence River (ga)
- Hurunui River (g)
- Mid Waiau River (a)
- Glencoe River (a)
- Wandle Stream(g)
- Lower Waiau (g) Mason River at Mt Lyford (g)
- Seaward River (ga) Lottery River (a)
- Fox's Creek at Broad Road (g)
- Whitewater Stream (ga) Porter River (g)

- Rakaia River and tribs. upstream of Glenarriffe (ga) Selwyn River near Coalgate (g)
- Rakaia River near Barrhill (g) Rubicon River upstream of "Torby" (g)
- Esk River (a)
- Upper Selwyn Gorge (g)

- Upper Waimakariri River at Cora Lynn (a)
- Upper Wilberforce River (a)
- Harper River (g)
- Swift River (g)
- Ashburton River S. Branch (g) Thirteen Mile Bush Stream (a)
- Lower Tengawai River (a)
- 34. 35. Maerewhenua River N.+ S. Branch (a) Otaio River upstream of gorge (a)
- Rangitata River and tribs. upstream of gorge (ga)
- Forest creek (g) 38. Orari River (g)
- Twizel River (g)

- Boundary Stream (trib. of Lake Tekapo) (a) Okuku River (g) Jollie River - First Stream (a)
- Irishman's Stream (a)
 Godley McCauley River (a)
- Tekapo River (g)
- Pukaki River (g) Lake Pukaki Shoreline (g)
- Ohau River (g) Ohau 'C' Crown land (g)
- Lake Ohau Shoreline (g)
- Hanmer River (g) Kahutara River (g)
- Charwell River (g)

Copies of the full annual spraying programme, and further information, is available from Landward Management Ltd during office hours on Ph/FAX 0508 244-746, or write to P.O. Box 5627, Dunedin, Email graeme@landward.co.nz.

AFB NPMS Operational Budget 2006–2007: Beekeeper Consultation

BIOSECURITY (AMERICAN FOULBROOD—APIARY AND BEEKEEPER LEVY) ORDER 2003 – Payment of levy – Section 16: Consultation on how levy spent —

- (1) The management agency must, before the start of each levy year, consult with beekeepers on how the levy money is to be spent.
- (2) The management agency must use the following process to consult beekeepers:
 - (a) it must send to every beekeeper a proposed budget for the levy year's expenditure; and
 - (b) it must give every beekeeper an opportunity to make submissions to it on the proposed budget; and
 - (c) it must send to every group or association of hobby and commercial beekeepers known to it a copy of the proposed budget.

The budget presented below is for the coming 2006–2007 operational period: 1 June 2006 through 31 May 2007. The budget is based on the 2004–2005 operational expenditure. The budget outlines how the Management Agency intends to spend levy income for the 2006–2007 period. If the budget is approved, the levy will be set at \$20.00 per beekeeper and \$8.00 per apiary (that is, no change from the previous year).

If you wish to make a submission on the proposed budget then please do so in writing by 1 December 2005 to:

James Driscoll, AFB NPMS Manager

PO Box 9098, Hamilton, email: james@driscoll.pn

CATEGORY/ITEM	ITEM TOTALS
2006-2007 LEVY PERIOD	ACTUAL
A. ADMINISTRATIONAL	
1. Contractor Supervision	\$2,000.00
2. Financial Accounting	\$5,000.00
3. Financial Auditing	\$3,000.00
4. Reporting Govt & NBA	\$3,800.00
5. Legal Expenses	\$2,000.00
6. Levy Management	\$25,000.00
7. AFB NPMS Administration	\$7,000.00
Subtotal	\$47,800.00
B. OPERATIONAL	
1. Disputes Arbitration	\$5,000.00
2. Review Committee	\$3,000.00
3. Beekeeper Communication	\$7,000.00
4. Beekeeper Education	\$15,000.00
5. DECA Scheme	\$11,000.00
6. Certificates of Inspection	\$8,500.00
7. AFB Recognition Course Facilitation	\$5,000.00
8. AFB Counselling	\$8,600.00
9. Audit Programme Branches	\$30,000.00
10. Audit Programme Contractor	\$22,000.00
11. Annual Disease Returns	\$33,600.00
12. Abandoned Apiaries	\$2,000.00
13. AFB Spore Testing	\$14,000.00
14. AFB Drug Investigation	\$1,000.00
15. Operational Meetings	\$8,000.00
16. Default Audits	\$10,000.00
Subtotal	\$183,700.00
TOTAL	\$231,500.00

DISCUSSION PAPER

The American Foulbrood National Pest Management Strategy — The Five-Year Review

Purpose

The purpose of this discussion document is to gather views from beekeepers on whether the American Foulbrood National Pest Management Strategy (AFB NPMS) should be amended. This is the first step in a two-part process.

Under section 88(6) of the Biosecurity Act 1993, pest management strategies must be reviewed after five years of operation. Following the review, the strategy may be amended, revoked, or left unchanged. This discussion document is the first step in the process. The document seeks beekeeper opinion on whether the rules and objectives of the strategy are still appropriate after five years.

The second step of the process will begin when the results of this consultation are taken into account and a formal proposal is prepared under the Biosecurity Act. The formal proposal will be publicly advertised for submissions. The Minister will take these submissions into account when deciding if the strategy should be amended, revoked, or remain unchanged.

Timeline

Task	End Date	
All registered beekeepers consulted for feedback	31 October 2005	
Submissions close	16 December 2005	
Significant changes considered	21 January 2006	
Public discussion paper (with new strategy proposals if needed)	28 February 2006	
Submissions close	18 April 2006	
Submissions considered	30 April 2006	
Report and recommendations to Minister	16 May 2006	

Internal Five-Year Review of Operational Measures

The Management Agency has carried out an internal five-year review of the strategy. As a consequence several recommendations were made on improvements to operational aspects. These recommendations have been implemented progressively, with many more to be undertaken over the next few months. While these have affected the way in which the strategy has been administered, the strategy rules have remained unchanged.

