

NOTES FROM MEETING WITH NICK WALLINGFORD, TED ROBERTS AND MICHAEL WRAIGHT TO DRAFT SUBMISSION RE: BIO-SECURITY BILL

20 AND 21 JANUARY PALMERSTON NORTH

How we approach, set up timings. NW will be latest; aim for timing to finish when MW is due to go (1:30pm tomorrow).

3 to 5 pp submission of how in general/specific, especially how it affects the beekeeping industry.

Rough out now to lunchtime - overview, identify key points. After lunch, work through key points. Thursday morning draft submission. Thursday afternoon tidy up, aiming to finish at 12 to 12:30.

MW suggestion: Work through 3 scenarios. Play act if we produced a PMS, how we would be involved in hearings, how set up levies. Do nothing at all until June 1996. Do nothing ever. Assess costs in dollars and disease risks of these three.

Fear of 'unfriendly' PMSs, especially from Regional Councils. Also identified by Ian Berry disease committee.

Bill seen to be 'baby' of MAF Regulatory, with Ag Products and Ag Compounds (fertilisers, pesticides, etc) still to come.

Loss of schedules, the statutory obligation to react if certain pests, diseases appear.

Africanised bees: If beekeepers decide not to do a PMS, the whole country could be put at risk. Decision/management of agricultural security should be on a national interest basis, not that of a region or industry or individual pest/organism basis.

Internal physical by police, external by armed services. Why is Bio-Security being user-paid and not those? Who stands to benefit by police force: Crimes against person (all), crimes against property (with some insurance available), and by default now user pays. Against person, still have police and expect it and all pay for it. Armed services: perhaps only need rapid reaction force (helicopters?) and some form of surveillance.

Border security: what assurance is there that it will continue? If no PMS, then very likely that it wouldn't be checked for at border.

Disappear in July: Clause 7 (moveable frame hives), 8 (access to be kept clear), 9 (notification of change of location), 17 (bee disease advisory committee).

Stays until 1996 OR until a PMS for named pest/disease is put in place: Clause 4 (registration), 5 (identification), 6 (information to be supplied to Registrar), 10 (abandoned and neglected hives), 11 (feral colonies), 12-16 (first schedule diseases), 18-20 (second schedule diseases).

Keeping 'clean' does not count; must be real loss. Only real reference to marketing advantage is in 69 (2) (a).

Clause 149 seems to say that you commit an offence by possessing at the time you report.

Clause 47 (1) (b): MAF is contributing to the creation of the problems that an EFB pest management strategy would be raised to control by allowing IN ANY FORM honey from Australia.

Regional PMSs don't need Ministerial approval! Example of BOP Regional council going for EFB re: pollination costs.

Danger of Regional Council could impose tolls on bee movements, site charges.

Fear of 'unfriendly' PMSs, that get 'imposed', even though consultation was involved. Especially as bees as stinging insects are not considered desirable.

Not really talking about the diseases, but rather the pest - BIO Security.

Working through PMS: Streptococcus pluton on honey bee. Anywhere in NZ, as it does not exist. 'Keep out for 5 years'. Surveillance, delimitation, control, elimination. Capacity to put in place, so there is big cost even if no outbreak occurs.

Training of field team, training programmes for field team members (diseasathons).

If multiple (different) disease outbreaks, the decision as to which to respond in the face of limited resources, the decision would be political. This bill gives the industry the (incorrect) impression that it is a business arrangement.

Under levy, industry would have to fund 'standing costs' as well as response cost. Government does it by special appropriation if there is an outbreak; industry does not have facility to levy in this manner.

This Bill seems to be written primarily from the viewpoint of endemic management - feral pools, movement of stock, etc. Does not really fit the exotic outbreak.

Situational decisions necessary. Too many places and times of the year. Better to be able to have a strategy that simply describes how the decisions will be made (by whom) at the time of an outbreak.

