



Beechworth Honey Experience
Visitor Education Centre
31 Ford Street
PO Box 197
Beechworth, Vic, 3747

Beechworth Honey Discovery (opening late 2014)
87 Ford Street
PO Box 197
Beechworth, Vic, 3747

Factory:
38 – 40 Hammersley Rd, Corowa, NSW, 2646
P.O. Box 450, Corowa, NSW, 2646 Australia

www.beechworthhoney.com.au



31 March 2014

Committee Secretary
Senate Standing Committees on Rural and Regional Affairs and Transport
PO Box 6100
Parliament House
Canberra ACT 2600

Re: Submission to the Senate Inquiry - Future of the beekeeping and pollination service industries in Australia

Dear Committee,

Please find contained the submission from the Beechworth Honey Group to the Senate Inquiry: *Future of the Beekeeping and Pollination Service Industries in Australia*.

The Beechworth Honey Group comprises of Beechworth Honey Pty Ltd and Beechworth Honey Experience Pty Ltd. Beechworth Honey Pty Ltd is Australia's largest independently owned specialist honey packaging and marketing company. Beechworth Honey Experience Pty Ltd is Australia's premiere honey visitor education centre open 364 days a year in historic Beechworth in North East Victoria. It operates a honey education centre and concept store incorporating a free honey tour. The centre is currently being expanded to incorporate a second location to be known as Beechworth Honey Discovery which will showcase further, the link between food production and honeybee pollination via a honeybee garden, honey mead cellar door and hive kitchen and cooking school.

The Beechworth Honey Group is owned by Steven and Jodie Goldsworthy, themselves apiarists from a fourth generation beekeeping family. Our own commercial apiary is still run as part of our enterprises and we deal with beekeepers from all states except the Northern Territory.

Beechworth Honey has been a leader in the quest to improve public awareness of the importance of bees and we work tirelessly to ensure our 120,000 annual visitors understand that two thirds of Australia's agricultural production relies on honeybees for pollination. From our market research we know our message reach from our public relations activities is in the millions and we are committed to continuing to play a lead role in the space of public education and awareness of the complex, cumulative and interrelated threats to honeybees and beekeeping.

We are particularly concerned at the rapid decline in the number of beekeepers in Australia. Around the time of the 2008 More than Honey Inquiry there were 2000 mainstream or commercial beekeepers in Australia. In 2011 industry reports consistently quoted 1700 mainstream beekeepers and the latest figures quoted in the Plant Health Australia generated "Draft National Bee Biosecurity Program" (p. 14, February 2014) states 1423 mainstream beekeepers, operating more than 50 hives, in Australia. This equates to a decline of 30% of Australia's mainstream beekeepers since 2008. In addition to this the industry has always quoted that 60% of Australia's honey is produced by 250 beekeepers. Put simply Australia's future food security and agricultural prosperity lies in the hands of around 1400 barely viable, ageing beekeepers. This group of geographically isolated persons are ill equipped to manage the challenges they face. There is an urgent need for greatly improved Government policy outcomes and interventions, increased research and development and a platform that enables the ability to leverage a greater premium for Australian honey products to keep pace with the cost of production.

Jodie Goldsworthy was a key driver in mounting the *"Food Security needs Bee Security Campaign"* in 2011 which resulted in the Senate Inquiry into the *"Science underpinning the decision to cease eradication of the Asian honeybee"*. The outcomes of the inquiry clearly demonstrated the inadequacies in regard to preparedness for an exotic pest or disease incursion and highlights the serious market failure that exists with the current classification of pest threats as Category Three. Such categorisation requires the failing beekeeping industry to "carry the can" for Australia's future food security, pollination dependent industries and broader food manufacturing industry sourcing honey and pollinated food products. This campaign was a key driver in raising awareness amongst key agricultural and food industry stakeholders such as the National Farmers Federation and the Australian Food and Grocery Council to which Beechworth Honey is a member.

Throughout this submission 39 different recommendations are made for the committee's consideration. In anyone's language this is an enormous number of recommendations to make within one submission and careful consideration was given to reducing the number of recommendations. It was however decided that each recommendation was important in its own right and should be retained. The large number of recommendations gives testimony to the enormity of the task ahead in dealing with the legacy of apathy on the part of all past governments in regard to the complex, cumulative and interrelated threats to the beekeeping industry which have been allowed to escalate through such apathy. Past apathy however should be no reason for all those who play a part in the solutions not to take a lead from the hardworking and professional Australian beekeepers who, with humility, passion and

enthusiasm face enormous challenges daily, against a backdrop of a bleak and unsupported future, to work to the best of their ability, with the means they have, to achieve what they can.

The groups Managing Director, Jodie Goldsworthy is available to attend the public hearing to be held in Murray Bridge on the 15th April 2014.

Please find attached our responses to the terms of reference for the current inquiry. And most sincerely thank you for the opportunity once again.

Yours sincerely,

Steven & Jodie Goldsworthy
Directors – Beechworth Honey Group

Terms of Reference

The future of the beekeeping and pollination service industries in Australia, with particular reference to:

a. The importance of these industries from a food security, environmental and financial point of view

Food security

- Worldwide, European honeybees (*Apis Mellifera*) are credited as the most efficient pollinator known to mankind.
- Many of our food producing crops have co evolved in combination with the honeybee
- In Australia over two thirds of our agricultural production relies on honeybee pollination (RIRDC).
- Fruits, vegetables, nuts, seeds and some stockfeed fodder crops such as Lucerne and Clover rely heavily on honeybee pollination.
- Honeybee pollination of many horticultural and seed crops results in increased yields, improved quality of yield and greater saleability and return on investment for Australia's agricultural sector.
- The importance of honeybees in terms of food security is highlighted by the submissions of the broader food industries via the National Farmers Federation and the Australian Food & Grocery council making submissions to this inquiry.
- These submissions should be taken as being indicative of the growing public awareness of the important role that honeybees play in our food production systems. The submissions of the 2008 inquiry sees such broader food industry submissions absent and their presence this time around is indicative of the growing interest by key food stakeholders in where our food will be derived from in the future.