The AFB NPMS Manager and the Management Agency have been busy during 2005, administering the strategy and carrying out a major review of the Operational Plan, so that it includes all policies and procedures necessary to run the strategy effectively.

Guidelines for annual reviews have been formulated so that in the future all reviews will be conducted consistently from year to year, irrespective of who will be carrying out the reviews. Another major area of activity was to ensure nationwide surveillance of apiaries for American foulbrood. This will now be a yearly activity where those carrying out inspections will be paid for their work. As a result of this surveillance several small 'hot spots' have been identified and have been further investigated. Beekeepers have been counselled and Disease Elimination Conformity Agreements (DECAs) reviewed, with appropriate measures put in place to help the beekeeper concerned.

Notes for Submitters

Submissions are invited on the contents of the American Foulbrood National Pest Management Strategy, as set out in the 1998 Order in Council. **Please note that submissions should address the contents of the Order itself**, rather than any operational or implementation issues which reflect the 'how' of administering the strategy. The operational issues do not form part of the strategy.

The Order in Council can be viewed on: http://www.legislation.co.nz/browse_vw.asp?content-set=pal_regs. Look under "B", for Biosecurity (National American Foulbrood Pest Management Strategy) Order 1998.

Alternatively, the particular piece of legislation can be ordered or purchased from Bennetts Bookshops.

A copy that has been taken from the above website is available on request from the Secretary or President of the Management Agency at the addresses below.

Disclaimer: To our knowledge the document being sent to you is the same as the one on the website; however, we will not be responsible for any error that has occurred during copying. We ask that you look closely at the Objectives of the strategy, as well as clauses 10–40 in the Order in Council 1998, and make comment on the appropriateness of these clauses as guiding principles of the Strategy.

Some comment is provided to help guide discussion. We will list the main clauses where we think there will be likely to be some feedback from beekeepers but stress that this review covers all clauses outlined in the Order in Council. When making your submission, please state:

- 1. Which aspect of the current strategy you support;
- 2. Which aspect of the current strategy you oppose;
- 3. Your reasons for the support or opposition; and
- 4. Any specific alternatives to the current strategy you wish to recommend.

Submitters should note that copies of their submissions may be requested by other people under the Official Information Act 1992 (OIA). The OIA specifies that information is to be made available to requesters unless there are sufficient grounds for withholding it, as set out in the OIA. Submitters may wish to indicate grounds for withholding specific information contained in their submission, such as that the information is commercially sensitive or they wish personal information to be withheld. Any decision to withhold information requested under the OIA is reviewable by the Ombudsman.

Please mail, fax or e-mail your submission to:

NBA Secretary: Pauline Bassett, Executive Secretary, PO Box 234, Te Kuiti, Ph/Fax 07 878 7193, waihon@actrix.co.nz; or

NBA Executive Council President: Jane Lorimer, President, 258 Tauwhare Rd, RD 3, Hamilton, Fax 07 856 9241, email hunnybee@wave.co.nz

The discussion document follows on pages 17 through 27.

The Biosecurity (National American Foulbrood Pest Management Strategy) Order 1998

Clause 5: Objectives of the Strategy

- (1) The primary objective of the strategy is to manage American foulbrood to reduce the reported incidence of American foulbrood,—
 - (a) During the 4 years beginning on 1 July 1999, by an average of 10% each year of the reported incidence of American foulbrood cases in the year beginning on 1 July 1999; and
 - (b) During the 5 years beginning on 1 July 2003, by an amount sufficient to ensure that the reported incidence of American foulbrood cases in the year beginning on 1 July 2007 is 0.1% or less.
- (2) The secondary objectives of the strategy are—
 - (a) To locate all places where beehives are situated and ensure that each honey bee colony is inspected at least once each year for American foulbrood; and
 - (b) To identify American foulbrood cases in beehives; and
 - (c) To eliminate American foulbrood in beehives by destroying any American foulbrood cases and associated bee products, and destroying or sterilising associated appliances.

Comment

Performance against the targets in the primary objective may be difficult to determine, as the Annual Disease Returns (ADRs) that record this information are not all received each year. Currently there is an 80% return rate for 2005, but this is an improvement on previous seasons. During the first five-year period of the strategy AFB levels appear to have increased, but declining levels have been reported since then. However, this may reflect an improving level of reporting and/or effectiveness in looking for and understanding the clinical signs of AFB despite the mixed return of ADRs.

The trends in the amount of AFB reported or found annually have been noted in the Management Agency's Annual Reports on the strategy as follows:

Total reported or AFB Found:

Year	Incidence (%)	
1999	0.28	
2000	0.29	
2001	0.37	
2002	0.42	
2003	0.5	
2004	0.3	
2005	0.26	

The Management Agency sees the above reported objectives as still being very important in ensuring effective control of AFB. In particular, now that the North Island is dealing with varroa, we see it as being imperative that American foulbrood is kept under control and eliminated. Beekeepers cannot afford to lose hives to AFB and varroa. In areas where varroa is present, the elimination of feral or neglected colonies may be assisting those who are managing hives to get levels of AFB down to negligible levels. The Management Agency is also confident that recent improvements to management and operational areas will improve performance against the primary objective of reducing the level of AFB.

The secondary objectives are designed to ensure that all beehives receive an adequate inspection for visible cases of AFB at least once each year. Measures put in place to achieve the secondary objectives include Annual Disease Returns, Disease Elimination Conformity Agreements and Certificates of Inspection. These are addressed in more detail in following clauses of the strategy.

Although not listed as objectives, the strategy also has two central points that underlie it:

- That individual beekeepers are responsible for carrying out control of AFB within their own hives, by destroying infected hives; and
- 2. Prohibiting the use of any drugs that will mask the symptoms of AFB or attempting to cure it see clause 14.

