

# AUSTRALIAN HONEY BEE INDUSTRY COUNCIL INC

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## SUBMISSION TO SENATE INQUIRY ON

### *The future of the beekeeping and pollination service industries in Australia*

#### INTRODUCTION

The Australian Honey Bee Industry Council Inc (AHBIC) is the peak body for beekeeping in Australia. Its members are:-



Queensland Beekeepers Association Inc. (QBA)  
New South Wales Apiarists Association Inc. (NSWAA)  
Victorian Apiarists Association Inc. (VAA)  
Tasmanian Beekeepers Association Inc. (TBA)  
South Australian Apiarists Association Inc. (SAAA)  
Beekeepers Section – West Australian Farmers Federation (WAFF)  
Honey Packers and Marketers Association of Australia (HPMAA)  
National Council of Pollination Associations (NCPA)  
Australian Queen Bee Breeders Association (AQBBA)  
Associated Members

AHBIC has encouraged its member bodies and individual beekeepers to put in a submission to this Inquiry.



In this submission, the Australian Honey Bee Industry Council Inc. has taken the terms of reference and used these headings as a guide for making our submission.

The main points of our submission are:-

- Access by beekeepers to public lands
- Keeping the beekeeping industry viable so it can carry out the pollination requirements of the agricultural and horticultural industries
- A new standard for honey in Australia
- More rigorous checking of imported honey and faster action to remove fraudulent product from the Australian market place
- Better labelling of honey and products containing honey
- Having any GM crops registered in Australia registered in the EU as food
- Keeping varroa out of Australia
- Consideration of honey in any Free Trade Agreements
- Enforcement of labelling requirements of pesticides
- Comments on the recommendations from the 2008 More Than Honey Report



## **LIST OF ABBREVIATIONS**

ABS	Australian Bureau of Statistics
ACCC	Australian Competition and Consumer Commission
AHA	Animal Health Australia
AHBIC	Australian Honey Bee Industry Council Inc.
APVMA	Australian Pesticides and Veterinary Medicines Authority
AQBBA	Australian Queen Bee Breeders Association
CSIRO	Commonwealth Scientific and Industrial Research Organisation
EU	European Union
FSANZ	Food Standards Australia and New Zealand
FTA	Free Trade Agreement
HAL	Horticulture Australia Limited
HPMAA	Honey Packers and Marketers Association of Australia
PHA	Plant Health Australia
IRA	Import Risk Assessment
IWG	Industry Working Group
NCPA	National Council of Pollination Associations
NRS	National Residue Survey
NSWAA	New South Wales Apiarists Association Inc.
QBA	Queensland Beekeepers Association Inc.
QDAFF	Queensland Department of Agriculture, Fisheries and Forestry
RIRDC	Rural Industries Research and Development Corporation
SAAA	South Australian Apiarists Association Inc.
SPV	Slow paralysis virus
TBA	Tasmanian Beekeepers Association Inc.
T2M	Transition to Management Plan for the Asian bee
USDA	United States Department of Agriculture
VAA	Victorian Apiarists Association Inc.
WAFF	Western Australian Farmers Federation

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

**Value of pollination**

It has been estimated that the value of crops in the horticulture and agriculture industries in Australia that rely on or benefit from honey bee pollination is between \$4 and \$6 billion annually.

There are many obvious crops that benefit directly such as almonds and the cucurbits including watermelons, pumpkins and rockmelons. However there are some industries where the benefits may not be obvious at first glance. Onions do not need bees for pollination once the seed is planted but bees are essential for pollination in the seed production phase. Lucerne is another one in this category. These are only two examples of many.

With Governments wanting to increase food production, there will be a need for crops reliant on honey bees for pollination to have more bee hives available to carry out this vital job. This will mean that the beekeeping industry in Australia will need to increase hive numbers to be able to carry out that pollination.

So it can be seen that a vibrant beekeeping industry is essential to increased food production as well as being able to maintain the status quo. As has been said - **food security needs bee security.**

**Value of honey**

In an average year, Australian beekeepers produce between 25,000 and 30,000 tonnes of honey. Currently the value of honey and beeswax produced in Australia is around \$90million annually. The current farm gate price for honey paid by packers is between \$3.70 and \$4 per kilogram. The price has only moved higher in recent months due to the shortage in Australia caused by drought, hot weather and bush fires.

**Beekeeping statistics**

The latest statistics do not include the Australian Capital Territory as there is no beekeeper registration there.

<b>State or Territory</b>	<b>No. of beekeepers</b>	<b>No of hives</b>
Queensland	3,098	100,939
New South Wales	3,461	214,296
Victoria	3,689	103,130
*Tasmania	182	16,361
South Australia	858	62,510
Western Australia	1,080	28,500
*Northern Territory	46	2,295
<b>Totals</b>	<b>12,414</b>	<b>528,031</b>

\* Registration is not compulsory



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

**Assured access to public lands**

Beekeeping in Australia relies heavily on access to public lands. Beekeepers have been utilising public lands for well over a century. The majority of honey produced in Australia comes off public lands.

These public lands also provide an important role in either building up hives for pollination or rejuvenating hives after pollination. Many of these areas of public land that are under threat have been used by beekeepers for over 100 years.

