



# SABIO

South African Bee Industry Organisation

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## SABIO – STRATEGIC PLAN AUGUST / SEPTEMBER 2013

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# 1. Mission Statement

**SABIO Mission Statement:** *To represent and promote the interests of all persons involved in the beekeeping industry in South Africa in order to establish, support and develop an economically viable and sustainable apicultural sector and ensure the environmental security of the honeybee.*

## 2. Goals and Objectives

- 1.1 *promoting and advancing the beekeeping industry in South Africa;*
- 1.2 *being the spokesperson for the beekeeping sector in South Africa on all matters affecting the beekeeping industry;*
- 1.3 *acting as an umbrella body for all affiliated beekeeping bodies and assisting with the establishment and promotion of Beekeeping Organisations throughout all provinces in South Africa;*
- 1.4 *liaising directly with any government department or institution on all matters affecting the beekeeping sector in South Africa;*
- 1.5 *liaising with any body or organisation involved in agriculture in South Africa to promote beekeeping activities and services and all bee products linked to the agriculture industry;*
- 1.6 *to promote the development of beekeeping in the informal and disadvantaged communities in South Africa;*
- 1.7 *to assist with the development of research in any aspects of apiculture and liaise with any research institution on matters impacting on the beekeeping sector in South Africa;*
- 1.8 *keeping all persons involved in the beekeeping industry informed of current issues affecting beekeeping in the country and internationally as far as is reasonably possible;*
- 1.9 *encouraging conformity amongst the beekeeping community with all statutory requirements affecting beekeeping including (although not limited to) registration of beekeepers, movement of bees, disease control and the importation of any bee products into the Republic of South Africa;*
- 1.10 *liaising with other international organisations involved in apiculture.*

### **3. Code of Conduct**

#### **PREAMBLE**

1. In terms of its Constitution SABIO aims primarily to promote and advance the welfare of Apiculture within South Africa and to encourage the competency and professional conduct amongst its members in their beekeeping activities. To this extent the Organisation expects of its members that they themselves maintain a competent and professional approach in all aspects of their beekeeping activities.

#### **COMPLIANCE WITH STATUTORY REGULATIONS**

2. All members who keep bees whether for recreational use, commercial use or for any reason relating to the production and harvesting of honey bee products must comply with the statutory laws of South Africa relating to the keeping of bees, marketing of bee products and the management of bee diseases including National Legislation, Control Measures and Local Government by-laws.
3. All members who keep bees must be registered with the Department of Agriculture, Forestry and Fisheries (DAFF), as prescribed in terms of the Agricultural Pest Act, and must hold a valid registration number issued by that regulatory body.

#### **INSURANCE COVER**

4. All members who keep bees should consider being covered with some form of insurance for public liability.

#### **CONDUCT OF MEMBERS**

5. All members of the Organisation are expected to:
  - 5.1 adhere to the Organisation's Constitution;
  - 5.2 practice proven and ethical standards in working and managing their bees or any activity associated with apiculture, including the removal of feral swarms and any aspect of research and development in apiculture;
  - 5.3 behave in a proper, lawful and responsible manner in all activities associated with beekeeping;
  - 5.4 behave in a responsible manner in all dealings with the general public on beekeeping matters;
  - 5.5 acknowledge and respect the views of fellow beekeepers without derogatory or disparaging comment whilst maintaining their right to express their own views in any forum of the Organisation.
  - 5.6 implement all appropriate measures to produce pure South African beehive products of the highest quality.

## **LANDOWNERS AND THE GENERAL PUBLIC**

6. Any member who keeps bees on property which is not his own must have the permission of the Landowner to keep his bees on that property.
7. The member shall at all times act in an environmentally and socially responsible manner whilst working with his bees on any site.
8. The beekeeper must work as safely and as responsibly at all times especially with regards to the use of smoke whilst working his bees and be aware at all times of the hazards relating to the negligent use of fire.
9. The beekeeper should at all times keep the area in which he keeps his bees in a tidy and clean environment and avoid any damage to other landowner's property.
10. The beekeeper should maintain regular contact with the landowner and adhere to reasonable requests made by the landowner regarding the keeping of bees on the property.
11. The beekeeper must ensure that the interests of the general public are observed when working on his bees or transporting bees in any vehicle.
12. The beekeeper needs to respect his fellow beekeepers' interests in regards to apiary site allocations and their existing relationships with landowners. No beekeeper should invade an apiary site territory of another beekeeper without the knowledge and permission of the existing beekeeper where that beekeeper has the permission of the landowner to keep his bees on that property. No beekeeper should over-populate an area with his colonies where an existing beekeeper is already established irrespective of the number of beehives currently being maintained by the existing beekeeper.

