

**2021 Business Impact Survey on proposed
changes to NAC 552**
Plant Industry Division



Overview of Survey Administration:

The Nevada Department of Agriculture (NDA) launched this survey on July 28, 2021 the survey closed on August 11, 2021. On July 28, 2021 this survey was posted to agri.nv.gov/survey. Additionally, this was sent out to licensed honey businesses and beekeepers on record with the department via SurveyMonkey. An additional search was conducted to supplement the contact list to include businesses and beekeeper organizations within Nevada. In total this email went out to 128 contacts. The survey notification email was opened by 82 contacts. In total 33 contacts did not open the email and 8 emails bounced. 5 contacts on this list opted out of receiving NDA communications.

An additional email was sent to all agriculture businesses and NDA contacts registered through our MailChimp account. In total this email went out to 7,244 contacts. In total 2,096 contacts opened the email, 110 clicked on links within the email, 34 emails bounced, and 22 contacts unsubscribed from receiving NDA communications. In order to correct for this error, the survey was reopened, and a communication was sent to those impacted During this period from 8/27/2021 to 9/7/2021 a total of 6 responses were received.

A link to all active surveys including NAC 552 was shared on Facebook and through the NDA Director's July newsletter on July 30, 2021. The survey was additionally shared by the Nevada Farm Bureau through their newsletters on July 30, 2021 and August 6, 2021. The survey was also posted through the Mason Valley Beekeepers Facebook on July 31, 2021.

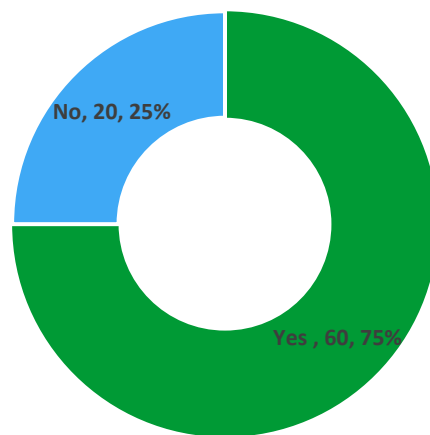
Survey Response Rate:

In total this survey received 80 responses with a 70% survey completion rate. In total 30 responses were received through the SurveyMonkey email. While 50 responses were received through social media, Mailchimp, website postings, and other survey promotion.

Survey Results:

Q1. Does your business fall under the definition of a small business as defined by NRS 233B.0382 as a business with fewer than 150 employees? (80 respondents, 0 skipped)

Figure 1. Does your business fall under the the definition of a small business as defined by NRS 233B.0382

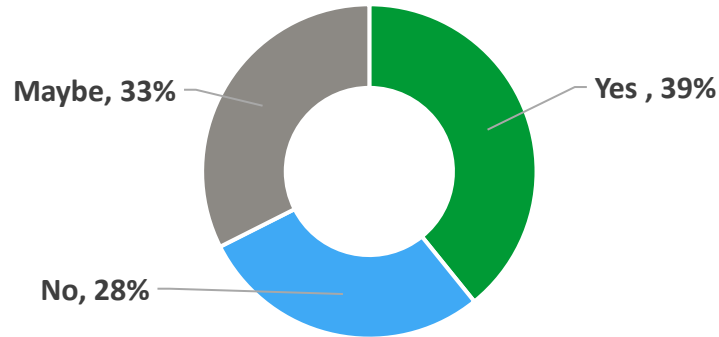


- Yes - 60 respondents (75.00%)
- No – 20 respondents (25.00%)

Q2. If enacted would the proposed changes to NAC 552 impact your ability to do business?

All Respondents: (74 respondents, 6 skipped)

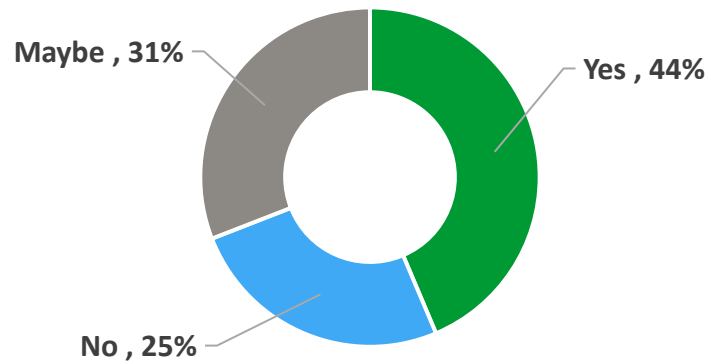
Figure 2. If enacted would the proposed changes to NAC 552 impact your ability to do business?



- Yes – 27 respondents (38.57%)
- No – 19 respondents (27.14%)
- Maybe – 24 respondents (34.29%)

Respondents that Identified as a Small Business: (55 respondents, 5 skipped)

Figure 3. If enacted would the proposed changes to NAC 552 impact your ability to do business?



- Yes – 24 respondents (43.64%)
- No – 14 respondents (25.45%)
- Maybe – 17 (30.91%)

Q3. How would changes to NAC 552 impact your ability to do business? (39 respondents, 41 skipped)

Figure 4. Respondents who identified as a small business: (32 respondents, 28 skipped)

My concern is that the proposed changes to NRS 552 (not NAC) is another attempt by the State of Nevada, Department of Agriculture to regulate beekeepers based on "perceived" issues. The difficulty of accepting any legislative changes is not understanding the basis for which the changes are founded.

Hive requirements will lead to control of my apiary. This is not needed.

The NAC 552 is strictly commanding how to be a beekeeper. It is very restrictive in it's procedure. The many books available and bee clubs teach the proper way to be a beekeeper. Many of the statements in NAC 552 are trying to regulate steps that are natural to bees themselves (i.e., robber bees). There is nothing wrong with having robber bees. It is a natural lifestyle of the bee and does not hurt the honey or comb. By the way, honeycomb is the beeswax. There are times where you can have a communal bee feeding area. You could say that robber bees will be attracted to this area. This is the purpose of a communal feeding area. If you don't want robber bees you learn from the available books, internet, bee club meetings, workshops, etc., how to prevent this event. You do not control bees. Whether you buy bees or buy queen bees is a personal option. Bees can fly across borders or swarm across anytime they want. Any beekeeper who has learned to become a beekeeper has learned about pests to the bees and illnesses the bees may incur. Again, this is the natural life of a bee. Whether we keep bees in manmade hives or leave the bees to find their own homes in the wild, these types of things are possible. We as beekeepers LEARN what the proper procedure is to either help the affected bee colony, let the bee colony expire on its own or destroy what is necessary based on the problem. Mites and other problems for bees are not diseases (neither are robber bees). If the colony is strong these problems are not problems. If the colony is weak the colony could die off. The beekeeper has been taking care of their bee problems for hundreds of years (I have read that beekeeping has been documented since ancient Egypt). Issues that could cause the colony to die off are not problems for the human race, only for the bees (other than needing them for polination). You cannot control if and when these types of problems can occur to the bees. You can recommend procedures but putting them into law is not the answer as you cannot control the insect world. They are not trainable. The Department of Agriculture does not need to control the beekeeping world they just need to be available for us beekeepers to go to as a resource. There should not be any limitations of how many beehives can be maintained in an area unless it causes a problem to a person, place or thing. In most cases if this were to occur there is usually an easy fix. There are countries that prefer each residence to have a beehive. Another thing you cannot absolutely control is whether a colony is weak or strong. The bees take care of that. That doesn't need to be controlled as long as there is pollination going on. What's wrong with having beehives that are natural to the bee where there might not be movable frames? Now you are messing with the bees natural ability to survive in their natural habitat. There are all kinds of different style hives. Some are easier than others to

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maintain. It shouldn't matter where the beekeeper extracts their honey as long as it is done in a clean and safe manner. It is the beekeepers problem of being surrounded by bees trying to get to the honey the beekeeper is extracting. It is normal for the beekeeper to find a place where they can keep the outside bees out while they extract the honey. You shouldn't have to mandate how they work their extraction process. You are taking beekeeping, something completely natural and having been done basically since the beginning of time, into a mechanical process and strict laws and fees.

time and money required to notify neighboring properties. Many are vacant and would require research to locate owners.