If access was denied to these public lands, the number of bee hives that could be managed in Australia would drop dramatically. This would have a flow on effect to the number of bee hives available for pollination in Australia. This would then result in fewer crops that rely on honey bees for pollination being able to be grown. This would result in a threat to Australia's food security.

So whilst there is currently access in most States to public lands, there needs to be surety given to the beekeeping industry that this will continue otherwise the viability of the beekeeping in Australia is threatened.

**Threat of varroa and other exotics**

So far Australia has not had varroa or other exotic mites of bees establish in Australia. Australia is the last major beekeeping country in the world to remain free of varroa.

Unfortunately there was the incursion of the Asian bee (*Apis cerana* Java genotype) which was found in Cairns in 2007. This incursion is discussed later in this submission. Fortunately the original swarm did not have any varroa mites on it. How fortunate the industry was is emphasized by the interception, in November 2012, of an Asian bee swarm at Kurnell in Sydney. This swarm had many varroa mites on it. If this swarm made land then there would be a reservoir of varroa mites on mainland Australia.

There was only recently, on 23 March, 2014, Asian bees detected at Townsville in a crane from Port Moresby. Varroa mites were found in this detection. Fortunately these were found.

There has been work carried out to look at how Australia would handle varroa when it arrives in Australia. The general consensus is that it is not if varroa arrives but when.

To have any hope of mounting a successful eradication program when varroa, or any other mites, arrives, the incursion needs to be found early. To this end, the beekeeping industry is contributing \$75,000 a year to the National Bee Pest Surveillance Program. Members of AHBIC are on the Steering Committee. Details of this program can be found at:-

<http://nbpsp.planthealthaustralia.com.au/public.php?page=aboutnbpsp>

If Australia is to remain free of these mites then there needs to be a satisfactory quarantine system in place to be able to keep these mites out or detect them when they arrive on bee swarms and not allow the swarms to establish as has been the case with the Asian bees in Cairns.

Looking to strengthen surveillance at the port of embarkation of goods coming to Australia is one way of helping our quarantine system here in Australia. If these countries supplying the goods can be persuaded to put in place better monitoring systems then bee swarms would be removed before being loaded onto the ship. Thus Australia would not be relying on detecting them at the port on arrival.

In January, 2011, Terry Ryan produced a paper titled “The potential for a supply-side shock to pollination dependent industries from the introduction of *Varroa destructor*.”

One point in the paper was “To achieve a significant increase in managed hive numbers for pollination purposes will likely entail much higher prices for rental of hives for pollination.” This means that the cost to the agricultural and horticultural industries will be increase as beekeepers seek higher fees for pollination in the light of the extra cost involved in managing varroa.

One of the conclusions was “The impacts on pollination costs for industries already paying for pollination services and industries that will no longer receive free pollination services from feral honey bee colonies could be extremely significant.”

## **Chemical exposure**

Pesticides kill bees. However, many beekeepers carrying out paid pollination have a very good relationship with the farmers they carry out the pollination for. The problems usually occur when neighbours spray without regard for the presence of bee hives nearby.

In recent years there have been concerns overseas about the use of the neonicotinoids. Here in Australia there are varying experiences regarding this group of chemicals. Some believe they are being adversely affected and others believe they are not adversely affected.

The Australian Pesticide and Veterinary Medicines Authority (APVMA) has prepared a paper on the use of chemicals and pollinators. There is to be a Neonicotinoids Research and Stewardship Symposium to be hosted by Plant Health Australia (PHA) in April this year. AHBIC will be participating.

Many losses of hives can be attributed to other than the neonicotinoids. Fipronil is one that has been responsible for the loss of many bee hives in recent years. Again these losses are usually by neighbours spraying or the off label use of the chemical.

## **Declining beekeeper numbers**

Like a lot of primary industries, beekeeping has an aging population of beekeepers. Industry has been proactive in looking to have training put in place to help attract more people into the industry.

Currently there is a Certificate III in Beekeeping (AHC32010) and in 2013 became a recognized Traineeship in some States. Details can be found at <http://honeybee.org.au/pdf/Release1AHC32010CertificateIIIinBeekeeping.pdf>

There is also a Basic Introduction to Beekeeping Skill Set (AHCSS00023) that has been developed to give those seeking employment in the beekeeping industry an avenue to obtain skills that make them suitable for employment. This can be found at <http://training.gov.au/Training/Details/AHCSS00023>

Whilst the industry has been proactive in this training area, there are other reasons why there are declining numbers in beekeeping. As has been mentioned previously in this submission, the need for access to public lands is paramount to the beekeeping industry remaining viable. For anyone contemplating a career in the beekeeping industry, they need security of resources to be able to be confident that they can make a go of beekeeping. If the resources are not out there then new entrants into the industry will not be willing to risk capital for a business that may not be viable in the future.

Often agriculture is not a part of the school curriculum.

## **Loss of export markets for live bees**

With the incursion of the small hive beetle in 2002, many markets for live bees were lost. Among these were the European Union and Canada for packages bees from the Australian eastern States. Originally queen bees were also not able to be shipped to Canada from the eastern States but this has changed in recent times.

With the advent of the Asian bee incursion in Cairns, the United States of America now cites their presence as a reason to keep the ban on live exports from Australia in place. Originally the ban was put in place because of the possibility of slow paralysis virus (SPV). When it was pointed out that Australia did not have SPV, the reasoning then shifted to the presence of the Asian bee.