## **ACTION TO BE TAKEN REGARDING MISCONDUCT**

13. In the event that any member brings the name of the Organisation into disrepute or conducts himself in any manner deemed irresponsible or unethical the Board of the Organisation may act in terms of the Constitution in dealing with the matter.

## **CONDUCT IN RESPECT OF BEE REMOVALS**

14. Any member of the Organisation who carries out the removal of feral swarms must be trained and competent to do so. The bee remover must know his limitations and must not endanger the safety of other persons, livestock, pets or other animals.
15. The primary responsibility of the bee remover should be to preserve the feral colony as a unitary community colony in order to re-hive the colony in its entirety and independence rather than creating hybrid colonies. Where this is impractical the bee keeper should be experienced in combining swarms in order to preserve the majority of the feral swarm removed.

16. No feral swarms which are accessible and can be re-hived should be destroyed. A bee remover should decline a job without recompense if he believes he is not capable of or is constrained in any way from completing a successful bee removal.
17. Where the client requests that the bees should not be destroyed the bee remover must decline the work without recompense if he cannot remove the bees for relocation. In the event that the client requests that the bees be destroyed whereas the bee remover is of the opinion that the bees can be relocated he should endeavour to persuade the client to allow him to remove the colony.
18. The bee remover should be prepared to refer a removal to another bee remover without due favour where he is not able to remove the swarm.
19. The bee remover who undertakes an assignment must commit to his arrangements with the client in respect to date and time or communicate with the client where he is unable to honour the commitments made.
20. Any fees charged by a bee remover for undertaking an assignment shall be at the discretion of the bee remover as agreed with the client. The Organisation shall not prescribe to any member with respect to any charges levied for such assignment and the bee remover shall not involve the Organisation in any way regarding any dispute arising out of any services rendered.
21. The Organisation reserves the right to act in terms of its Constitution against any member with respect to any irresponsible action or conduct caused by the member who may bring the aims and objectives of the Organisation or the bee keeping fraternity in general into disrepute in respect of any activity associated with the removal of bees or their destruction.

## **FIELD DAYS AND OUTINGS**

22. All members who attend Field Days, Field Trips or any Outing held under the auspices of the Organisation do so at the invitation of the Organisation and the hosts where the activity is held. Members and their guests and family attending such functions are required to respect the requests as made by such hosts regarding access to their premises and the non-removal or otherwise of property belonging to the host.
23. Any person who conducts himself in an irresponsible or unacceptable manner at any function or outing organized by the Organisation may be requested to leave such function by any member of the Board or the person responsible for organizing the function.

## **4. Communication**

### **Objective:**

Communication is vitally important for the survival and growth of any Organisation. Without a sound Communication Strategy an Organisation shall become obsolete and dysfunctional.

SABIO needs to implement a more functional communication system along the following lines.

**Plan of Action:**

- (i) **Intra Board Members:** Given the geographical spread of Board Members and the fact we can feasibly only meet on a quarterly basis Board Members must keep in touch more regularly, especially when decisions and advice need to be solicited. The ideal method here would be by e-mail. Board Members must respond when e-mails are sent out requesting comment, input and decision making.
- (ii) **SABIO Members:** SABIO needs to communicate more regularly directly to its members; i.e. those who are paid up members. This should include regular communiques, ideally to the membership database, via e-mail, and post to those who do not have e-mail, on critical and newsworthy items, as well as what SABIO is currently involved in with other stakeholders. We need to provide a more visible presence of our existence and link with our paid up members. SABIO should not rely on the Google-Groups networks to communicate newsworthy items. By improving the regular communications to beekeepers this way we will encourage greater membership and less suspicion that SABIO is doing nothing. We should in addition, in the interim, also include those persons not only on our membership list but who are involved in beekeeping to keep them informed and hopefully encourage them to support and join SABIO as members; thereby consolidating the influence of the beekeeping industry.
- (iii) **Government:** SABIO does have a good communication link with relevant Government officials. This must be maintained and improved. We need to engage Government policy makers more actively and keep pressure on them for progressive change within the beekeeping sector.
- (iv) **Website:** Our website is a tool which we must use to market the Organisation and industry more aggressively to our members, the beekeeping fraternity in general, stakeholders and to the general public. The current state of our website is not good. It needs to be revamped entirely, contain practical and informative content, be up to date, and more simply set out.
- (v) **The SABJ:** Our Bee Journal must be maintained. It is a very good publication for the South African Beekeeping fraternity. The data base of recipients should be checked as some persons are receiving two or more copies which is unnecessary and is wasted costs. Non-members should be required to pay a subscription fee.

