



# NSW APIARISTS' ASSOCIATION INC.

ABN: 89 417 216 326

## **Submission Feedback – NSWAA say on the NSW Forestry Monitoring and Improvement Program 2019**

### **Introduction:-**

The NSW Apiarists Association (NSWAA) is responding to the invitation from the NSW Natural Resources Commission (Commission) to provide comment on the *Draft Program Strategy* - for the Forest Monitoring and Improvement Program (the Program) that is open for comment until 4 July 2019.

The following submission intends to address the request from the Commission to establish from a significant stakeholder in NSW Forests, the NSWAA who represent commercial beekeepers, whether the Program as drafted meets the criteria of:-

- Is the proposed design of the Strategy sound? How can it be improved?
- What are the priority issues and decision needs the Program should focus on?
- How can organisations within and outside of the NSW Government contribute monitoring and research on NSW forests coordinated by the Program?

The NSWAA comments and feedback are based upon the considered concerns to ensure that the draft Program will more fully involve commercial apiarists in the monitoring and improvement of NSW forests. This inclusion will support the goal of having ecologically sustainable forest management key in forest operations into the future. The NSWAA is aware and supportive of the fact that this response will be made publicly available.

### **1. Background to respondent organisation.**

The NSWAA is the peak industry body for NSW's 839 commercial apiarists and has provided over a century of service to its members. Over the same period commercial beekeepers have been active in the State forests of NSW and have coexisted constructively and amicably with the timber industry.

The NSWAA represents a majority of the state's commercial beekeepers and the NSW apiary industry is characterised by:-

- Contributing \$36 million annually to the NSW economy from the value of honey and associated bee products.
- Contributing to \$94 million of national gross value of honey and associated bee products.
- Providing the greatest number of commercial pollination hives nationally that service the 35 agricultural industries dependant on honey bees for their production. On a national basis a conservative economic value of the pollination of agricultural industries is estimated to be in a range of \$4 - \$6 billion, however this contribution continues to be scaled upwards towards \$ 8 to 12 billion as the value of horticultural and agricultural crops increase.
- Being the nation's leader in production of honey and ownership of hives accounting for 40 – 45% of the national honey crop.

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- Having approximately 8,600 registered beekeepers accounting for 293,833 registered hives (1).

## **2. The importance of NSW Forests to NSW Commercial Apiarists**

The NSWAA acknowledges the significant economic and environmental use and value to their commercial members of forests especially those containing native species on both public and private land in NSW. These areas provide licensed apiary sites or the potential for apiary sites, that either directly through the provision of floral resources, or as a site for hives where access to floral resources further afield are available as honey bees can forage up to 3 kilometres from their hives.

In an environment of declining floral resources access to NSW forests is essential, Such access provides the provision of a diverse range of flora that are unique in their capability to be highly productive in terms of nectar and pollen resources for honeybees. This high level of resource production with its species diversity allows honeybees to develop strength, vigour and health before and after pollination events. It also provides honey that is vital for cash flow to maintain beekeeping businesses during the gaps that exist between pollination events and to ensure beekeeping businesses are viable.

NSW, as the nation's leading apicultural state, is ideally located to capitalise on the growth of paid pollination services that has significant benefits to regional economies and the State as a whole. To meet predicted demand from one horticultural industry, the almond industry, will require the placement of 270,850 hives in almond orchards by 2025 or 60 % of Australia's current total number of commercial hives. It is important to note that hives from Western Australian and Tasmania cannot legally be transported into NSW or Victoria compounding this anticipated shortage. This one industry, almonds, that is completely dependent on honeybees, achieved a farm gate value of approximately \$750 million from February 28, 2018 to March 1, 2019 (2). Almond exports in the 2017 / 2018 marketing year accounted for \$ A 429 million (3).

This prediction for the number of hives required to service the almond industry in 2025 will not be achievable based on current hive numbers. Every one of these predicted hives required will need to have had time exposed to the nectar and pollen resources from flowering native plants and woodlands found in areas such as NSW Forests and the surrounding private and public lands.

## **3. How can the Program be improved.**

Comments and highlights have been provided within the accompanying pdf. These comments and observations are to be considered in tandem with the accompanying written feedback submission from the NSWAA.

A review of the draft performance measures in the Program, what success will look like and identified key performance indicators both short and medium term would be further enhanced from a review by an independent MERI operative. It is well worthwhile considering the online monitoring, evaluation, reporting and improvement tool (MERIT). MERIT has been developed for the project and programme reporting requirements of Australian Government Natural Resource Management (NRM) Programmes. MERIT allows the recording and uploading of data about the progress of projects on a continual basis and to submit reports online. It will also increase information sharing within NRM communities and the broader public. Developed in collaboration with the Atlas of Living Australia, MERIT will enhance the reporting process by allowing simpler yet more

complete project records and by demonstrating direct links between project activities and contributions to Australia's biodiversity conservation work. This system is well worthwhile considering by the Commission.