At the New South Wales Apiarists Association conference at Merimbula in May 2013, Dr. Jeff Pettis from the United States Department of Agriculture (USDA) stated publically and privately that there were three things needed to be put in place for the USDA to consider the re-introduction of live bee imports from Australia. They were:-

1. Proof that no new diseases came in with the Asian bee incursion in Cairns
2. Proof that Australia did not have slow paralysis virus
3. Some sort of containment or surveillance program for the Asian bee in north Queensland

For 1., Dr. John Roberts from CSIRO in Canberra has carried out a survey of both European and Asian bees in the Cairns area and found that no new diseases came in with the incursion. Dr. Roberts reported on this at the Merimbula conference and Dr. Pettis was accepting of the results. This report can be found at <https://rirdc.infoservices.com.au/items/13-082>

For 2., Dr. John Roberts is being funded by RIRDC to carry out a survey of pathogens in Australia. Dr. Pettis said the USDA would accept these results. Details of this project can be found at [http://www.rirdc.gov.au/research-project-details/custr10\\_HBE/PRJ-008540](http://www.rirdc.gov.au/research-project-details/custr10_HBE/PRJ-008540)

For 3., Discussions have been held with the Queensland Department of Agriculture, Fisheries and Forestry (QDAFF) on having a control line, or something similar, put in on about the latitude of Cardwell. The purpose of this line is to have a zone above which bees cannot be moved out of unless they have a permit. Enquiries show that there would not be many beekeepers affected. Those affected were more than happy to seek permits.

To date, the QDAFF have not been willing to do this so any hope of re-opening the live bee trade with the USA will not come to fruition.

The Canadians have just recently put out a new protocol for exporting package and queen bees from Australia. At this time they do not require any control line but the implications are they would like some monitoring.

## **Tariffs**

Australia continues to be disadvantaged by tariffs imposed by importing countries on honey exported from Australia whilst honey from those countries does not attract a tariff when coming into Australia. Typical tariffs are the European Union 17.3% and it is protectionist, South Korea 253%, Japan over 25%, China 15% and India 60%.

Beekeepers incomes are being held back by the imposition of these tariffs on honey exported to those countries. Australia does not impose tariffs on honey being imported from those countries or any other country. There needs to be a concerted effort from Government to have these tariffs removed.

Unfortunately honey was not included in the Free Trade Agreement (FTA) with South Korea. It would seem that the South Koreans wanted to protect their own beekeeping industry.

There are concessions on some products containing royal jelly and honey and live bees. Australian beekeepers will not benefit from the royal jelly export concessions as the cost of production in Australia is far greater than the price paid for royal jelly imported from places like China. The live bee component may be able to be taken advantage of but it will all depend on how South Korea reacts to the presence of small hive beetle and Asian bees in Australia. These arrived here as a result of quarantine breaches.



There are currently FTA's being negotiated with China and Japan and AHBIC has made representation to the Minister for Trade re having honey included in these negotiations. Industry would hope for a better outcome than was achieved in the FTA with South Korea.

## **GMO crops**

With the planting of GMO crops in Australia, in particular canola, honey exporters have come across a new problem when exporting to the European Union (EU). The pollen, which is within the honey, is the GMO component that causes the problem. The honey itself is not a GMO.

There is a requirement that before being able to be sold in the EU, any GMO product must be registered as a food. Thus there have been problems in the past with the main canola grown in Australia, GT73, not being registered as a food in the EU. It would now seem this has been registered so there will be no problem with this variety.

It has been suggested that as the pollen is the GMO component then it should be filtered out and the honey will not then be classed as a GMO product. The problem is that in the EU, if the pollen is filtered out, it cannot be called honey.

With the registering of the main GM canola crop grown in Australia as food by the EU, it does not eliminate the problem. There are other GM crops grown in Australia that could inadvertently be worked by honey bees and the pollen from these non food registered crops in the EU could render a shipment for honey not acceptable.

The recent review in Tasmania revealed the problem that could be caused by GM poppies which the honey bees could collect pollen off when working another source of nectar in the near vicinity. The poppy would need to be registered as a food in the EU to make any honey, containing poppy pollen, acceptable.

FSANZ have recently advised that Monsanto will be looking to register a new GM canola variety in Australia. AHBIC will be asking that before any registration is approved, this new variety be registered as a food in the EU.

It has been said that the beekeeper should stay away from the GM canola. This seems a simple solution but in reality the beekeeper could be working a non GM variety but there could be, unbeknown to the beekeeper, a new GM variety in the area which the bees will also work.

AHBIC has been recently advised that Taiwan is now imposing the same conditions on GM food as the EU. This means that if that GM crop is not registered as a food in the EU it will not be allowed into Taiwan.

AHBIC is not asking that GM crops be banned only that before approval is given that crop, if worked by honey bee, should be approved as a food in the EU.

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

**Australian Standard for honey**

Currently the standard for Australia honey is covered under the Australian New Zealand Food Standards Code 2.8.2. This is a very weak code and AHBIC has been trying, through its Food Safety and Prevention of Residues Committee, to have a new Standard put in place.

The proposed standard that AHBIC is proposing is attached.

AHBIC will be continuing to try to have a more robust Code put in place and is meeting with FSANZ to move this forward.

