



29th August 2022

Almond Board of Australia

To whom it may concern,

Re: Submission to the Standing Committee's Inquiry on the Adequacy of Australia's Biosecurity Measures and Response Preparedness, in particular with respect to varroa mite.

Key points:

- All biosecurity responses are funded by government and affected agricultural industries.
- A more equitable funding system that recognises the responsibility of those that pose the greatest threat to our biosecurity – i.e. the freight industry which imports exotic pests and disease and do not contribute towards biosecurity responses - needs to be developed.
- Year-round national biosecurity surveillance activity needs to be appropriately resourced according to the economic and environmental protection it provides.
- National Response Plans to biosecurity incursions should transcend State borders and be enacted in a harmonised manner which an agreed risk assessment recognised and used by all agencies.

Case study:

Almond industry experience, 2022 varroa incursion:

- The Australian almond industry was on track to produce a \$1 billion crop this year due to an increase in yields as new plantings come into production.
- Almond Board of Australia represents all of industry growers, processors and marketers.
- The industry footprint for all but one farm (in WA) lies across NSW, Victoria and SA in the southern Murray Darling Basin.
- The industry is 100% dependent on commercial beehives for pollination during each year.
- The annual beehive requirement is estimated to be in excess of 300,000 hives.
- Almost all commercial beehives dedicated to pollination in Queensland, NSW, Victoria and SA are required to meet this almond orchard demand in July-August.
- A National Response Plan was approved in July following the discovery of varroa mite in Newcastle on June 22. The budget for the first 100 days was estimated to be \$65 million.
- Varroa outbreak was a category 3 biosecurity issue and as such funding would be split 50-50 industry-government. The almond industry's share of that cost was initially estimated at almost \$10 million.
- NSW established a movement permit system that quarantined bees in the incursion zones but allow bees in other parts of the State to be moved to almond orchards in time for pollination.

- Victoria, Queensland and South Australia activities were not included in the National Response Plan and banned the entry of NSW-based beehives.
- As a result of this ban, Victorian orchards – which represent 60% of Australia's almond production - were at least 70,000 (almost 50%) short of the required beehives during pollination.
- Some South Australian orchards were also understocked as a result.
- Growers in Victoria and South Australia were forced to pay higher hive rental rates due to the shortage of beehives available.
- Reduced pollination rates could lead to production losses in Victoria alone of up to \$300 million. Broader economic losses will be far in excess of this.
- Despite numerous representations, the almond industry could not get the co-operation of Victoria and SA to embrace/replicate the NSW movement system in order to allow beehives from outside the quarantine area safely travel across the border for pollination.

Suggestions:

- **A National Response Plan must feature a harmonised approach across all jurisdictions.**
- **There needs to be a national appeal mechanism to address impasses such as the one cited above.**
- **The experience has highlighted the need for a national traceability system of Australian beehives. All beehives, commercial and recreational, should be registered and traceable by way of QR code or some such simple monitoring system.**

Almond industry background:

The value of the almond industry to the Australian economy was recently assessed by consulting firm RMCg based on 2019/20 figures as contributing \$1 in every \$1,000 to the nation's GDP. The study showed the almond industry supports over 9,500 jobs across the nation and 4,500 jobs in the regions where almonds are grown. In 2022 almonds were grown over 60,500 hectares in NSW, Victoria, South Australia and Western Australia and produced around 138,600 tonnes.

The almond industry acknowledges they are highly dependent on the apiary industry to cross-pollinate flowers and set nuts on over 18 million trees. Each July-August the industry relies on more than 300,000 high quality European honeybee hives to move across the country to provide a specialized fertilization service that only honey bees can provide. This service is worth more than \$40 million to the beekeeping industry.

For many years our industry has played an active role, partnering with the Australian Honey Bee Industry to support their operations, advocating for continued bee keeper access to native floral resources in National Parks and provided financial support to initiatives that protect and enhance the health of honey bees. Our growers have contributed financial support to maintain inspection of sentinel hives under the National surveillance program as well as previous eradication responses such as *Varroa jacobsoni*. We have developed best management practices for honey bees describing how to look after hives during their short stay in almonds. We have also partnered with When Bee Foundation and provided financial support to set up the Bee Friendly Farmer program to increase the biodiversity of pollinators in Australia backyards and farms. Almost 50% of the industry has signed up to be a Bee Friendly Farmer in the first 6 months and many have started planting native trees on almond properties to demonstrate their commitment to honey bee health.

The timing of the current incursion could not have been worse for the almond industry.

