



APICULTURE
NEW ZEALAND

SUBMISSION

TO: Auckland Council
FROM: Apiculture New Zealand
SUBMISSION ON: Animal Management Bylaw Review 2021

DATE: 16 July 2021

CONTACT DETAILS: Apiculture New Zealand
PO Box 10-414
Wellington 6143
04 471 6254
Email: ceo@apinz.org.nz

Submission to Auckland Council Animal Management Bylaw Review 2021

Introduction

Apiculture New Zealand (ApiNZ) welcomes the opportunity to make this submission to Auckland Council on the Animal Management Bylaw Review.

ApiNZ is the national body representing the apiculture industry in New Zealand representing the full range of sectors in the industry, from hobbyist and commercial beekeepers to honey exporters and suppliers. ApiNZ aims to support and deliver benefit to the New Zealand apiculture industry by creating a positive industry profile, business environment and opportunities for members. ApiNZ was established in 2016 after a restructure of the National Beekeepers Association of New Zealand (NBA) to better meet the needs of its members.

ApiNZ's comments are restricted to Council's Proposal 1 which states:

Proposal 1:

Require an approval to keep more than two beehives on urban premises 2000 square meters or less. Council has heard a range of views about limits on beehives in urban areas. We are seeking feedback on:

- allowing more or less beehives without an approval than the proposed two (for example, retaining the current no limit)
- limits for different sized urban premises than the proposed 2000 square metres (for example, requiring *an approval for any beehive on urban premises less than 600 square metres, or in an apartment*).

To own more than two hives, people would need to apply for an animal management license, which would consider factors like location and proximity to neighbours. These rules will not affect people living in rural areas.

ApiNZ feedback on proposed changes

Overall, ApiNZ does not agree with the proposal and think that there should be less rules. The main reasons we disagree with the proposal are given below.

Bylaw definitions

The proposed bylaw contains a new definition that relates to beekeeping:

- Standard Beehive means a hive that has inner assembled dimensions up to and no greater than: (i) length: 465mm (ii) width: 365mm; and (iii) depth: 238mm.

ApiNZ does not support the proposed definition of a standard beehive as it only allows one box per beehive. This does not allow beekeepers to add additional boxes to support the growth of the colony in situations where the bees need more space. Beekeepers often need to use several boxes to house a bee colony.

Limit of two beehives per premise under 2,000m² unless approval is granted

ApiNZ does not support this proposal in section 8 of the proposed bylaw. A standard beehive is defined as a hive that has inner assembled dimensions up to and no greater than: (i) length: 465mm (ii) width: 365mm; and (iii) depth: 238mm.

This proposal would have the effect of meaning that every urban beekeeper would need to apply for approval as the limit is too restrictive. Beekeepers need flexibility with the number of boxes per hive, so that they can manage their colonies to ensure their continued good health.

ApiNZ believes the key animal management criteria should be nuisance factor (as is the case in the 2015 bylaw). One poorly sited hive can cause much more of a problem than four well sited hives.

ApiNZ supports the current policy of having compulsory minimum standards for responsible beekeeping in urban areas so that concerns related to public health, safety and nuisance can be managed.

ApiNZ supports the additional guidelines that were introduced in the 2015 Bylaw that we understand the Auckland Beekeeping Club had input into developing. These include managing flight paths, minimising the occurrence of swarming, collecting swarms and providing a water source for bees.

Many predominantly urban councils, including Hamilton City Council, Tauranga City Council, Wellington City Council, and Hutt City Council do not have any stipulations on how many hives can be kept by land area of the premises, but instead use guidelines on how hives should be managed. ApiNZ believes this is a more pragmatic approach to ensure best practice beekeeping in line with the public's expectations around safety and nuisance.

Approval process

The proposed bylaw contains the following a provision:

“those with more than two standard hives in an urban area will need to apply for an animal management licence, pay a fee and include a scaled site plan showing where the hives would be contained on the property. When an application is submitted, compliance officers would consider matters including:

- *Beehive location and the size and suitability of the site*

- *Flight path of bees when foraging*
- *Housing for the bees and potential nuisance to neighbours*

Section 8(3) of the proposed bylaw sets a six-month phase in period for existing urban beekeepers who have more than the permitted two hives to apply for approval for any additional hives.”

If a maximum number of hives is to be set, ApiNZ supports a higher number of hives than two to give beekeepers greater flexibility to manage swarms. If an approval process is introduced, ApiNZ supports having a phase-in period as this gives beekeepers time to comply with the proposed new provisions. There is, however, a risk that beekeepers could abandon additional hives rather than applying for consent. These abandoned hives could spread bee diseases such as varroa and American foulbrood (AFB).

General feedback

ApiNZ is concerned that Auckland Council’s proposal under Proposal 1 could become so restrictive and costly that the Council could lose the benefits of keeping bees in the urban environment, notably the benefits in pollinating plants from flowers, native trees and bush to vegetable and fruit crops. Beekeeping is a worthwhile and rewarding hobby and while it needs to be managed, particularly in the urban environment, we would encourage greater flexibility overall.

Comments on the responsible beekeeping information

ApiNZ has identified incorrect or outdated information that should be amended:

- Registrations of beehives for the purposes of controlling AFB are no longer managed byASUREQuality. These registrations are now managed by The Management Agency, National American Foulbrood Pest Management Plan through its online platform Hive Hub (see www.afb.org.nz/hivehub for more information).
- The National Beekeepers Association of New Zealand (NBA) no longer exists and beekeepers should be directed to Apiculture New Zealand (ApiNZ) instead.

It may be helpful to include a link to Apiculture New Zealand’s Beekeeper Code of Conduct (<https://apinz.org.nz/wp-content/uploads/2017/02/ApiNZ-Beekeeper-Code-of-Conduct.pdf>) which aims to promote the keeping of bees in a manner compatible with the environment they are located in, and to encourage the keeping of bees in such a way as to be acceptable to the relevant regulatory authorities, the general public, landowners and other apiarists, and considers the sustainability of the bees and the environment that supports them.