



# NSW APIARISTS' ASSOCIATION INC.

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**About You:**  Non Government Organisation

The NSW Apiarists Association (NSWAA) is responding to the invitation to provide their views on this Private Native Forestry Review, that is a component of the NSW Forestry Industry Roadmap, that will support the development of new codes of practice, and the associated rules, regulations and approvals process for private native forestry in NSW. The NSWAA also welcome the opportunity to highlight their potential role in guiding the development of training and advice services for private native foresters.

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. The submissions aim is to identify to them the vital need for the age and species mix of native forests to aid both the apiarists and the long term sustainability of our valuable native forests.

The NSWAA is aware and supportive of the fact that this response will be made publicly available.

The NSWAA is the peak industry body for NSW 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 and the predecessors of the Forestry Corporation of NSW.

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

- 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 current economic value of the pollination of agricultural industries is estimated to be in a range of \$ 8 to 12 billion. This estimate will increase as the value of Australian 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.
- Having approximately 7,000 registered beekeepers accounting for 285,553 registered hives.
- 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.

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### 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](http://www.epa.nsw.gov.au/vegetation/nativeforestry.htm).

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

<b>Broad forest type</b>	<b>Stand height (&lt; 25 metres)</b>	<b>Stand height (≥ 25 metres)</b>
Tablelands hardwood	12 m <sup>2</sup> /ha	16 m <sup>2</sup> /ha
Tablelands ash	12 m <sup>2</sup> /ha	16 m <sup>2</sup> /ha
South coast ash/stringybark	12 m <sup>2</sup> /ha	18 m <sup>2</sup> /ha
Spotted gum	12 m <sup>2</sup> /ha	16 m <sup>2</sup> /ha

*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**

<b>Landscape feature</b>	<b>Operational conditions</b>
13 Requirements are listed here	It appears that none of these impact upon beekeeping operations.
Dispersible and highly erodible soils	Existing roads may be maintained. Drainage feature crossings must be armoured with erosion-resistant material.

	<p>Road batters and table drains must be stabilised using erosion-resistant material, vegetation or slash.</p> <p>Log landings must be stabilised using erosion-resistant material, vegetation or slash at the completion of forestry operations.</p> <p>Measures must be taken to immediately stabilise any erosion of roads or snig tracks</p>
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*The position of the NSWAA is roads may should be replaced by roads must be maintained thereby providing access for logging and beekeeping vehicles at a standard that will permit traffic.*

#### **4.4 Drainage feature protection**

(1) Forest operations must not occur in riparian exclusion zones, other than in accordance with this clause, and except where otherwise allowed by this Code. For the purpose of this clause, riparian exclusion zones are defined as those areas within the distances specified for ‘Drainage feature’ as listed in Table F.

**Table F: Riparian exclusion and riparian buffer zones**

<b>Drainage feature</b>	<b>Riparian exclusion zone distance from drainage feature</b>	<b>Riparian buffer zone distance beyond riparian exclusion zone</b>
Mapped first-order streams	5 metres	10 metres
Mapped second-order streams	5 metres	20 metres
Mapped third-order or higher streams	5 metres	30 metres
Prescribed Streams	20 metres	15 metres

*The position of the NSWAA is based on anecdotal evidence for instance of the results of cable logging in the Blowering dam catchment that was identified as contributing to run off creating sedimentation in the dam. The lack of sufficient riparian buffer was identified as the cause of the sedimentation. A previous recommendation to the IFOA review was for the inclusion of adequate buffers with no prescribed distance.*

### **5. Construction and maintenance of forest Infrastructure**

#### **5.1 Construction and maintenance of roads**

*The position of the NSWAA is that adequate infrastructure is vital for the effective and efficient placement and collection of hives from forest sites. Within Section 5 of this PNF Code of Practice there are 74 conditions with in some areas further additional conditions therein. This section as it stands currently, prior to redrafting, is worth a review.*

*Ease of access to bee sites for beekeepers vehicles is essential for the conduct of their business. This requirement is often overlooked with the presence of steep banks graded that are an impediment to vehicles. The NSWAA require that if a track leads to bee site then track drainage must be constructed in a manner that allows heavy vehicular access for beekeepers.*

#### **Question 2.**

**Do you have any suggestions to ensure the Private Native Forestry regulatory settings are efficient, enforceable and effective?**

#### **Response:-**

Efficiency and effectiveness of the current or proposed Private Native Forestry regulatory settings can only be determined based on compliance with the Code by private native foresters.