Based on your supposed impact of bees to neighbors, it is not determined if bees from my Apiary or bees from the wild cause harm to my neighbors. Or the treatment of my bees cause any adverse reaction to either of my neighbors.

If I were unable to keep bees on my property, I would have to locate property and establish a contract with said property owner.

20 plus locations on private property not my own but permission granted.

Having to identify the owner's location as being remote from the hive will lead to theft. California has eliminated this type of notification requirement as beekeepers have experienced theft from remote apiaries

My apiaries have been in place longer than some of my neighbors. It only takes one person, whether intentional or unintentional, to change my ability to have bees. I don't like those odds.

Currently neighbors do not know I have bees. The change would encourage neighbors to enter my property and destroy my hives.

Beekeeping is a labor intensive and expensive business that requires significant time and energy. Apiaries provide much more than a source of honey, they provide pollination services within a diameter of three to five miles surrounding the apiary. Pollination increases crop yields which benefit not only farmers and gardeners, but all of us as fully 1/3 of the food we eat is directly supported by pollination due to honey bees. Beekeepers do not generally charge for this service. Limiting beekeeping operations at any scale negatively affects the ability of beekeepers to do business.

More oversight on honeybees would impact my business financially through higher fees or more labor.

Why aren't we getting a say prior to this.

The impact of this change to NAC 552 limits side-liners, hobbyists, and small backyard beekeepers. This seems to be a continuation of Senate Bill 407 which was defeated in the current legislative session requiring a minimum of five acres to have a bee hive. Several cities in Nevada, Carson City and Henderson for example, have great city ordinances that allow side-liners, hobbyists, and backyard beekeepers to have hives within the city limits. This would severely impact pollination of orchards, gardens and other food crops. In addition to concerns regarding pollination there would be considerable economic repercussions to the sale of honey, wax, and other hive products. Additional expenses for proposed fees and hive

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<p>registration adds to the already costly activity of beekeeping with no apparent benefit educationally or economically for the beekeeper.</p>
<p>This feels like an attack on local bee keepers to add more constraints. Most of my hives are located in locations where their forage range encompasses whole neighborhoods. It feels like these proposed changes are envisioned by someone that lack fundamental understanding honeybees. Additionally, many are not able to identify honey bees from other types of bees or wasps. Hence most of the complaints you receive are because someone knows a bee hive is near and blames them for all of the other bees in their yard.</p>
<p>The impact of this change to NAC 552 limits side-liners, hobbyist, and small backyard beekeepers. This seems to be a continuation of Senate Bill 407 which was defeated in the current legislative session requiring a minimum of five acres to have a bee hive. Several cities in Nevada, for example Carson City and Henderson, have outstanding city ordinances that allow side-liners, hobbyist, and backyard beekeepers to have hives within the city limits. This would severely impact pollination of orchards, gardens and other food crops. In addition to concerns regarding pollination there would be considerable economic repercussions to the sale of honey, wax and other hive products. Additional expenses for proposed fees and hive registration adds to the already costly activity of beekeeping with no apparent benefit educationally or economically for the beekeeper.</p>
<p>Notifications would be burdensome...unclear... and bureaucratically cumbersome. What about those businesses that benefit from pollinators?</p>
<p>It would impact nuc sales because most of our customers buying bees are simply wanting 1-2 hives in their backyard to pollinate their garden.</p>
<p>Puts my busses in the hands of my neighbors</p>
<p>Financially</p>
<p>It could affect the amount of hives we have.</p>
<p>Notification of adjacent properties lacks proper definition. By adjacent, does it mean properties that are to the left, right and to the back where each of those share a common fence? Does it mean properties located across a road way? The question truly is what is meant by adjacent? And, one needs to question the scope of information required in the notification. Far too many un-answered questions to answer the question.</p>
<p>it will force me to contact all the neighboring home owners to let them know i am keeping bees it also does not say how far from the apiaries its required. just says adjacent this could be a farmer.</p>
<p>Notification of neighbors puts my bees at risk. Folks who do not understand bees can become afraid of something only because they do not know better. Educating them can become time consuming .</p>
<p>The proposed regulation substantially increases the risk of hive theft and harassment of beekeepers. If would make it harder for our students, veterans and first responders with PTSD and/or TBI, to continue to receive the benefits of beekeeping to their PTSD or TBI symptoms.</p>

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Thus the regulation would directly harm our veteran and first responder populations in the state.
It would likely restrict where bee yards could be set up.
I think that it would paint a target on my business of beekeeping. I shouldn't have to tell my neighbors what I do in my own yard. I have a right to privacy. Bees often times do not even bother neighbors as they fly away from the area to find nectar and pollen.
The administrative burden to notify every neighbor adjacent to hives would be time and cost prohibitive.
Properties are regularly bought and sold and this regulation imposes upon the apiary owner the obligation to review land sales transactions records daily in order to maintain the notice to neighboring properties. I won't do that, so I will abandon my apiaries.
I am a beginning farmer and B cheaper I have 10 acres of 10 acres if I want to put down 20 hives what would I need to do? I don't have a bunch of Internet I can't just go online you're creating another barrier I than other barrier I think to Market entry I think the larger ap Aries with a 100 or plus hives should have different requirements print requirements I don't have the money to pay for inspection fees action fees with one beehive
The recording and reporting of the address and information several times/day increases my cost of goods, adds labor and additional recordkeeping and/or documentation to each call as a Pest Control Principal Thus, significantly impacts my daily business.
We would be forced to stop selling these products.

Figure 5. Respondents who did not identify as a small business: (7 respondents, 13 skipped)
potential loss of farmers market sellers
The proposed identification requirement for apiaries located off of the beekeepers own property could prove problematic. A system whereby the beekeepers name and address are posted on the hives invites vandalism.
Burdensome regulations are proposed that do not explain how identification and notification will occur. Not sure how the state is going to pay for the additional qualified inspectors that will be needed. Unclear how the notification to adjacent property owners will occur. Will the burden fall on the beekeeper? Currently, some counties have local ordinances that can and do cover these issues. State does not have the funds or the program staff to start a new program to inspect hives.
I would have to move my hives to another location and possibly not be able to keep bees altogether.
I live in an agricultural community. My neighbors shouldn't live here unless they are prepared to live around livestock, bees are classified as livestock.
I would have to eradicate my colonies.

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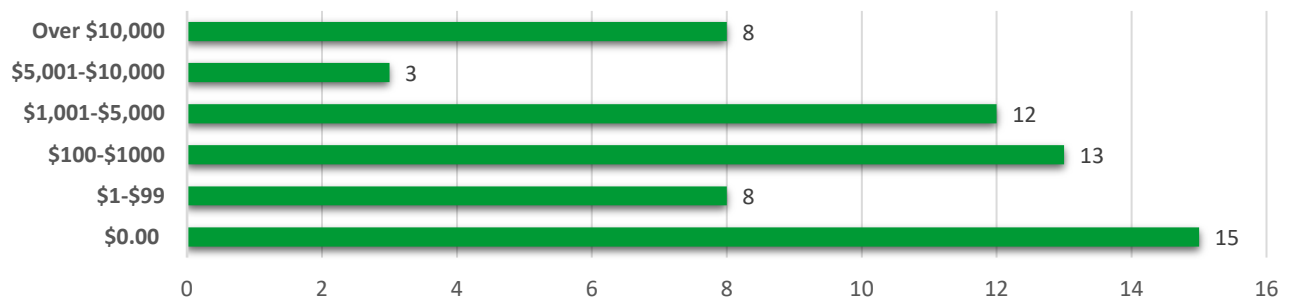
1- i am not a bussess, i do not sell have never sold bot \$1 has ever been collected with thousands of dollars spent 2- where is the line for a neighbor, does across the street no matter the street size define nabor? Or is it defined as someone within the hive foraging area? As bee's travel up to five miles. Who is it say who's beens the nabor is having issues with? 3- having to notify the Nabor's anyone for any reason is alerting the nabor to something they had no clue existed 4- we notified our direct Nabor's, and they had no idea this was going on for years, only to have one complain months latter, we moved the hives to other side of the yard, he still thinks they have been removed, that has been years ago. No one knows until you alert them, the first thing most people do when they see a bee is panic, i try to explain a bee will not bother you unless you bothering the hive

Will an adjacent property owner be able disagree with an apiary being on my property therefore forcing me to get rid of my hives?

