



NSW APIARISTS' ASSOCIATION INC.

ABN: 89 417 216 326

Manager
NPWS Planning, Evaluation and Assessment
Locked Bag 5022
Parramatta NSW 2124

Dear Sir / Madam,

**Feedback from the NSW Apiarists Association on the National Parks and Wildlife Services (NPWS):
- Draft Cycling Policy, Cycling Strategy Consultation Draft and the Draft Cycling Strategy
Guidelines for Implementation.**

1. Key issues

The principal issues identified by the NSW Apiarists Association (NSWAA) that these three documents would be aided by is: -

- Incompatibility of public access when cycling in the vicinity of apiary sites.
Commercial beekeepers are permitted to maintain bee sites in many of NSW's National parks. These sites are sign posted in accordance with the agreed "*National Best Management Practice for Beekeeping in the Australian Environment.*" In the interest of public safety and to avoid interference from the public with commercial bee sites cycle ways need to be located appropriately.
- recognise that commercial beekeeping in NSW forests within National Parks is a significant co dependant industry alongside the provision of public amenity and heritage value.
- consider the opportunity of the voice and expert opinion of commercial beekeepers through public consultation. As a co dependant industry the process of policy and strategy development has the potential to benefit from this important stakeholder industry.
- consult with and benefit from the value of commercial NSW apiarists as assessors of forest health through their developed knowledge and experience. This will benefit the current and future generations of National Parks and Wildlife users.

2. Comments on the Draft Cycling Policy

Page 3 – *Changes to cycling access - points 20 – 23.* An opportunity exists here to accommodate commercial beekeeping operations through adjustments or closures of cycling tracks.
Page 4 - *How does NPWS partner with cycling stakeholders? Point 25. NPWS may partner and engage with cycling groups, other park users, adjacent land managers, local councils, government departments and others, in the: a. planning, design, construction, maintenance, closure and rehabilitation of cycling tracks, networks and facilities.* The NSWAA would welcome the opportunity, as another park user where commercial beekeeping sites will be impacted, to be included in the planning and design stage of cycling tracks.

President

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3. Comments on the Cycling Strategy Consultation draft.

Page 9 – Point 4. Deliver coordinated and collaborative planning - Coordinate planning in parks, across state, regional and local levels and collaborate with cross-tenure land managers to provide cycling experiences. The NSWAA would welcome the opportunity, as another park user where commercial beekeeping sites will be impacted, to collaborate in this planning process.

Page 17 – Priority Action 5. Engage effectively with the community - 5.1 Engage early with stakeholders, including traditional owners, when planning the development of new tracks and considering the closure of unauthorised tracks or inclusion of unauthorised tracks into a track network. The NSWAA would welcome the opportunity, as a stakeholder where commercial beekeeping sites will be impacted, to collaborate in this process.

Page 18 – note that the page number appears to be missing from this draft – Table 2 – Factors for consideration when prioritising the development of possible on park cycling experiences – Compatibility with other users and park management operations.

The recognition of commercial beekeepers as another user is important.

4. Comments on the Draft Cycling Strategy – Guidelines for Implementation.

Page 7 – Point 1.5 Community Involvement - The NSWAA would welcome the opportunity, as a stakeholder where commercial beekeeping sites will be impacted, to collaborate in this process through the provision of advice in the planning process and comment on draft plans.

Page 11 – Point 2.7.2 Plans of Management - - The NSWAA would welcome the opportunity to be consulted early in the planning process.

Page 23 – Point 5.1 Management of cycling experiences – visitor safety. The NSWAA's position on appropriate distances between commercial bee sites and cycle tracks is consistent with a need for public safety.

Background to respondent organisation.

The NSWAA is responding to the invitation from NPWS to provide feedback on the Draft Cycling Policy, Cycling Strategy Consultation Draft and the Draft Cycling Strategy Guidelines. The NSW Apiarists Association (NSWAA) is the peak industry body for NSW's 1066 commercial apiarists and has provided over a century of service to its members.

The NSWAA represents a majority of the state's commercial beekeepers and the NSW apiary industry in 2021 was characterised by: -

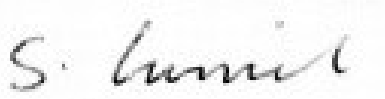
- Contributing \$36 million annually to the NSW economy from the value of honey and associated bee products.
- Contributing \$129 million of national gross value of honey and associated bee products at the farm gate.
- Providing the greatest number of commercial pollination hives nationally that service the 35 agricultural industries dependant on honey bees for their production. John Karasinski from Curtin University estimated that the economic value of honey bee pollinators in Australia in 2015 was 14.2 billion dollars.
- Being the nation's leader in production of honey and ownership of hives accounting for 40 – 45% of the national honey crop.
- Having approximately 12,008 registered beekeepers accounting for 355,413 registered hives.

Closing Remarks

The NSWAA welcomes any opportunity to expand further or provide clarification on any of the above areas where feedback has been requested. The NSWAA also would welcome any opportunity where dialogue and constructive collaboration would support further their responsibilities to the NPWS and other users of this vital public amenity.

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

yours sincerely

A handwritten signature in black ink, appearing to read "S. Cunial". The signature is written in a cursive style and is positioned above the typed name.

Steve Cunial
President NSWAA
18 January 2022