Questions:

Are these Objectives still appropriate and achievable?

If you think they are not, why not?

What are your alternative suggestions?

Clause 6

6. Management Agency—

The Management Agency responsible for implementing the strategy is the National Beekeepers' Association of New Zealand Incorporated.

The National Beekeepers' Association has been appointed as the Management Agency by the Minister.

Questions:

Do you support the status quo remaining, with the NBA as Management Agency?

Do you think the make up of the Management Agency should be changed?

If so, what alternatives would you like to suggest?

Clauses 10-14: General Obligations

- 10. Obligation to supply information—
- 11. Obligation to keep honey bees in moveable-frame hives—
- 12. Exemption from obligation to keep honey bees in moveable-frame hives—
- Access to beehives—
- Restrictions on use of drugs—

Comment

All of clauses 10–14 place some obligations or restrictions on what people/beekeepers are able to do and not do. Some may feel that these restrictions are either too harsh or not necessary; however, all provide the necessary framework in order for the strategy to be managed.

Clause 10 allows an authorised person to require information that is important for the purposes of the strategy. That could involve monitoring the presence of the disease, and the ownership and movement of beehives.

The purpose of **Clause 11**, obligation to keep honey bees in moveable-frame hives, is to allow the contents of beehives to be readily inspected. Occasional breaches of the clause are found, usually boxes with missing frames that are attended to once the beekeeper has been advised. This does not appear to cause difficulties in disease control.

Clause 12, exemption from the obligation to keep bees in moveable-frame hives, allows beekeepers to seek an exemption for suitable purposes such as sending package bees or rearing queens. The exemption is needed to avoid creating an offence.

Clause 13 requires that people in charge of bees must keep beehives clear of vegetation, so that the beehives can be inspected effectively. Beekeepers do not appear to have any problems in complying with this clause.

Clause 14, restrictions on the use of drugs, requires that no drugs that mask the symptoms of AFB are fed to bees. This appears to be generally very well understood by beekeepers. The restriction has the dual purpose of allowing accurate inspections and assessment for the disease, and also assists in meeting health standards for residue contamination in honey for domestic and export markets.

The restriction on the use of drugs is an important part of the strategy to ensure that no beekeeper will feed drugs that may mask the visual symptoms of AFB.

The Management Agency will in the future be placing more emphasis on the education of beekeepers to ensure their obligations in relation to the abovementioned clauses are met.

Questions:

Do you feel that any of these clauses should be changed? If so, please outline which ones and your reasons for wanting the change.

What alternatives would you like to suggest?

Clauses 15-31: Notification of Places as Apiaries

- 15. Prohibition on keeping bees in place other than apiary—
- 16. Transitional provision for notification of apiaries—
- 17. Place may be notified as apiary—
- 18. Seasonal apiaries—
- 19. Allocation of identification code—
- 20. Marking of apiaries—
- 21. Removal of identification code—
- 22. Use of marks similar to identification codes—
- 23. Register of apiaries—
- 24. Place ceasing to be apiary—

Comment

The clauses in the above sections of the Order are designed to ensure good record-keeping. Apiaries must be registered and the owner must be easily identifiable. The information is used for a number of purposes: levies, disease control under the NPMS, MAF's surveillance for exotic bee diseases, for purposes of the new varroa NPMS in the South Island, and also for export certification where a declaration of an AFB-free area is required.

Clause 15 is a general empowering clause to ensure that an apiary site is registered if beehives are held there for more than 30 consecutive days. The time limit has been set to ensure that beehives being moved to pollination sites do not fall into the category of needing to be registered as an apiary.

Clause 16 is a transitional provision in the setting-up of the NPMS, and should not be relevant now.

Clause 17 sets out the information and format that must be supplied when registering an apiary. The location details require an NZMS grid reference. NZMS grid references may now be somewhat out of date if numbers of beekeepers use GPS coordinates for location.

Question:

Do you think clause 17 should be changed to include GPS references too?

Clause 18 allows beekeepers to notify places as seasonal apiaries. The purpose of this clause is to improve the management agency's ability to inspect the hives, by making it clear that they are not held there all year round.

Clause 19 allows the Management Agency to allocate identification codes to individual beekeepers, to mark and identify their apiary sites.

Clause 20 requires that beekeepers must display that code on the outside of a beehive or on a sign within the apiary for identification. Two timeframes are given — the clause states that apiaries must be marked within 7 days of being notified to the Management Agency unless the applicant is a new beekeeper, in which case the timeframe is 30 days.

Marking of the apiary site with the beekeeper identification code does not always occur, which may at some point in time be a problem for the running of the strategy.

The identification must be marked in such a manner that any person may readily locate and read the identification code of the apiary.

Questions:

Do you think the timeframe given for marking of apiaries in clause 20 is a fair and reasonable expectation? If not, what alternatives would you like to suggest?

Clause 21 relates to the removal of identification codes when the marked beehive is sold. The identification code of the seller must be struck out or removed, and replaced with the new owner's code. Many beekeepers do not, or cannot do this where the code is branded into the gear (especially when the branding includes all parts of the hive including frames).

The Management Agency will in the future be placing more emphasis on education to ensure that beekeepers know what their obligations are.

Questions:

In clause 21, is it too tough to ask that the buying beekeeper has to remove the seller's ID code?

What alternatives would you like to suggest to this part of the clause 21?

Would beekeepers prefer to post a sign noting their identification, as provided for in clause 20, to avoid confusion with old codes branded into beehives?

Clause 22 ensures that beehives and apiaries are not marked in such a way that might cause confusion with identification codes allocated by the Management Agency.

Clause 23 requires the Management Agency to keep an apiary register.

