

**NEW SOUTH WALES APIARISTS' ASSOCIATION INC.**



**SUBMISSION**

**BIOSECURITY REGULATION 2016**

**16 January 2017**

## PROPOSAL - Draft Biosecurity Regulation 2016

- **Registration -Bees**

1. Alignment and limit registration to 2 years rather than the proposed 5 years.
  - a) A national agreement is already in place for a maximum 2 year registration. Apiarists' are aware of this agreement and this current method works well.
2. NSWAA recommends the consideration by Minister/Secretary to waive the fee for recreational users with 10 or less hives as a good biosecurity practice as it is imperative to know where the hives are, if and when we have an incursion. We recognise that the new fees structure is based on cost recovery and suggest consideration be given to increasing the fee for commercial apiarists to take account of small recreational beekeepers.
3. NSWAA proposes:
  - a) Free registration ONLINE ONLY for 1-10 hives.
    - The commercial industry will absorb the cost.
    - As an incentive to encourage current recreational unregistered beekeepers. (In Victoria over 2000 extra registrations occurred.)
  - b) Recreational up to 100 hives - \$50.00
  - c) Business up to 500 hives - \$100.00
  - d) Business over 500 hives - \$200.00
4. Condition of registration that Apiarists update details of hive numbers at a registration renewal.
  - a) This is imperative as hive numbers change periodically.
  - b) The industry is keen to capture data to ascertain commercial and recreational users.
5. In all categories hive numbers should be recorded to give the industry a snapshot of where the industry is at in relation to growth or decline.
6. Identify who will maintain and hold the register of beekeepers.
  - a) The Association is informed that the Act still provides for a register, however it does not stipulate who i.e. Department of Primary Industries.
    - This needs to be clarified.
7. Completion of a relevant course that meets the requirements of the industry code must be undertaken prior to renewal of registration.

- **Records and notification**

81 (1) (a) (iv) Biosecurity Regulation 81 (IV) “the name of the person who moved the hive.”

1. Should be “the entity” not the person.
  - I. Many of the beekeepers have employees undertaking the role.
  - II. Needs to be conditional to provide when not under employment entity.
2. Should be “bees” not hive.

- **Suggested Amendment to the Regulation/Biosecurity Manual**

Terminology ‘a bee’, needs to capture plural – colony or *Apis mellifera*.

- **Bee Candy**

1. Queen candy should be “all apiary products fed back to hives must be irradiated”.
2. Further consideration necessary to the risk associated with use of ‘queen candy’ and whether the management through the general biosecurity duty is sufficient or if additional mandatory measures are required.

- **Proposed Compliance and Enforcement Policies**

a) Nuisance Bees – Biosecurity Impact and Public risk.

- I. Nuisance bees – This mainly refers to bees being moved in the heat of the day.
- II. Bees left behind while being transported i.e. at a public place such as a service station - Industry has formulated a code of practice on a national basis but this needs to be regulated.
- III. Evidence provided such as service station surveillance video of truck with hives on board, bees congregating around lights and the registration of the truck would be very a very clear case for prosecution.

Scenario: beekeeper stops at a service station during peak pollination period leading closure of service station evidenced by CCTV footage. How does the industry code of practice apply?

b) Disease Control – Inappropriate Use of APVMA label.

The handling under the new arrangements for the inappropriate use of APVMA label in the case of masking a biosecurity risk by using oxytetracycline hydrochloride (OTC) to manage American foulbrood (AFB) and then transporting bees needs to be clarified. How would this matter be handled under the new arrangements?

- **American Foulbrood – Prosecution**

American foulbrood – Prosecution needs to be considered for control to be effective and prevent major outbreaks.

- **European Foulbrood – Registration**  
As a further condition of registration – there should be an obligation/undertaking to indicate number of hives being treated when seeking to utilise oxytetracycline hydrochloride (OTC ) to manage European foulbrood (EFB).
- **Braula Fly**  
Imports from any areas with Braula fly must be restricted.
- **How to Handle/Dispose Unidentified Bees**  
NSWAA is concerned that the description in the Regulations has been removed. The Association has been informed that information as to how obligations are met as described in Policies and Procedures. We strongly recommend that the Department of Primary Industries provide copies of relevant compliance policies and procedure as soon as possible.
- **Communication Material**  
NSWAA suggests consideration of additional, regulated and updated communications material and enforcement policies to inform current and future bee-keepers of requirements.
- **Terminology of Key Terms and Tools**  
There is a need for a greater understanding through advice and education for people to understand and appreciate the broad terms and tools when addressing the spectrum of biosecurity issues and risks.