## **5. Finances**

### **Objective:**

A viable and sustainable body with adequate finances to run itself administratively and to supplement extra finances for selected and approved projects.

### **Plan of Action:**

- (i) Ensure that a suitably qualified Board Member is appointed to manage this portfolio.
- (ii) Maintain the services of Hortgro to administer the financial affairs of the Organisation in compliance with good accounting practice, tax implications if any, and with up to date financial statements.
- (iii) Review financial statements of the Organisation at every quarterly Board Meeting.
- (iv) Market the Organisation more vigorously within the beekeeping community to encourage increased membership.
- (v) Ensure annual membership fees are administered properly and pursued.
- (vi) Consider innovative ways of securing financial support through sponsorships, levies, advertising and subsidies.
- (vii) Manage expenses; no freebies; no personal liabilities.
- (viii) Revisit the Statutory Levy issue. (Refer Item 10.)

## **6. Administration**

### **Objective:**

Maintain a sound and efficient administration system within the Organisation.

### **Plan of Action:**

- (i) Maintain the services of Hortgro based in Paarl who are carrying out an efficient and competent service.
- (ii) Liaise more closely with Hortgro officials on the required services required by the Organisation and those other services which Hortgro may offer.

- (iii) Ensure that there is a dedicated person employed by Hortgro with whom Board members and the general membership can liaise.
- (iv) Communicate to general membership how to access administrative services, especially those relating to membership applications and renewal of membership.

## **7. Membership**

### **Objective:**

Increase the current membership of paid-up members of SABIO and satisfy membership of viability and values of belonging to the Organisation.

### **Plan of Action:**

- (i) SABIO must be seen to be doing and achieving things in the bee industry.
- (ii) Beekeeping Associations must be encouraged to affiliate to SABIO.
- (iii) Board Members must make regular visits to Beekeeping Associations and keep them informed what SABIO is doing and achieving.
- (iv) Members of those Beekeeping Associations who are not members of SABIO should be encouraged to join.
- (v) Beekeepers who are not members of SABIO should be encouraged to join.
- (vi) Annual membership fees for belonging to the Organisation must be kept reasonable and affordable. Consideration should be given to having a special fee structure for developmental beekeepers to encourage them to join SABIO.
- (vii) Commit to regular communication with current membership informing them as to what is happening in the industry.

## **8. Section 7: NAMC Recommendations**

### **Objective:**

Until such time as a new Section 7 Report in terms of the Agricultural Marketing Act for the Beekeeping Industry is compiled we must not lose sight of the very important Recommendations which came out of that Report of 2008. SABIO needs to revisit the

Recommendations made in the light of changing circumstances in the industry and socio-economic environment.

### **Plan of Action:**

- (i) Assess what have we achieved in respect of the Recommendations.
- (ii) Assess where further objectives need to be achieved or whether they are still achievable.
- (iii) Address the Recommendations.

As a reminder the 25 recommendations included the following sub-sections:

1. The unification, consolidation and structuring of the industry;
2. Legislation / Regulation;
3. Food Safety;
4. Marketing;
5. Research;
6. Training, information and dissemination;
7. Small farmer development / unexploited forage usage;
8. Imports.

The full set of Recommendations is attached as an Annexure.

## **9. Marketing**

### **Objective**

SABIO needs to market itself better amongst the beekeeping community with respect to commercial beekeepers, small scale beekeepers, development beekeepers and hobbyists. It needs to focus on both honey producers and pollinators. It also needs to secure the support of bottlers, importers and the Research Institutions. All stakeholders need to be targeted.