Environmental importance

- Honeybees provide a key ecosystem service and whilst an exotic species they provide a number of important benefits to their local environment.
- There are no known detrimental environmental consequences of honeybees in Australia.

Financial importance

- Worldwide demand for honey has begun to outstrip supply of genuine honey produced by honeybees. Because of this the value of the Australian honeybee industry (estimated to be around \$100 million) is likely to increase. The value of the industry alone does not accurately capture the depth of financial importance of the Australian beekeeping industry.
- Although a relatively small industry by direct output of honey, beeswax and paid pollination, the Australian beekeeping industry contributes directly to up to \$6 billion worth of pollination dependent agricultural crops.
- As beekeepers decline in numbers Australia's agricultural production risk increases with a corresponding decrease in productivity as there are less bees available for pollination and areas where there will not be sufficient bees for efficient crop pollination. The almond crop alone is predicted to need 750,000 hives in the future to meet current plantings and market growth projections. This year 150,000 hives were used to meet almond pollination needs. Access to adequate numbers of bees for pollination will be the limiting factor for future growth in the almond industry along with many others in the future.
- Without honeybees it will become uneconomical to grow these crops because there are not enough alternate or native pollinators to pollinate efficiently in the short flowering times.
- Further up the supply chain, the Australian food manufacturing sector relies heavily on the availability of honey or honey derived products, pollination dependent plant derived foods and dairy, meat and protein products many of which are derived from animals which graze on pastures reliant on honeybees.
- During the current severe honey shortage being faced by the industry, it is clear that the lack of availability of a simple product like honey alone has the capacity to cease production and close down factory shifts in the nation's largest food manufacturing factories. The lack of a quality, reliable Australian produced broader food source would have a disastrous effect on the \$111 billion Australian food and grocery manufacturing sector. To date this up stream supply chain impact has largely gone unconsidered by Governments.
- Clearly European honeybees are one of the most strategically important inputs into the Australian food sector.

Key recommendation:

1. The strategic importance of the Australian beekeeping sector must be urgently recognised by the Australian Government and in the national interest such

recognition must translate into relevant policies which address the complex, cumulative and interrelated threats to beekeeping in Australia.

b. Current challenges facing the beekeeping industry domestically and internationally, and its future sustainability

- The Australian beekeeping industry is now at crisis point as it continues to endure the same mix of complex, cumulative and interrelated threats to its viability as were identified in the 2008 report. As many other submissions will focus on these challenges, this submission will focus more on market challenges.
- It is little wonder that we have seen a decline in the order of 30% of mainstream beekeepers since the 2008 inquiry as outlined earlier due to ageing beekeepers, a clear lack of Government support of the recommendations from the 2008 “More than Honey” report, a tighter global economic conditions, a more complex and demanding business environment, sustained climate variability; droughts, floods and fires. The perfect storm has continued to rage with force for the Australian beekeeping industry.
- The small size of the Australian industry has always been a limiting factor but as the number of mainstream beekeepers fall, and those remaining in the industry age, without younger replacements entering, the industry’s ability to manage its own challenges collectively is diminished.
- In the 2013 / 2014 honey production season most beekeeper suppliers to Beechworth Honey Pty Ltd will produce between 50% and 90% LESS honey than in an average year. Such severe production declines will result in unprecedented financial hardship for most beekeepers in Australia this year. Australian beekeepers do not have a history of use of conventional Government drought assistance measures available to other agricultural sectors because beehives can be moved around and outside drought declared areas even though this does not often result in any better production prospects as is currently the case.
- The Australian honey packing sector will not currently be able to fill the demand for Australian honey within the domestic market and have ceased export activities for Australian honey to try to focus on the needs of the local market.
- At Beechworth Honey we only use 100% Australian honey...always! The current production shortage has meant that we are in the process of requesting voluntary deletions of honey across the Australian retail market and with our major food manufacturing customers and we have cut our international market. This step is essential as we do not import any honey to fill our shortfall as we do not believe we can be confident in the quality or integrity of the imported offer.

- Worldwide the demand for honey produced from bees (ie. genuine honey and not “man made”, “fake” or “adulterated” honey) is outstripping supply. Honey packers in Canada, Europe and the USA are struggling to meet the increasing demand for quality honey produced from bees with some honey packers and marketers in Europe also deleting products from supermarkets there as they are unable to source quality honey. As world honey production continues to fall and prices increase due to supply and demand unscrupulous parties will have increased motivation to manufacture fake honey that keeps one step ahead of laboratory detection methods.
- Imported honey from China and India can typically be purchased at about half the price that Australian honey is produced for.
- Other key challenges to industry likely to be covered by other submissions remain as:
 - Honeybee health (due to existing pests and diseases, chemical use and agricultural practices)
 - Access to reliable floral resources and negative impact of climate variability on nectar producing plants
 - Low financial return against cost of production and required effort in managing honeybees
 - Lack of adequate research and development and transfer of information within industry
 - Biosecurity threats of introduced pests and diseases not currently in Australia and a lack of an equitable mechanism for managing the cost of incursions and eradication efforts shared across other benefiting industries.
- The future sustainability for the Australian beekeeping industry and therefore of longer term food security in Australia is bleak assuming nothing were to change.
- Improved viability is heavily dependent on the outcomes, and Government actions taken as a result of this inquiry.
- The only glimmer of hope for future sustainability of the industry is that as production continues to decrease, and the normal supply and demand principles begin to apply, an opportunity exists for genuine honey to be transitioned from a commodity to a higher value product. This will assist with improved financial viability of the industry if there are mechanisms in place for consumers to be confident of the differences.
- Whilst currently enduring a perfect storm the final blow to sustainability is yet to be felt until Australia loses its Varroa free status.
- The Draft “National Bee Biosecurity Program” (Plant Health Australia, February 2014) promises to:
 - “put the responsibility for established pests and disease management back to beekeepers” (page 8),

- “enforce a mandatory Code of Practice” (page 6)
- Only use proposed honey producer levy increases to establish and manage the code of practice with no new monies (over the current \$210,000) being directed to preventing Varroa entry into Australia via the “National Bee Pest Surveillance Program”

With the nation’s beekeeping industry currently only protected to the tune of \$210,000 annually (\$75,000 from beekeepers, \$75,000 from other pollination dependent industries and \$60,000 from Government) against the entry of Varroa and other exotic pests and diseases, and the industry maintaining equal responsibility with Government under Category 3 Classification (with no prospect for changes to this under the new Draft outlined above) the future viability of the Australian beekeeping industry quite frankly looks catastrophic.

