

**Submission
No 281**

**INQUIRY INTO MANAGEMENT OF PUBLIC LAND IN
NEW SOUTH WALES**

Organisation: Australian Honey Bee Industry Council Inc

Name: Mr Stephen Ware

Date received: 13/08/2012



AUSTRALIAN HONEY BEE INDUSTRY COUNCIL INC

Address: Level 2, 105 Pitt Street, Sydney NSW 2000 Telephone: 02 9221 0911
Mailing Address: PO Box R838, Royal Exchange NSW 1225 Facsimile: 02 9221 0922
Email Address: ahbic@honeybee.org.au Web Site: www.honeybee.org.au
ABN: 63 939 614 424

10 August 2012

RECEIVED

13 AUG 2012

GPSC's

The Director
General Purpose Standing Committee No 5
Parliament House
Macquarie St
SYDNEY NSW 2000

Dear Sir

RE: Government Inquiry into the Management of Public Lands in New South Wales

As you may be aware the Australian Honey Bee Industry Council (AHBIC) is the peak body representing the Apiary Industry in Australia. Members of the Australian Honey Bee Industry Council include:

New South Wales Apiarists' Association
Queensland Beekeepers Association
South Australian Apiarists' Association
Tasmanian Beekeepers' Association
Victorian Apiarists' Association
Western Australian Farmers Federation - Beekeepers Section
Honey Packers' and Marketers' Association of Australia
National Council of Pollination Associations
Australian Queen Bee Breeders' Association

Industry would make the following comments in relation to the review:

1. The Importance of Native Floral Resources

The honeybee industry is heavily dependent on native floral resources both on public and private lands. A key threat to the industry is the gradual decline in availability of important floral resources for honeybees, through increasing limitations on access to public lands and through declining trends in the quality of these resources.

Increasing areas of state forestland are being converted into conservation reserves and state conservation agencies are, in many cases, taking a 'purist' approach to the management of conservation reserves by banning all exotic species, including honeybees, from these reserves. In some but not all cases, these 'purist' views have been balanced against the needs of apiarists in the

policy process. Overall, however, the honeybee industry's position is tenuous and it will need to take a strong proactive stance to counter the ill-informed views of some sections of the community. Increasing areas affected by dryland salinity, land clearing, declining quality of river red gums and several other factors are also eroding access by apiarists to quality native flora. These trends are not being fully compensated for by access to expanding areas of agricultural crops such as canola.

2. Pollination

The Australian honeybee industry has a great story to tell as it provides enormous value to the production of crops. Estimates suggest honeybee pollination provides value within the economy of around \$4.6 billion per year "More Than Honey" (standing Committee on Primary Industries and Resources May 2008). If honeybee pollination were suddenly to stop (as might be the case with a disease outbreak), growers of honeybee dependent crops and pastures would suffer and the Australian consumer would find themselves without access to many of the major fruits, vegetables, crops and pastures (Gordon and Davis 2003).

3. Precautionary Principle

Although this is a relatively small industry, it has a hugely disproportionate impact on the rest of agriculture and the economy — through pollination services. But apiarists mainly depend on honey production for their income with pollination service income providing a relatively small component of gross receipts as a lot of the pollination is free through incidental pollination. There are no significant alternatives to native flora for honey flows and most of these resources are on public land. The consequence of continual erosion of access to national parks can be serious not only for apiarists but for much of agriculture as well. Due to the nature of the timing required for the delivery of pollination services for some crops, the bees must first be "strengthened", which is usually provided by access to pollen and nectar resources within public lands before being delivered for pollinating generally mono floral crops. Access is often required to rebuild the colonies after pollination. Without this access there would be major reductions in production of significant agricultural crops.

The precautionary approach of conservation reserve management requires engagement with land managers, and strategic, collaborative and well informed responses. Most national parks in Australia have multiple uses including recreation, tourism and supporting management infrastructure. The honeybee industry stands for and depends on the preservation of native flora and hence has much in common with those in the community whose values support nature conservation and the establishment of conservation reserves. The honeybee industry is always looking for avenues for forming alliances with community organisations with such values at a national level to maintain both the social, environmental and economic values of the industry and the public lands on which it is dependent. It is important to note that industry has already commissioned a number of scientific papers to support its arguments on the effects of bees on native flora and fauna rather than just form an opinion.

4. Impacts of public land restrictions and inconsistencies on apiarists

Apiarists face direct and indirect costs as a result of the regulatory inconsistencies both within states and across the country, particularly for apiarists that operate along the eastern seaboard. These costs can primarily be broken down into the costs associated with accessing multiple land types within states and the costs associated with accessing land across state borders.

