NSW APIARISTS' ASSOCIATION INC.

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About You: ● Non Government 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 $8 - $12 billion.
- Being the nation's leader in production of honey and ownership of hives accounting for 40 – 45% of the national honey crop.
- Having a total of approximately 8,600 registered beekeepers accounting for 293,833 registered hives (1).

The importance of native NSW Forests to NSW Commercial Apiarists

The NSWAA acknowledges the significant economic and environmental use and value to their commercial members of native forests 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 as 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.

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. The almond industry is completely dependent on

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honey bees and 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. NSW native forests provide a diverse range of flora that are unique in their capability to be highly productive in terms of nectar and pollen. This high level of resource production from the diversity on a biological level from the floral resources and nectar of native forests that is free from pesticide, insecticide and herbicide impacts is essential. This resource allows honey bees to develop strength, vigour and health before pollination events and subsequently after pollination activity to rebuild their depleted reserves. On an economic level apart from equipping honeybees to be successful pollinators the native forests provide honey for human consumption that provides vital cash flow for beekeepers between paid pollination activities.

While honey production is the most obvious and tangible outcome from the activities of honey bees, pollination is vital to agriculture and paid pollination is now an important business for commercial beekeepers. Pollination by the honey bee is essential to 35 agricultural industries for production from crops as diverse as clover for the grazing industry through to watermelon production. 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.

1. Do you want your submission marked as confidential? ❑ Yes ■ No
2. Do you want to receive future notifications and updates on the PNF Review? ■ Yes ❑ No
3. Which of the following best describes you? ❑ PNF Industry ❑ Timber Industry ❑ Landholder ❑ Individual ❑ Other (please specify): **NSW Apiarists Association** ■ Agricultural Industry ❑ Environmental organisation ❑ Local Government
4. Which draft PNF Code are you providing a submission on? ■ All Codes ❑ Northern NSW ❑ Southern NSW ❑ River Red Gum Forest ❑ Cypress and Western Hardwood Forests
5. Feedback on draft Codes Please provide your feedback and comments on the draft PNF Codes of Practice in an attachment. Where possible, please refer to the relevant section of the draft PNF Codes (e.g. Section 1 - PNF Plans; Section 2 - Forest operation planning and management).

The NSWAA comments and feedback are predicated by the position that they do not want to be considered as an impediment to private native foresters earning income from their resource.

Comments:-

The two proposed changes included in the suggestions provided in the NSWAA submission of 31 January 2019 as follows have not been included in the revised March 2020 Codes of Practice as reviewed.

Question 1.
What improvements should the NSW Government consider making to the existing Private Native Forestry Codes of Practice?

Response:-
Using as an example the current Private Native Forest Code of Practice for Southern NSW
Private Native Forestry Code of Practice for Southern NSW

3.1 Single tree selection and thinning
(1) Single tree selection and thinning operations must not reduce stand basal area below the limits specified in Table A.
(2) The **minimum** stand basal areas in Table A must be calculated in accordance with the *Silvicultural Guidelines for the Code of Practice for Private Native Forestry* available at www.epa.nsw.gov.au/vegetation/nativeforestry.htm.

Table A: Minimum stand basal areas for single tree selection and thinning operations

Broad forest type	**Stand height (< 25 metres)**	**Stand height (≥ 25 metres)**
Tablelands hardwood	12 m2/ha	16 m2/ha
Tablelands ash	12 m2/ha	16 m2/ha
South coast ash/stringybark	12 m2/ha	18 m2/ha
Spotted gum	12 m2/ha	16 m2/ha

This Table has been replaced by
Section 3.2 Single tree selection and thinning (2) Single tree selection and thinning operations must not reduce stand basal area below 12m2/hectare across the harvested area of the Forest Operation Plan or Forest Stewardship Plan area.
Where the NSWAA request was: -

The position of the NSWAA is that NSWAA stresses that a minimal basal area of greater than 10 square metres of tree basal area per hectare is necessary to give species mix, age diversity and genetic diversity for future forests. Species mix, age diversity and genetic diversity are all important for fauna as well as meeting beekeepers needs and the continuing health of a unique forest. The minimum standard basal areas as provided in Table A above fall within the Associations position.

4. Protection of the environment
4.1 Protection of landscape features of environmental and cultural significance
(1) Forest operations in and adjacent to specified landscape features must comply with the requirements in Table C.

Table C: Requirements for protecting landscape features

Landscape feature	Operational conditions
13 Requirements are listed here	It appears that none of these impact upon bee keeping operations.
Dispersible and highly erodible soils	Existing roads may be maintained. Drainage feature crossings must be armoured with erosion-resistant material. Road batters and table drains must be stabilised using erosion-resistant material, vegetation or slash. Log landings must be stabilised using erosion-resistant material, vegetation or slash at the completion of forestry operations. Measures must be taken to immediately stabilise any erosion of roads or snig tracks

The position of the NSWAA is roads may should be replaced by "some existing roads must be maintained for forest management and firefighting purposes" thereby providing access for logging, firefighting and beekeeping vehicles at a standard that will permit traffic.

The Code of Practice has continued with this "may" see Table B: Requirements for protecting landscape features. This provides an option not to maintain roads which is a concern.

A review of all four PNF Codes failed to identify a section on ***"Training and advice services to assist landholders, industry and the community".*** The assumption is that this area is still under development and the offer from the NSWAA is still current where they would welcome an opportunity through training and advice services to inform landholders, industry and the community more broadly on the importance of floral resources from NSW native forests to the NSW and Australian beekeeping industry and the sustainability of Australian agriculture and resultant food security.

The NSWAA regard it as imperative that a greater understanding is created amongst PNF owners and the broader community of the current situation of declining floral resource access within native NSW forests. Continued access is essential for honeybees and beekeepers to continue to support Australian agriculture.

NSWAA understands that a large percentage of private native forests are managed for timber harvesting. With good silvicultural practices and biodiversity management there can be a triple bottom line outcome of:

1. Increased income for the forest owner with maximum number of trees reaching maturity and therefore maximum return.
2. Increased nectar production from the mature trees (mature trees produce much more nectar than young trees) for bees and native fauna.
3. Improved environmental outcomes with a multi aged, multi species forest.

As passive users of native forests honeybees are very compatible with all private native forest management goals. Beekeepers natural stewardship and care for forests also leave a small footprint in native forests.

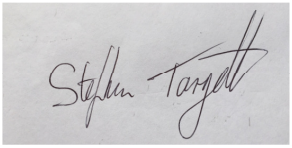
Closing remarks

This is the second response provided by the NSWAA to requests for comment on the draft Private Native Forestry Code of Practice.

The NSWAA welcomes any opportunity to expand further or clarify any of the above areas where feedback has been requested. The NSWAA would also welcome any opportunity where dialogue and constructive collaboration would enhance further the sustainability of the native forest resources of NSW.

The NSWAA would like to receive project updates and are supportive of this submission being made public.

yours sincerely



Stephen Targett
President NSWAA
May 2020

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.