Key Recommendations:

2. An annual “State of the Industry” report be commissioned on the Australian beekeeping industry to provide ready access to key industry data not currently and consistently readily available such as:
 - a. Number of beekeepers
 - b. Number of bee hives kept by beekeepers
 - c. Overall number of hives
 - d. State location of beekeepers
 - e. Quantity and value of honey, beeswax and other hive products produced
 - f. Value of paid pollination services undertaken
 - g. Value of capital invested in enterprises
 - h. Beekeepers return on investment
 - i. Demographics of beekeepers
 - j. Level of beekeeper training undertaken
 - k. Success of shared Government / industry funded programs designed to assist with industry issues against Key Performance Targets eg. Pollination Australia report, National Pest Surveillance Program report.
3. “State of the Industry” data be reviewed annually by a Government / Industry and wider food stakeholder “Task Force” to be set up to help shape policy and programs required to address the complex, cumulative and interrelated threats to beekeeping.
4. The Australian Government should increase support of the National Bee Pest Surveillance Program commensurate with the risk of the introduction of Varroa to the Australian food sector.
5. Additional research and development must be supported through the development of a National Centre for Honey Bee and Pollination Industry Research or CRC which is funded widely by Government and the food industry and takes into account the principle of market failure of the small and ailing beekeeping industry, who will never be able to fund this in tune with the magnitude of issues it will need to address

for the benefit of all those in the larger food supply chain.

c. The adequacy of the current biosecurity arrangements for imported and exported honey, apiary products, package bees and queen bees

Whilst this term of reference assesses biosecurity from a planned trade perspective more importantly biosecurity arrangements need to be considered from an unplanned or “incursion” perspective. This issue could also be covered under the Reference e) as part of the past two enquiries but will be outlined here.

Biosecurity to protect exotic pests and diseases for unplanned incursions

- To date there have not been any adequate Cost Benefit analyses completed on the full list of potential exotic pest or disease incursions that could impact the Australian beekeeping industry in the future or have impacted them in the past. There does not seem to be a clear mechanism for the conducting of cost benefit analyses. This important step seems to be continually overlooked.
- The ABARE Research Report 12.5 “A benefit-cost framework for responding to an incursion of Varroa destructor”, June 2012 presents a narrow view of the economic value of honeybees. It fails to consider any financial implications for broader food industry stakeholders other than for direct primary producers of pollination dependent crops. Many of its assumptions are incorrect and as such it the document is fundamentally flawed. It also fails to identify any cost range for either containment or eradication of Varroa Destructor. This document is in need of a serious rework and independent review if it is to form the basis of important decision making for the response to the most significant pest threat that the beekeeping industry faces.
- Without rigorous cost benefit analysis future exotic pest and disease incursions are likely to fall under the automatic classification as a Category 3 pest requiring 50% industry and 50% government funding to eradicate or control them.
- The Asian bee incursion in Cairns has adequately demonstrated the failure of this current arrangement with the result of the eradication effort being severely limited by the small financial capacity of the beekeeping industry alone to fund the eradication effort required. Beekeepers willingness to support their financial means through a sustained, on the ground volunteer effort in Cairns at their own personal expense demonstrates their belief that additional efforts were warranted. The bitter disappointment of this bungled eradication and move to containment effort for the industry remains keen. Lessons should be learned from the failings of this case study. The fundamental issue was the failings of the Classification of the incursion as Category 3 and the lack of a cost benefit analysis to demonstrate the case for eradication and Classification of the pest as a Category 1 Pest.

- Australia's continued status as 'Varroa mite free' should not be taken as a testament to how well the current biosecurity measures are working. Whilst the transition of the sentinel hive program to the "National Bee Pest Surveillance Program" is a good basis from which to build our biosecurity defences, "luck" should be acknowledged as a major factor in the fact that Varroa does not yet exist within Australia after numerous incursions have been detected and many have just not had Varroa present on the bees detected. A surveillance program developed amongst the constraint of fitting "available funds", being currently \$210,000, should not be passed off as a serious or comprehensive effort to prevent the entry of exotic pests and diseases likely to have national significance on the Australian food manufacturing sector worth \$111 billion dollars and on up to \$6 billion of Australian agricultural production.
- Serious biosecurity defences are large, complex and expensive programs. There is a need for greater involvement from, and training for, commonwealth staff at ports, as well as state DPI's, hobby beekeepers etc. Research and development also needs to form part of these programs where suitable diagnostics can be developed, awareness improved and communication strengthened between the stakeholders. Currently Australia does not have the diagnostic capacity for serious pests such as *Tropilaelaps*.
- A recently completed CSIRO port risk assessment identified the ports that need to receive greater surveillance focus, and PHA are incorporating this information in their management plans but without additional funding and resources gaps filled, are likely to only shift gaps to other ports. In Victoria for example, there is only one DPI Bee Specialist based at Rutherglen, a 3 hour drive from all Victorian ports, whose job it is to respond to all incoming incursions coming into Victoria.
- It is critical that our nation has an early warning system, and that there is trade support for beekeepers to export queen bees and packaged bees.