Call to Melissa Hodd, Fed Farmers, to discuss approach re: exotics and endemic. She felt their approach would be that almost all response would be under the emergency powers, with collection of levy after the fact. If exotic is introduced, it indicates a breakdown of (the government's) border protection service. Accordingly, she feels that the surveillance and initial response should be government funded, with the industry only moving in after the fact to manage/fund a control programme.

Cost of Board of Inquiry are at proposer of the strategy, including all the copies, etc.

Can't use Commodities Levy, as wouldn't have the statutory powers to inspect, etc.

Issue of warrants for inspectors still comes back to Chief Technical Officer (and can't be delegated). Effectively cuts out a level - current apiary officers have permanent warrant (one day course, familiar with Act, and warrant then issued by head of ASD on advice of GM Reid). Permanent warrant holder can delegate some but not all (can find and report back, but power to decide on destruction can't delegate). Decision on import stays with GM Reid and can't 'come down'.

Minister can change operational matters, Chief Technical Officer can say who will do it (who is fit and proper person), costs of processing and other RA costs will be loaded onto PMS.

* Schedule 1 diseases statutory response ends in 1996. Even these are only 'may respond' in the current Apiaries Act.

* From 1906 has the government's obligations to agricultural security have changed from 'shall' to 'may' to not at all.

Risk goods (those subject to permit, etc) will only be looked for by border protection if there is a PMS. If no PMS then no pest, then no risk organisms, then we don't have to keep them out! Border protection in nearly eliminated.

Regulatory Authority becomes a 'cost plus' organisation - all costs of operation are covered by recovering from the industries.

We've had Apiaries Act since 1906. Start of an effective industry. Without it there would not be the industry as today. First beekeeping legislation in the world. World leader in field of apicultural legislation since then, particularly relating to disease control. Change from 'shall' to 'may' to no involvement by government. 'Encourage and protect the bee industry in New Zealand' in 1906 (same day as Habitual Drunkards Bill). Originally asked for by beekeepers. 1907 says 'inspector shall direct the beekeeper to forthwith take such measures as may be necessary to cure the disease'. 1908 says 'offence to sell barter or give away hives known to be affected by disease'. Security that we have enjoyed for 85 years.

Beekeeping could have regional restrictions imposed on it by other interest groups. PMS for Africanised bees could be proposed by anyone.

Bio-security versus physical security as regards 'the public good'.

Marginal costs of adding on an additional pest/disease on top of the Minister's already-to-be-paid for Foot and Mouth. In the national interest, most cost effective to have national organisation for bio-security. Emergency response capacity is 95% 'down time'. If one agency is primarily delivering, which probably will still be the case, with MAF being it, conflicts caused by limited resources will be decided by 'the national interest'. The Bill gives an unfair impression of security based on business contract, which really doesn't exist.

Presumably the necessary contents of a PMS will already have been done by MAF, already paid for by the taxpayer. The ERP for EFB, for instance, has had thousands of dollars of work, developing manuals, training personnel, preparing procedures. Anyone who would want to bid 'against' MAF would not have this headstart.

A small industry, or a small problem, cannot readily be dealt with under these regulations. The overhead costs of processing a PMS (which will be recovered by the RA from the industry) would be the same for a small process as for a large one.

As well, a small industry's problems would not entice alternative providers. There would be no real competition. If a PMS had provisions that MAF didn't want to supply, the industry would be obliged to change what it wants!

All the various MAF EDPRs are interlocked, with overlapping personnel, etc. To split out one of them would be very very expensive.

Inference from the act is that there would be bio security inspectors (rather than particular 'bee' inspectors), then one level down are the 'authorised persons'. This seems to direct us toward (the same) MAF inspectors, even if the body to deliver the overall service is outside MAF.

'Although one of the inferred aims of this Bill is to open up MAF Quality Management to competition, there are a number of constraints that preclude or make very difficult the use of alternative providers. Some examples include:

- * reservation to the CTO of the appointment of inspectors (Clause 98(1)) and this power cannot be delegated (Clause 100(1)(c))

- * setting of all standards relating to inspectors, facilities, procedures (Clause 157).