As a result our industry has actively contributed to the Varroa response by taking on the role of Horticulture Industry Liaison Officer in the Control room in Orange for the benefit of all affected horticultural industries that are signatories to the Emergency Plant Pest Response Deed (EPPRD). We have maintained an active involvement during the last two months to provide assistance to the NSW DPI response team and support the many almond producers and beekeepers who rely on the pollination season to make a living and sustain the vitality of those who live in regional communities that rely on them.

This has also involved being a key member of the Interstate Movement Working Group that was reconvened to address the myriad of challenges of cross border transportation of beehives from NSW during a stand still order.

Without bees there is no almond crop. Victorian almond growers (comprising 60% of almonds produced) have been impacted the most with hard borders imposed by states outside of the National Response Plan. Some Victorian growers will only receive 1.6 of the required 5-6 hives per hectare seriously jeopardizing the viability of their businesses. The full impact on almond businesses is unknown at this early stage but hard borders have unduly restricted hive movement and are not a sustainable option in the long term.

The Almond industry appreciates the opportunity to share its observations and provide an industry perspective on the current Varroa mite response:

National response for NSW. The Almond industry is grateful for NSW DPI's rapid response to the detection of Varroa mite in June and their recognition of business continuity for all affected industries. We recognized the efforts of NSW DPI to develop plans and systems that enabled hives to be managed and moved within NSW under strict protocols underpinned by a risk assessment within a very short timeframe. Without this responsiveness in enabling beekeepers to manage and move hives in NSW, the almond crop would have been seriously jeopardised and the threat of bees swarming would have made the ability to contain the current incursion impossible.

States operating outside of the National response. The current emergency response does not include all states. Actions by states other than NSW are determined by their own separate risk assessment, risk appetite and controls. This created unnecessary double handling and stress that was detrimental to bee colonies. For example, SA beekeepers moving hives into Lindsay Point Victoria. The almond industry requests states are brought into a truly national approach, adopting one risk assessment recognized by all states used to highlight high risk areas and enable movement with appropriate protocols and controls in all other areas without unfounded constraints and hardships on primary producers that have been inflicted by hard borders.

Current system undermines and discourages industry participation in the EPPR Deed. The almond industry is a party to the EPPRD and as such will be the largest financial contributor from the listed affected industries to the current Varroa response under its current categorisation. While the principle behind the EPPRD is sound, in that industries who benefit most from the response (industry value and impact) contribute a greater apportionment of the costs, participation in the EPPRD is voluntary and industries who chose not to participate pay nothing. These industries provide no financial contribution towards the activities required to achieve proof of freedom and yet benefit from the same. This inequity undermines the EPPRD and disadvantages those industries who value, prioritise and financially contribute to national biosecurity programs.

Biosecurity responses increase the cost-price squeeze for growers. At present primary producers across Australia are suffering from increasing production cost pressures and uncertainty of supply on many fronts including power, fuel, fertilisers, machinery, labour, etc. The industry will rely on almond growers paying an EPPRD levy to raise the funds needed to

reimburse the Australian government for the response expenses incurred to control Varroa. This further erodes the profitability and sustainability of almond producers and their ability to support regional communities and businesses.

Current systems are inequitable and disadvantages plant industries – growers are continually being called on to cover the bill for incursions they haven't caused. The increased biosecurity pressure has been shown to be caused by an increase in freight and imported products largely from shipping containers. The almond industry believes the cost of cleaning up an incursion should be shared more equitably and include the freight industry. Frequently incursion results from products being imported that have no relevance to agricultural production. Primary industries are continually having to pay so as to avoid additional costs should the pest or disease become established even though they have no part to play in causing the problem. The almond industry strongly believes a more equitable model needs to be implemented whereby the costs for remediating incursions is funded by those who bring the pests and diseases into Australia and asks that the option for an Onshore Biosecurity Levy is revisited.

Surveillance activities – The almond industry recognizes the importance of an going biosecurity vigilance that features a National program that maintains and monitors sentinel hives and contributes grower levies towards these each year. However, sentinel hives are only as good as their chosen location and frequency of inspection. The almond industry would like further investigation into how this surveillance program can be better supported financially and sustained in the long-term to ensure intervals of inspection are fit for purpose.

Review of the honey bee industry hive registration and movement protocols – In the case of the current varroa incursion, it has become clear that there needs to be a national beehive registration system given the transient nature of the industry. Beekeepers operate across a number of States each year and the issues faced during the recent almond pollination season has highlighted the shortcomings of a State-by State approach. Implementing a nation-wide traceability program that allows hive moments to be tracked in times of emergency would help address the varying levels of risk adopted by various State agencies and provide a level of transparency that allows for a quicker, more informed decisions around beehive movement.

Yours sincerely,

Tim Jackson
Chief Executive Officer
Almond Board of Australia