### **Plan of Action**

1. Implementation of this Strategic Plan
2. Improved communication to all stakeholders
3. Achievement of objectives

4. Transparency
5. ....
6. ....

## **10. Statutory Levy**

### **Objective**

To revisit the feasibility, without undue influence and negativity, of introducing a statutory levy into the beekeeping industry for the securement of sustainable finances to run and grow the administration, marketing, media and research needs of beekeeping in South Africa.

### **Plan of Action**

1. Go back to the NAMC Recommendations on this issue.
2. Create a smaller more positive group / committee of persons to look at this issue.
3. Look for innovative ways to implement a levy system which is more consumer based than beekeeper based.
4. Seek guidance and help from the NAMC officials who were prepared to assist us before.

## **11. Beekeeping Legislation**

### **Objective**

To put in place a consolidated set of legislation affecting the beekeeping industry which protects, promotes and regulates the industry as well as empowering the relevant government department to act in the best interest of beekeeping in the country.

### **Plan of Action**

1. Wait for and anticipate the promulgation by the Minister of the new Control Measures on Beekeeping before the year end.
2. Co-operate with DAFF with the takeover of the Registration administration.
3. Commence work on drafting the new Beekeeping Act with DAFF.

4. Consolidate all aspects of beekeeping under one umbrella to the extent possible.

## **12. Standards**

### **Objective**

Compile and draft, alternatively endorse a set of standards for the beekeeping industry accredited by SABIO.

### **Plan of Action**

The standards anticipated to include the following:

1. Honey Standards – endorse and retain Regulation 835 as the relevant Honey Standards for SA;
2. Pollination Standards
3. Labelling Standards
4. Beehive Standards
5. Extraction Facility Standards (HACCP)
6. Laboratory Accreditation Standards
7. Training Standards
8. Pesticide Usage Standards

## **13. Trade Relations**

### **Objective**

To monitor international trade in bee products into and out of South Africa and to ensure that the honey production sector is not compromised by illicit, unethical, and uneconomical trade agreements and transactions which may damage the bee industry in South Africa. In addition where feasible to encourage and promote export markets of South African honey and bee products.

### **Plan of Action**

1. Source data on imports and exports of honey and bee products;

2. Liaise with government regarding tariff regulations and rebate applications;
3. Source any illicit, suspicious or non-regulatory bee products on consumer shelves and bring these products to the attention of the relevant government authority within DAFF.

## **14. Honeybee Research**

### **Objective**

To strengthen, improve, monitor and assist with Research into our honeybees and the honeybee sector in South Africa.

### **Plan of Action**

1. Acknowledging that finance and sponsorship is always a problem for research institutions, support and encourage and where possible source funding from the private and government sector for bee research;
2. Promote all aspects of practical research into honeybees especially those which impact directly and indirectly on the South African honeybee population and industry;
3. Maintain close liaisons with all South African Research Institutions conducting honeybee research;
4. Promote learnerships for students in bee research with commercial beekeepers;
5. Publish research reports in the South African Bee Journal;
6. Ensure that current research topics are featured at annual BEECONs;
7. Support research institutions by encouraging beekeepers to provide when requested samples for research;
8. Support the use of questionnaires in beekeeping research and encourage beekeepers to participate meaningfully in such research.

## **15. Disease Management**

### **Objective**

To ensure that Pests and Diseases of honeybees in South Africa are properly monitored and managed to ensure minimal threat to honeybees and the beekeeping industry.

## **Plan of Action**

1. Identify those pests and diseases which exist in South Africa; the degree of their threat to honeybees and the geographical location of their existence or potential existence.
2. Produce basic guidelines for the diagnosis and treatment / management of such pests and diseases.
3. Publish such information on the revamped SABIO website.
4. Establish an advisory link for beekeepers to use for advice if faced with problems with pests and diseases.
5. Liaise closely with all Research Institutions in South Africa and internationally on research on honeybee diseases and pests.
6. Monitor World Health Bodies standards and requirements on honeybee diseases.
7. Liaise with DAFF officials responsible for pests and disease management control.
8. Establish local (South African) laboratory accreditation for diagnosis of notifiable diseases.

## **16. Development and Training**

### **Objective**

To encourage the development of beekeeping within the poorer rural areas of South Africa and to ensure that training standards are developed and improved for Developmental and Smallholder beekeepers.