Clause 24 – place ceasing to be an apiary. This clause states that unless an apiary site has been notified to the Management Agency as a seasonal apiary, it ceases to be an apiary once beehives are no longer on site. When a place ceases to be an apiary, beekeepers must notify the Management Agency in writing within 30 days. A seasonal apiary does not lose its status until it was been without beehives for more than 30 consecutive days.

We know that many beekeepers do not give notification in writing but instead phone the contractors, or leave the notification until they return their Annual Disease Return (ADR).

Questions:

Do you think that the requirement in clause 24, to notify in writing that an apiary is no longer used, should be changed?

Do you think it would be suitable instead to require some operational changes only to recognise this practice?

Are there any alternatives you would like to suggest?

Clause 25

25. Destruction of beehives posing risk—

- (1) Where-
 - (a) One or more beehives have been situated for more than 30 consecutive days in a place that has not been notified to the Management Agency as an apiary; and
 - (b) The provisions of clause 16 do not apply; and
 - (c) An authorised person has complied with subclause (2); and
 - (d) The beekeeper has not notified the Management Agency of that place as an apiary before the expiry of the time limits in subclause (2)(b) or (c), whichever is the later,—

an authorised person may destroy the beehives and all honey bees, bee products, and appliances associated with

those beehives.

- (2) Before action is taken under subclause (1), an authorised person must make reasonable attempts to find the owner of the beehives by—
 - (a) Making inquiries, including inquiries of the occupier of the place where the beehives are situated; and
 - (b) Fixing 1 weatherproof notice to 1 of the beehives instructing the owner to notify the management agency of that place as an apiary within 30 days of the date of the notice; and
 - (c) Publishing a notice in a daily newspaper circulating in the place where the beehives are situated and a notice in the official journal of the management agency; and each notice must include the location of the beehives and an instruction to the owner of the beehives to notify the management agency of that place as an apiary within 30 days of the date of the last publication of that notice.

Comment

The issue of dealing with abandoned beehives has over the years posed problems for the Management Agency and its contractors as well as the public. The time and cost incurred to try to track down owners has been a problem to the Management Agency. Where beehives pose a risk to the public there are no provisions for the removal of the hives to an alternative site.

Note that destruction of the hives is only one of the options, as the clause states they "may" rather than "must" be destroyed. Often a beekeeper can be found who would be willing to take over and look after the beehives in question.

Questions:

Do you think that clause 25 should be changed to allow "ownerless" beehives posing a risk to be transferred to another beekeeper?

Or do you think that a policy and procedure decision as is the case at the moment sufficient?

Are there any alternatives you would like to suggest?

26. Notification of American foulbrood—

- (1) Where an American foulbrood case is discovered in a beehive, the person in charge of the keeping of the honey bees must, within 7 days of becoming aware of the case, notify the Management Agency and the beekeeper, in writing, of the American foulbrood case.
- (2) A breach of this rule, without reasonable excuse, is an offence under section 154(q) of the Act.

Comment

This clause forms a very important part of the strategy, in that it provides timely information of possible AFB problems and allows the Management Agency to make informed decisions in particular on the audit and inspection programme as outlined in clause 40.

Currently it also impacts on export certification and the ability of the New Zealand Food Safety Authority to sign certificates with confidence that there is an area freedom from AFB. The use of strategy information for export certification is currently under review.

The Management Agency will continue to use education to inform beekeepers of their obligation under this clause, and believe that the 7-day reporting should remain in place.

Clause 27

27. Annual Disease Return—

(1) On or before 1 June in each year, every beekeeper must, for all beehives owned by that beekeeper, complete and

send to the Management Agency an Annual Disease Return.

- (2) An Annual Disease Return must be in the form provided by or obtained from the Management Agency and must contain—
 - (a) The number of honey bee colonies in beehives owned by that beekeeper; and
 - (b) The location of each beehive where an American foulbrood case was found and the dates on which those cases were discovered; and
 - (c) The dates on which the ownership of any beehives was transferred to or from the beekeeper and, in each case, the number of beehives transferred and the name and address of the transferee and transferor; and
 - (d) Any change to the information supplied to the Management Agency in accordance with clause 17.
- (3) A breach of this rule, without reasonable excuse, is an offence under section 154(q) of the Act.

Comment

All registered beekeepers must fill in and return this ADR form by the due date (1 June). Historically it can be seen that there is only a 60–80% return rate after the reminder letters go out.

This return of course gives the Management Agency vital information. It is difficult for the Management Agency to run the strategy effectively, and achieve its objective of eliminating AFB if beekeepers are complying poorly with their obligations under the strategy. The majority of non-returns are from smaller hobbyist beekeepers.

In the future, the Management Agency will concentrate on an education campaign for beekeepers. It will also individually contact a number of non-compliers to educate them of their obligations but to also find out if there is a significant problem with the 'system' that can be reviewed and altered to get increased compliance.

28. Obligation of beekeeper to destroy honey bees and materials—

- (1) Where an American foulbrood case is discovered in a beehive, the beekeeper who owns that beehive must, within 7 days of becoming aware of that case, destroy by burning all honey bees, bee products, and appliances associated with that honey bee colony unless directed otherwise by an authorised person.
- (2) The provisions of this clause do not apply to—
 - (a) A beekeeper who is acting in accordance with the relevant provision of a Disease Elimination Conformity Agreement between the beekeeper and the management agency; or
- (b) A person acting in accordance with a permission, regulation, or authorisation provided for in sections 52 or 53 of the Act; or
- (c) A person acting in accordance with an exemption given under clause 30.

Comment

As noted in the comment on clause 26, we know that many beekeepers do not report the incidence of AFB on time to the Management Agency, in particular to its contractors AgriQuality. Most do destroy the hives quickly when AFB has been found. This is an important issue for disease control, because the longer an infected hive is left in an apiary, the greater the chance for the infection to spread.