For apiarists operating within a state, there are considerable costs associated with managing access to a range of public land types. With site permits issued through either a central office for some land types or through regional offices for others, apiarists face significant direct costs managing the application, renewal, transfers and payment of site fees. Additionally, access can be dependent on local scale management plans of particular parks, which leads to the tyranny of small decisions and cost to the industry of dealing with local level decision-makers. These costs are compounded with apiarists often facing differing cost structures for different land types. These can be significant transaction costs caused by government regulations to an industry that is dependent upon timely access to appropriate floral resources and also is migratory in its requirements for these resources, with the addition of additional costs in time and travel from these administrative arrangements.

Along with increases in site access and management costs, apiarists face a range of indirect compliance costs resulting from the different regulations and management practices associated with different land types, and in certain cases, different regulations and management practices at different sites within certain land types, particularly national parks. Again this adds to transaction costs for apiarists which are a pure deadweight loss to society.

Additionally, as access to sites is increasingly becoming restricted, with a number of states capping the number of national park apiary sites, and in the case of Queensland (this is being reversed – not as yet but is promised) reducing the number of available sites, apiarists face increasing costs and more importantly, loss of access to the native flora resource. These restrictions and reductions in turn force apiarists to look further afield for sites, increasing their indirect management and direct transportation costs.

In conjunction with managing further afield sites, apiarists face significant management costs associated with maintaining access to specific sites in terms of gate access, road blockages and maintenance. In the face of poor quality access, the availability of sites is effectively reduced if not excluded. This not only increases the costs and inconvenience of accessing those sites but also increases the costs associated with finding sites to replace those that are unavailable. Suitable new sites are becoming increasingly restricted or hard to find.

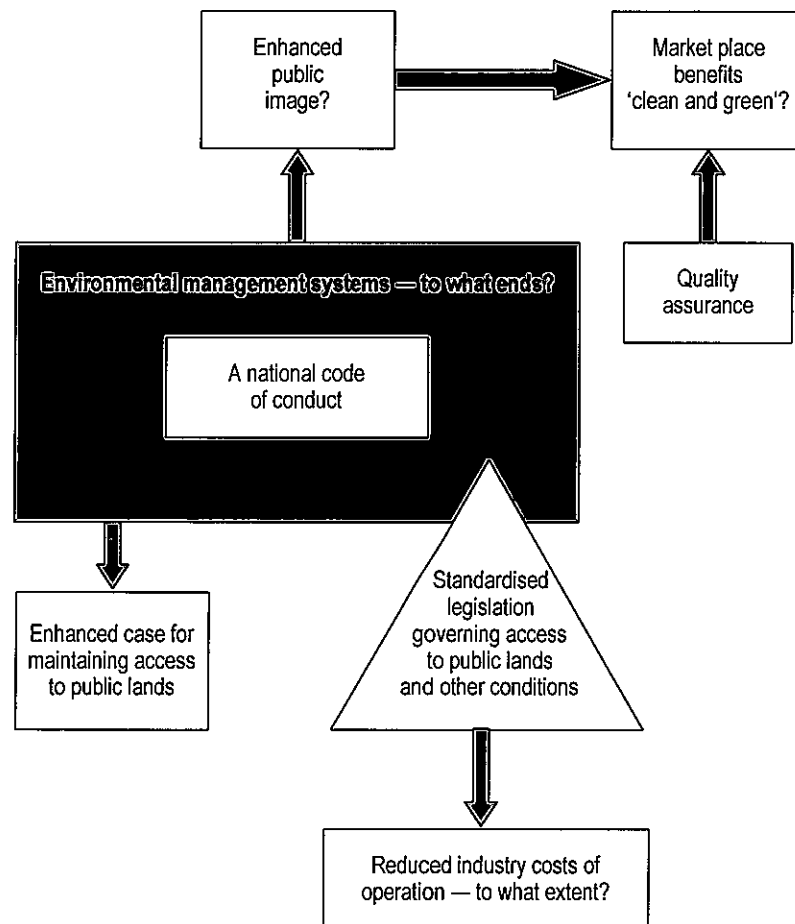
For apiarists working across states, particularly along the eastern seaboard, the varying degrees of regulation and requirements for each state add to the costs faced by the industry. The requirement by most jurisdictions for apiarists to be

registered adds to the direct costs of apiary management. Furthermore, apiarists face large indirect costs complying with a range of overarching state based legislation.

The situation along the eastern seaboard contrasts with that in Western Australia, where operators are able to move along the coast while still operating under one set of state based legislation although they have the quarantine zone at the Tropic of Capricorn for SHB. While still having a range of within state costs associated with different land types, the ability to operate along the coast in line with seasonal variations in pollination spawning reduces industry costs.