Q4. Please estimate the total annual impact the proposed changes to NAC 552 will have on your business.

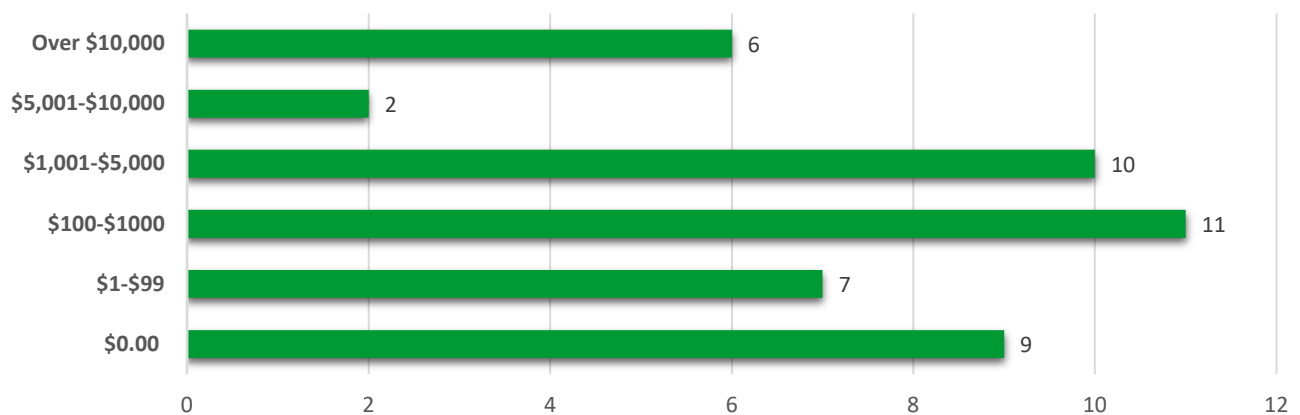
All respondents: (59 respondents, 21 skipped)

Figure 6. Please estimate the total annual impact the proposed changes to NAC 552 will have on your business?



Respondents that Identified as a Small Business: (45 respondents, 15 skipped)

Figure 7. Please estimate the total annual impact the proposed changes to NAC 552 will have on your business?



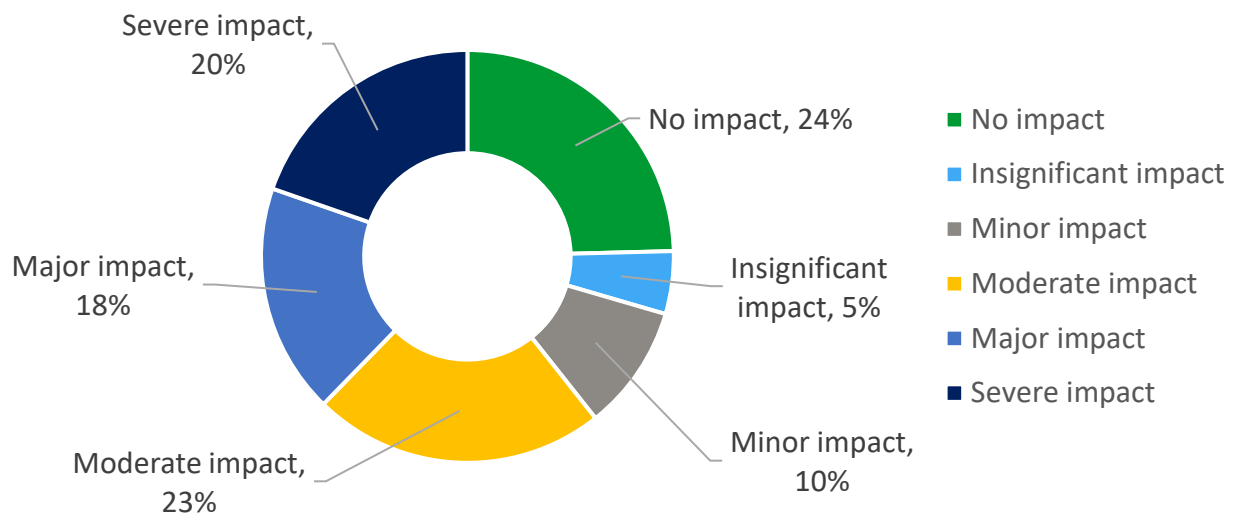
Reported cost of the proposed changes to NAC 552 on small business would be between \$81,119 and >\$141,693 based upon the ranges reported by respondents. In total 60% of small business respondents reported there would be less than \$1,000 in additional costs associated with the proposed changes in NAC 552.

In total 9 respondents (20.00%) reported that there would be no cost due to NAC 552. While 36 respondents (80.00%) reported they would incur costs as a result of the proposed regulations. Additionally, 18 respondents (40.00%) reported they would incur costs in excess of \$1,001.

Q5. What level of negative impact will the proposed changes to NAC 552 have on your business?

All respondents: (61 respondents, 19 skipped)

Figure 3. If enacted would the proposed changes to NAC 552 impact your ability to do business?

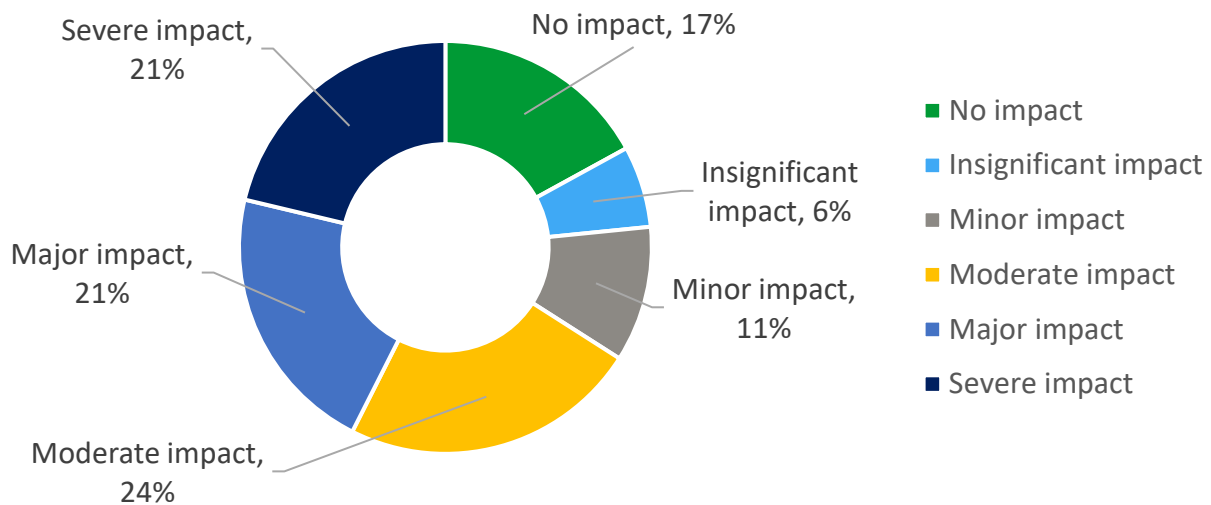


- No impact – 15 respondents (24.59%)
- Insignificant impact – 3 respondents (4.92%)
- Minor impact – 6 respondents (9.84%)
- Moderate impact – 14 respondents (22.95%)
- Major impact – 11 respondents (18.03%)
- Severe impact – 12 respondents (19.67%)

Q5. What level of negative impact will the proposed changes to NAC 552 have on your business? (Continued)

Respondents that Identified as a Small Business: (44 respondents, 12 skipped)

Figure 3. If enacted would the proposed changes to NAC 552 impact your ability to do business?



