



# **AUSTRALIAN HONEY BEE INDUSTRY COUNCIL INC**

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## **SUBMISSION TO**

## **PRODUCTIVITY COMMISSION**

## **INQUIRY INTO REGULATION OF AUSTRALIAN AGRICULTURE**

Submission prepared on behalf of the Australian Honey Bee Industry Council Inc.

## Introduction

The Australian Honey Bee Industry Council Inc. (AHBIC) is the peak body for beekeeping in Australia. Its members are:-

Queensland Beekeepers Association Inc.  
New South Wales Apiarists Association Inc.  
Victorian Apiarists Association Inc.  
Tasmanian Beekeepers Association Inc.  
South Australian Apiarists Association Inc.  
Western Australian Farmers Federation Inc. – Beekeepers Section  
Honey Packers and Marketeers Association of Australia Inc.  
Australian Queen Bee Breeders Association Inc.  
National Council of Pollination Associations Inc.  
Associated Groups

*Is there scope for zones to allow a broader range of complementary land uses, while still preserving agricultural interests and recognising essential land management or conservation purposes?*

Within Australia there are moves to have beekeeping excluded from areas that have been traditionally used for beekeeping. This has been brought about by a change in land title.

The classic example would be in Queensland where Government has converted State Forests to National Parks and have decreed that apiary sites on these newly created National Parks will not be issued beyond 2024. This despite the fact that there have been apiary sites on many of these lands for over 100 years with no adverse impact.

AHBIC would submit that the approach should be along the lines of the Victorian Government ([http://agriculture.vic.gov.au/\\_data/assets/pdf\\_file/0008/191438/Public-land-apiculture-beekeeping-policy.pdf](http://agriculture.vic.gov.au/_data/assets/pdf_file/0008/191438/Public-land-apiculture-beekeeping-policy.pdf)) who recognise the importance of the beekeeping industry and where the benefit of beekeeping to both the agricultural and state economies as well as food security requires secure access to the public land resource base for beekeepers. Consequently, the developed policy seeks to:

## 4. OBJECTIVES

This policy and the associated standard operating procedure seek to:

- encourage apiculture on public land;
- maximise coexistence or minimise conflict between apiculture and other public land uses/values;
- establish an efficient, effective and uniform system for the management and administration of apiculture on public land; and
- ensure an appropriate financial return to the State from the use of a public resource. |

AHBIC would like every government in Australia to recognise the importance of beekeeping in the same way and provide similar policies to support that recognition.

*Is the approval process for GM crops effective and efficient? If not, how can it be improved?*

With the advent of GM crops such as canola, the nectar and pollen that is collected by honey bees and turned into honey from these GM crops presents a problem for our honey exports to the European Union (EU).

Honey itself is not GM. It is the natural pollen which occurs in the honey that is the GM component. The EU have decreed that if the pollen is not from a crop registered as a food in the EU it cannot be exported to the EU. Currently there is only one GM canola variety registered in the EU as a food. This means that any other GM canola crop plus other GM crops such as soybean, corn and cotton are not registered as foods in the EU

AHBIC would submit that before a GM crop is registered in Australia it must also be registered as a food in the EU. This would apply to crops such as canola, soybean, sunflower and corn.

There is also a problem for other crops such as poppy. Whilst honey bees do not collect nectar from poppy they can collect pollen. So a honey bee that has worked poppy and has brought pollen back into the hive has the potential to introduce that GM pollen into the honey that has been collected from another source. So this would mean the honey is now classed as GM.

*Does the regulatory system for agvet chemicals effectively align regulatory effort with risk? How can a better system be achieved?*

In Australia the registration of agricultural chemicals and the labels are the responsibility of the Australian Pesticides and Veterinary Medicines Authority (APVMA). However the enforcement of the label directions is the responsibility of the States.

Our industry has found that the enforcement of these labels is not carried out by some States. Beekeepers who have lost bee hives due to poisoning have been told by the New South Wales Environmental Protection Agency (NSWEPA) that the labels are only a guide and NSWEPA have no way of enforcing the label direction. This despite that in some cases the label has "DO NOT" in capital letters before giving instructions on application when bees are foraging or prior to flowering.

AHBIC would submit that label directions are part of the registration process and should be able to be enforced by the State Authorities. If they are not able or unwilling to carry out their duty then enforcement should be taken over by the Commonwealth Government Departments.