Clause 29 requires as a disease control measure that materials which have come into contact with an AFB-infected hive must be kept away from other bees unless the products or appliances have been sterilised using a method approved by the management agency.

Comment

The Management Agency will carry out a regular education programme to ensure beekeepers are aware of these prohibited practices, and effective sterilisation techniques. In particular this would be outlined in the "Starting with

Bees Booklet" being updated and extended from one that has been used by a branch disease co-ordinator.

Clause 30 allows exemptions from the clauses requiring the destruction of infected hives, the prohibition on allowing bees access to unsterilised materials, and removal or transfer of ownership of those materials. The exemptions are allowed for the purposes of research, education and training.

Comment

The Manager of the strategy is now keeping a log of those people who have applied for exemptions and is managing the renewal process.

The exemptions should also cover those who are carrying out diagnostic services as occurs with HortResearch at the moment, but we do know there are others in the country who do carry out this as a fee for service programme — they too should be applying to the Management Agency for an exemption.

Clause 31 prohibits the removal or transfer of bees and products or appliances associated with an infected hive, unless the activity is carried out with the written consent of an authorised person.

Comment

Similar comments apply as in the case of clause 29.

Clauses 32-35 Inspection

- Clause 32 Certificate of Inspection
- Clause 33 Statement by person inspecting honeybee colonies
- Clause 34 Obligation to notify beekeeper of American foulbrood case
- Clause 35 Obligation to specify approved methods

32. Certificate of Inspection—

- (1) Every beekeeper must ensure that every honey bee colony in every beehive owned by that beekeeper is inspected for American foulbrood cases by an authorised person on or after 1 August and on or before 30 November each year commencing in 1999.
- (2) The inspection specified in subclause (1) may, if the beekeeper agrees, be carried out by a person named as a person responsible for disease management in a Disease Elimination Conformity Agreement between any other beekeeper and the management agency.
- (3) Within 14 days after the inspection is completed or before 15 December of each year, whichever is the earlier, every beekeeper must complete a Certificate of Inspection in a form provided by or obtained from the Management Agency and forward to the Management Agency the Certificate of Inspection together with the statement made in accordance with clause 33.
- (4) The obligations in subclauses (1) and (3) do not apply to a beekeeper who holds a Certificate of Inspection Exemption from the management agency.
- (5) A breach of this rule, without reasonable excuse, is an offence under section 154(q) of the Act.

Comment

All beekeepers who do not have a Certificate of Inspection Exemption (COIE) must have a Certificate of Inspection completed and signed by an authorised person by 15 December each year. This is done to ensure a competent beekeeper has carried out the inspection for the presence of American foulbrood.

Most of the beekeepers who have to have this form filled in are hobby beekeepers. They are required to complete this form as well as the Annual Disease Return, which is due on 1 June each year.

A large number of beekeepers in this category — approximately 60% — do not complete and return the necessary

forms. It is unclear as to why this is happening: whether this is a time and cost factor, or a lack of understanding as to the importance of the forms mentioned.

The Management Agency intends to carry out more education of this group, and in contacting these beekeepers we may find that there are improvements that the Management Agency can adopt to get a better result.

Clause 33 – this clause sets out the information that must be passed back to the Management Agency when the Certificate of Inspection has been carried out.

Comment

The Management Agency sees the need to promote more education in this area. Authorised persons need to become more familiar with the requirements to fill in and sign the declaration and incorporate the necessary information.

Clause 34 – this clause requires that if any American foulbrood is discovered in the course of an inspection, the inspector must advise the owner of the beehive in writing.

Clause 35 – this clause specifies that the Management Agency must approve the methods by which inspections are carried out, and the methods must be recognised as generally effective by the scientific community.

Clauses 36–39: Certificate of Inspection Exemption

- Clause 36 Certificate of Inspection Exemption
- Clause 37 Disease Elimination Conformity Agreement
- Clause 38 Amendment of Disease Elimination Conformity Agreement by management agency
- Clause 39 Review of Certificate of Inspection Exemption

36. Certificate of Inspection Exemption—

- (1) The Management Agency must, from time to time, notify beekeepers of the opportunity to obtain a Certificate of Inspection Exemption.
- (2) The Management Agency must grant a Certificate of Inspection Exemption to any beekeeper in relation to beehives owned by that beekeeper if that beekeeper enters into a Disease Elimination Conformity Agreement with the management agency.
- (3) The Management Agency must, by notice in writing to the beekeeper, revoke a Certificate of Inspection Exemption if requested, in writing, at any time, by the beekeeper to do so, and the Disease Elimination Conformity Agreement is cancelled at the time of the revocation.

Comment

A Certificate of Inspection Exemption (COIE) is given to those beekeepers who enter into a DECA agreement (see clause 37). This reduces the number of forms that beekeepers need to fill in and return. The Management Agency intends to initiate an education programme to encourage those who do not have a DECA to enter into this agreement so that more beekeepers can obtain the advantages of receiving a COIE.

When a beekeeper fails to carry out the steps outlined in the DECA, or fails to meet other obligations outlined in the strategy, it is the COIE that can be revoked which automatically then removes the DECA.

If the COIE is removed the beekeeper then reverts to having to have a Certificate of Inspection filled out and signed by an approved beekeeper - see clause 32.

