

**Productivity Commission Inquiry.**  
**"Impacts of Native Vegetation and Bio-diversity Regulations."**  
**Submission.**

1. Introduction.

- 1.1 The Victorian Apiarists' Association Inc. [VAA] is the Victorian peak body for the Apiculture industry [beekeeping]. The VAAinc. is a member body of the Federal Council of Australian Apiarists' Associations. [FCAAA], which represents honey producers at a national level through the Australian Honey Bee Industry Council [AHBIC].
- 1.2 Apiculture is a primary industry with a national GVP of about \$90m at the farm gate. Significant honey price increases over the past 12 months or so have occurred due to a buoyant export market as well as the effects of drought on supply. GVP has potential to further increase as production levels return to normal following the drought.
- 1.3 Victoria's share of the national GVP is about \$16m, mainly deriving from honey and bees wax production. Retail value of honey sold in Australia is about \$200ml.
- 1.4 From the wider community perspective, the greatest external benefit of the apiculture industry derives from the pollination [fertilisation] of agricultural and horticultural crops by honeybees through contract and incidental services. The benefit of honeybee pollination, represented by increased crop yields, was first measured by the University of New England, Armadale, to be up to \$1.2b per annum, [Gill1989], throughout Australia. Updating of this significant community benefit to \$1.7b per annum has recently been completed, Attachment [111], RIRDC, VALUING HONEY BEE POLLINATION, GORDON DAVIES, 2003.

- 1.5 Eucalypt forests and woodlands systems represent the most important melliferous [nectar and pollen producing] resource for beekeeping in Australia. In Victoria, about 85% of honey production derives from species of eucalypts.
- 1.6 Native forests and woodlands on public and freehold land therefore play a critical role in maintaining prosperous commercial honeybee populations, essential not only for efficient apiary production, but for the production of much of the human and animal foods that are successfully grown, harvested, sold, and consumed by Australians and overseas customers.
- 1.7 Commercial beekeeping practices in Australia, including Victoria, are mainly geared to the inherent, sporadic flowering characteristics of the vast range of eucalypt species that are regionally located on public and freehold land throughout the continent. As a consequence, the industry is highly mobile, each operation migrating several times each season to different forest systems, in different regions, up to and sometimes more than 1000kms apart. This mobility sometimes helps to mitigate adverse effects on industry participants arising from occasional regional depreciation of resources.
- 1.8 In Victoria, beekeeping in public land forests including parks is authorised by various pieces of legislation, and administered through a system of annual licences and temporary permits. Policy guidelines for beekeeping, [21.5pl] developed by the state government and industry in consultation, regulate day to day management.

## 2. Submission Focus.

- 2.1 The VAAinc. notes the inquiry includes investigation of the impacts of native vegetation regulation regimes applying to both public and freehold land in Australia. The VAAinc. advises, although this submission is primarily focussed on the working of the forested public land estate by the Victorian migratory beekeeping industry, the industry extensively works native flora growing on crown land leased to farmers, and on freehold land.

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- 2.2 This submission asks the Commission to recognise,
- [a] the critical economic dependence of the Victorian apiculture industry on being able to maintain access to native forest systems on public land, including the expanding conserved estate [parks etc], to crown leasehold and to freehold land.
  - [b] that the maintenance of access to native forest systems in Victoria and Interstate, now and in the future, can be clearly demonstrated to be in the public interest.
  - [c] that such access can continue to be authorized by legislation and regulation without compromising land management objectives related to nature conservation.

### 3. Documentation.

- 3.1 Attached to and forming part of this submission are the following national industry policy documents.
- [a] The Economic Value and Environmental Impact of the Australian Beekeeping Industry. [Gibbs and Muirhead, 1998. Attachment [1].
  - [b] Honey Bees in Australian Conserved Forests, [Briggs and Keith 1987, revised 1996. Attachment [11].
- 3.2 The Gibbs and Muirhead study brought together into one volume all of the known facts about the Australian apiculture industry's economic values, impacts, and resource needs. The VAAinc submits that examination of this independent study by the Productivity Commission will provide a sound basis for consideration by the Commission that future legislation and regulation enacted by Governments should not limit future access provisions for beekeeping in public and freehold land native forests, on the basis of the public interest question.
- 3.3 The Briggs and Keith study articulates the case, based on the science, why migratory commercial beekeeping practices do not adversely impact on the reproductive success of native flora and fauna, [bio-diversity] and that the practices therefore are compatible with land management objectives of nature conservation. The VAAinc. submits that an examination of this study by the Productivity Commission will provide a sound basis for consideration by the

Commission that future legislation and regulation enacted by governments should not limit future access for beekeeping in public and freehold land, on the basis of perceived impacts adverse to the reproductive success of native flora and fauna.

The VAAinc. asks the Commission to note that updating of this study in terms of values and additional research outcomes is currently proceeding.

#### 4. The Public Interest.

4.1 The VAAinc. submits, the above studies show that ,

- [a] the beekeeping industry in Victoria and elsewhere is critically dependent for its economic viability on its continuing access to native forest and woodland systems growing on public and freehold land.
- [b] through production of principally the high quality food item, honey, this small primary industry contributes to national domestic and export revenues.
- [c] regional native forest systems sporadically provide the natural floral resources that are collectively necessary to help maintain prosperous commercial migratory honey bee populations throughout the season.
- [d] honey bee populations thus maintained represent the principal resource on which sections of the agricultural and horticultural industries rely for the delivery of crop pollination services by apiarists. This sector of the beekeeping industry is expanding, as more growers become aware of the potential for increasing crop yields through contracted honey bee crop pollination services.
- [e] as previously discussed, and referred to in the above documentation, the benefit of honey bee crop pollination in Australia, measured by increased crop yields is up to \$1.7 billion per annum. Overseas research studies that investigate honey bee crop pollination benefit corroborate the Australian findings.
- [f] reduced honey bee crop pollination, for what ever reason, would mean that human and animal food production in Australia would become less efficient in terms of productivity and output. The circumstances would inevitably translate to increased food prices for Australian consumers, and less revenue from horticultural exports. More competition from some food imports would also be likely to occur.

4.2 The VAAinc finally submits that the Commission recognize that many of the food crops grown in Australia today evolved in the Old World or elsewhere in partnership with their natural pollinator, honey bees. Where ever Europeans have settled throughout the world, that partnership is continuing.

Conclusion.

5.1 Witnesses representing the VAAinc. attended the Commission's public hearing in Melbourne on the 14th August 2003. Earlier, the Association had lodged a draft submission with the Commission. This final submission is lodged in response to a recent request by the Commission.

5.2 The VAAinc also draws attention to our letter of the 1 5th September 2003, which responded to a request by the Commission for information about the application of the Precautionary Principle by regulators regarding access by beekeeping industry participants to native forest systems.

Yours faithfully  
Graham Matthews.  
President,  
Victorian Apjarists' Association Inc.