Exposure to risk is initially determined by political expediency (cf. honey from Australia increasing risk of EFB). The management of further risk is then turned over to the industry to develop a PMS.

Agricultural biosecurity is a national asset. Its maintenance benefits more than the readily identifiable primary beneficiaries. Often the people who benefit do so without being either readily identifiable or benefit to a lesser degree. They nevertheless benefit.

Difficulties in general with obtaining a PMS:

- * Cost of paying for the process of getting a PMS.

- * No means of budgetting or estimating costs incurred (and to be collected from industry) in the processing and implementation (Clause 47(2)(b) - how can you know the cost at this stage, as you don't know the cost of processing, etc)

- * The cost of processing a PMS is to be met by the proposer, and there is no facility to recover these costs by any levy. No equity considerations for the cost of proposing, developing, processing (meeting the requirements of the act). These costs fall only on the group/individual who proposes the strategy.

- * Overhead costs of collection of a levy would be inefficient.

- * Administrative loading (Board of Inquiry, etc) would make cost prohibitive.

- * Every programme, no matter what its size, would have a similar overhead cost of processing. This would disadvantage small programmes and small industries.

Impossible for exotic:

- * Government has never budgetted for outbreaks, but rather relied on supplementary appropriations.

- * Unable to predefine the numbers of responses required.

- * Do not have control over level of risk re: Border Protection

- * Do not have control over level of risk at the border (for example Australian honey)

MECHANICS OF PRODUCTION

Covering letter to Chairman of Primary Production Select Committee.

NW to produce by Monday, copy in mail to DW. DW to sign and forward on to Head Office. Olive to have it by 1 February. Olive will make copies as required and send to Parliament. DW to receive by Wed 27 January. TR to let NW know if problem with covering letter not being signed, etc.

1 February 1993

Mr Ross Meurant, Chairman
Primary Production Select Committee
Parliament Buildings
WELLINGTON

Dear Mr Meurant

Enclosed is the written submission from the National Beekeepers Association on the Biosecurity Bill.

Our industry has kept a watchful eye on the development of this bill through the last few years. We believe that our submission has been formulated with sufficient consultation and industry agreement so that it adequately addresses the major concerns and particular interests of the beekeepers of New Zealand.

We most certainly share the desire as stated in the Bill to exclude, eradicate and effectively manage unwanted organisms. However, the degree of cost transfer from government to industry as described will, in the long term, result in the loss of the essential services. The net effect will be a loss to the industry of the biosecurity it so urgently requires.

Again, our industry would agree that all strategies for pest management should be carefully chosen, completely investigated for cost benefit and that the delivery and operations should be subject to notions of accountability. We do not believe that simply transferring the responsibilities for funding to the industry as this Bill does is the correct response from government.

Being a comparatively small primary production sector, the beekeeping industry will of necessity face some problems caused simply by scale of operations. We believe that because of the restricted nature of the industry we will be severely disadvantaged by some of the financial and systems development aspects of the Biosecurity Bill. We hope that our comments in this regard will lead to your understanding of why an industry such as ours would ultimately have to choose inadequate and ineffective biosecurity rather than pay the 'real costs'. Our view of 'the public good' sees it as a continuum. In some cases, biosecurity aspects can have a readily identifiable primary beneficiary. This Bill then loads the entire cost of development and operations of biosecurity strategies on that one sector. It ignores the shared benefits that accrue between industries, the less readily identifiable (or easily leviable!) beneficiaries and the need for an integrated, national approach to biosecurity and the public good.

Thank you for the opportunity to make this submission. We wish you well in your deliberations and look forward to seeing the results. Should there be any aspect in general or particular related to our submission on this Bill or our industry that we could amplify or clarify we would welcome the opportunity.