Clause 37

37. Disease Elimination Conformity Agreement—

(1) A beekeeper and the Management Agency may at any time enter into, or amend, a Disease Elimination Conformity Agreement if—

- (a) The beekeeper agrees to implement the agreement by ensuring that the persons named in the agreement as the persons responsible for disease management supervise or carry out the procedures and practices specified in that agreement; and
- (b) The Management Agency is satisfied—
 - (i) That the practices and procedures set out in the agreement are, if carried out, sufficient to reduce or maintain at zero the overall annual rate of American foulbroad cases in beehives owned by the beekeeper; and
 - (ii) The beekeeper is likely to implement the practices and procedures set out in the agreement; and
 - (iii) The persons named in the agreement as responsible for disease management are sufficiently familiar with and are suitable persons to supervise or carry out the practices and procedures specified in the agreement.
- (2) The Disease Elimination Conformity Agreement must specify—
 - (a) The methods to be used for the inspection of honey bee colonies for American foulbrood; and
 - (b) The number of inspections to be carried out each year; and
 - (c) The times during the year when the inspections will be carried out; and
 - (d) The systems to be used to record the time of inspections, the results of inspections, and the actions taken in respect of American foulbroad cases and associated bee products and appliances; and
 - (e) The systems to be used to record movements of appliances and bee products in and out of an apiary; and
 - (f) The methods to be used to destroy American foulbrood cases and associated appliances and bee products, including, where necessary, the movement of such cases, appliances, and bee products; and
 - (g) The methods to be used to sterilise appliances salvaged in relation to any American foulbrood case; and
 - (h) The methods to be used to sterilise and disinfect appliances used in inspecting honey bee colonies for American foulbrood; and
 - (i) The name of the natural persons who are—
 - (i) Responsible for disease management; and
 - (ii) Responsible for liaising with the Management Agency in relation to the agreement.
- (3) The Disease Elimination Conformity Agreement must require the destruction of American foulbrood cases and associated bee products.
- (4) The methods specified by a Disease Elimination Conformity Agreement for inspection or sterilisation are not required to be methods approved under clause 29 or clause 35, but must be methods generally recognised by the scientific community as methods effective in detecting American foulbrood or in sterilising appliances contaminated with American foulbrood.

Comment

In many respects the Disease Elimination Conformity Agreement (DECA) is the main tool for our industry to move towards the objective of the strategy to eliminate AFB from the country. It is through a robust agreement between the beekeeper and the Management Agency that we ensure the beekeeper knows what must be done to find, destroy or sterilise (if the agreement has a section on this) beehives that show clinical (visual) symptoms of the disease. Those beekeepers who have a DECA have less paperwork to be completed in that they only have their Annual Disease Return (ADR) and reporting of disease to be carried out.

Currently around 70% of beekeepers have signed up to this agreement, which covers around 95% of hives. The Management Agency wishes to encourage more to enter into the agreement. The Management Agency will also encourage more to sit the competency exam (that has been reviewed and rewritten to ensure that it only relates to AFB related issues). This will give greater confidence that beekeepers know what they are looking for to diagnose the disease.

Clause 38 – This clause allows the Management Agency to amend a DECA held by a beekeeper, if the beekeeper's hives have been infected with AFB, are not being effectively managed, and the rate of infection is not likely to decrease unless the amendment is made. The Management Agency must advise the beekeeper in writing, giving reasons for the decision.

Clause 39 – this clause requires the Management Agency to review each Certificate of Inspection Exemption annually. The Management Agency may revoke the exemption if the beekeeper has breached the DECA, or the annual rate of AFB cases is increasing in that beekeeper's hives.

Comment

Both of these clauses are necessary to allow for changes to be made if there appears to be a change in the disease status in a beekeeper's hives, or a beekeeper has failed to adhere to their DECA.

The annual review of the Certificate of Inspection Exemption has not been fully carried out in the past. With this in mind the Management Agency will formulate a policy to cover this issue and all COIEs are to be reviewed.

Clause 40

40. Inspections and audits—

- (1) On or after 1 September each year and on or before 31 May of the following year, the Management Agency must—
 - (a) Audit beekeepers' compliance with their obligations in accordance with the strategy to complete and send to the Management Agency Annual Disease Returns, Certificates of Inspection, and notifications of American foulbrood cases; and
 - (b) Audit the accuracy of the statements regarding American foulbrood made in Annual Disease Returns, Certificates of Inspection, and notifications of American foulbrood cases; and
 - (c) Audit beekeepers' compliance with the provisions of clauses 28, 29, and 31 and the obligations in any applicable Disease Elimination Conformity Agreements, and
 - (d) Carry out surveillance of beehives to detect American foulbrood cases; and
 - (e) Carry out work, other than the work specified in paragraphs (a), (b), (c), or (d), to enable the Management Agency to measure the success of the strategy in achieving its primary objective.
- (2) In carrying out the matters specified in subclause (1)(b) to (e), the Management Agency must ensure that a selection of honey bee colonies is inspected based on the results of the actions taken under subclause (3).
- (3) In carrying out the matters specified in subclause (1)(b) to (e), the Management Agency must—
 - (a) Take samples for spore testing from honey bee colonies and beehives selected in a manner to be determined by the management agency; and
 - (b) Carry out statistically significant sampling to verify the statements regarding American foulbrood made in Annual Disease Returns, Certificates of Inspection, and notifications of American foulbrood cases; and
 - (c) Analyse the Annual Disease Returns, Certificates of Inspection, notifications of American foulbrood cases, and the results of the spore testing conducted under paragraph (a).

Comment

This clause outlines the most important aspects of the strategy. The intent of the clause is to look at beekeepers' compliance in completing and returning the ADRs, and COIs, and the accuracy of the statements they make in those. This is an area of increasing importance to the Management Agency and it is becoming increasingly important to have a good balance between the in-the-field work and the paperwork.

Clause 41

41. Funding of strategy—

The strategy is to be funded by the National Beekeepers' Association of New Zealand Incorporated from the [levy paid under the Biosecurity (American Foulbrood - Apiary and Beekeeper Levy) Order 2003].

Comment

All financial aspects of the strategy are kept distinctly separate from the National Beekeepers' Association, with the Manager employed to manage the strategy receiving and banking the money. All payments of accounts must be approved by the Management Agency prior to payment.

Those who have not paid their levy by the due date and following the reminders are then moved to a debt collection agency for recovery.