- No impact – 8 respondents (17.02%)
- Insignificant impact – 3 respondents (6.38%)
- Minor impact – 5 respondents (10.64%)
- Moderate impact – 11 respondents (23.40%)
- Major impact – 10 respondents (21.28%)
- Severe impact – 10 respondents (21.28%)

Q6. Would you need to make operational changes to your business as a result of the financial impact of NAC 552? If so, what would those changes be? (49 respondents, 31 skipped)

Figure 11. Respondents who identified as a small business: (40 respondents, 20 skipped)
No operational changes would be necessary.
The proposed changes, as articulated in the NAC 552 document (which is really NRS) by the Department of Agriculture is nebulous as it relates to fiscal impact. I am concerned that the language is misleading and an attempt to gain a stronghold of legislative action against beekeepers. What do financial impacts have to do with regulating neighborhood and pesticide notifications reference beehives? What do financial impacts have to do with “enforcement action” relative to improper signage of personal information and beehives? I am not clear on how to factually answer this question.
No, I only have two hives with a plan to max at three hives by next year. I am on more than 5 acres.
This brings more cost to the beekeeper and will have to be added to the consumer for honey, wax products, etc.
fewer bees
Drop the bees off in your lobby
It would be either to stop my operation or reduce it to minimal. Stopping the operation would lead to reduction of pollinators.
If I was instructed to move my hives, I would incur additional costs related to moving equipment, cost related to contracts and possible rent for new location.
Not sure
If theft became a problem I would need to shut down operations.
If there is a complaint and your agency decides that I can no longer have bees, who is going to pay me back for all of the time, energy, resources and effort? Do I get to sue my neighbor?
Wait and see. The neighbors will destroy my hives due to fear.
Abandonment of beekeeping.
Yes. It would raise then price of the honey and other hive products.
What do you think?
I would most likely go out of business. Because a good portion of my sales are small colonies to local beekeepers. Additionally, people will know where the bees are leading to vandalism and unwarranted complaints. Good beekeepers work with neighbors to resolve bee complaints, NDA does not need to impose regulations that hinder beekeepers ability to keep bees.

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It would force me to ensure my hives are located on five or more acres. As someone who is a beekeeper and provides education for beginning beekeepers, this will be a burden to them and their experience.
no changes needed. We have bees on 60 acres.
It would force me to move my hives to locations that had five or more acres. Travel and relocation would add expenses that would likely force me out of the beekeeping business and which would severely impact pollination in my area.
No- I have over 97 acres
I am sick of these bullshit rules.
Move to new location
No
Time involved in researching property owners, time notifying property owners, record keeping, relocating apiaries, costs of signage, the need to downsize apiary numbers
We would have to lower our amount of hives which changes how much honey we get.
One problem with this survey is that this is not a business, it is a hobby. So I am answering your questions in order to provide input, but truly this survey is not meant for the hobby bee keeper.
Contact all the people that live within five acres of my apiary install signs (most people in my area do not know i keep bees at this point in time)
Probably. Neighbors may insist they are moved. I would have to rent space for them.
As long as I keep the apiaries on my land NAC 552 will have no effect. I will not expand to other locations because of NAC 552. I don't want to be regulated.
We would have to overcome increased reluctance of donors to make donations to a program that is being hampered by the NDA.
Moving bee yards to location that might not have the forage availability they have now. Less honey produced.
Yes I would have to send letters out and keep track of them as if it were a tax document. I would have to bother my neighbors to see if they were new or the same ones on a regular business in a urban area which would become a burden.
We would stop having hives.
Close my apiaries.
Time consuming identification of neighbors and notifications (monthly? Annually?) Labeling hives. Am I assuming liability for ANY bee stings that occur do to the proximity to my hives? If so, liability insurance costs (if available) will end my business and perhaps all beekeeping enterprise.

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None
None required
As a beginning farmer and beginning beekeeper more regulations and hoops to jump through are market barriers and if the administration says so what while you're leaving behind rural development and when you leave rural development you leave agriculture. Small farmers need autonomy and a blanket regulations not yeah I think it regulations not ministerial bureaucracies that slow us down and create market entry I have 20 seasons left I don't want to spend 3 of those dealing with your fucking paperwork
We would stop selling the products.
Software, IT and paper records will have to be changed to accommodate the new language. Training will have to be provided to each employee. It may even impeded the ability for my company to offer same day services.

Figure 10. Respondents who did not identify as a small business: (9 respondents, 11 skipped)
N/a
Unknown
No operational changes anticipated
I would probably shut down my operations on outside properties, making less local honey available.
N/A
No
I would have to close my business.
Would force shutting down, all product is donated to local schools to sell and raise money. They raise as much as \$10,000. Shutting down would be a huge loss to those who count of this extra moneys
No

Q7. How could the proposed section(s) be adjusted to mitigate their level of negative financial impact? (44 respondents, 36 skipped)

Figure 11. Respondents who identified as a small business: (35 respondents, 25 skipped)
N/A
Again, how is this question tied to financial impacts as related to the Department of Agricultural' s proposed changes? This appears completely unrelated to "increased complaints about hobbyist beekeepers."
Maybe allow for digital ways of communicating hive location awareness. My financial increase would only be the paper to post my information if needed.
Do not change the existing regulations.
Quit trying to make a natural thing into strict laws. This is like trying to add costs to the homeowner for the wind.
A undetermined levy of bees depending on the number of hives and amount of honey collected per season could be put in formulary to determine negative "financial impact" if any. Most beekeepers are one hive beekeepers and not a business.
Instead of focusing on the person with one or two hives on personal property, contact and also require business with 10+ hives to participate and answer to these guidelines. It seems the owners with large number of hives are allowed to move them on to properties and not required to notify any surrounding neighbors/property owners. The larger number of hives would have a much greater impact for people with allergies and for pesticide use.
Don't know
Adopt privacy, such that the casual observer would need to make necessary inquiries that a thief would not likely do.
Common sense in all decision making.
Remove the notification aspect. If there is an issue a good neighbor makes changes to keep good relations.
Let local city ordinances take care of populated centers in terms of beekeeping. Let rural apiaries continue to operate as they are. Keep the state and the state's elected officials out of the regulation of beekeeping in Nevada.
How about no fees for honey producers?
The proposal to NAC 552 adds governmental oversight with certification requirements that have not been specified with no apparent benefit to the beekeeper or the public. At this time, general public education about beekeeping in Nevada is offered primarily by four local bee clubs: Northern Nevada Beekeepers, Mason Valley Beekeepers, Great Basin Beekeepers of Nevada and Douglas County Pollinators. Providing this education is an underlying cost for beekeepers. If the Nevada Department of Agriculture wishes to reduce the negative financial