Yours faithfully

D L Ward
President

**SUBMISSION
FROM THE NATIONAL BEEKEEPERS ASSOCIATION
ON THE
BIO-SECURITY BILL**

SUMMARY OF MAJOR CONCERNS

- O Long history of effective protection under Apiaries Acts
- O Biosecurity is a national asset. It is always to a greater or lesser degree in the public interest. It should be managed and funded with a national strategy rather than piecemeal or regionally.
- O Industries are being asked to fund the programmes for the risks of exotic introductions without control over the levels of risk that they must manage.
- O The costs of proposing a pest management strategy fall inequitably on the proposers alone, even if the strategy will benefit others. There is no provision for recovering the costs of proposal and processing.
- O The MAF Regulatory Authority, becomes a cost plus government body. All costs of processing and other activities related to the Bill are passed on with inadequate provision for scrutiny and acceptance.
- O Pest management strategies directed toward exclusion of exotics pose particular difficulties. Levies must be set based on pre-defined responses that by their very nature cannot be known beforehand.
- O The opportunity exists for the creation of pest management strategies not acceptable or desired by the industry primarily to be regulated.

DISCUSSION OF MAJOR CONCERNS

1 Long history of effective protection under Apiaries Acts

The beekeeping industry has enjoyed a long history of pest and disease regulation. The first Apiaries Act was enacted in 1906. This Act is still viewed today as the real beginning of an effective beekeeping industry.

The Apiaries Act of 1906 was, in fact, the first ever beekeeping legislation. New Zealand has remained a world leader in apicultural legislation since then, particularly relating to disease control. Over the years, the perception of our industry has been that the government's involvement and feeling of shared responsibility has changed with the words of the Acts, from 'shall' to 'may' to a complete hands off approach. Our industry welcomed then as we would now a bill to 'Encourage and protect the bee industry in New Zealand'.

2 Biosecurity is a national asset. It is always to a greater or lesser degree in the public interest. It should be managed and funded with a national strategy rather than piecemeal or regionally.

Industries and other sectors of the public often benefit mutually from biosecurity. New Zealand's current freedom from European brood disease certainly benefits the beekeeping industry. However, it also has considerable benefit to the fruit growing industries that rely on bee pollination services. The absence of EFB reduces the cost of managing hives for pollination. The New Zealand honey consumer benefits by reduced costs of production, resulting in lower honey prices.

The Biosecurity Bill, however, seemingly stops at the identification of the first major beneficiary, and assumes that the industry will 'do the right thing' for itself and develop a pest management strategy. It specifically limits the ability for a lesser or secondary beneficiary to take action. The Minister would not be able to satisfy him/herself that the 'continued presence of pests on or in premises owned or occupied by those persons would have significant adverse effects on other persons'. Clause 47(2)(b).

Decisions about the relative importance and possible consequences of unwanted organisms must be made following consideration of all individuals, industries and groupings of the public who receive benefit from a strategy for biosecurity. This should be, properly, a political decision.

The necessary development of the strategies to be followed, the levels of activity to be undertaken, and the prioritisation caused by conflicting needs or resource limitation should involve industries and all other concerned parties. Adequate consultation should take place. The final decisions about biosecurity should be made from a wider perspective than simply that of the primary beneficiary. Similarly, the funding base for strategies should include a fair and equitable component from government for those groups or individuals that will ultimately benefit, but are not readily identifiable or leviable.

An interesting parallel can be drawn between attitudes and delivery systems for biosecurity and for physical security. The internal physical security concerns (risks) of New Zealanders are managed by the police; external physical concerns are managed by the armed services. In both cases, apart from the particular instance of insurance against property loss, these services

are paid for as part of the public good. It is only if a person desires more than the base level of security that 'user pays' might enter into the picture. The bulk of the 'strategy' is clearly accepted as being in the public interest, even if a primary beneficiary can be identified.