The Management Agency is ensuring that the beekeepers who pay the levy are being informed via *The New Zealand Beekeeper* magazine circulated to all beekeepers in October and April. The October issue is used for consultation on the upcoming year's budget — where all beekeepers are invited to make submission on the proposal.

REMINDER ON SUBMISSIONS

Submissions close on 16 December 2005.

Submissions are being sought from beekeepers at this stage only on the contents of the Order in Council outlined as part of the five-year review of the strategy.

For more detail please see the section on Notes for Submitters at the beginning of this document.

NOTE: You have approximately six (6) weeks to make a submission.

We realise that this is the busy time of the year, but if we extended the period further, it would still not be suitable for many.

If you have strong views on the strategy we know you will make the time available to make a submission and get it in on time.



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Varroa Agency Incorporated news

By Duncan Butcher, chairman, Varroa Agency Incorporated

A report from HortResearch into the effects of varroa has reiterated the importance of biosecurity, and of keeping the South Island varroa free.

Ruakura-based scientist Dr Mark Goodwin's studies into the effect of varroa on beekeeping, pollination and the sustainability of agriculture has found the numbers of managed colonies in the North Island has declined, and most feral colonies, perhaps as many as 50,000, have been killed by varroa. Even with the importation of over 5000 hives from the South Island to replace losses, Dr Goodwin estimates there are now 24,000 (16 percent) fewer managed hives in the upper North Island than before varroa. This trend is likely to continue throughout the North Island as the full impact of varroa is felt in areas that have become more recently infested.

The apicultural industry's major contribution to New Zealand's economy is the pollination of plants, both paid and unpaid. This is worth many times the value of honey and other hive products. It is estimated that one third of the food we eat relies on honey bees for pollination. Major export industries such as the kiwifruit and avocado industries rely on beekeepers to bring hives into the orchards for pollination.

New Zealand is currently facing a pollination crisis: the number of bee colonies is decreasing due to varroa, and the acreage of crops reliant on bees for pollination is increasing. If varroa should become established in the South Island it will further compound the problem. Over the last few years a significant trade in bees from the South Island to the North Island has been established to replace hives lost to varroa for activities such as pollination.

Dr Goodwin's report has further bad news, as he questions the financial ability of some beekeepers to treat hives, and raises the likelihood of the development of miticide-resistant varroa.

Varroa has increased the costs of keeping bees by between \$30 to \$50 per hive when pesticides, labour and hive losses are included. But while good international honey prices and increased charges for horticultural pollination had enabled beekeepers to absorb the costs of varroa management, world honey prices now appear to be falling. If prices return to prevarroa levels, many beekeepers may not be able to afford to treat varroa, which will further erode beehive numbers.

This is particularly true if varroa becomes established in the South Island as the opportunities for South Island beekeepers

to undertake paid pollination work is limited. Thus most South Island beekeepers are reliant on honey production for their income.

Dr Goodwin also says the current control practices are not sustainable long-term, due to varroa developing resistance to control products — a worldwide problem. Varroa can complete its life cycle about 20 times in a year and as it reproduces sexually, it can quickly build resistance to chemical control products. In the USA, varroa can be found that cannot be killed by any of the registered varroa control chemicals. This is part of the reason the USA is reported to have lost between 40–60% of managed hives last winter and had to start importing bees from Australia to pollinate the Californian almond crop. New Zealand should expect to start having hive losses due to resistance within the next five years. Because New Zealand does not have many other honey bee pest and diseases found elsewhere, we do not have the luxury of being able to import honey bee colonies.

Reference

Goodwin R. M. 2005. The effect of varroa on beekeeping on the Sustainability of Agriculture. *Primary Industry Management* Vol. 8(3), September: 19–20.

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Queens available for delivery throughout the North Island

News from the New Zealand Food Safety Authority

The Risk Management Programme (RMP) roadshow workshops are all done and dusted. There was a fantastic turnout by beekeepers. RMPs have hopefully now been demystified and we will begin to see some come through for registration soon.

As this issue of *The New Zealand Beekeeper* goes to all beekeepers, I thought it important to make sure everyone in the industry is clear about the rules relating to RMPs and export requirements.

Primary processing = \underline{no} RMP required

Primary processing of bee products includes the following activities:

- (1) beehive management including queen rearing for royal jelly production
- (2) collection of honey supers, temporary storage prior to delivery to the extraction facility and transport to the extraction facility
- (3) scraping or other collection of raw propolis including removal from propolis mats, bagging and temporary storage of raw propolis, transport of raw propolis to an extraction facility
- (4) collection of pollen, bagging, holding in a freezer by the beekeeper and transport to a pollen drying/ processing facility.

Those beekeepers who don't process product or store finished product do not need an RMP. However, this does not mean they are exempt from regulatory requirements. Primary processing of bee products is regulated under the Animal Products Act through the Human Consumption Specifications. These can be found at: http://www.nzfsa.govt.nz/animalproducts/legislation/notices/animal-material-products.htm

These specifications are in the process of being updated and the revised version should be available soon.



Caption: Jim Sim and Christine Esquerra from the Food Safety Authority at the RMP workshop in Palmerston North. *Photo: Jim Edwards*.

Secondary processing

Secondary processing is deemed to start once the raw material (pollen, propolis or honeycomb, comb containing queen larvae/royal jelly) arrives at the facility where it will



be extracted, dried, or otherwise processed, packed or stored. Secondary processing includes extraction, processing, packing and storage of bee products.

RMP required if official assurances are needed for product

To be eligible for an official assurance — usually provided through export certificates but sometimes through other mechanisms notified by Overseas Market Access Requirements (OMARs) — secondary processors must have an RMP registered in accordance with the Animal Products Act 1999, by 1 July 2006. Operators will need to have their RMP completed, evaluated and submitted to NZFSA for registration by 1 April 2006 to ensure that their RMP is fully registered by 1 July 2006. Bee products for human or animal consumption produced in premises operating without an RMP after 1 July 2006 will not be eligible for official assurances but can be sold on the domestic market.

