Lloyd Kingham
Varroa Response Planning Officer

Monday, 1 May 2023

Hi Lloyd,

I appreciate your time last week at the meeting.

The reason I have become so involved in this matter is as a direct consequence of the way DPI has treated myself, my family and the wider community when exercising your authority in relation to the honey bee varroa mite situation.

Lloyd based on our meeting last week I have some pressing concerns and questions.

"Ground Zero" the sentinel hive located at the Port of Newcastle (Mayfield and Mayfield West 22nd June 2022) which is where the varroa mite was first detected by DPI monitoring is now proven not to be the original site of the varroa outbreak as the mite has been in Australia far longer than that period, in fact no less than 6 months and possibly greater than 12 months.

"Ground zero" is not at the Port of Newcastle and in fact it could be anywhere for example out west in the pollinating bees used for almond and other intensive agricultural cropping or even Sydney or Wollongong.

Further to this no one has been charged, no one has been blamed, there are no reports, no genetic sequencing has been done to find the origin of the mite, in fact nothing at all has been provided to support the Port of Newcastle or any other site anywhere in Australia or overseas as being the source of the varroa mite outbreak.

If we look at the Biosecurity Act which is about a "thing" and the "reasonable suspicion about that thing" which gives you incredible powers and is what you created the emergency order from and the non-existent location of where that thing originated and that no one has been implicated or charged about introducing that thing the whole varroa mite situation is a genuine concern to me and my neighbours.

I draw your attention to the obvious, when looking at the now debunked "ground zero" location, the timing of the first discovery and the spread of the varroa mite from that location down the central coast and up the mid coast it is hard to believe that the varroa mite did not and has not presented in Sydney, Canberra or Wollongong. In reality the traffic and free movement of hives up and down the coast has been very healthy in the past so how did the mite decide to stay away from such large population hubs especially when the volume of traffic is millions of times greater than the traffic that goes to Booral or Allworth.

Further to this the seasonal movement of bees backwards and forwards between inland cropping areas and the NSW coast has always been very healthy and prominent to anyone travelling up the coast who sees the hives. The idea that not only did the varroa mite not go

into any major traffic or population hubs and did not go out west to the hundreds of thousands of hives is once again astounding to my simple mind, in fact I do not believe it.

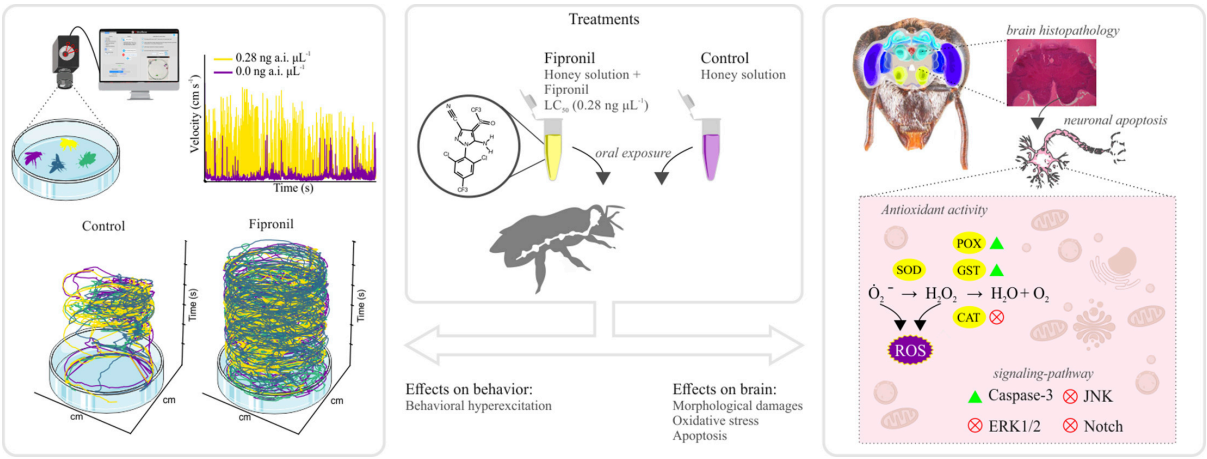
To base any management plan on the premise that “ground zero” is the original source for the varroa mite is ludicrous and misleading.

“fipronil” is a deadly insecticide used to poison all honey bees in the red zones and adjoining immediate purple zones. You clarified with us that the residual life of the fipronil is 6 months although we have other claims that it is closer to 3 years, you also informed us that the poison baiting is only for 2 hours and could be repeated a month later if bees are still observed.

Fipronil is added to a sugar syrup to attract the bees and is placed in a container inside of a larger box. A mat is added to the top of the poison syrup container for the bees to land on and draw up the poison syrup, the mat is designed so that the native stingless “sugarbag” bees cannot draw up the poison syrup.

When the European bees draw up the poison syrup they will take it back to their hives which will poison the honey stores and kill the bee colony. Once the bees are dead then other scavenging European honey bees from hives and hollows further away and native stingless bees and other native bees will raid the honey and take the poison back to their hives and hollows and contaminate the honey, kill the bees and the cycle starts all over again.