**Level of inspection of imported honey**

AHBIC would submit that the level of inspection of honey imported into Australia is not adequate. We are told that only 5% is inspected. However, in the past few weeks, it has come to light that this is now not being done to this level.

The requirement for honey imported into Australia is also inadequate. As an example, Australia is required to have a National Residue Survey (NRS) in place before any honey can be exported to the European Union. Australia does not have similar requirements for honey coming from the European Union. This is not a level playing field. Why should Australia be expected to allow honey into Australia from the EU that clearly does not comply with the standards that the European Union requires for honey coming in to its countries?

China now is imposing strict controls on honey being imported from Australia yet Australia in return does not require the same conditions on Chinese honey coming into Australia. If China expects these conditions to be met by Australia honey going into China then it stands to reason China should also expect the same standard for honey being exported from China.

Monitoring of honey and bee products imported into Europe shows that Chinese honey often contains residues of unwanted chemicals. Despite this being brought to the attention of Australian Authorities, they refuse to impose a greater inspection regime on the imported Chinese honey even after being shown the repeated breaches in Europe. Logic says that if the honey going to Europe contains these residues then the honey coming to Australia would also contain these residues.

The case of the Victoria Honey and Hi Honey has been highlighted in this submission. This was not picked up by the inspecting authorities so the question can be asked how much more honey, that is not honey, is being imported into Australia?

## **Port inspections**

Inspections at ports are the best way of ensuring that Australia stays free of the varroa mite and other pests. With Australia now going to Risk Assessment for inspections there is a danger that our freedom from these mites and pests will not remain as such.

This is a fluid situation. For many years Malaysia, except for planes coming to airports such as Adelaide, was not identified as a risk. However, out of the blue a swarm of dwarf bees (*Apis florea*) and Asian bees (*Apis cerana*) were found in a shipment of motor vehicles from Malaysia. Fortunately the swarms were found but it highlights the problems that can arise if the inspection is based solely on the Risk Assessment.

### **d. Australia's food labelling requirements, and how these affect the beekeeping industry**

#### **Victoria honey**

AHBIC has been involved in a case regarding a product sold in Australia as Victoria Honey. It is imported from Turkey prepacked in one (1) kilogram containers and the imported price was around \$1.83 a kilo. According to statistics from the Australian Bureau of Statistics (ABS) there has been 194,455 kilograms imported from Turkey from the December quarter 2011 to the December quarter 2013. This is most likely the Victoria Honey and Hi Honey which is detailed in the next section. This does not include any that may have been imported prior to the December quarter 2011.

Originally AHBIC had contemplated an anti dumping case but, as these cases take such a long time to put in place, this avenue was not pursued.

AHBIC wrote to the Australian Consumer and Competition Commission (ACCC) on 18 September, 2012 drawing the attention of the ACCC to this product and saying that AHBIC considered the labelling to be misleading. This was on the grounds that people could think that the honey was from Victoria, Australia, when in fact it was imported from Turkey. We have a case brought to our attention by a beekeeper on the Gold Coast in Queensland where this product was advertised out the front of a fruit shop as Victorian Honey.

The ACCC replied on 1 October, 2012 to say that it may breach the Australian Consumer Law and it had lodged details of the AHBIC complaint on its database. AHBIC finds it very strange that no action was taken even though ACCC said a breach may have occurred. If a breach is possible, action should be taken and not just be put on their database. What does putting it on the database achieve?

As AHBIC could get no action here and there being a history of adulteration in Turkey, AHBIC decided to have this product tested. A 1kg container was purchased and a sample sent to a world renowned laboratory in Germany. The results came back to say that this product was not honey, as labelled, but most likely maize sugar syrup.

AHBIC then contacted the ACCC and Food Standards Australia and New Zealand (FSANZ) on 22 April, 2013.

ACCC replied to say that as the results were not from an Australian laboratory and tested to the Australian New Zealand standard it could not accept the results. ACCC was asked that, as the standard was an Australian New Zealand standard, would they accept a test from a New Zealand laboratory. They could not answer this. This question was asked as it was thought that a laboratory with the capabilities to test, as per the test from Germany, did not exist in Australia. It was subsequently found that there is no laboratory in Australia that can carry out the C4 sugar test.

FSANZ replied on 3 May, 2013 to say that the enforcement of food standards in Australia was in the hands of the State Government Departments of Health. AHBIC wrote to the State Departments in Queensland (where the product was purchased), New South Wales and Victoria. AHBIC was aware that this product was being sold in these three States. Queensland Health replied that as the importer of the product was in Victoria they would pass on the complaint to Victoria.

Victoria Health purchased some of the honey and sent it to New Zealand to Asurequality for testing on 13 August 2013 after our initial complaint dated 14 May, 2013. By the end of October, 2013 the test results finally came back showing it was not honey. Victoria Health passed the information on to ACCC. By the end of November, 2013 ACCC said they would reconsider AHBIC's complaint.

The consequences of the sale of this fraudulent product are that:-

1. The Australian public has been buying, in good faith, a product that is **not** honey
2. Australian beekeepers have been financially disadvantaged because of the loss of sales of Australian honey.
3. Why would the ACCC not act when it thought a breach had occurred and then they were presented with evidence to show it was not honey?
4. Why did Victoria Health take so long to investigate the situation when presented with the evidence?