What is not obvious in the draft Program strategy is the involvement of ongoing economic analysis as a part of the process, nor is an economist listed in any of the committees. Page one highlights the quadruple bottom line mentioning economics in ecologically sustainable forest management however after this mention the reality of economic sustainability appears to be largely ignored.

Mention of Climate Change and measuring its impacts and developing adaptive responses is not obvious in the draft Program strategy as presented. NSW beekeepers are exposed to the impacts of a changing climate and its impact on floral resource and its geographic distribution.

The NSWAA principally requires the State of NSW to strive for scale, balance and to have native forests available in perpetuity. That is all values and uses are recognised in perpetuity striving for equitable coexistence amongst all legitimate forest users that are recognised by Government. This must include commercial apiarists. A long-term goal could be that

*"NSW forests will be a vibrant ecosystem that is sustainable, diverse, healthy, multi-age and multispecies."*

#### **4. What are the priority issues and decision needs the Program should focus on?**

The Program needs to ensure that the final program reflects the request for input from all stakeholders and it is effective and meets its obligations. The outputs and outcomes derived from the Program must be communicated through a diversity of communication channels while meeting the agreed timelines.

#### **5. How can you contribute? How would you like to be involved?**

The NSWAA must be included and represented on the NSW Forest Monitoring Steering Committee. The NSWAA would develop a position with this Committee as how it could best support the Program in achieving its objectives.

The complete absence or acknowledgement in this draft Program of apiarists as a significant co-dependent forest industry is a major omission. This omission diminishes, at this drafting stage, a significant opportunity for the monitoring and management of environmental values and highlights a major flaw in the understanding of the comprehensive nature and value to the broader community of forest users.

The NSWAA has highlighted in numerous submissions to Government agencies that have requested feedback on forest associated policies and proposals, especially since 2017, a need for a greater degree of communication and consultation with them. These requests in the submissions have identified the need for the agencies responsible for the public and private domain, that includes NSW's forests, that commercial apiarists are effectively collaborated and communicated with. Formal consultation with commercial apiarist representatives through the NSWAA will derive benefit from the day to day

assessment of forest health and observation of logging practice and forestry operations that can be provided by commercial apiarists. The unexploited potential for such assessments combined with policy and research findings input from the Australian Honeybee Industry Council's Natural Resource Committee will aid in achieving ecologically sustainable development outcomes for the benefit of the current and future generations. This is a significant opportunity derived from the licensed and private sites occupied by beekeepers. For instance *The May 2009 Draft Report on Progress with Implementation of NSW Regional Forest Agreements* identified 2,509 licensed apiculture sites in NSW regional forests. This number of potential monitoring sites is not insignificant.

To exclude such a valuable repository of knowledge and information accrued over generations from beekeepers familiar with the same sites and areas and ongoing seasonal observations would be a major loss for the community of NSW in this generation and for future generations.

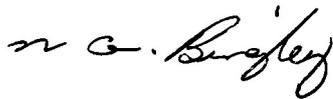
The NSWAA, through the NSW Forest Monitoring Steering Committee and independently must contribute to annual reviews and major reviews. It is essential that the commercial honeybee industry through the NSWAA must be part of this process where they can assist in areas such as developing matrices to score the various land tenures and report on ongoing forest health and monitor the status of floral resources.

It is essential that the NSWAA play a role commensurate with their position as a co dependant forest industry in influencing the Program design and particularly the monitoring, evaluation and review process.

## **6. Conclusion**

It is to the detriment of the State of NSW that the request for involvement of commercial beekeepers in advisory bodies associated with public lands in NSW has been ignored to date. This in-depth knowledge of the valuable mixed species native forests of NSW, developed over generations in many cases is a significant loss to the broader NSW community and its economy. This position is in stark contrast to Victoria where a constructive coexistence between the Forest Industry and beekeepers is encouraged and facilitated by the Victorian State Government.

I am available at anytime to further elaborate on this submission and address any questions or clarifications required.



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### Source

1. NSW Department of Primary Industries - Honey Bee Industry Team report to NSWAA Annual Conference. 16 - 17 May 2019. *Statistics current at 29 March 2019.*
2. Spence A. **Record crop to drive Australian almond exports.** The Lead - News leads from South Australia.
3. Almond Insights 2017 - 2018. Almond Board of Australia.