Honey

- In relation to imported honey, currently there are not enough adequate, cost effective and reliable testing methods available to detect for more complex adulterated honey. Australia's imported food risk assessment processes do not adequately address non food safety risks to prevent continued competition with low priced imported honey of questionable quality, which is able to be passed as "honey".
- In relation to the movement of honey interstate, currently an unenforced situation exists whereby all honey / honeycomb/ beeswax / pollen and other beehives or hive material should not be moved interstate without a " (Form 3a,3b) In accordance with State and Territory Apiaries and Stock Diseases Acts HEALTH CERTIFICATE FOR THE INTERSTATE MOVEMENT OF APIARY PRODUCTS, BEE COLONIES USED APPLIANCES, QUEEN BEES, ESCORTS, QUEEN CELLS AND PACKAGE BEES" however it freely does. The certificate must be certified

by a Senior Apiary officer from the state of origin of the material. As is current industry practice honey is shipped freely in and out of all states (except WA – where for good biosecurity reasons this form is used to prevent entry of American Foul Brood in WA where it doesn't exist) without the enforcement of such a certificate. On the eve of submitting this application at 10pm one of our trucks was stopped at Yamba Roadblock in South Australia and detained because it did not have this certificate. The reason that this dated form and requirement is not actively enforced is because all states except for WA each have all bee diseases and pests and it is impossible for an Apiary inspector to certify the requirement below (taken from the form, copy of which is available at http://www.pir.sa.gov.au/data/assets/pdf_file/0014/24215/form3verjuly2001v2.pdf)

**2) The honey / honeycomb / beeswax / pollen / bee colonies / used hive equipment / used appliances / queen bees / queen cells / packages / or other apiary products* described herein were derived from apiaries which are free of American foul brood (Bacillus larvae) and are from colonies (hives) not showing field symptoms of any other disease of bees. (Exert from the form above)*

- In our 20 year history of marketing honey and moving honey interstate we have never been asked for this form. Movements of honey occur on mixed loads of grocery freight which freely cross state borders (except WA where the form is always used and checked) every day due to the nature of our large supermarket distribution network. The current outdated system is unworkable and current practice which does not jeopardise biosecurity should be matched with updated legislation. Otherwise, as officials become more intent on enforcing “red tape” we are likely to see more incidences where free trade is hampered and costs are incurred to the industry contributing to further viability issues.
- Whilst tonight the truck has been allowed to continue clearly the interstate movement of honey and other related products requires an urgent update legislation update to bring the current accepted free trade practice within Australia in line with relevant and meaningful legislation. From our history in the industry we understand that this form was developed at least 30 to 40 years ago and has not been reviewed or updated in a bipartisan manner since this time.

Quarantine

- One of the biggest concerns for planned import of live bees into Australia by industry around biosecurity is the proposal to relocate the NSW quarantine facility to the new AQIS facility in Melbourne.
- The 2008 Inquiry recommended the establishment of a new quarantine facility to replace the facility at Eastern Creek (Sydney), which is scheduled to close in August 2015. However, the quarantine station that is planned for Victoria is far from ideal for honey bees. This is due to lack of essential floral resources and poor weather conditions for rearing honey bees. Bees imported into Victoria will arrive mid-winter into Melbourne. Most of the users of the current facility are based in central or northern NSW because importing bees into cold climates or working with them in

cold climates reduces their chance of survival. It is likely that this facility will not be able to be used for the purpose it is designed due to its inadequate location.

- When Varroa arrives, it will be essential that we have a working system in place to be able to import varroa-resistant stock from the USA and/or Europe. However, if there isn't a quarantine facility in the Sydney basin, this is going to be problematic, if not impossible.

Key Recommendations:

6. A thorough cost benefit analysis to be conducted urgently for all known pests and diseases and a review conducted of the diagnostic capability of Australia to adequately detect for these pests and diseases.
7. Based on the above cost benefit analysis, a classification to occur of all pests and diseases likely to impact the Australian beekeeping industry with serious consideration given of the market failure that exists due to the small size of the beekeeping industry and what is at stake in terms of the nations food security) to the classification of all honeybee pests and diseases as Category 1.
8. A bipartisan review of the Interstate Movement of Honey, other hive products and beehives be urgently undertaken to bring the accepted free movement and trade of honey and honey products (ie all manufactured foods containing honey) between all states except WA into line with the out dated requirements of the State and Territory Apiaries and Stock Diseases Acts.
9. A review of the adequacy of the current imported honey protocols for their contribution to a level playing field for Australian produced and imported honey should be conducted. This project may involve the ACCC having input into the process. For natural products such as honey which are known to be able to be mimicked or replicated via artificial means, additional criteria (in addition to food safety risks) must be added to the risk assessment import processes of Government under the Imported Food Protocol.
10. Additional research must be undertaken in regard to adulterated honey detection in order to keep pace with the ever changing push by opportunists to manufacture honey which falls under the radar of current test methods.
11. Alternatively the Australian Government could introduce the USA's "True Source Honey" Quality Assurance scheme which includes food safety audits and financial and logistics audits to verify the "true source" of all imported honey sold in Australia. This highly successful USA program would go a long way to providing a level playing field for Australian beekeepers against imported honey.

12. The proposed increased levy to support a “National Bee Biosecurity Program” must be radically expanded to encompass funding from the broader food industry and those benefiting from honeybee pollination. The beekeeping industry itself is simply too small to provide the financial resources needed to support the investment needed into a National Bee Biosecurity Program that will achieve the industries vision of “preventing exotic pest incursions”.
13. Quarantine facilities for the import of live bees are maintained in NSW in the Sydney basin.

d. Australia’s food labelling requirements, and how these affect the beekeeping industry

Country of Origin Labelling

- The industry needs transparency in food labelling so customers can immediately recognise if the honey they are purchasing is produced in Australian – or not.
- This need is not unique to the Australian honey industry and therefore should be considered as part of the wider country of origin labelling consideration.
- Whilst the Australian Food and Grocery Council believe that requirements set out in the Australian Consumer Law under the “substantial transformation” should not allow the “Made in Australia” claim to be used when a substantial transformation of ingredients has not occurred. They believe that importing honey and blending it with Australian honey would not be considered a substantial transformation under current court decisions however, this practice is common place in Australia especially during shortages as a result of drought.