3 *Industries are being asked to fund the programmes for the risks of exotic introductions without control over the levels of risk that they must manage.*

Risk management as a systematic philosophy relating to biosecurity has some areas of concern to the beekeeping industry, but would, in general terms, be understood and accepted. The Biosecurity Bill, however, will force the industry into accepting a level of risk over which it has no control.

To raise the risk level associated with a particular organism by any amount, however small, can only be acceptable if the organisation that brings about the increased risk is the same organisation that must manage the resulting risk. The Biosecurity Bill puts the onus for developing (and funding) strategies to manage the risks associated with the unwanted importation of undesirable organisms with industry.

The level of that risk, however, can be considerably affected by, for instance, the quantity and quality of border protection services controlled by government expenditure. If, for whatever reason, the government of the day decides to cut back on border protection services, the increase in risk would be reflected by an increased cost to the industry in its pest management strategy.

Similarly, the development of trade related protocols can change the risk of pest and disease introduction. In our industry's case, the proposed entry of honey from Australia will increase the risk of the introduction of European foulbrood. The decision to agree to this protocol will be made by MAF Regulatory Authority. The consequent increase in the risks related to the pest management strategy, however, would be borne entirely by the beekeeping industry should it choose to develop a strategy to deal with an EFB introduction.

4 *The costs of proposing a pest management strategy fall inequitably on the proposers alone, even if the strategy will benefit others. There is no provision for recovering the costs of proposal and processing.*

The Biosecurity Bill places the costs of development, proposal and processing of a pest management strategy clearly on the proposer of the strategy. The actual cost cannot be controlled, or even known beforehand, by that person or body due to the open-ended administrative processes through which it must pass before approval is given by the Minister.

Further, there is no facility for the originators of a strategy to ever recover the costs associated with the proposal and its processing. Our industry administrative functions, for example, are currently funded by the provisions of the Hive Levy Act 1978. We are still looking toward use of the Commodity Levies Act 1990. It would be somewhat ironic that the National Beekeepers Association would probably need to apply for a Commodity Levies Order in Council in order to fund the work associated with obtaining a levy under the Biosecurity Act.

5 *The MAF Regulatory Authority becomes a cost plus government body. All costs of processing and other activities related to the Bill are passed on with inadequate*

provision for scrutiny and acceptance.

Some or all of the costs of processing pest management strategy applications, as well as other functions related to this Bill, will ultimately be charged to the proposer or to the ultimate levy payers. The quality and quantity of services provided by the Regulatory authority in their roles associated with the Bill are a complete unknown and uncontrollable expense to the industries concerned.

In addition to the requirement that consultation take place before the acceptance of a national pest management strategy, the Biosecurity Bill insists upon the creation of a Board of Enquiry. The composition, activities and life of this Board are to a considerable degree out of the control of the proposer of a strategy. The costs cannot be estimated, managed or limited in any way by the proposer of a strategy.

6 *Pest management strategies directed toward exclusion of exotics pose particular difficulties. Levies must be set based on pre-defined responses that by their very nature cannot be known beforehand.*

This Bill appears to be primarily written toward the strategies related to management of an endemic pest or disease. It goes to great lengths to describe feral pools, movement of stock and marking of organisms. A strategy for endemic pest or disease control would be difficult to propose and fund for many industries. The application of the Bill to exclusion of unwanted pests and diseases becomes even more awkward.

Under this Bill, industry would need to fund the development costs (for an emergency response procedure) and the 'standing costs' (of provision of staff 'on call', their training and maintenance). In addition, however, any strategy designed to respond to an unwanted introduction would, obviously, include the actual costs of responding to an outbreak.

Included in the strategy would be provision for a given number of responses during the period of the strategy. This number would have to be decided at the time of setting the levy. It would not be feasible to exceed this number of outbreak responses, however desirable it might seem at the time.