A measurement of the degree of compliance with regulatory settings needs an initiative that audits compliance across a statistically rigorous sample size of private native foresters, that is repeated over a reasonable period of time. Such an initiative would potentially aid in developing community confidence in the NSW Governments commitment to achieving the third of the four priority pillars under the NSW Forestry Industry Roadmap 2016, “Community Understanding and Confidence” in the NSW Governments commitment to ecologically sustainable forest management. A transparent process such as this to support this pillar needs to be put in place.

With approximately 8.8 million hectares of NSW’s native forest estate held as private native forest the Codes of Practice as they currently exist with their extensive prescriptive conditions are a major undertaking if regulatory compliance is to be thorough. The degree of complexity with the Codes of Practice is demonstrated for instance within Section 5 of the Southern NSW PNF Code of Practice where there is 74 conditions with in some areas additional conditions therein. It is of concern that with this degree of detail that the regulations could be adequately monitored let alone enforced, it is worthy of consideration therefore that the Codes for the four forestry areas are abbreviated for example into a summarised format in plain English supported by the current detail as an addendum to such a summary.

#### **Question 3.**

**How can the NSW Government improve the authorisation and approval system for Private Native Forestry?**

#### **Response:-**

The NSWAA suggest that improvements to the authorisation and approval system for Private Native Forestry are best addressed by private foresters and the associated industry participants.

#### **Question 4.**

**What training and advice services would assist landholders, industry and the community?**

#### **Response:-**

The NSWAA 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.

In an environment of declining floral resources access to native NSW forests is essential for honeybees. NSW native forests have 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 honeybees 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 honeybees, pollination is vital to agriculture and paid pollination is now an important business for commercial beekeepers. Pollination by the honeybee is essential to 35 agricultural industries for the majority of their production from crops as diverse as clover for the grazing industry through to water melon 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.

#### **Question 5.**

**Do you have any other comments or feedback relevant to Private Native Forestry that you would like to share with us?**

Response:-

Barriers that restrict access to floral resources have been identified by the commercial beekeepers who comprise the NSWAA as the single greatest threat to the sustainability of the NSW beekeeping industry. NSW commercial apiarists have a vested interest in the maintenance and where possible the further development of all native forests both private and government. The concept of ecologically sustainable development is both a reality and a necessity to commercial apiarists. Their need is for the continuation of the great value derived from nectar and pollen resources provided by the unique forest biodiversity available in Australian native forests. Beekeepers cannot countenance logging practices that result in both the creation of sterile monocultures with single native species and the retention of minimal forest areas created by poor policy and lack of enforcement of codes of practice. Their requirement is for a fully bio-diverse forest reflecting the full range of native species contained within multilayered forest canopies that are appropriate for the specific environment.

Beekeeping has extensive and significant benefits for all of the citizens of NSW and their communities, environment and economy.

The comments provided in the responses here highlight the need for a greater degree of communication and consultation from the agencies that support Private Native Forests that includes NSW's coastal timber production forests with forest users, such as commercial apiarists. 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. Commercial apiarists in many cases have in-depth knowledge of the valuable mixed species native forests of NSW. This knowledge has been developed over generations and it is a resource that cannot be underestimated. 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.

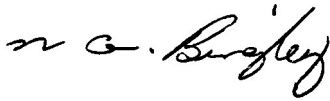
Commercial beekeepers and the timber industry in NSW have coexisted for over 100 years in the private and public State forests of NSW. This coexistence however has become tenuous in recent years with the beekeeping industry believing they are becoming increasingly marginalised by government agencies such as FCNSW. The NSWAA would welcome greater involvement with industry and all government agencies with a responsibility to Private Native Forests.

### **Closing remarks**

The NSWAA welcomes any opportunity to expand further or clarify on any of the above areas where feedback has been requested. The NSWAA also would 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



Neil Bingley  
President NSWAA  
31 January 2019