### **Plan of Action**

1. Develop training standards
2. Support and assist with established development projects under the auspices of SABIO.
3. Identify and establish new projects in feasible economically deprived areas.
4. Design and establish Mentorship schemes for rural projects.
5. Encourage the use of international experts to facilitate training and advice on international standards and disease management at an advanced level to established beekeepers.

## **17. Preservation of Bee Forage**

### **Objective**

The NAMC Report set out certain recommendations regarding the protection and development of our natural bee forage resources which are governed by two pieces of legislation; Conservation of Agricultural Resources Act (CARA) and National Environmental Management Biodiversity Act (NEMBA). Whilst certain positive measures have been introduced in recent times to preserve in particular a number of species of Eucalypts there is still a large amount of uncertainty and lack of control in keeping to the guidelines and statutory measures in this regard. Furthermore there are still vast areas of potential bee forage available within South Africa which is not being utilized properly.

### **Plan of Action**

1. Fully understand the current status regarding bee forage legislation; what is allowed and what isn't?
2. Obtain the complete requirements regarding the preservation of Eucalypt species in "demarcated areas" and the regulatory process to prevent the destruction of trees in those areas.
3. Liaise with relevant persons in DAFF to be more involved in developments regarding CARA and NEMBA changes, in particular the Executive Officer for CARA and the Director: Land Use & Soil Management.
4. Create awareness amongst beekeeping sector regarding the legislation and regulatory process to preserve designated "demarcated areas".

## **18. Collaboration**

### **Objective**

Work with all other stakeholders in the industry and related Agri-industry in order to improve the functionality of SABIO and to create partners rather than trying to do everything alone.

### **Plan of Action**

1. Liaison with DAFF
2. Address conflict within the industry – we cannot be seen to be a threat to other stakeholders / interest groups within the industry.
3. More visible contacts and communications with local Beekeeping Associations.
4. Closer contact with other bodies in the Agri-sector. Identify the relevant ones and liaise with them.

## **19. Special Projects**

### **Objective**

SABIO must be involved in various special projects which are outcomes based from time to time.

### **Plan of Action**

1. Maintain a list of current projects which SABIO is involved in.
2. Address progress on such projects; increase support for those which are viable; abandon support for those which are non-viable.
3. Keep membership and beekeeping fraternity aware of these projects.

## **20. Promotion of Service Providers**

### **Objective**

To promote and encourage those Service Providers in the industry who support the aims and objectives of SABIO by providing ancillary needs within the beekeeping sector.

### **Plan of Action**

1. Provide affordable advertising through the SABJ.
2. Allow for advertising space and linkages via SABIO website for reasonable fee.
3. Invite applications for Tenders in SABIO based projects.
4. Encourage Service Providers to join SABIO as Ancillary Members.

5. Devise specific plan for Bee Removal Service Providers; accreditation, training, data base for regional needs and marketing of registered BRSP's who are SABIO members.

## **21. Annual BEECON**

### **Objective**

The current Regulations appended to the SABIO Constitution provide a general guideline support approach for an annual BEECON. SABIO needs to reconsider its active and financial support for annual BEECONs; who is or are responsible for its organisation; how it should be financed and the marketing of BEECONs to attract a greater participation by the beekeeping community. Should it be national? Should it be regionalized? How do we fund these conventions? Can we secure regular sponsorships?

### **Plan of Action**

1. Draw up a written document to address SABIO's commitment or otherwise to supporting and sponsoring annual BEECONs.

## **22. Beekeeping Organisations**

### **Objective**

To encourage and support the establishment and sustainability of local Beekeeping Associations or Organisations and to keep them informed of developments in the beekeeping industry and the role which SABIO is playing.

### **Plan of Action**

1. Instead of having one Board Member responsible for this portfolio regionalize the responsibility to encourage liaison with SABIO to local Associations with the SABIO Board members in that region.

2. Board Members to attend the local Beekeeping Association Meetings and address attendees on what SABIO is currently involved in. Encourage beekeepers to join and support the initiatives of SABIO. Identify the benefits of belonging to SABIO.
3. Assist weak Associations to grow their membership.
4. Encourage re-vitalization of Associations in those areas where Associations have disbanded or gone dormant.
5. Encourage Associations to join SABIO as Affiliated Association Members.
6. Strive to develop better relations with those Organisations which recently have criticized SABIO.