Health labelling

- There are currently discussions underway for a ‘traffic light’ system, or something similar, to be used for food labelling to provide easily interpreted information using colour codes. Red, amber and green ‘traffic light’ shapes on the front of food packages would show consumers, at a glance, whether a product is high, medium or low in fat, saturated fat, sugar and salt, etc.
- The implementation of such a system would be problematic for the Australian honey industry because honey, a natural sweetener, but predominantly composed of sugars would automatically be labelled as “bad” or “red”. This system does not take into consideration of the amount likely to be consumed in a normal diet or new scientific evidence of its potential as an exciting prebiotic which makes its consumption beneficial.

Key Recommendations:

14. Current Country of Origin food labelling laws be reviewed by the ACCC in relation to imported honey and the claim of “Made in Australia” where substantial transformation of the ingredients does not occur but a simple blending and decanting into smaller containers makes up the process.
15. That honey is exempted from the proposed “traffic lights” system or any similar simplified health message system.

e. The recommendations from the House Standing Committee on Primary Industries and Resources 2008 report “More than Honey; the future of the Australian honey bee and pollination industries”

The 2008 *More than Honey Report* contains a number of recommendations, that if adopted would help address the complex, cumulative and interrelated threats to beekeeping and assist in making the industry more sustainable. Sadly, very few of the recommendations from this report were adopted and some of those adopted, for example the development of “Pollination Australia” have been “stillborn”, providing little benefit to the industry. Since this report, public awareness has continued to build in relation to the strong food security link to bees via their pollination. Now more than ever public expectation is emerging to support the transition of an industry in serious decline to a sustainable and viable industry essential to the future of food security in Australia for the future. Time and hindsight now offer the opportunity to review each of the recommendations with a view to ensuring relevance in today’s changed world and environment.

“More than Honey” - Recommendation 1:

The Committee recommends that the Australian Government provide the necessary leadership, funding and organisational resources to establish and run Pollination Australia

- Initial funding of Pollination Australia was problematic due to a change of Government and the Global Financial Crisis.
- Pollination Australia has been described as “stillborn”. Whilst it has existed it has not realised the benefits intended or required by this inquiry.
- Pollination Australia would require a far more proactive funding, management team and approach than currently exists to be able to achieve what it was set up to achieve. In many ways, it has worked against future collaboration between the beekeeping industry and pollination dependent industries because many horticultural commodity groups see it as having not added any benefit but to being a cost burden on them.

Key Recommendation:

16. Review the effectiveness of the current Pollination Australia organisation and structure and set key performance targets and industry reporting requirements for its management to achieve.

“More than Honey” - Recommendation 2:

The Committee recommends that the Australian Government fund research and training in the provision of paid pollination services as part of its contribution to Pollination Australia

- The development of pollination Fact Sheets and website via the RIRDC Pollination Aware series has been a useful resource to industry and the broader food industry.
- The writer is not aware of any concerted effort to conduct additional research in this area since 2008 and certainly there has been no evidence of any training made available in regard to pollination services by the Australian Government.

Key Recommendations:

17. More than Honey Recommendation Two remains highly relevant to meet an increasing demand for paid pollination services into the future and should be adopted as is.
18. Additional crops benefiting from honeybee pollination should be incorporated into the Pollination Aware series to provide a comprehensive list of crops benefiting from pollination.
19. A study into impact on the supply chain of a failure of beekeeping and pollination dependent industries to food manufacturing in Australia is recommended.

“More than Honey” - Recommendation 3:

The Committee recommends that the Australian Government fund research into alternative pollinators as part of its contribution to Pollination Australia

- As alternative pollinators are predominantly solitary insects rather than social insects such as European honeybees they cannot be hived, domesticated and used for commercial pollination services.
- Extreme caution should be exercised when assessing the introduction of alternate introduced pollinator species such as Bumblebees. The notion of bumblebees being a viable commercial pollination alternative is not supported widely by the industry.

Key Recommendation:

20. It is recommended that this action be removed from any future funding as it is unlikely to yield any real results unless it is directed towards habitat and biodiversity preservation to retain current numbers of naturally occurring pollinators.

“More than Honey” - Recommendation 4:

The Committee recommends that the Australian Government alter labelling requirements for agricultural chemicals to reflect their impact on honeybees and other pollinating insects

- The APVMA in consultation with industry have played an important role in advancing the issue of agricultural chemical labelling
- Despite this positive development, there has been an increased incidence of apiaries being sprayed and killed by agricultural chemicals since 2008 demonstrating that there is still more work to do.
- Greater liaison between farmers and beekeepers is required to arrest this trend and leverage the information on labelling.
- The proposed Code of Practice for beekeeping would assist with providing better information to landholders in regard to being able to contact beekeepers when the need arises for spraying.

Key Recommendation:

21. That government support continued work by the APVMA to continue to improve chemical labelling.

“More than Honey” - Recommendations 5-7 – Resource Security:

- All three recommendations under this section remain relevant and should be actioned

“More than Honey” - Recommendation 8:

The committee recommends that the Australian Government maintain and enhance the National Sentinel Hive Program with a view to ensuring that:

- ***All major ports are covered by sentinel hives and bait hives***
- ***All beekeepers are brought under the program, with priority given to those operating in the vicinity of port facilities***

- *Arrangements are made for an effective program of pre-border security; and*
- *Government provides funding adequate to achieve the above objectives*
- The National Sentinel Hive program has been transitioned into the National Bee Pest Surveillance Program but to date no new government funding has been allocated to this program.
- As noted earlier even under the proposed “National Bee Biosecurity Program” no additional government or industry funds are proposed to expand this program.
- This program remains our largest defence against the introduction of Varroa and other significant and devastating bee pests and diseases and yet government allocation to this program is a mere \$60,000 per annum of the \$210,000 allocated to the program.
- It is quite frankly mind numbing and highly concerning to see the small value that the current and past Governments have placed on the nation’s future food security.
- A cost benefit analysis needs to be undertaken urgently and an assessment of the required measures needed to prevent the entry of exotic bee pests and diseases.
- The current opposite approach of matching what can be done for the available dollars is a crazy strategy to apply to such an important preventative activity that sits front and centre in the nation’s ability to feed itself into the future.