The operation plans relating to an outbreak require a number of situational decisions which make the pre-decision of the full details of response more difficult. In the case of the beekeeping industry, and presumably for others, the extent of an outbreak, the part of the country, the nature of the business concerned and the time of the year can all have drastic impact on an operational plan. To actually require budgeting beforehand for such an exotic outbreak becomes incredibly difficult.

We note that the government has never in the past attempted to do this. It has funded emergency responses through a special appropriation if there is an outbreak. It has not felt able, presumably, to do what it is asking industry to do. There is no facility for an industry to levy in a manner equivalent to a 'special appropriation'.

7 *The opportunity exists for the creation of pest management strategies not acceptable or desired by the industry primarily to be regulated.*

When examining the Bill, our industry identified, as one example of an unwanted organism, the Africanised honey bee. The beekeeping industry would certainly be readily identifiable as

a group that would benefit from the Africanised bee's exclusion. Should, however, the industry for whatever reason decide not to propose and fund a pest management strategy, it would be the New Zealand public who would also stand to lose, should the bee ever be introduced and established.

Our presumption, then, would be that, for example, the Minister of Health might choose to develop and fund a response strategy as it would be in the public interest, as related to his/her portfolio obligations. If carried out in this manner, however, our industry would have, effectively, little control over onerous provisions that might be included in the strategy.

Our industry, while most often viewed with thoughts of honey, can often be the recipient of less desirable publicity through stings. It can be shown that many of the fears of beestings are exaggerated in people's minds. While acknowledging that stings hurt, the incidence among the public of bee sting allergies is very much lower than the public perception. Many of the public have difficulty in distinguishing between the various stinging insects, and beekeeping suffers from the resulting generalisation of 'I was stung by a bee'.

In light of this, provisions for restrictions on siting, numbers of colonies on a site and transport of colonies might well form part of a strategy proposed and funded by the Minister of Health. Our industry would feel quite aggrieved to be regulated in this way.

Similarly, the development of regional pest management strategies, with concomitant lower levels of consultation and scrutiny, could easily work unfairly against rural interests, all in the guise of biosecurity.

OTHER CONCERNS OF A PARTICULAR NATURE

Clause 128(1).

Costs of processing are already recoverable from the proposer. What other costs are envisaged here? To what level? Collected by and from whom?

Clause 149(2).

This clause makes it an offence to possess a unauthorised organism, with no provision for a reporting time. These seems to run contrary with the intent of Clause 33 and 44.

Clause 175(1).

This excludes clause 7, 8, 9 and 17 of the Apiaries Act 1969. Clause 7 is particularly important to our industry. Ironically enough, it was this provision that was the impetus for the original apiaries legislation. It is an essential provision for all bee disease inspection and control programmes.

Clause 115.

This clause seems to say that an inspector could do almost anything and use almost any product with no further need for approval. A specific concern to our industry involves the use of antibiotics, particularly in a prophylactic manner, without the need for prior registration of the product.

Clause 56.

A 28 day period after gazette publication is required before a national PMS becomes effective. A regional PMS is effective immediately (Clause 65). Why is there a difference?

Clause 69(2)(a).

This clause could be used, for instance, by a Trade and Industries Minister to block the beekeeping industry's use of antibiotics as part of the control strategy (as it affects the market image of New Zealand products). Again, there is an irony that this is the only application of 'market' in the Bill, and it is used in a negative context, describing why an industry may not be allowed to manage its own pests and diseases by its preferred method.

Clauses 98(1) and 100(1)(c).

These indicate that the power to appoint inspectors and authorised persons cannot be delegated below the level of Chief Technical Officer. This seems to unduly restrict the selection and appointment process. One would think the managing body would have powers to appoint inspectors.

Clause 70(3).

Compensation is for the organism. In the case of beehives, this would mean that hives and honey would not be eligible for compensation, contrary to industry expectations and current practice.

Clause 31(d).

It is our understanding that the current surveillance programme for bee diseases which is required to enable NZ to meet its reporting obligations under OIE will continue as provided in this clause.

Clause 38.