The current status of this complaint is that ACCC have advised AHBIC some enforcement action will be undertaken. Details cannot be given due to privacy provisions. Whilst this is welcome, Victoria Honey now seems to be not sold in Australia. Maybe this is because the stocks imported have all been sold.

## **Hi Honey**

Our industry has uncovered this product that is being sold as honey in Australia but, according to the analysis we have had carried out in Germany, this is **not** honey. Again it is from Turkey.

AHBIC lodged a complaint with the ACCC on 10 February, 2014 on the grounds that the label was did not conform to the Australia New Zealand Food Standard Code 2.8.2, was misleading and also deceptive.

On 20 February, 2014 AHBIC passed on the results to the ACCC of the analysis obtained from Germany showing that this product was not honey. This product was purchased in Victoria.

On 6 March, 2014, AHBIC has been advised this case is now being investigated by the Enforcement Operations in Victoria.

AHBIC cannot understand why it is taking so long to remove a [REDACTED] product from the market. Why cannot an order be issued by someone, be it ACCC or the relevant Department of Health, to have this product removed from the shelves. AHBIC has been told that it is not a health issue.

The current status of this case is that ACCC have advised they are looking to leverage action from the Victoria Honey case. Again whilst this is welcome, the product still remains out in the market place. AHBIC has been advised by the Queensland Department of Health that the product cannot be recalled, despite the fact that our laboratory results show it to be not honey, as it is not a health risk. Queensland Health was approached as Hi Honey is now on sale in Queensland.

There is something wrong with our enforcement system when a product, that is shown to be not honey, can remain on sale. **This needs urgent attention.**

## **Bee Bear**

There was a product sold at Coles called Bee Bear - Honey and Syrup. Its ingredients were listed as "Sugar syrup and honey (35%)". In light of the Victoria Honey case, AHBIC had this product tested in Germany. It came back to say it did contain some honey but it could not be assessed how much honey was in the product.

AHBIC wrote to Queensland Health, as Queensland was where the product was purchased, to say that the labelling could be misleading. It is called Bee Bear although it only contains 35% honey, had honey cells on the label which again would imply honey and the product was packed in a bear container which has been used universally to sell honey. Again, AHBIC felt this was done to highlight the honey component.

The main reason for our complaint was that as it only contained 35% honey and the rest, by the label, being sugar syrup, would be 65%. Labelling laws are meant to have the major ingredient first. So in this case it should have been labeled sugar syrup and honey.

Current status of this complaint is that it would seem the product is no longer being sold.



## **Honey in products**

Adding honey to various products has many benefits. An example is that work has shown that adding honey to bread will keep it moister for longer.

However in most cases the origin of the honey is not known. The public is becoming more discerning and wants to know the origin of its food. AHBIC would argue that where honey is used in a product, if the country of origin is other than Australia, then the origin should be shown.

## **Country of origin labelling**

There remains confusion in Australia and overseas as to the terms “Made in Australia” and “Product of Australia”. It can also have an effect on Australia’s reputation.

As an example, royal jelly was being imported from China to Australia, packed in Australia then sold overseas as “Made in Australia”. When Japan did some analysis on the royal jelly and found it contained a chemical banned in Australia, Japan then assumed that Australia was using this chemical in beekeeping in Australia. Australia’s international reputation for clean green beekeeping products was being tarnished by a product that was not produced in Australia.

At the time, despite complaints to the Department of Agriculture, testing of royal jelly coming into Australia would not be carried out despite this clear evidence that the royal jelly coming in had unwanted residues in it as shown by the Japanese analysis.

Another aspect of Country of Origin labelling is when honey is used in a product and the name honey is used as part of the product name to help sell that product. There is no indication on the ingredient list as to whether that honey used is Australian or imported or what country it is imported from. The public is becoming more discerning and they want to know where their food comes from.

Beekeepers have stories of people talking with them saying it is good that the particular product has honey in it and they are pleased the Australia beekeeper is benefitting. This may not be the case as the source of the honey is not identified in the ingredient list. So it is in the best interest of consumer awareness that ingredients used are clearly identified if they are imported.

Also with country of origin labelling it often has “Made from Australian and Imported Products”. There are two inadequacies here. One, the proportions of the Australian and Imported Product are not known. As Australian is mentioned first it could be assumed that more than 50% of the product is Australian. But this may not necessarily be the case. The imported product could be the majority.

The other flaw is that the country of origin of the imported product is not shown. Surely the public has a right to know from which country that imported product comes.

- 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, and the Rural Affairs and Transport References Committee 2011 report *Science underpinning the inability to eradicate the Asian honey bee***

***2008 More than Honey report Recommendations***

1. ***The Committee recommends the Australian Government provide the necessary leadership, funding and organizational resources to run and establish Pollination Australia.***

Pollination Australia did not come into fruition. There is a Pollination Advisory Committee (PAC) within the Rural Industries Research and Development Committee (RIRDC) which does fund research into common pollination issues for the beekeeping and horticultural industries. Details on this can be found at <http://www.rirdc.gov.au/research-programs/rural-people-issues/pollination>

2. ***The Committee recommends that the Australian Government fund research and training in the provision of paid pollination.***

This has not happened.

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

Pollination Australia was not established.

Looking at alternative pollinators, AHBIC would submit that there is a niche role for alternative pollinators but they cannot be expected to replace honey bees as pollinators for agricultural and horticultural crops. The role of pollination of major agricultural and horticultural crops in Australia will need to be filled by honey bees.