5. Regulatory framework of public land access in Australia

Each state and territory has different requirements and regulations in relation to apiary management on public lands and the range of differences is extremely broad. For example, some states have a centrally managed Register with varying fee structures attached, while other states set out highly specific requirements for hive identification. Furthermore, states have different and highly specific requirements for apiary site management, with differences ranging from fire prevention strategies to the number and placement of hives on sites.



If regulatory authorities recognise a national EMS would this satisfy all jurisdictions?

In addition to variations at the state level, there are different management and site application requirements and procedures for different public land tenures within states. Within the broad spectrum of public land, there exists a range of conservation reserve classifications such as national parks and wilderness areas; state forests; defence estates; world heritage areas, other crown and reserved crown lands and privately managed public (leasehold) lands, with each type of public land in each state generally having different management processes. Examining two examples from New South Wales, the day to day management of apiary sites within national parks is done by the relevant park authority and within the relevant National Park Management Plan. The number and allocation of apiary permits, however, is centrally coordinated, with the number of apiary sites capped, and with all sites either currently allocated or in the process of being allocated. It is unclear how there can be an effective determination of the appropriate number of apiarists sites under a centralised bureaucratic structure. Local requirements and resources and seasonal conditions would not be taken into account. New South Wales state forests, on the other hand, have a large number of unallocated sites, with site permits and site management all coordinated out of the relevant regional forestry office.

6. Changing management in conservation reserves

In some states within conservation reserves, a reduction in access and apiary sites is occurring due to the change in management by land agencies. Sites to place apiaries may have arisen due to road diversion, realignment, or old log dumps. But unless maintained they revegetate, restricting access to vehicles. Some sites will be utilised for public amenity as picnic sites. Minor access roads used in forestry operations are being allowed to regenerate, removing access. There is also a requirement to adhere to a greater number of stipulations when using conserved areas, such as holding public liability insurance or placing hives further away from the road or public access sites.

7. Climate change

The temperate climatic patterns of the world have generally favoured *Apis mellifera* (European honeybees). Beekeeping in tropical and sub-tropical climates is practised, but without the same success as in the temperate zones. Beekeeping in arid areas is also possible, with various management modifications, but becomes extremely dependent on rainfall events with long periods of lean production.

The dominant native flora of Australia is programmed to survive for lengthy periods of minimal water supply, but in so doing during such periods, flowering activity is virtually non-existent. Long term climate change that may have the impact of increasing drought durations and frequency will equate to reduced reliability of the floral resources within Australia to regularly and reliably flower. These long term dry periods may also equate to an escalation in fire events, which potentially remove a floral resource for many years until regrowth is mature enough to return to a regular flowering pattern.

Prolonged droughts followed by periodic 'normal seasons' will also see dramatic differences in the total honey crop obtained by the industry from year to year,

which will affect the marketability of such a commodity and the regularity of income.

8. Specific Recommendations

a) Continued Access by Apiarists

It is imperative from an Industry point of view that Apiarists continue to have access to the Red Gum and public resources. The importance of beekeeping not only in its own right but its value to other agricultural industries means that it is essential that public lands continue to be made available to apiarists.

b) Regulatory Regime

Industry supports a consistent regulatory approach and also notes that the Red Gum forests of NSW are not only a resource for NSW Apiarists but are also used by Apiarists from Victoria, South Australia and Queensland. It is therefore important that any regulatory regime recognises that the resource base is not only one for NSW Apiarists.

In relation to the Industry's environmental credentials Industry has recently collaborated with the Queensland Government and Department of Environment and Resource Management (now Department of Environment and Heritage Protection) to test an environmental management system for apiarists. Industry continues to strive to prove its environmental credentials and its right to access public lands

c) Maintenance of Roads

An important contributing factor in the use of public lands by apiarists is access to bee sites and this means that it is essential that access roads continue to be maintained and made available to apiarists using public land. In states such as Queensland they are looking at developing an MOU for a procedure whereby beekeepers can keep open roads on Crown land as the Departments do not have the money to keep the roads open.

d) Support of New South Wales National Park Policy

Industry supports current access arrangements in New South Wales National Parks. It is also noted that when the state acquires private land recognition is given to existing sites of Apiarists and we support this policy nationwide.

e) Greater Access to Public Land

As previously noted apiary resources are limited and industry needs more access to public land. We therefore request an audit of all existing public land so as to make available more resources for the apiary industry.

Naturally should you seek any clarification of the above please do not hesitate to contact me.

Yours Sincerely

STEPHEN WARE
EXECUTIVE DIRECTOR