## THE NAMC (SECTION 7) RECOMMENDATIONS

### RECOMMENDATIONS

#### ***The unification, consolidation and structuring of industry***

1. *The beekeeping industry through its representative structure (SABIO) should investigate either direct or indirect representation on the Agricultural Trade Forum (ATF).*
2. *The functions and structure of the SABIO board should be reviewed to ensure that administration is up to date and portfolios are defined and properly managed.*
3. *The industry should apply for Statutory Measures (levies; records and records, and registration) once the necessary support has been obtained from its members.*
4. *The lack of accurate information regarding the beekeeping industry (such as production volumes, number of producers and provincial distribution of beekeeping activities) is a matter of concern. It also makes it difficult for the industry to properly organise itself. It is recommended that the industry in cooperation with the authorities address this issue as soon as possible. It is recognised that the application of statutory measures would enhance the industry's ability to compile and make available necessary information.*

#### ***Legislation/ regulation***

5. *Short/ Medium term: all current legislation impacting on the South African beekeeping industry should be reviewed and adjusted (in conjunction with the regulatory authorities) where necessary to eliminate inconsistencies and remove redundant aspects of legislation.*
6. *Longer term: The feasibility of introducing a single Beekeeping Act for the South African beekeeping industry should be thoroughly researched.*

#### ***Food Safety***

7. *SABIO should where possible (and in consultation with the relevant authorities) be more involved with the processes surrounding the importation and exportation of honey (including the setting/ monitoring of quality and health related requirements and standards).*
8. *SABIO should create awareness in the beekeeping and affiliated industries of honey standards including labelling.*
9. *Everything possible should be done to ensure that SANAS accredited competent testing of honey products is carried out (in a consistent and transparent manner).*
10. *SABIO should draw up a food safety plan and create awareness of food safety in the beekeeping and affiliated industries (and investigate the feasibility of listing in terms of the HACCP regulations).*

#### ***Marketing***

11. *SABIO should coordinate efforts to create awareness and inform consumers regarding the positive attributes of beekeeping products and regarding the beekeeping industry in general.*
12. *Possible speciality/ niche markets on the local and domestic market and marketing strategies/ approaches should be further investigated and the results made available to the beekeeping industry.*

#### ***Research***

13. *It is recommended that dedicated beekeeping extension officers be introduced for the South African beekeeping industry. It is recommended that government drives and monitors the process of creating the necessary capacity.*
14. *It is recommended that the proposed dedicated beekeeping extension officers assess the feasibility of future development projects.*

15. It is recommended that Government allocate sufficient funds towards beekeeping research and to managing and fine tuning research in this area.

16. Research needs and priorities of the industry should be coordinated.

17. Alternative funding for research needs to be investigated.

### **Training/ information and dissemination**

18. The beekeeping industry should develop formal accreditation (NQF standards) for training. Suitable funding should be secured for this purpose.

19. The beekeeping industry should ensure that training of beekeepers is coordinated (as much as possible).

### **Small farmer development/ unexploited forage usage**

20. The beekeeping industry should develop formal accreditation (NQF standards) for training. Suitable funding should be secured for this purpose.

21. The beekeeping industry together with the relevant authorities (including DWAF) should identify areas where beekeeping can be expanded in future (and the number of hives that can be accommodated quantified).

22. The beekeeping industry should discuss and if necessary proposed the amendment of legislation affecting non-invasive eucalypts (CARA and its schedules).

23. The beekeeping industry should establish closer linkages with the forestry industry pertaining to:

a. the breeding and planting of bee friendly cultivars,

b. the mapping of forests by cultivar and thus determining possible bee carrying capacity, and

c. the forging of agreements regarding access to forests for beekeeping purposes.

24. In order to facilitate the development of new entrant farmers the beekeeping industry, in cooperation with the relevant authorities and organisations, should develop methodologies and support structures to ensure that:

a. suitable candidates are identified,

b. that accredited training and mentorship are made available,

c. that financial support is available,

d. that products produced are properly marketed, and

e. new entrants are absorbed into the Bee Industry organizations, both at national level (SABIO)

and at local level (the provincial bee farmer associations).

### **Imports**

25. The industry should investigate the need for the existing tariff rebate facility for honey imports and consider the possibility (after consulting relevant stakeholders) of applying to ITAC for the removal of this facility.