Product produced before 1 July 2006 will be eligible for export assurances after 1 July 2006, providing the premises in which it is stored has a registered RMP from 1 July 2006.

Once you have a registered RMP this replaces your Local Authority registration and inspections under the Food Hygiene Regulations.

An RMP is not required for domestic market-only processing

Secondary processors who only supply product for domestic consumption do not require an RMP. They will need to retain their current Local Authority registration under the Food Hygiene Regulations or alternatively have a food safety programme approved. None of their product will be eligible for export to any market requiring any form of official assurance after 1 July 2006.

Bee Products Code of Practice

The Code of Practice (COP) and RMP templates have been finalised and are now approved for use. This means that any RMP based on the templates will not need evaluating by an independent evaluator. Links to these documents can be found at the NZFSA bee products main web page: http://www.nzfsa.govt.nz/animalproducts/subject/bee-products/index.htm

NZFSA will need to update the COP to incorporate any changes to the human consumption specifications that have been consulted on recently, so there will be an opportunity to make further amendments if necessary. If you have any suggestions for changes that you would like NZFSA to consider please send them to me before Friday 11 November 2005.

Ordering hard copies of web-published documents

Hard copies of the COP, templates and other NZFSA publications can be ordered from:

Geoff Maughan Manor House Press Limited PO Box 38-071 Wellington Mail Centre

Telephone: 04 568 6071 or 04 568 8914

Facsimile: 04 568 7282 Email: manorhouse@clear.net.nz **NB:** There is a charge for this service.

Overseas Market Access Requirements (OMARs)

Although premises have until 1 July 2006 to register and operate their RMPs, overseas market access requirements (OMARs) and the requirements of the Bee Products Official Assurances Guide apply now. Operators and exporters should ensure they comply with the requirements of this guide so they can be certain that their bee products are eligible for export certification. The guide can be found at: http://www.nzfsa.govt.nz/animalproducts/publications/manualsguides/bee-products/index.htm

OMARs may vary from virtually nothing for some markets through to significant additional requirements for others. OMARs change regularly as importing countries change their legislation and policy, so it is not practical to incorporate these into the COP. These OMARs are updated on the Internet and if you subscribe to the NZFSA update service you will be automatically notified by email when they change. The update service is available at:

http://www.nzfsa.govt.nz/site/notify/index.htm

If you are exporting bee products you need to ensure that they are eligible for their destination market.

- Jim Sim Senior Programme Manager Animal Products



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Single payment on Propolis purity results. Our aim is to have payment in your hands within three weeks of receipt. If sending Propolis for the first time please include your GST number, or advise to say you're not registered.

Phone to arrange FREE REMOVAL FROM MESH MATS SCRAPPING AND MESH PROPOLIS REQUIRED SOUTH ISLAND SUPPLIERS

Freight forward your propolis to Te Puke by Post Haste or Tranzlink.

Contact Ken for details.

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AGRIQUALITY LIMITED REPORT TO THE ANNUAL CONFERENCE OF THE NATIONAL BEEKEEPERS'ASSOCIATION OF NEW ZEALAND: CHRISTCHURCH 5 JULY 2005



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REGISTRAR OF APIARIES AGRIQUALITY LIMITED

Byron Taylor or Murray Reid

Registrars for the North Island.

Carole Lasseter

Registrar for the South Island Phone (03) 358 1732; Fax (03) 358 1733 Email lasseterc@agriquality.com

BEEKEEPER, APIARY AND HIVE NUMBERS

There were 2911 beekeepers, 19281 apiaries and 294886 hives on the 20th of June 2005 (see Table 2). This compares to 3211 beekeepers owning 292530 hives on 19592 apiaries this time last year. Beekeeper numbers are continuing to track downwards with a net reduction of over 300 beekeepers for the year ending June 2005. This compares with a net reduction of just over 100 in the previous 12-month period. Interestingly, hive numbers appear to be stabilising, which is good news for industries that rely on the active or passive pollination services of honey bees. Beekeepers are still entering the industry with

a similar number of registrations during this contract period as was seen last year (160 compared to 173 in 2003-2004). Table 1 shows the changes in the number of beekeepers from May 2000 to May 2005. The arrival of varroa in April 2000 and the introduction of apiary and hive levies for the two Pest Management Strategies have contributed to the decline in beekeeper numbers.

Table 1 Changes in New Zealand Beekeeper, apiary and hive statistics since varroa arrived in 2000

May-00			
Location	Beekeeper	Apiary	Hives
Blenheim	414	1741	28443
Canterbury	727	4748	60356
Hamilton	486	2800	49863
Otago/Southland	451	3495	50823
Palmerston North	1214	3655	43534
Tauranga	496	2971	51008
Whangarei	1168	3033	36086
New Zealand	4956	22443	320113

	May-05			
Location	Beekeeper	Apiary	Hives	
Blenheim	284	1647	25966	
Canterbury	524	4075	55987	
Hamilton	213	2275	39117	
Otago/Southland	350	3209	46566	
Palmerston North	771	3420	45241	
Tauranga	263	2715	51666	
Whangarei	542	1878	28385	
New Zealand	2947	19219	292928	

Guideline for the use of Food Grade Mineral Oil as an alternative varroa control



Figure 1 Propane Fogger

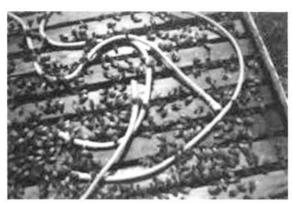


Figure 4 FGMO Emulsion Cords





Figures 2 & 3 Fogger Ready Position above FGMO Fog below



Figure 5 FGMO Emulsion Cord Tray