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<p>impact of this proposal, they might begin by reimbursing beekeepers and their organizations for expenses toward public education, or work with (rather than against) the abovementioned clubs to provide education for the public.</p>
<p>Remove the requirement to notify adjacent landowners. As mentioned before this leads to unwarranted complaints because now every bee they see must belong to that one apiary even though the bee may not even be a honey bee. Also only require registration for apiaries of a particular size, say, 10 hives. The problem is not local beekeepers, the problem is large out of state operators dumping hundreds of hives to summer in Nevada. Although this year as been average for honey production, some beekeepers have had to feed their hive to keep them alive because large operations are stripping the local forage.</p>
<p>The proposal to NAC 552 adds governmental oversight with certification requirements that have not been specified with no apparent benefit to the beekeeper or the public. At this time, general public education about beekeeping in Nevada is offered primarily by four local bee clubs: Northern Nevada Beekeepers, Mason Valley Beekeepers, Great Basin Beekeepers of Nevada and Douglas County Pollinators. Providing this education is an underlying cost for beekeepers. If the State Agricultural Department wishes to reduce the negative financial impact of this proposal, they might begin by reimbursing beekeepers and their organizations for expenses toward public education.</p>
<p>Have a downloadable pre-printed Apiary info graphic- of the need for bees or food circle impact of bees or some such to be placed in an east to read poster to be placed next to The Beeks information</p>
<p>How about you all move to California? Well for one you could only require it in confirmed areas of Africanized bees? The European honeybee is not aggressive and frankly the scientific research points towards declining aggression in northern latitudes as the species mix.</p>
<p>Drop to 1 acre</p>
<p>Not pass the proposed, unenforceable changes; focus on the real bee issues facing the bees in Nevada</p>
<p>Not sure</p>
<p>That truly depends on how these regulations affect my operation. In the worst case, I would need to end my hobby of beekeeping.</p>
<p>if you are on a city lot you may need to talk to your neighbors about your hobby</p>
<p>No notification of neighbors andno name, address, phone numbers on bee boxes. Too much personal information readily available to strangers for my small business</p>
<p>Don't enact the new regulation. Stop trying to find ways to curtail urban beekeeping in the state.</p>
<p>The main impact is in cities where there are Africanized bees. Let local counties and cities pass laws to restrict beekeeping in cities. Provide training to beekeepers to help them understand beekeeping in areas with africanized bees. Help them understand that requeening is important and that non africanized queens should be marked. Regular inspections to make sure your marked queen is in the hive and if not a new marked non africanized queen should be</p>

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ordered ASAP. When queens are not available State might help city beekeepers have a community bee yard away from city where they can safely requeen and then return there colony after requeening is complete. Education is the key State inspections might be helpful as well as testing for africanization for hives close to people. This might be costly but public safety is key.
I don't think they should be put in place most beekeepers already speak with neighbors and give them honey as a gift. Why put the burden of notifying them and obtaining paperwork from both parties. That is a bother for both the business owner and the neighbor.
Eliminate the requirement to notify every neighbor.
Let bees be bees; you and legislature should make beekeeping easier and more rewarding, not harder and more burdensome. .
Abandon this legislative initiative.
No comment
Grandfather existing apiaries, apply the changes to new operations
Tier large corporations away from small business and small farmers less regulations for Small business small farmers more regulation on large corporations and what they're doing When your regulatory agency agency creates this problem you have a responsibility to fix it
Reduce fees, reduce regulation. We are already choked almost to death and you want more??? You are becoming the problem.
The interface between Dept. Ag/licensee will be the bottle neck of information flow. How easy to update and/or receive refreshed, updated information in a timely manner from the Dept. Ag...Licensing/Certification of ability to care for Africanized Honey Bee by hobbyist must be established.

Figure 12. Respondents who did not identify as a small business: (9 respondents, 11 skipped
Eliminate all new rules and reduce existing rules
mediation or series of steps prior to hive destruction
Apiary Identification using the beekeepers name and address has been changed in favor of other methods in other states because of vandalism issues. If the beekeeper has to state that he/she lives several miles from an apiary, those looking to steal hives are not deterred, but rather emboldened in their mischief. Hives are valuable and very costly to replace.. It is not the identification of the hives that is objectionable, but rather the method.
Don't adopt this NAC.
Have less government involvement in beekeeping.
N/A

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Don't change the law. Do an awareness campaign. The enemy is not the bee or the beekeeper. It's people who kill bees. I personally think that there should be state funds to assist apiaries in re-queening their hives for mild genetics.

Only notify a Nabor who is 50ft of a hive, more than this, could be anyones bee's

No comment

Q8. Please feel free to provide any feedback you would like us to consider in relation to the proposed changes to NAC 552? (41 respondents, 39 skipped)

Figure 13. Respondents who identified as a small business: (33 respondents, 27 skipped)

My only concern would be the requirement to notify adjacent property owners. This could use clarification. Would it be literally just those properties that touch the apiary's boundaries or would it be within a certain range from the apiary? Would it truly be just notification or would the adjacent property be in a position to object and intercede in the development of the apiary? These would be the biggest concerns I can see coming from this proposed change.

I want to begin by stating that I am suspect of the "increased complaint" issue. If there are actual verifiable complaints, what is the basis to those complaints? Are the complaints founded on "fear" or "fact?" I would argue most are "fear." While I completely understand that honeybees and beehives are not without concern, it appears as if Nevada's attempts at regulation are the blind leading the blind. Or worse, the intent is founded upon bias (against beekeepers) without merit. Has the Department of Agriculture asked a committee of "actual" beekeepers (hobbyist and sideliners) to sit down and discuss any of these proposals for regulation? Perhaps education (on both sides) is warranted. It appears as if Nevada is intent upon controlling beekeepers. At every turn in the last 4 years there are attempts at legislative regulation. Would it not be prudent to put interested stakeholders together and discuss the concerns, whys, resultant issues, and solutions? Perhaps beekeepers might provide the legislative body and/or the Department of Agriculture a different perspective, other than biases which appear to cause attempts at legal state regulation. The proposed attempts at legislative changes in the last 4 years bodes of bias and misinformation. Would it not be more judicious and practical to handle beekeeping issues, on a case-by-case basis, when they arise instead of attempting knee jerk legislation? Again, I question "the increase in complaints." Figuratively, let's say there were 3 legitimately recorded complaints in 2019 and an increase of 3 more in 2020 for a total of 6 complaints in 2020, that is a 100% increase. However, that data is based on a VERY small sample number. The resultant information suggesting a 100% increase is really a misleading political synecdoche. Is that the basis of this attempted legislation? Is it based on skewed numbers or perceptions of "problems" that do not exist? Is there verifiable statistical data that confirms an increase in complaints? Does the Department of Agriculture log phone complaints, written complaints and/or complaints in person? If so, is there a