This does not apply particularly well to the beekeeping industry where the organism (the bee) is not identified but the apiary should be. We are assuming that an apiary might be considered 'associated premises' but this does seem to stretch the meanings in the clause somewhat.

Clause 71.

We find it amazing that this clause could be worded in such a way that it clearly limits Crown costs simply to that which the Crown has agreed to provide.

Clause 95.

What are the biosecurity implications addressed by this clause?

Clause 109.

This seems to say that the person reporting the discovery of risk goods must (without option) be charged for the ultimate destruction of the item. This should apply specifically to seizure and destruction of illegal importations. Rather, by tracing the references back through clause 108, then 103, this clause must be applied to routine inspections. We do not think this could be the intention.

NBA APPEARANCE TO SUPPORT SUBMISSION ON BIOSECURITY BILL

*Prepared by Nick Wallingford
20 May 1993*

Date: Wednesday 18 May 1993
Attending: Michael Wraight, Ted Roberts, Nick Wallingford
Where: 10th floor, Bowen House, Wellington

The NBA presented oral submissions to the Parliamentary Primary Production Select Committee on aspects of the Biosecurity Bill. This was, apparently, the last day that they would be hearing submissions. They were somewhat 'livelier' than we had been led to expect based on their reception of the Federated Farmers' submissions.

The Committee was chaired by Ross Meurant (National, Hobson). The three other members present were Margaret Moir (National, West Coast), Jack Elder (Labour, West Auckland) and Hamish MacIntyre (Liberal, Manawatu). MAF officials present included Chris Boland, Don Crump and one other not known to us.

We were preceded by Cath Wallace who spoke on behalf of ECO, a coalition of the various environmental groups.

We had agreed on a plan of sorts and were able to stick relatively well to it. After an introduction mentioning the Apiaries Act 1906 and emphasising our support for effective biosecurity by N Wallingford, M Wraight described to the Committee the unique nature of beekeeping. He emphasised the relatively small nature of the industry and the comparatively small number of full time/sideline commercial operators.

T Roberts then described the particular problems the Bill would impose re: applicability to exotics (need to budget without knowledge of number of responses, etc).

From this point, the discussion was 'question driven' with questions coming from all of the members of the Committee, but especially Ross Meurant and Margaret Moir (who mentioned at one point that her husband was at one time a beekeeper!).

R Meurant said that the Bill provided that a Minister could create/pay a national PMS - why doesn't the NBA feel confident that would happen in practice? We referred to AFB programme, and our history of trying to get Ministers to pay.

Some discussion on the desirability of smaller, regional approaches to specific problems. We said that no bee pest/disease would remain small or regional for more than a couple of seasons, and that our real concern was national.

We acknowledged that our primary worries related to the need for effective border protection service to avoid pests/diseases.

We discussed the need for shared costs among shared beneficiaries. Described the kiwifruit/pollination beekeeping shared benefit of remaining free of EFB. Mentioned that the shared benefits of public at large and beekeepers of avoiding Africanised bees existed, but that the beekeepers might well choose to NOT develop/pay for a PMS, as other priorities (mites, EFB) existed for us.

This resulted in quite a series of questions on what the Africanised bee was, how it had affected honey production, management techniques and what the US was experiencing. We finished with a reiteration of the importance of NZ being able to effectively certify absence of pests/diseases in order to expedite exports of bees, honey, queens and other hive products, based on our unique opportunities due to pest/disease free status in the world.

The hearing and questions were all of a friendly, informal nature. We were before the Committee for a bit more than half an hour, more than we had expected (Federated Farmers mentioned 10-15 minutes for them). I feel we maintained the relationship that has been developed over the years, with MPs realising

our concern and sincerity of presentation.

As we left the hearing rooms, Hamish MacIntyre came out and spoke with us for five minutes. He had picked up on the need for national management of biosecurity, and wanted us to realise it was important to his people.

The Bill will probably return quite quickly now to the House for final passage.