Australia has many native bees but their habitat is being destroyed so their numbers are in decline. To arrest this decline there needs to be work carried out on retaining resources for the native bees to survive on.

Some native bees are not suitable for pollination in many arenas. An example of this is the native stingless bee (*Tetragonula sp.*). It does not fly below around 18°C. So if the temperature is below this, pollination will not be carried out. Also there is anecdotal evidence that some flowers e.g. zucchini are too big for the stingless bee to effectively pollinate this crop. Also how many nests of stingless bees would be needed to do the work of one European bee hive?

4. ***The Committee recommends that the Australian Government alter labelling requirements for agricultural chemicals to reflect their impact on honey bees and other pollinating insects.***

Whilst labeling as per this recommendation is welcome, the problem is in the enforcement of the labelling.

There has been a recent case in New South Wales where honey bee hives were killed as a result of an insecticide application. During the investigation phase, it was pointed out that the chemical involved had a label warning to not spray when bees are working the flowers of the crop. When this was pointed out to the investigating authority, they said that this could not be enforced as it was a warning only and was not a directive.

This came as a shock to the beekeeping industry as it had been thought that the labeling was a directive and could be enforced.

A newly registered chemical, cyrantraniliprole, has a warning that bee hives need to be shifted out if this is sprayed. The application of this warning is another aspect that needs to be considered. It is not practical for a beekeeper to be told that the crop is going to be sprayed tomorrow. The logistics of moving beehives out is not something that can be done at a moment's notice. The beekeeper may be many hours away. There may be more than one load of bee hives in the area.

- 5. *The Committee recommends that the Australian Government, in conjunction with State and Territory governments, establish guidelines for beekeeper access to public lands, including national parks, with a view to securing the floral resources of the Australian honey bee industry and pollination dependent industries.***

Access to public lands is crucial for the survival of the Australian beekeeping industry.

There has been some progress by various State Associations on this access issue but there has been no input by the Australian Government.

The aspect of having some uniform guidelines for access to public lands in Australia would be a great benefit to the beekeeping industry and to the Trustees of those public lands.

- 6. *The Committee recommends that the Australian Government provide incentives for the planting and conservation of melliferous flora under Commonwealth funded revegetation projects and carbon credit schemes.***

Whilst tree planting is to be applauded, the reality is that plantations are not a good source of pollen and/or nectar for honey bees and will not replace access to public lands. Dr. Doug Somerville has a paper on this. It can be found at <https://rirdc.infoservices.com.au/items/10-076>

Whilst a particular tree may be a good source of pollen and/or nectar where it grows naturally, when planted in a different area it may not produce in the same manner. Also, within a natural forest there are many provenances growing which provide variety. When a plantation is established, often the seed is collected from a couple of trees so that natural variation in provenances is lost.

Whilst the use of plantations for revegetation and carbon credit schemes may be viable, the use of these plantations as a replacement for other areas currently worked by honey bees is not viable. This, at one stage, had been a suggestion by the Queensland Government.

**7. *The Committee recommends that the Australian Government fund research into the impact of fire management on the Australian honey bee industry with a view to establishing honey bee industry friendly fire management practices.***

AHBIC is not aware of any research that has been conducted in this field.

Hazard reduction burning is becoming accepted. Within this comes the need to consider how often these burns need to be carried out.

If the period between burns is too long, then the hazard reduction burn can be a “hot one” and a loss of vegetation occurs.

Burning at too frequent intervals can result in the loss of low scrubs that are often important sources of pollen for the bees to work.

It is a fine line to work out how frequent these burns should be and urgent work needs to be carried out in this field, especially in light of the recent devastating fires around Australia.

**8. *The Committee recommends that the Australian Government maintains and enhances the National Sentinel Hive Program with a view to ensuring that:***

- *All major ports are covered by sentinel and bait hives;*
- *All beekeepers are brought under the program, with priority give 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 achieving the above objectives*

The National Sentinel Hive Program has now been replaced with the National Bee Pest Surveillance Program. Members of AHBIC are on the Steering Committee. Industry is contributing \$75,000 a year for this current financial year and the next financial year. Horticulture Australia Limited (HAL) is also contributing \$75,000 and the Commonwealth Government is contributing \$60,000.

Details of this program can be found at:-

<http://nbpsp.planthealthaustralia.com.au/public.php?page=aboutnbpsp>

The issue of pre-border security has been mentioned elsewhere in this submission. AHBIC is of the opinion that this will be very beneficial as it introduces another point at which likely swarms of bees, which have the potential to carry mites, can be intercepted.

**9. *The Committee recommends that the Minister for Agriculture, Fisheries and Forestry request that the Australian Pesticides and Veterinary Medicines Authority fast track the pre-registration of pesticides and other chemicals necessary to combat a Varroa incursion.***

There are several applications in with the APVMA.

***10. The Committee recommends that the Australian Government improve the nation's incursion response capacity by providing for:***

- ***Better education of those charged with border protection;***
- ***Improved diagnostic capacity for pests and diseases;***
- ***The establishment of national diagnostic protocols;***
- ***The establishment of a comprehensive biosecurity research program for the honey bee and pollination dependant industries.***

AHBIC is not aware of any of these aspects that have been carried out other than a course which was held on identifying pests. These need to be carried out at regular intervals as the staff who attend these courses often are reassigned within the Department or leave.