*Is there scope for Australian regulators of agvet chemicals to recognise the tests and standards developed by their overseas counterparts?*

Australia is the last major beekeeping country in the world that does not have the varroa mite (*Varroa destructor*). We are told it is a matter of when the mite will arrive in Australia not if.

To be prepared, applications have been lodged with the Australian Pesticides and Veterinary Medicines Authority (APVMA) to have shelf registration of acaricides so that when varroa does come to Australia and, if it is not eradicable, then, at the stroke of a pen, beekeepers will have access to these acaricides to treat their bee hives. This would prevent the problem of having an exotic pest but not the treatment options available to combat it. This exact problem has been the experienced in other countries when they had incursion of the varroa mite.

As with all chemicals and learning from overseas experiences, there will be resistance build up by the varroa to the acaricide used. Worldwide there are new chemicals being developed to treat the varroa mite. For them to be registered in Australia it is often the requirement that testing needs to be undertaken in Australia. AHBIC would submit that APVMA should be able to accept test data developed overseas so that these acaricides can be registered in a timely manner in Australia.

*Are food safety standards proportionate to the risks they are designed to address?*

AHBIC has been lobbying for a new honey standard for Australia for several years now without success. The answer given by Food Standards Australia and New Zealand (FSANZ) is that this is a quality issue and not a food safety issue. The current Australia New Zealand Food Standards Code 2.8.2 can be found at <https://www.comlaw.gov.au/Details/F2008B00657> As can be seen it is very brief.

When AHBIC found honey being sold in fruit shops and subsequent analysis showed it was not honey but C4 sugar most likely corn syrup, a complaint was lodged with the Victorian Health Department who are responsible for the enforcement of the food standard in Victoria. Their answer was that even though it was most likely in breach of 2.8.2, as it was not a health issue, they would not act. Action was later taken up by the Australian Competition and Consumer Commission (ACCC).

If a Department has the responsibility to enforce a standard then they should do so.

*Are there other significant regulatory issues affecting farm businesses not directly addressed in this issues paper?*

1. The New Wales Forestry Corporation had a tried and proven method of allocation of apiary sites. It gave certainty to the beekeeper that there would be sites that could be booked up to allow them to produce a honey crop or to build bees before or following pollination.

In an effort to maximize revenue the Corporation decided that they would trial auctioning of sites. Whilst this may have given the Corporation a short term gain it is not sustainable for the long term for beekeepers. Secure, economically viable tenure of public land access is vital to the future of beekeeping and those agricultural industries that rely on the industry for the pollination services they provide. The auction produced economically unsustainable prices for the sites auctioned as desperate beekeepers were caught up in the heat of the bidding.

The Corporation is also looking at the possibility of tendering sites. This would create uncertainty with the beekeeping industry because beekeepers would not know if they would be able to have sites available to them or at what cost they would need to bear. As Australia, including NSW, have been in a run of very poor production seasons for honey, this added burden of uncertainty and an increased financial burden of a massive jump in site fees will produce extra mental pressure on beekeepers at a time when it is imperative to reduce this.

Whilst these measures may seem to have financial gains for the Corporation, the ramifications for the beekeeping industry need to be considered. If this was the case then AHBIC would submit that the secure future of the beekeeping industry would become uncertain. It must be remembered that when considering the future of the beekeeping industry, the future of many agricultural and horticultural commodities need to be also factored into the equation. It is estimated that between \$4-6 billion worth of agricultural and horticultural crops rely on honey bees for pollination.

2. A skilled labour force to work in the beekeeping industry is not readily available in Australia. This has been shown by the inability of beekeepers to employ skilled labour either through employment agencies or by advertising. Beekeepers have been able to secure skilled employees through 457 visas.

The recent changes to the English requirement for the 457 visa makes it now a lot harder for beekeepers to secure their necessary skilled labour force by this means. Examination of the increased requirements do not seem to be justified for the beekeeping industry.

### *General comment*

Much has been made about the reduction of red tape in Australia. However there are instances when this has been used as an excuse to not implement some actions. As an example, Asian bees were found in Cairns in 2007. Subsequently eradication was attempted but was ceased despite the protestation of the beekeeping industry.

Industry lobbied to have a biosecurity zone in north Queensland for the Asian bee as this was seen as a way of keeping live bee exports open and hopefully a way to have the export of live bees resumed to the United States of America. The excuse was put up that this would increase red tape. The reality was that there would have been minimal red tape but it was a convenient excuse.

Australian Honey Bee Industry Council Inc.  
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