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longitudinal chart (or other data) that depicts the increase in complaints? What are the actual numbers of complaints and how does the department break down the complaints (e.g. “Sting Based,” “Fear Based,” “Nuisance Based,” etc.) Are there parameters denoting which complaints fall into which categories? These are just a few questions that would be important to know before proposing changes to Nevada law. Breakdown of Background and Proposed Changes Background argument: “Notification and apiary identification is needed to protect neighbors and allow for education and compliance action to be taken.” Foremost, I completely agree that education is needed. But I ask how does identification of apiaries “protect” neighbors? If the beekeeper adheres to the existing NRS 552 regulations - to include these “proposed changes”- and a neighbor complains about the bees (surmising it is a fear-based complaint) how will the Department of Agriculture respond? What is “protecting the neighbors” based on? If a beehive is on an adjacent property and the neighbor gets stung, is it provable it was the beekeeper’s bees or a feral/managed honeybee from another hive in the area? Often, people get stung by yellowjackets and they believe it was a honeybee. Are you going to “investigate” the suspected insect? It is not unreasonable for beekeepers to notify neighbors about their honeybee hives. And through education encouraging beekeepers to do so would be more effective (maybe not at a 100% - but legislation will never get 100% compliance either). There are many sources on the internet advising beekeepers on how to keep the neighbors happy about beehives via giving them honey. Most, if not all the beekeepers, I know have advised their neighbors about their bees. And their neighbors love receiving the honey as gifts. What does “compliance action” mean? Are you going to forcefully remove the beehives because someone complained? I would posit you are going to tell the “complaining” neighbor the beekeeper is in compliance with existing regulations (providing they are). Correct? Or are we headed to a draconian state whereby the Department of Agriculture becomes a policing body? I understand that there will be an issue here and there. If a beekeeper has too many hives in a small, congested neighborhood (the past Las Vegas issue we all know about) then by all means the beekeeper needs to be held accountable and adhere to the local municipal regulations. But barring that “case-by-case” issue that might happen on a rare occasion, why does this perceived need for more state regulation keep creeping up? Is that what the Department of Agriculture wants to do? Minus a complaint about a beekeeper’s bees, is the Department planning to send out Department representatives to go and “check” the “adhered to” regulations of beehives? Are you going to send a representative onto someone’s property without their consent? Law enforcement cannot just go onto someone’s property without exigent circumstances or a warrant. Are your employees prepared for visceral responses from angry beekeepers or landowners? This is and will be an emotional issue. Is that where the Department of Agriculture wants to spend its time and efforts? "This notification also would assist in the protection of the bees from pesticide use on the adjacent lands. This regulation would allow appropriate contact to be made involving pesticide application in addition to enforcement action involving hive mismanagement that could lead to the spread of diseases and pests to other hives." Who is tasked with the notification of pesticide use? Do you think a neighbor will run over to the beekeeper and tell them they are spraying Roundup? My experience, coupled with stories from other beekeepers, is that those

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who use herbicides or pesticides do not care if you have honeybees. If they are determined to spray their weeds or get rid of insects, that's what they will do. They might be kind enough to tell you - if you have a good rapport (and that again is between neighbors without Department regulations). Further, will the Department of Agriculture send out notifications of events, such as disease outbreaks, pesticide, and herbicide applications in certain areas surrounding apiaries, etc.? Who pays the staff to send out notifications and manage this process? Would that burden be placed upon existing staff already overloaded with existing job duties? If notification is mismanaged and a beekeeper's bees are killed due to non-notification, will the Department of Agriculture provide compensation to the beekeeper for the loss of his/her bees? "~enforcement action involving hive mismanagement that could lead to the spread of diseases and pests to other hives." What entails enforcement action? Based on what initial information? Who will go out to backyard apiaries to do inspections? Who is a designated inspector? A certified beekeeper? Based on what certification? Is the Department of Agriculture prepared to certify employees to conduct those inspections? If you require this a state law mandate, (if an inspection is not requested by the beekeeper) are you paying employees with taxpayer monies to conduct inspections of the hives? What are the regulations and requirements of those inspections on private property? I would argue that most beekeepers are your first line of defense for identification of diseases/pests and initiating control efforts. Again, education, not legal regulations, is paramount. Providing education in the way of identifying diseases and pests and how to manage those issues will produce far better results than changes to Nevada law. How will the Department of Agriculture be notified that a backyard beehive has Nosema or Varroa mites? I argue that helping beekeepers understand hive management (one example would be for the timing and methods of Varroa mite treatments) would produce far better results at preventing diseases and pests. First section of your proposed changes: "Adjacent Property Owner Identification: 1) Notification of adjacent property owners All property owners adjacent to any apiary of any size must be notified in writing by the beekeeper if the area on which the apiaries are placed is under five acres. Notifications must be maintained by the beekeeper as long as apiaries are present." Who determined that 5 acres was the magic number? Why not 1, 2, 3 or 4 acres? If a beekeeper lives on 4.5 acres and the hive is placed 10 feet from the property line adjacent to another neighbor's house, does it matter? Honeybees will be a "nuisance" or something to "fear" if that neighbor determines they are. Are the employees from the Department of Agriculture going to make contact with the beekeeper and tell them to move the hives because the neighbor is complaining? If the beekeeper is in compliance with existing regulations, what is the merit for intervention by Department of Agriculture? Additionally, what if neighbors never complain and the beekeeper never complies with the notifications? How does the department enforce non-compliant beekeepers? Or is the proposed modified NRS based upon "only if we find out and/or the neighbor complains?" Or more egregious, will the Department of Agriculture pay someone to drive around looking for "lawless" beekeepers? What "enforcement" action is the Department tasked with? There are far more in-depth issues surrounding the details related to this section. Further, what are the regulations for "notifications?" A postcard? A signed agreement form (what format?) telling neighbors about the beehives and obtaining their signatures depicting

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notification? What if the neighbor refuses to sign? Who determines if notification was “in fact” made? What if the beekeeper states the notifications were made (has copies) but the neighbor doesn’t remember? It becomes a “he/she said – she/he said.” Who prevails? Should the beekeeper send the notifications certified? (Incurring another expense imposed on them by the state.) Moreover, how do neighbors react to certified letters by their neighbor? Would that bode well for a harmonious environment in the neighborhood? What if the neighbor says he/she doesn’t want the beekeeper to have bees and the Department of Agriculture needs to stop them? How are you going to handle those contentions? Most neighborhoods (barring immediate adjacent neighbors) do not even know there is a beehive in someone’s backyard. Often, when other neighbors find out about the beehive they state, “Oh, that is why my garden looks great or my fruit trees have doubled in production.” If I am wrong on this perspective, I would readily review any empirical data proving otherwise. Second section of your proposed changes: "Apiary Identification: 1) Each apiary location shall be identified by a sign showing the owner's name, home or business address and contact information (telephone or email), unless the apiary is located on property owned by the beekeeper. 2) The identifying information shall be at least one inch in height, easily readable and displayed in a conspicuous location in the apiary; or similar identification conspicuously displayed on one or more hive bodies within the apiary. Any apiary not so identified shall be considered abandoned and shall be subject to seizure and destruction as provided for in NAC XXXXX." Displaying personal contact information for anyone to see is a little disconcerting. Would you want your personal contact information (especially your home address) publicly displayed? If a beekeeper’s hives are on someone else’s farm, land, etc. would it not stand to reason the landowner knows the beekeeper? Contact with the beekeeper could be made through the landowner. If the landowner consents to hives on his/her property any possible dispute with a neighbor would be between the landowner and neighbor. The beekeeper has no authority on the land he/she does not own. Furthermore, is the Department prepared to seize and destroy healthy honeybee colonies simply because a beekeeper did not comply with the identification parameters? What if the lettering is ¾ of an inch high? Who pays for the equipment if the beehive is destroyed? Is the Department prepared for civil litigation for compensation when destroying someone’s property? Bees and beehives are expensive. In Sum It “appears” that the resulting impact of one beekeeper in Las Vegas stirred a continuous flow of attempts at regulation of beekeepers. To what avail? Why would the Department of Agriculture start defining and writing proposed changes to beekeeping that will incur fiscal impacts to an already strained state budget? Who pays for the Department’s “compliance officers” and what are their legal recourses for regulation? Is a Department of Agriculture representative driving through neighborhoods looking for wayward beekeepers? Is the Department allowed to violate 4th amendment rights? Or is this a piece of “feel good” legislation for the benefit of anti-hobbyist beekeeping folks? Or worse, perhaps, anti-honeybee folks? I cannot understand the rationale behind the current proposed changes as well as the last 4 years of attempted legislation concerning beekeeping. Furthermore, who is paying someone now to draft proposed changes to legislation? Is this what the Department of Agriculture wants to spend its time doing? Suggestions Why doesn’t the Department of Agriculture put budgeted money into promoting and providing educational