Key Recommendation:

22. The Government must determine the required level of funding needed to prevent exotic pest and disease incursions, first with having a focus on Varroa and then fund the prevention adequately to maintain our current disease free status.

“More than Honey” - Recommendation 9:

The committee recommends that the Minister for Agriculture, Fisheries and Forestry request that the APVMA fast track the registration of pesticides and other chemicals necessary to combat a Varroa incursion.

- With the efflux of time and based on both the USA and New Zealand experience with Varroa incursion, it is evident that chemical use to control Varroa is not the best approach to combat a Varroa incursion. Chemical use leads to resistance of the pest and a more difficult adjustment period. It also has serious risks in terms of honey contamination and food safety.
- Natural selection of the hives displaying the best hygienic behaviour to out compete Varroa seems to work best against the Varroa although it should be noted that

significant losses will initially be very high.

Key Recommendation:

23. Chemicals registered for control of Varroa should be deregistered and a compensation fund established to support beekeepers experiencing hive losses due to Varroa. Such funding would allow the process of natural selection to take place and the industry would be best placed for the longer term to manage with Varroa.

“More than Honey” - Recommendation 10:

The committee recommends that the Australian Government improve the nation’s incursion response capacity by providing for:

- *Better education*
 - *Improved diagnostics*
 - *Diagnostic protocols*
 - *Pest and disease management protocol*
 - *A comprehensive biosecurity research program*
-
- The Asian Bee Incursion in Cairns demonstrated the urgent need for all of the above to occur.
 - This work remains outstanding and is one of the most important areas of work requiring funding.
 - This needs to be supported by clear cost benefit analyses and the classification of the most serious pests and diseases as Category 1

Key Recommendation:

24. Government needs to urgently action recommendation 10 from the More than Honey Report and fund it appropriately.

“More than Honey” - Recommendation 11:

The committee recommends that the Minister for Agriculture, Fisheries & Forestry establish a new honeybee quarantine facility as a matter of urgency, this facility to be commissioned prior to the closure of the current facility at Eastern Creek, and that:

- *This facility be integrated into a national honeybee and pollination research centre.*
- *This facility have a containment laboratory for research on honeybee genomics and biotechnology;*
- *The Minister for Agriculture, Fisheries and Forestry enter into immediate negotiations with his NSW counterpart to establish the new honeybee facility at the Elizabeth Macarthur Agricultural Institute, Camden, or some other*

more suitable location.

- The decision taken to house the new facility in Melbourne is problematic for reasons outlined earlier and the feasibility of relocating the bee component of this facility to Sydney needs to be explored.
- A facility based in Melbourne does not meet the needs of industry and is likely to prevent the ability for industry to effectively import Varroa resistant stock in preparation for the entry of Varroa to Australia.

Key Recommendation:

25. Explore the ability to locate the bee component of the new Melbourne based quarantine facility in a suitable location in Sydney.

“More than Honey” - Recommendation 12:

The committee recommends that the Minister for Agriculture, Fisheries and Forestry direct Biosecurity Australia to complete the risk analysis for drone semen by the end of 2008

- The writers do not have sufficient knowledge of this specific issue to make comment on this issue

“More than Honey” - Recommendation 13:

The committee recommends that the Australian Government in conjunction with State and Territory Governments, establish and fund a national endemic bee pest and disease control program.

- The proposed National Bee Biosecurity Program currently being drafted by Plant Health Australia is an effort made towards a national endemic bee pest and disease control program. The main problem with the program is that the funding is to be found via a proposed increased levy to honey producers and through a proposed mandatory code of practice. Both these measures are an increased impost on the stakeholder most ill equipped to deal with these additional costs in both dollars and time.

Key Recommendation:

26. The Australian government find alternate funding sources to a honey production levy to support the action required of this recommendation.

“More than Honey” - Recommendation 14:

The committee recommends that the Australian Government in conjunction with State and Territory governments, establish bee biosecurity regions based on natural boundaries.

- The Asian Bee incursion demonstrated that if this measure had have been in place then there would have been less negative trade implications for exports of live packaged bees and queen bees.

Key Recommendation:

27. Recommendation 14 from “More than Honey” should be actioned.

“More than Honey” - Recommendation 15:

The committee recommends that the Australian Government, in conjunction with State and Territory Governments, establish a national system of registration for beekeepers, bee hives and apiary sites.

- It would be ideal if this were possible but the work commended to date on the Draft National Bee Biosecurity Program, and the Code of Practice that is incorporated within it, indicates that this issue has been explored but deemed currently not possible due to our system of State Governments.
- It would seem that at the very least a better co-ordinated approach would be helpful if a national system is not possible.

Key Recommendation:

28. Continue to work towards a national hive registration system outcome or a system that minimises biosecurity threats due to the current system of states holding crucial information about beekeepers which needs to be accessed quickly to prevent the spread of a pest or disease.

“More than Honey” - Recommendation 16:

The committee recommends that the Australian Government, in conjunction with State and Territory governments commit \$50 million per annum in pursuit of biosecurity measures and research in support of the Australian honey bee industry and pollination dependent industries.

