

8 February 2023

Tēnā koe 

Thank you for your Official Information Act request to the Department of Conservation, received on 12 November 2022, in which you asked for:

- (1) Information pertaining to the setting of beehive placement concession fees on DOC land since January 1 2021 (DOC has stated a review of fees was begun in 2021). DOC's website claims the Department works with Apiculture New Zealand on the issue of setting hive placement fees – so any meeting notes or correspondence with the industry body should be among the information provided. As well as internal discussions on the matter.*
- (2) Information detailing the amount of money earned by DOC from beekeeping concessions in each of the past five years (DOC's annual reports has a breakdown of revenue from various concessions, but beekeeping is not included in the breakdown. I would like this information). If possible, this should include all fees garnered from beekeepers, such as "processing fees", "annual levy's" and "hive audit fees" as well as the fee for each hive placement.*
- (3) Total number of concessions for beehives approved in each of the last five years, and the amount of concessions active in each of the last five years.*

On 22 November 2022, you refined your request to seek the following:

- (1) Information pertaining to beehive concession fees to place beehives on DOC land ('activity fees'). Specifically, you are seeking information that relates to ApiNZ's request for DOC to review beehive activity fees, and any work undertaken by DOC to respond to this request and/or review beehive activity fees.*

You have specified you are seeking the following 'information' which is any:

- Briefings*
- Memos*
- Meeting Agendas/Meeting notes (either in DOC, or between DOC and ApiNZ or other stakeholders regarding beehive concession fees)*

- Any written reports or analysis regarding the review of beehive concession fees (and whether these fees remain appropriate)
 - Any written correspondence between DOC and ApiNZ regarding the review of beehive concession fees (and whether these fees remain appropriate)
- (2) The amount of money earned by DOC from beehive concessions for the past five years. This request has not been refined and will remain 'as is'
- (3) The total number of beehive concessions approved for the past five years, and the number of beehive concessions active in each of the past five years. This request has not been refined and will remain 'as is'.

You confirmed that you are not seeking general email correspondence between our staff relating to the beehive activity fee review. You also advised that, for Question One, the scope of this request includes information from 1 January 2019 to 12 November 2022.

On 19 December 2022, we advised you that, for Question One and Question Three, we were extending the 20 working day period to respond to your request under Section 15A(1) of the Official Information Act 1982. In that letter, we were able to provide you a response to Question 2.

Our responses to Questions One and Three are listed below.

Question One

You have requested information pertaining to our work to review beehive concession activity fees from January 2019 to November 2022. This includes conversations with Apiculture New Zealand ('APINZ') about these fees. Attachment B provides a table of all key documents released to you under this OIA request. Attachment C provides all the key document released under this OIA request.

I have decided to release the relevant parts of the documents listed above, subject to information being withheld under one or more of the following sections of the Official Information Act, as applicable:

- personal contact details of officials, under section 9(2)(a) – to protect the privacy of natural persons, including deceased people, and
- commercially sensitive information, under section 9(2)(b)(ii) – to protect the commercial position of the person who supplied the information, or who is the subject of the information.

In making my decision, I have considered the public interest considerations in section 9(1) of the Official Information Act and determined there are no public interests which outweigh the grounds for withholding.

For ease of reading the information provided in Attachments B and C, please note the following:

- Some of the documents, email attachments, and embedded links are repeated throughout the release. We have attempted to avoid duplication where possible. If the same document or embedded link is attached to multiple emails or documents, we have only provided the document once and have attempted to keep the attachments close to their original document.
- To avoid duplication of emails, we have provided email chains; however,
 - if an email is not part of an email chain, it has been provided separately, and
 - if an email chain has branched off and been sent to different recipients (and contains new or different content from the previous email chain), then any copies of the email chain variants have also been provided.

We have only provided emails between internal staff about the beehive pricing review if these emails are saved as embedded links in the 'key documents' you have requested. Other general emails between staff associated with the beehive pricing review work have not been included.

Additional context on beehive concession fee review

Those undertaking a commercial activity on public conservation land require a concession. The Minister of Conservation (or the Minister's delegates) have the statutory power to accept and process concession applications and, if the application is successful, grant a concession.