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programs to ALL citizens (to include beekeepers) about honeybees and all pollinators? There is a plethora of topics suitable for the Department of Agriculture. The following are a few of my suggestions: For the public • Plant forage for pollinators. Describe the whys. Which native and non-native plants are the best for landscapes and gardens in different areas in the state? Promote the existing programs through UNR for exactly these educational topics and programs. Look at education through school and community programs. • How important ALL pollinators (native and honeybees alike) are for your backyard garden and landscape. Most people in this state do not “see” the amount of wonderful native bees and insects we have here. The things they do on their property (garden) impact these very important insects. • What do you do if someone has a hive in their backyard? Should you be worried? (I would argue “no” and the why needs to be explained in detail (with the caveat of caution for those with an allergy.) However, those who know they have an allergy are always at risk no matter if it is managed or feral honeybees, wasps or hornets. And for the record, more people are allergic to wasps and hornets, than honeybees. • There will always be a “fear” factor concerning bees because these little critters sting. And, yes, some people are allergic to bee stings. That alone elicits fear. And while caution is appropriate, “fear baiting and fear propaganda” is not. Most honeybees people encounter are foragers (the girls out in the world looking for nectar and pollen on flowers), and these girls are the LEAST likely to sting anyone. For the Beekeepers • Simple breakdown (bullet style, etc.) of existing regulations (not directing them to NRS – too difficult or cumbersome for some people to read or look up) concerning backyard beehives. Make it simple and succinct. • What do you do if you suspect AFB, EFB, Nosema, etc.? • Do you have an Epi-pen on hand? Why this is important as a beekeeper. • If neighbors are concerned about your hives, here are some tips at putting them at ease. • If a neighbor is upset about getting stung, here are some suggestions. • While there is more responsibility in areas with Africanized bees (Southern Nevada areas) and beekeepers need to comply with certain protocols, I posit that the Department of Agriculture can educate and prepare beekeepers for enhanced responsibility in Africanized areas. Beekeepers are exponentially more important in diluting the pool of Africanized genetics by having the more docile European honeybees in the area. While these are just a few suggestions, I believe the Department’s time is better spent educating and changing perspectives rather than working on legislation that is flawed from the start. Public policy options do not always have to involve rules and regulations through legislation. The ability to “nudge” behavior through education is certainly a viable option. I am sure the Department of Agriculture could put together beekeepers (or beekeeping clubs) from various areas in the state and have round table session(s) to discuss concerns and solutions that would be beneficial to ALL stakeholders. Ultimately, beekeeper’s do not want problems with their neighbors or their honeybees. The great thing about most beekeepers is that they LOVE to talk about bees and educate anyone who will listen.

Thank you for the opportunity to provide my input on this matter.

It is shown that requiring hive registration in California, has led to easier location of hives which are being stolen by thieves. I do not want the government to control my apiary activities.

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All of this has a detrimental impact on the hobbyist for sure. Therefore, the pollination process with be lowered for all gardners and landscapes. These laws do not help the beekeeper or educate the public. They are more restrictive than anything else.
1. Consider bees lost in winter and replacement. 2. Consider replacing Queens. 3. Consider cost of pest control
F off
Refer to previous answer.
None for now
Not needed, don't make the proposed changes.
Spend more time educating folks about the importance of beekeeping. There needs to be a timeline/process in place. Warning, notice, and then a final result.
Please remove the required neighbor notification requirements.
Beekeeping is an important "hidden" benefit to Nevada's food chain. Why would you want to limit a service that beekeepers provide for free?
The continuance of targeting side-liners, hobbyist, and small backyard beekeepers has got to stop. These people are not the enemy. Instead work with the beekeeping clubs and groups to improve communication and to better understand the situation. Then ultimately change can begin to occur.
These changes are imposed in a manner that shows a lack of understanding for human allergies. 1 in 100,000 humans is anaphylactic to all allergens. Which means in the worst case scenario around 30 Nevada residents are truly allergic to all allergens (milk, eggs, peanuts, bee stings, etc. The NDA needs to stop trying to attack hobbies and local beekeepers. This is the second time this year and will drive a wedge between NDA and the beekeeping community.
I'm not against notification - and backyard beekeepers can be both a good and bad addition to keeping larger apiaries Two notes: one negative one with the potential to be positive 1. down south there is a risk of hives becoming Africanized so it is important to know where hives are- however, without a real bee inspection program fully funding both a full time inspector and on staff bee researchers or staff to help identify disease/mites etc., posting owners names seems like an opportunity to allow 'fearful, uninformed neighbors a target. Creating nuisance-based complaints based on fear of bees 2. The changes should have included a three times a year inspection for varroa and both advise and help with treatment The hands off approach of dealing with varroa and the bee die offs without a real inspection program that offers solutions to helping this serious problem has led to continued colony collapse both dead outs, untreated mites that spread to other colonies, and poor mortality rates in Nevada colonies The efforts we put into alternative ways to manage bees and encourage and provide good information from a Extention-based, natural resource position the better opportunity to improve the health and longevity of bee colonies
Most importantly, the proposed changes pick at minutia within the existing Nevada Code. The question is not, "How many hives can a hobbyist have?". The question is, "How does the

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Nevada Code improve the public’s understanding of pollinators and improve support for honeybees and their beekeepers?” or “How does the Nevada Code address bees as livestock?”
With decline of native pollinators you are just undermining our industry. If it comes to it I will spend every penny on attorneys.
Not needed
Regulations of this kind should be addressed at the local level and not statewide as all areas have unique situations. Property owners know whose bees are on their property. Names/addresses/etc should not be out for the general public. Does NDA have a qualified person to enforce these changes?
Be absolutely certain that the change in regulation does not create conflict between neighbors. I have seen cases where dog kennel regulations appeared to be designed to create conflict within neighborhoods.
I really don't think it is required as bees are very seldom a problem
Sometimes people who sell honey and other bee products operate on a very small budget. Bees are needed in our urban areas and having to announce their presence endangers them.
It is my personal opinion that this is yet another attempt by the NDA to curtail urban beekeeping within the state. It totally ignores the advantages to people's gardens of having bees in their neighborhoods and even worse ignores the psychological benefits of beekeeping on conditions such as PTSD and TBI and the harm you are attempting to do to under represented populations (veterans and first responders) in the state.
Director Ott, this I Rodney Mehiring. Africanized bees and beekeeping is my speiculty I have been working with Africanized bees for 30 years now. I spent 10 years as UNLV's research beekeeper. I now how to keep bees in Africanized city settings. Let me help you on this, I feel I can help protect both sides interest and help make a safe beekeeping environment for both the public and beekeepers.
Don’t add this change.
While we agree that identification of hives could be beneficial, we believe that there is an unintended liability that comes with notifying every person that one’s hives are nearby. Someone who comes in contact with a bee will automatically assume it’s the beekeeper’s bee when in reality it could be anyone’s.
Don't be idiots. Nevada beekeepers know that NDA is not their ally. Thank you.
No comment
I guess this is the price paid for the influx of people choosing to live in Nevada
What's better 60000 small farmers or 4 large corporations? Time to wake up Why isn't the agency more outgoing to identify small farmers and help put them in place with these resources instead of saying go to the website or come join this webinar are you kidding me?
If your goal is to eliminate small businesses just keep passing more rules. Only mega businesses will survive as only they can afford hiring extra people to deal with the extra

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bureaucratic burden. Any benefit you think anyone will gain will be directly offset by a downside that is several times larger. - Go to rural Nevada and see how many people deal with these regulations - almost zero.

Africanized Honey Bee Quarantine for Sothern Nevada may help keep the increased attention and popularity of the honey bee in our area.

Figure 14. Respondents who did not identify as a small business: (8 respondents, 12 skipped)

these changes could potentially severely impact small scale agricultural productivity

The notification of adjacent property owners is something that responsible urban beekeepers have been doing. Unfortunately, it has met with less than favorable results for beekeepers with neighbors who don't know bees from wasps and have literally eliminated hives by the use of pesticides near the hive. There is no obvious solution other than education,. but that too is limited in effectiveness given the present self centered cultural environment. "It is my property and I have the right to do as I wish on my property, regardless of the results that may occur off my property as a result".