- Since this recommendation was formulated in 2008 **the urgency and need for such measures has only increased.**
- **The case supporting the rationale behind the investment from Government**

being worthwhile from a national interest perspective has also strengthened since 2008 with increased awareness of the important role that bees play in pollination achieving new heights.

Key Recommendation:

29. That the Australian Government finds a new resolve to commit serious funds to the above measures to prevent the total decimation of the Australian beekeeping industry and the inevitable negative affects to the downstream pollination dependent industries and food manufacturers.

“More than Honey” - Recommendation 17:

The committee recommends that the Australian Government request the ACCC to investigate the pricing practices for honey within the honeybee industry and the retail sector.

- It is clear that pricing practices investigations across a range of other grocery items have had little effect on farm gate prices to producers.
- In addition the work completed on the supermarket Code of Conduct provides a solid framework from which to allow suppliers to negotiate prices with the retail sector.
- The biggest economic challenge for Australian honey producers and marketers is competing with low priced imported honey derived from countries known to participate in adulteration practices.
- Therefore energies around this topic would be better directed to a reassessment of the Import Risk Assessment process to include food quality risks in addition to food safety risks. A more level playing field and competitiveness against imported honey would result.

Key Recommendation:

30. Redirect this action to a reassessment of the Import Risk Assessment for imported honey to ensure all honey imported is “genuine” honey and not “fake” honey.

“More than Honey” - Recommendation 18:

The committee recommends that the Australian Government request the Productivity Commission investigate the long term viability of the Australian honey bee industry in respect of industry organisation, marketing structures and the financial viability of producers and packers.

- An investigation by the ACCC is likely to tell the industry what it already knows, but could be worthwhile in assisting to negotiate better prices within the broader retail and industrial markets as there is often an incorrectly held view by large retailers, that because supermarket prices are higher in Australia than overseas that sectors are “profiteering”. This is most certainly not the case in the Australian honey category.
- Leadership talent is a serious challenge for the Beekeeping industry as there are such a small number of producers to draw leadership from. This fact should be acknowledged by Government and the industry should be assisted to adopt a more professional and effective national board structure through the provision of skills based directors from outside the industry. The voluntary nature and time involved for a small few, to try to manage the affairs of the industry, takes a massive toll on individual businesses and without impartial and independent skills and support, often strategic outcomes are difficult to achieve.

Key Recommendations:

31. That Recommendation 18 is redirected to an annual report on the state of the industry.
32. The Australian Government provide assistance to the national peak body, AHBIC through the supply of three skills based directors, to guide and support the important work that the organisation does.

“More than Honey” - Recommendation 19:

The committee recommends that the Department of Immigration and Citizenship look at the skilled migration program, with a view to further refining opportunities for the honey bee industry and the emerging pollination industry.

- In Australia there are about 250 beekeepers that produce about 60% of Australia’s honey. Some of these larger beekeepers require the skills of highly proficient beekeepers that are not readily available in Australia. As such, they rely on overseas skilled beekeepers that often work on Temporary Visa arrangements and are highly valued in the beekeepers enterprises.
- The training requirement and the English skills test have proven very difficult for international beekeepers to manage. The new measures since 2008 have resulted in highly trained and vital workers becoming unavailable as they have had to return to their home countries to avoid being in breach of their Visas due to the English test and training requirements. This situation is nonsensical where such severe skill shortages exist.
- A more permanent solution in the form of immigration and citizenship would be very welcome for the enterprises in need of this solution to fill the skills gap and unpreparedness to work and be stung by bees that exists in Australia.

Recommendation:

33. Recommendation 19 from “More than Honey” needs to be expedited.

“More than Honey” - Recommendation 20:

The committee recommends that the Australian Government develop product standards for honey and other bee products with regard to food standards and chemical contamination in line with those in force in the European Union, and that all imported honey products are tested against the standard.

- There is a degree of lack of knowledge of the way the Australian food standards code works and is designed to work within the beekeeping industry.
- Whilst the standard for honey in Australia is, at first glance, short and there are only two Maximum Residue Levels (MRL's) set for chemicals allowed in honey in Australia it does not follow that Australia has weak standards for honey. By default the way the food standards code works, is that when there are no MRL's set for other chemicals not named, then the amount allowed of those chemicals is deemed to be zero. This actually means that the current standard for honey do provide the protection required to protect against chemically contaminated and adulterated or fake honey.
- The real issue is not with the standard but rather with the classification of honey as “low risk” in terms of food safety and thereby its classification as Low Risk against the Import Risk Assessment and testing regime for imported foods. Whilst it is true that, even if imported honey were to contain any of the chemicals used in overseas honey production systems it would not kill or harm anyone, (therefore the low risk classification), the current system of only inspecting approximately 1 in 20 incoming shipments of honey does not provide for a level playing field for industry.
- The other issue is in regard to the type of testing conducted on the incoming imported honey. There is no transparency as to what is currently being tested for and if tests are only performed on the things listed in the standard and set MRL, eg. reducing sugars, moisture etc., then all of the chemicals used in overseas production systems are not even being checked for which we believe may actually be the case.

Key Recommendation:

34. Review the Import Risk Assessment process for imported honey with the view to ensuring that it covers the risks posed by chemicals used in overseas honey producing countries and known methods of adulteration.
35. Increase the frequency of incoming honey testing for the purposes of ensuring compliance to not only the Food Standards code but also to food quality risks for

the purposes of ensuring a level playing field for local producers.

“More than Honey” - Recommendation 21:

The committee recommends that the Australian government develop labelling standards to more accurately reflect the place or origin and composition of honey and honey bee products.

- This issue has been covered earlier in this submission under Reference d). Please see this section

“More than Honey” - Recommendation 22:

The committee recommends that the Australian Government pursue the development of a uniform international standard for the testing and labelling of honey bee products and the removal of all tariffs on honey bee products.

- Since 2008 there have been numerous Free Trade Agreements negotiated and honey has by and large been left out of most of them.
- A concerted effort to include honey and achieve the intent of this recommendation is essential to providing a more viable honey export return for industry.