Commercial concessionaires are required to pay an annual activity fee for the use of public conservation land and its associated resources. These fees are recovered by the Department and are Crown revenue.

Currently, there are two pricing models for beehive concession activity fees:

Option 1 – Set Fee

There is a base rental fee of \$30 + GST per hive, per annum.

Where hives produced mānuka honey, the fee is \$75 + GST per hive, per annum.

Option 2 – Percentage of Revenue

Operators may choose to pay \$10 + GST per hive, per annum plus 10% of the annual revenue from their hives if DOC is able to remotely monitor hive production.

We consider that most beehive concessionaires use the 'set fee' (Option 1).

In June 2019, APINZ approached us requesting we review our beehive concession activity fees due to concerns these fees were too high. Following an analysis by our Commercial Pricing Team in August 2019, we decided the activity fees were appropriate and would remain 'as is'. APINZ was advised of our decision.

In late 2019, however, we decided to review the appropriateness of beehive concession activity fees again. Work was undertaken by our Commercial Pricing Team from 2019 to 2021. The preliminary recommendation from the Commercial Pricing Team proposed:

- Activity fees for non-mānuka honey be reduced,
- Activity fees for monofloral mānuka honey be increased, and
- A new activity fee category be introduced for multiflora mānuka honey. This fee would sit “in the middle” between fees for non-mānuka and monofloral mānuka.

In late 2022 it was established that adding a new fee category for multiflora mānuka honey would be complex to implement and work would be required to determine the necessary changes to our system. We are deferring changing our beehive concession activity fees until the work has been undertaken.

This work is ongoing. We have made the decision to keep beehive concession activity fees ‘as is’ until this further work has been completed.


Once this work is concluded any decision on beehive concession activity fees will be communicated on our website. APINZ will also be informed.

Question Three


You have requested the total number of beehive concessions approved in the past five years, and the number of beehive concessions active in the past five years. Tables 1(a) and 1(b) in Appendix 1 provide this information.

You are entitled to seek an investigation and review of my decision by writing to an Ombudsman as provided by section 28(3) of the Official Information Act.

Please note that this letter (with your personal details removed) and enclosed documents may be published on the Department’s website.



Nāku noa, nā



Steve Taylor
Director, Regulatory Services
Department of Conservation
Te Papa Atawhai

Appendix 1

Table 1(a) – Number of beehive concessions approved in the last 5 years

	Approved	Declined	Withdrawn	Returned	Total
Financial Year					
01/07/2017 - 30/06/2018	10	2	3	0	15
01/07/2018 - 30/06/2019	3	2	1	0	6
01/07/2019 - 30/06/2020	8	1	4	0	13
01/07/2020 - 30/06/2021	10	7	2	1	20
01/07/2021 - 30/06/2022	7	0	5	0	12

Table 1(a) shows the number of beehive concession applications approved in the past five financial years. To provide more context, we have also provided the number of applications declined, withdrawn, and returned.¹

Table 1(b) - Number of beehive concessions active in the last 5 years

Financial Year	Active Concession
01/07/2017 - 30/06/2018	113
01/07/2018 - 30/06/2019	106
01/07/2019 - 30/06/2020	100
01/07/2020 - 30/06/2021	101
01/07/2021 - 30/06/2022	90

Table 1(b) shows the number of beehive concession applications active in the past five years. The table shows there has been a decline in the number of active beehive concessions. While we have not undertaken an in-depth analysis of this specific data, we consider that reduced numbers of active concessions may be attributed to the following:

- Applicants may not wish to pay the concession application processing fee,
- Applicants may not wish to pay the concession activity fee,
- We have terminated an active concession,
 - We can terminate a concession if a concessionaire does not comply with their concession contract. Typically, a termination will occur if there has been a significant breach of contract and the concessionaire has not sought to resolve or amend the breach despite receiving due notice.
- The concessionaire has surrendered their concession, and/or
- The applicant has sought to combine multiple beehive concessions under one new concession.

¹ 'Withdrawn' means the applicant withdrew their application. We cannot withdraw an application on behalf of an applicant. 'Returned' means the application did not meet the statutory tests to be accepted for processing and was subsequently 'returned' to the applicant.