The concept of placing the poison fipronil bait stations in a honey comb or grid pattern at 2.5km intervals throughout a large Australian forest is questionable and I propose your baiting program is designed to kill all foraging bees which then continue the process into inaccessible areas. To claim that native bees will not be affected and killed is without foundation. I have found an extract “Harmful effects of fipronil exposure on the behavior and brain of the stingless bee Partamona helleri Friese (Hymenoptera: Meliponini)”



Above is a diagram from the extract

This use of fipronil will destroy all bee life and as such any chance that residents on the east coast will be able to pollinate most of our edible foods will be non-existent. The green

carpenter bee which we have on our property was killed to the point of extinction in Queensland because of the use of fipronil.

The use of fipronil and its affects are far greater than just the bees as a large amount of beneficial insects and all other life dependent on the pollination process and the general insect life will suffer greatly. For example the swifts (a migratory bird) that spend a good portion of the year in Australia will suffer possibly by starvation as more insects are destroyed and its food source is impacted.

The costs to our ecosystem and the damage to the great dividing range and all small farms along the coast has not been considered and if it has you are unwilling to provide us with any information. For example the agreement with the crown re use of fipronil in National Parks, or any risk assessments that are used to base your agreements or actions off.

I propose the costs of attempting to eradicate varroa mite using fipronil is far greater than the benefit.

"Surveillance" can be carried out a number of ways although my concerns are based on the use of miticide strips such as Bayvarol which you use extensively. The permit PER92635 issued by the Australian Pesticides and Veterinary Medicines Authority clearly show that "persons generally" can use the Bayvarol strips for the purposes of surveillance and/or control of varroa mites in hives. If the bee keeper followed the basic instructions (in fact you do not even have to know how to read) then we would be in a position to monitor the hives and report the findings. The fact that the DPI do not allow this practice and instead complete the surveillance in private and remove the sticky mats offsite deprives us of any transparency and removes from our observation any handling, chain of custody or scientific reporting and processes. Added to this is the obvious "control" measures that were added as part of off label use. Already existing so why can't we do it? This practice is used in other countries around the World.

As promised I wanted to outline what we are planning as I cannot see a stop to your actions especially around the use of Fipronil.

"Our approach" is simple and involves three themes Education, Legal and Media. To expand this a little please see the following notes:

Education:

- We are building a package so that people in all three zones have an opportunity to understand the biosecurity act, the emergency order, permits and other notices etc placed upon us by the DPI.
- Also included in this is for people to become citizen journalists where poor, uncalled for or aggressive behaviour including threats and any actions by DPI personal are documented. Included in this is how to act when the DPI approach you.
- The use of fipronil is concerning so encouraging people to monitor all insect life around these poison fipronil baiting stations is essential.
- Encouraging those that are in the purple zones to complete alcohol washes on their bees prior to DPI entering the site for monitoring.

- Create some form of advocacy to support people who will be going through what we went through.

Legal:

- Review a basis for an injunction to stop the use of fipronil and proceed if we have a chance at stopping this.
- Test a private or class action for the effected population of the East Coast who could be affected by the lack of pollination on their industries and food supply.
- Review a basis to stop the eradication of European honey bees and create a sound management practice.
- Review a basis to order the DPI and other parties to clean up the damaged forests and other hollows on private property of all fipronil poison and to replace the hives that have been destroyed.

Media:

- Tell our story
- Ask for help, politicians, chemists, statisticians, environmental experts, lawyers, fipronil experts etc from around the World
- Encourage others to tell their story.
- Understand who is making the decisions for the varroa mite response and why.

To finish up I find it offensive that the biosecurity act and subsequent emergency orders are targeting the central and mid north coasts with severe restrictions and fines on hive movement and total destruction of the hives yet just a couple of km away hundreds of thousands of hives can move with little restriction or monitoring not only throughout NSW but most states of Australia because they serve the cropping industry for pollination.

Without any figures to the contrary I can only imagine that this is a distinct targeted effort to destroy the recreational and to some extent the commercial honey bee industries and the subsequent pollination and other benefits of having such a healthy environment.

Lloyd this affects every person who lives in or around the killing zones.

As a side note

James explained to you that the use of the word euthanize is false and misleading as you are killing healthy bees in massive quantities and in fact you only need 1 varroa mite in 870 cases (a case is a person with hives, we had 18 hives) That is 1 varroa mite in 15,660 bee hives will result in kill the lot.

merriam-webster definition of euthanasia “the act or practice of killing or permitting the death of hopelessly sick or injured individuals (such as persons or domestic animals) in a relatively painless way for reasons of mercy”

In a letter to Mr. P dated 3rd March 2023 Dr Chris Locke (Chair National Management Group, deputy secretary department of Agriculture, fisheries and forestry) makes reference also to euthanizing bees.

I ask that a direction or other notice be made so that all officials and others who may be involved understand fully that the term euthanasia should not be used, instead terms such as kill or murder would be more appropriate.

Evans