Key Recommendation:

36. Recommendation 22 from More than Honey should be actioned.

“More than Honey” - Recommendation 23:

The committee recommends that the Australian Government, in consultation with industry, reduce inspection charges, if possible, for queen and packaged bees to make the export of this product more cost effective for producers.

- Not being closely involved in this sector of the industry no information or recommendations are provided on this issue.

“More than Honey” Recommendation 24:

The committee recommends that the Australian Government establish a national centre for honey bee and pollination industry research, training and extension, funded as per Recommendation 16.

- The need for such a centre is urgent.

Key Recommendation:

37. Recommendation 24 from More than Honey should be actioned.

“More than Honey” - Recommendation 25:

The committee recommends that the Australian Government alter research funding arrangements to allow for:-

- ***Voluntary contributions to research funding to be matched by government funding, and***
- ***A levy on pollination services to be allowed under law.***
- A mechanism to broaden traditional industry funding sources outside the beekeeping industry remains essential in raising additional industry funds needed to address the many issues for the beekeeping industry and more broadly for the pollination dependent industries.
- A fresh resolve must be brought by Governments to clear the blockades that allow this to happen as it has been explored on many occasions but to no avail.

Key Recommendation:

38. The Australian Government must work harder to achieve a broader industry funding base to address the complex, cumulative and interrelated threats to bees and beekeeping.

The recommendations from the Rural Affairs and Transport References Committee 2011 report “Science underpinning the inability to eradicate the Asian honey bee”

- The RAT References Committee inquiry into the “Science underpinning the inability to eradicate the Asian honey bee” following a failed eradication attempt should act as an important case study from which to take learnings for better preparation for future incursions of exotic pests and diseases.
- From the evidence the committee concluded that the “ineradicability” was not based on sound science and was more likely linked to have been based on other constraints such as inadequate funding mechanisms.
- The Committee recommended that “the Consultative Committee on Emergency Plant Pests (CCEPP) reconsider the question with the intent that the National Management Group (NMG) review its position”. In effect the NMG was being asked to reverse its position and to reconvene attempts at eradication.

- Whilst the CCEPP did reconvene it could not reach consensus. The NMG then reconvened on 11 May 2011. It also failed to reach consensus but determined “that it is not technically feasible to achieve eradication”. In short the same thinking that made the first decision reached the same decision a second time without taking into account the information and compelling scientific flaws of their earlier decision.
- A limiting factor in being able to determine eradication feasibility was the absence of a cost benefit analysis as part of the decision that the Asian honey bee could not be eradicated. Eradication was simply not possible because industry did not have the money to pay for it and Government would only match the small amount of funds that could be found from the honey industry.
- In order to mitigate strong industry concerns and largely to make the growing public interest in the situation disappear, the Government of the day provided a further \$2 million to “support a national pilot program to facilitate the transition of action from eradication to the ongoing management of Asian honey bees”. The Transition to Management Program ran from 1 July 2011 until 30 June 2013. Since then there has been no further attempts to eradicate the Asian honey bee nor any reports to industry or the public in regard to the pilot program or outcomes of the transition to management.
- A detailed account of the lessons learned from this failed case study are contained within the submission of the Wheen Bee Foundation to this inquiry. Please refer to this submission for this important scientific information and for further information in relation to the outcomes of the industries financial investment in providing funds to try to shame the government at the time into committing further funding for a renewed eradication.
- The effort whilst not achieving the objectives of beekeepers was worthwhile as it focused on important lessons which assist our preparedness to detect an Asian honey bee incursion and increases our capacity to eradicate any incursion following early detection. Contained within the case study are also positive implications for early detection and eradication of varroa if it arrives with a future incursion of Asian honey bee.

Recommendation:

39. That the Committee detail the lessons learned in regard to the Asian honey bee incursion in Cairns to ensure that Australia is better placed in the future to respond to future incursions of exotic pests and diseases.

f. Any related matters

- Public awareness in relation to the issues that bees and beekeepers face is at an all time high.

- This new found public awareness also coincides with a growing trend towards a better understanding of, knowledge of and interest in where our food comes from.
- Industry, through a range of examples such as the Beechworth Honey Experience in Beechworth, has made significant private investment in assisting improved public education and awareness. It has garnered good support for Australian honey and in many areas Australian honey is held up as an example where the public are willing to pay more for an Australian product and retailers are willingly supportive of a higher priced Australian offer and an insistence on Australian content in their private label products. This has been achieved through the industry innovatively helping itself to the furthest degree possible with its modest resources.
- Educational enterprises have generated significant publicity surrounding the future of beekeeping in Australia and this is set to increase further as further investment and expansion is made in the area of raising public awareness by private enterprises from within the industry. Beechworth Honey is currently expanding its educational facilities in Beechworth to build on the results achieved to date with a solid additional investment being made in the new Beechworth Honey Discovery set to open the second half of 2014.
- The public are generally very supportive of improved Government measures and Government support for programs that improve outcomes for bees and beekeepers and that contribute to a higher level of food security for the future.
- As public interest continues to increase around the topic of bees and beekeeping, Governments will be expected to be acting in the national interest to manage the current risks around pollination as a result of the issues involved. Governments who continue to ignore this important issue are likely to be judged by voters who recognise that simply continuing to ignore the problems makes them all the larger to deal with at a point in the future.
- It is abundantly clear that the industry is in crisis and suffering serious decline. Government must act immediately to play its part to arrest this worrying trend.
- **Anomaly between current accepted practice and legislative requirements for Interstate Movement of Honey** – this issue has been discussed within the Import / Export – Terms of Reference c). above. Please see this section for explanation of this issue. Should our truck not have been randomly detained at 10pm on 31/3/2014 we would have overlooked adding this point. This demonstrates the accepted practice of the legislation being routinely ignored by all stakeholders and enforcement agencies and the need for the anomaly to be rectified as part of this inquiry.