***11. The Committee recommends that the Minister for Agriculture, Fisheries and Forestry establish a new honey bee 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:***

- ***The facility be integrated into a national honey bee 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 New South Wales counterpart to establish the new honey bee quarantine facility at the Elizabeth Macarthur Agricultural Institute, Camden, or some other suitable location.***

The Eastern Creek facility has re-opened and imports are proceeding through the facility albeit with some problems.

The previous Federal Government has commissioned a new all encompassing quarantine facility in Victoria. During the consultation process, AHBIC pointed out that Victoria was not the best place for a quarantine facility for honey bees due to the fact that most queen bee breeders who would use the facility are based in New South Wales and the climate in Melbourne was not always conducive to good beekeeping conditions.

Planning is now well underway for this new facility and AHBIC has been in consultation with the Department of Agriculture to make sure it is the best we can have under the circumstances. This new facility will become available in 2015 when the Eastern Creek facility is closed.

The other aspects of this recommendation have not been implemented.

***12. The Committee recommends that the Minister for Agriculture, Fisheries and Forestry direct Biosecurity Australia to complete the import risk assessment for drone semen by the end of 2008.***

Despite this recommendation, the industry is no nearer to having this IRA completed. This, despite many representations from industry to Government.



Reasons cited are a lack of importance in the eyes of the Department and lack of staff.

Whilst the IRA for the importation of queen bees has been recently completed and imports are now proceeding, the need for the ability to be able to import drone semen has not diminished. With the inevitability of Australia getting varroa mites, there needs to be the extra ability to import genetics for honey bees that will help combat the varroa mite when it gets here. Drone semen plays an important role for this to happen.

Concern has been raised about the possibility of having Africanised genes imported in the semen. This is also the case with the queen bees and has been adequately addressed in the import protocols for queen bees. These same conditions could easily be applied to drone semen.

***13. The Committee recommends that the Australian Government, in conjunction with State and Territory governments, establish and fund a national endemic bee pest and diseases control program.***

Currently AHBIC has an Industry Working Group (IWG) which is working on a National Biosecurity Strategy which will encompass endemic diseases. The IWG has prepared a case for increasing the Contingency Fund Component for the current honey levy. This can be found at <http://honeybee.org.au/programs/honey-levy-reform-and-increase/> Part of this case involves a reform of the levy process so that the levies collected are not eroded by collection costs.

A Code of Practice for Beekeeping in Australia is also being developed as part of this process.

Support for these reforms will be crucial. AHBIC has written to Minister Joyce for his support and met with the Minister's staff on 12 February, 2014. A letter from the Minister has been received commended AHBIC with the process and consultation being undertaken and he looks forward to receiving our formal submission later this year.

***14. The Committee recommends that the Australian Government, in conjunction with State Territory governments, establish bee biosecurity regions based on natural boundaries, being:***

- ***Eastern Australia, including New South Wales, Victoria, Queensland, Australian Capital Territory and South Australia;***
- ***Tasmania;***
- ***Western Australia;***
- ***Northern Territory; and***
- ***Kangaroo Island***

AHBIC is of the opinion that this still needs to be adopted. Despite many attempts to establish the Eastern Australia region, State Governments have been reluctant to do this.

- 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.***

As part of the National Biosecurity Strategy, the national registration system is being considered. Currently Tasmania, the Northern Territory and the Australian Capital Territory do not have compulsory registration of beekeepers.

- 16. The Committee recommends that the Australian Government commit \$50 million per annum in pursuit of biosecurity measures and research in support of the Australian honey bee industry and pollination dependent industries.***

Whilst AHBIC would still like to see this recommendation implemented, it is mindful that presently the Australian budget is under pressure. However, AHBIC would ask that this recommendation be kept in place for when the budget is in a better position to be able to fund this recommendation.

- 17. The Committee recommends that the Australian Government request the Australian Competition and Consumer Commission to investigate pricing practices for honey within the honey bee industry and the retail sector.***

AHBIC is not aware of any investigation that has been carried out by the ACCC.

- 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 financial viability of producers and packers.***

This recommendation has never been enacted.

- 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.***

Beekeepers had access to the 457 visas to be able to employ skilled migrants to help in their beekeeping operations. There is a shortage of workers that are able to be employed by beekeepers in Australia. This is evident by the number of advertisements in beekeeping magazines looking for workers.

- 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 all imported honey products are tested against this standard.***

This has not happened. See the comments in the first part of this submission.

- 21. The Committee recommends that the Australian Government develop labelling standards to more accurately reflect the place of origin and composition of honey and honey bee products.***

This has not happened. See comments earlier in this submission.

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

The adoption of a new Standard for honey in Australia has been discussed earlier in this submission.

The problem with labelling has also been highlighted earlier in this report.

The removal of tariffs in many countries to which Australia exports honey has been discussed earlier in this report.

***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 to producers.***

AHBIC is not aware of this happening.

***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.***

This has not happened.

***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.*

AHBIC has approached Government on several occasions to ask for a levy on pollination services to fund research. The answer was that a levy cannot be struck on services.

However, in recent months, AHBIC has been advised by Government that this may now be possible. This now needs to be progressed as fast as possible.