This was written as if intending to eliminate foods production by small businesses.

This draft NAC is beyond the scope or ability of the state to carry out.

We need bees and beekeepers and an impact like this will prevent a lot of people from doing so. More education is needed about bees and beekeeping. Not just for those who do it, but for everyone's benefit.

Don't change the law. Do a better job of creating awareness. Bees are SO important, you're regulating beekeeping and stifling beekeepers. Education of the public is key. Imagine if all the effort that goes into educating the public on conservation were applied to educating the public on bees.

To add a statement to the NAC, to be added to the notification, stating “this is to give notice an Apiary is being operated in the area, when scheduling to applying pesticides, weed control or other chemicals to advise the Apiary operator at least 48hrs in advance, giving the operator an opportunity to protect the apiary workers (bee’s). Something similar to above, maybe adding to the statement defining an apiary and site the law they are legal within the state, this also a great time for the grassroots to place a statement on education of how apiary’s work and the need

None

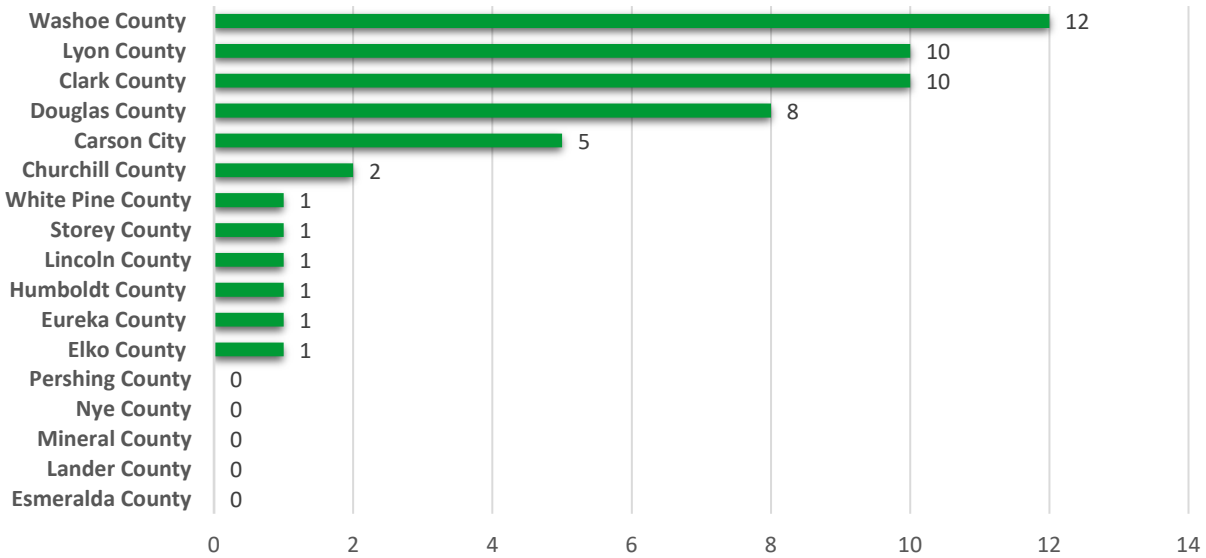
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Q9. In which county is your business primarily located?

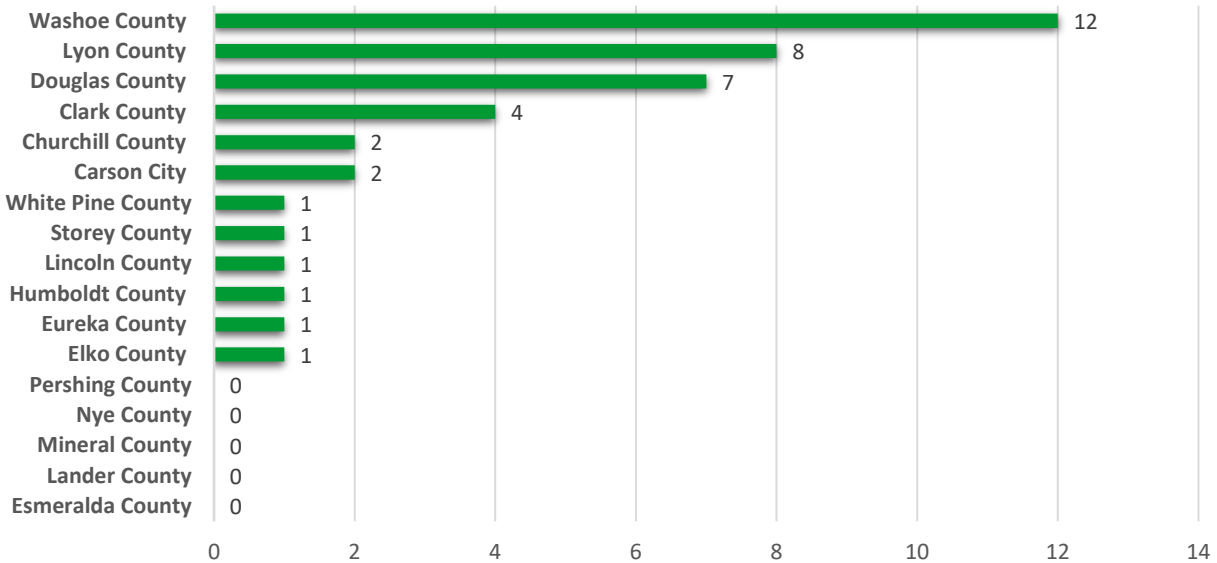
All respondents (53 respondents, 27 skipped):

Figure 15. In which county is your business primarily located?



Respondents that identified as a small business: (41 respondents, 19 skipped)

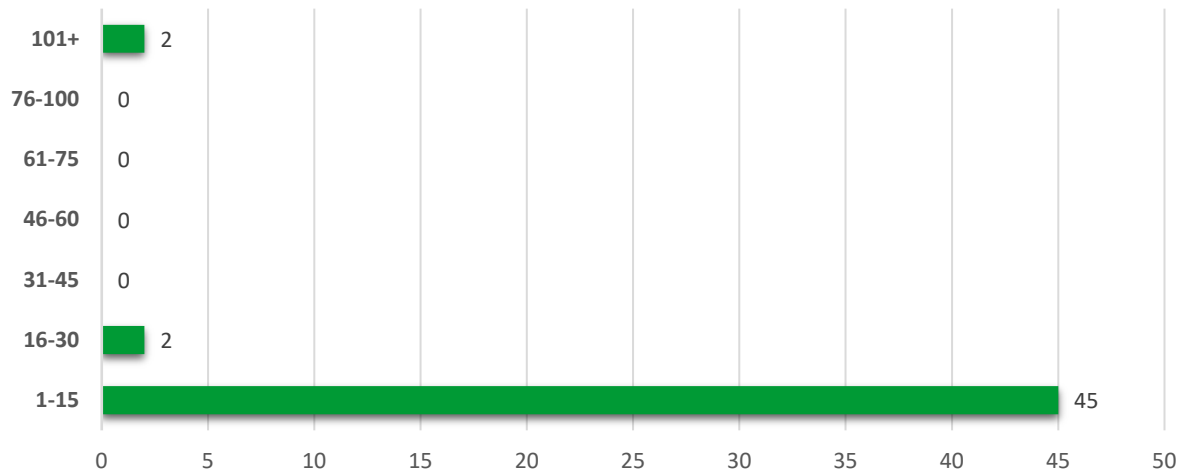
Figure 16. In which county is your business primarily located?



Q10. How many employees does your business have in Nevada?

All respondents (49 respondents, 31 skipped):

Figure 17. How many employees does your business have in Nevada?



Respondents that identified as a small business (39 respondents, 21 skipped)

Figure 18. How many employees does your business have in Nevada?

