



SABIO

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SABIO Response to Management Strategy and Regulations

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The AFB Management Strategy dated 10 November as a draft document from the AFB Steering Committee gave a comprehensive summary of developments since the discovery of AFB in South Africa. In addition it made three optional suggestions regarding a possible strategy for the future management of AFB – from minimal intervention to more comprehensive options. The supporting draft regulations were included and these were in effect based on the proposed Option C. The analysis below attempts to assess the efficiency of the regulations enforcing the desired option and looks at the specific terminology and definitions expressed in the regulations. The responsibilities of Government, beekeepers and the Industry may need to be further clarified.

In my report at the recent AGM on the 28 November as Chairman of SABIO I asked the following questions:

- “1) Is the proposed strategy adequate and which option do we consider appropriate?
- 2) Do the regulations support this best option? The implementation of this strategy with regulations makes SABIO the administering authority. We all need to think carefully about what this implies and act accordingly – hence the proposed office and extra administration staff.
- 3) Is SABIO to be contracted by the government to enforce these regulations or is this to be financed independently? The roles of DAFF and SABIO need to be carefully defined – for example government does inspections and testing but SABIO administers the regulations. The alternative is to place all control of AFB in government hands and leave us as purely negotiation partners. Are the necessary support systems in place to make implementation of the regulations feasible?”

Another vital issue is that if hives are to be destroyed within 72 hrs of discovering AFB then a positive and quick testing method needs to be established so that beekeepers can have concrete proof of AFB before destruction occurs. Identified clinical symptoms in Douglas were confirmed as AFB yet when tested in Denmark only EFB and IAPV were diagnosed. Further tests need to be done to confirm this result. APIS is mentioned as the testing authority – do these labs have the capacity to cope with the tests in a realistic timeframe and with sufficient accuracy? On what basis are samples collected and by whom?

These issues were discussed but without definite conclusions being reached. I refer specifically to issues that received mention at that meeting.

1) Clarification of definitions in the regulations.

AFB – infected colony – definition of clinical symptoms – are these to be supported by lab testing?

Executive officer – a more precise definition of this term needed.

Management measures – more clearly defined – who specifies when clinical symptoms are no longer observed?

The authority – is this the administration authority for registration or for the full implementation of the regulations. Much debate revolved around this issue. Ultimate enforcement of any regulations is the responsibility of the police and government inspectors. Roles need to be clearly understood here.

2) The Draft Regulations

3 (1) Users of land – seemed to be a vague term, which may lead to legal complications in the future. Are landowners responsible what if the land is hired?

4 (2) a and b need clearer definition – the threshold level and management measures need to be defined.

5 (2) c was fiercely contested although tracability of sites was felt to be an issue that would become more important in future as consumers insisted on this information on honey some beekeepers felt that they would not give their site positions to an organization run by other beekeepers. The question of who was to be responsible for registration was raised again. The cost of administrating the registration was discussed and a figure of R20 per registration was suggested, which seemed not to take into account the responsibility or costs involved.

7. (1) all beekeepers must/are required to allow access to the executive officer – what about sites where the beekeeper was not always present?

A final comment was made regarding the use of antibiotics - were these to be allowed under any circumstances or not at all?

There was also no mention of the movement of honey and the recording of imported honey – does this still need to be irradiated?

All strategy options stressed the need for a monitoring programme. This to me seems to be one of the priorities of the regulations so that meaningful records become a reality to the industry.

There may appear to be more questions outstanding than answers, yet I believe that if we continue to ask the right questions solutions will be forthcoming. I propose that a meeting of the Strategic planning committee be planned early next year in order to settle some of these issues so that we can begin to function effective with AFB as a reality in our colonies. We could then circulate a final draft for comment before publishing regulations early next year.

Signed J. Moodie (Chairman SABIO)