**2011 report Science underpinning the inability to eradicate the Asian honey bee**

***Recommendation 1***

***The committee recommends that the Consultative Committee on Emergency Plant Pests (CCEPP) reconsider the question of whether the Asian honey bee is eradicable from Australia; and, following that reconsideration, make a fresh recommendation to the National Management Group (NMG) on the Asian honey bee incursion management response; the CCEPP should specifically consider this question in light of evidence relating to the potential for the insect's spread and resulting environmental, economic and social costs; the CCEPP should specifically apply the precautionary principle to areas of scientific uncertainty in its reconsideration of these issues.***

## **Recommendation 2**

***The committee recommends that, on receipt of a fresh recommendation from the Consultative Committee on Emergency Plant Pests (CCEPP), the National Management Group (NMG) reconsider the question of whether it is technically feasible to eradicate the Asian honey bee from Australia; the NMG should specifically apply the precautionary principle to areas of scientific uncertainty in its reconsideration of this issue.***

## **Recommendation 3**

***The committee recommends that, in the event that the full Asian honey bee eradication program is reinstated, a scientific program of data collection concerning the detection, spread and eradicability of the Asian honey bee from Australia be initiated in order to properly inform future decision making regarding this emergency plant pest.***

The CCEPP did meet again by phone hookup but the position of the participants did not alter.

Following this the Federal Government allocated \$2million for a Transition to Management Plan (T2M) and the beekeeping industry put up \$400,000 which was to go to research.

With hindsight and having the benefit of the functioning of the T2M, industry should have asked for more with the T2M that would benefit the industry. As it turned out, the only part that could have benefitted industry was the Remote Nest Treatment Trial and this trial was not fully completed despite the representation from industry.

Another disappointing aspect of the T2M was the paper produced on the Asian bee. Originally it was to be on the Java genotype, the one present in Cairns, but as there was not a lot of data on this it was then expanded to encompass all *Apis cerana*. As was pointed out at the time there is a lot of difference between the Java genotype and the other strains of Asian bee. However, disappointingly this was pursued with and the paper produced, in the opinion of industry, was trying to make the case that the incursion should have beneficial aspects.

Industry had objected to the publishing of the paper but was overruled in the Committee.

What can we learn from the incursion? Industry is concerned that if the actions of Governments exhibited during the Asian bee incursion are again repeated during another incursion of an exotic pest, such as the varroa mite, then there will be no eradication attempted even if it was possible.

In this incursion, the environment was not a consideration despite many attempts by industry to have it seriously considered. What does this say about our regard for the environment?

What is the future? The spread of the Asian bee will be slow unless it gets a helping hand by the movement of swarms by humans such as on trains and trucks. In the area where the Asian bee is present it will mean that drones of the Asian bee will mate with the European queen bee as found in the work by Dr. Ben Oldroyd.

The project can be found at [http://www.rirdc.gov.au/research-project-details/custr10\\_HBE/PRJ-007768](http://www.rirdc.gov.au/research-project-details/custr10_HBE/PRJ-007768)

This means that the European queen bee will be trying to fertilise an egg that she lays but it will not be viable. This means that there will be less bee numbers in the hive thus less honey production and reduced pollination activity. Anyone who has been producing queen bees for sale in the area where the Asian bee is found will now not be able to do so.

As has been outlined earlier in this submission, since the Governments have walked away from the Asian bee incursion, they are not willing to put in place some sort of control area. This will mean that the resumption of the export of live bees to the USA will not be possible.

**f. any related matters**

**Australia Post**

For the beekeepers, spread throughout all of Australia, to be able to obtain new queens to keep hives viable, the only real way is to receive these queen bees by Australia Post.

Many years ago, AHBIC negotiated with Australia Post a protocol for sending these queen bees through the postal system. Australia Post insisted that they must go by Express Post and stickers were to be placed on the package. The wording on the sticker was agreed to by AHBIC and Australia Post.

For many years this system has worked well with only an occasional shipment not being delivered within the next day guarantee or in a time that would seem reasonable. However, this past season has been a frustrating one for queen bee breeders in that the delivery times have not been within the next day guarantee or has been unreasonable.

As examples, shipments to Melbourne from Queensland that are supposed to be next day delivery are taking two (2) days and on one occasion took four (4) days. A shipment to Maryborough Victoria lodged in Ipswich Queensland on Tuesday was delivered on the following Monday. These are not isolated instances.

Australia Post has been contacted by the queen bee breeders and on many occasions and they have received another satchel but the queen bee breeder would rather have the delivery time met than receive a free satchel.

It is imperative that the queen bees be delivered as quickly as possible and this used to happen in past years.

When lodging complaints, queen bee breeders have asked why the problem exists but are given no official reason. On one occasion, it was unofficially told to one queen bee breeder that the reason was because there is so much online overseas orders coming in. As they are given priority over internal mail, this was the reason why Express Post was so slow.



AHBIC has been in contact with Australia Post and has suggested that meeting with Express Post staff in Brisbane is necessary to try to sort out why the problems are occurring. So far Australia Post has procrastinated and has not agreed to such a meeting even though it would be in the best interests of queen bee breeders and Australia Post. The season when queen bee breeders send queen bees through the post is usually September to March. So it can be seen that this season is almost come to an end without resolution of the problem. It should be sorted before the next season starts.

**Australian Honey Bee Industry Council Inc.**  
**31 March, 2014**