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Ms Stephanie Galbraith
Committee Secretary
State Development and Regional Industries Committee
Parliament House
BRISBANE QLD 4000

By email; sdric@parliament.qld.gov.au

Dear Ms Galbraith

Submission on –Nature Conservation and Other Legislation Amendment Bill 2022

I have been directed by the State Council of the Wildlife Preservation Society of Queensland (Wildlife Queensland) to provide comment for consideration on the Nature Conservation and other Legislation Amendment Bill 2022.

Wildlife Queensland is one of the longest established and highly respected wildlife-focused conservation groups in Queensland. With over 6500 supporters Wildlife Queensland is a strong voice for our wildlife and its habitat. Wildlife Queensland is apolitical and gives credit when credit is due and criticism when warranted.

Our objects include,

- To preserve the flora and fauna of Australia by all lawful means
- To educate the community in an understanding of the principles of conservation and preservation of the natural environment
- To discourage by all legal means, the possible destruction, exploitation and unnecessary development of any part of the natural environment.
- To encourage rational land use and proper land planning of existing and future development, and the use of the natural environment and its management.

Our aims reflect a strong interest in conserving our biodiversity and natural landscapes and seascapes. Wildlife Queensland is not opposed to ecological sustainable development but there needs to be a balance among the needs of the environment, sustainable development and use and society's needs.

It is acknowledged that beekeeping currently is permitted in certain national parks in Queensland. This was the result of negotiations that underpinned the signing of the South-East Queensland Forests Agreement (SEQFA). The beekeeping industry has been established in Queensland since 1851 perhaps earlier, the 1820s, according to some commentary. The hives of the European honeybee (*Apis a mellifera*) are located predominately on eucalypt dominant

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native forests and woodlands with a significant percentage of the such vegetation communities occurring on public lands of various tenures. According to the SEQFA, logging of native forests was to be phased out by 2024 and certain State Forests were to be transferred to the Protected Area Estate under various tenures, but mainly national parks. The honeybee is an exotic feral animal so its presence in a national park conflicts with the cardinal principle of management of national parks. To correct this obvious inconsistency, the *Nature Conservation Act 1992* was amended in 2004 to allow beekeeping to continue until 31st December 2024 on SEQFA and Wet Tropics lands being transferred from forest reserve to national park or national park (recovery) tenure and the latter tenure no longer exists. This amendment provided for the continuation of existing apiary sites for beekeepers while alternative resources were found for, and by, the industry by 2024.

In May 2007, the Government of the day in a submission to the standing Committee on Agriculture, Fisheries and Forestry stated, and I quote, ‘Beekeeping is inconsistent with the management principles of national park tenure.’ It is pleasing to see that the Department of Environment and Science at least considers commercial beekeeping is inconsistent with the cardinal management principle of national parks as stated in the recent Information Sheet even though it is not necessarily current Government policy as indicated in the same document. As if the cardinal principle of management of national parks is not under enough pressure thanks to the 2013 amendments by the Newman Government by allowing tourist resorts (euphemistically defined as ecotourism facilities) to be constructed on national parks, why give a commitment as an election promise to extending the stay for feral animals on national parks for a further 20 years. Initially, beekeepers received a 20 year extension to phase out their operations on national parks and find other locations on which to place their hives. That was a big enough affront to the cardinal principle of management of national parks. It is our understanding the agreed 20-year phase out period was considered very reasonable by all parties at the time. The fact that little to no progress has been achieved in the initial 20 years in spite of the fact when back in May 2007 industry was advised that there is almost 19000 hectares of high honey yielding forest areas located on private land which may be available as an alternative resource gives Wildlife Queensland little confidence industry will not be presenting the same arguments in another 20 years- it is proven to be too challenging- another 20 years please.

Do not be confused by any arguments that our forests and woodlands need honeybees for pollination. Our native flowering plants have managed quite happily for millions of years without them by employing the services of our native bees, flying foxes, butterflies, honeyeaters and a host of other native animals. In fact, honeybees compete with native bees, can damage and destroy some native flowers so viable seed is lost from the ecosystem. Furthermore, heavy vehicle access to hives may cause additional damage to vegetation and if not effectively controlled may result in exotic weed invasions. It is feasible for the activities of honeybees to influence the floristic composition of an ecosystem and in turn that may influence the fauna populations.

There is an argument put that there is insufficient evidence of the ecological impacts of commercial beekeeping to justify its complete removal from national parks. However, it can

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be also stated that there is insufficient research to determine the ecological impacts of honeybees on various natural regional ecosystems so beekeeping should be excluded from national parks. A New South Wales Scientific Committee, an independent body of scientists, listed competition from feral honeybees as a Key Threatening Process under the *Threatened Species Conservation Act 1995*. It was stated that honeybees impact our biodiversity in two broad ways via competition for tree hollows and via competition for floral resources such as pollen and nectar. Granted commercial beekeeping activities were precluded. However, swarming of honeybees may naturally occur in spring and early summer. Honeybees need space and if a colony expands dramatically in numbers swarming may occur. What strong compliance or enforcement programs are in place for the commercial honey industry permittees accessing national parks to ensure swarming does not occur? Accidents happen so why continue a practice that has the potential to introduce a key threatening process?

There was a time when there was a general understanding by the community that the primary purpose of a national park was to protect our native plants and animals, plus the landscapes on which and in which those wildlife species live to form stable and sustainable ecosystems. There was also a reasonable understanding that such national parks offered distinct benefits for people in the form of enhanced water and air quality, climate mitigation and adaptation, carbon sinks, disaster risk reduction, scientific research and passive forms of recreation that result in minimal environmental damage. Grazing and foraging by exotic animals was not a reason for their existence then and not today.

Wildlife Queensland is of the view that the beekeeping industry has had knowledge for over twenty years that access to national parks would cease after 31st December 2024. It was stated in the Government's submission to the standing Committee on Agriculture, Fisheries and Forestry reported back in May 2007 that there is almost 19000 hectares of high honey yielding forest areas located on private land which may be available as an alternative resource when access to SEQFA land ceases in 2024. Why should that industry be rewarded for lack of action particularly when our native pollinators need access to resources without unnecessary competition to assist in arresting the decline in biodiversity let alone reversing the trend. Failure by the industry to take appropriate action to secure their future should not be rewarded by providing another 20 years for the industry to perhaps do nothing as the current situation appears to reflect. It is not as though our biodiversity is not in decline, the extent of our protected area estate including the national parks are nowhere near the 17% recommended by the Conference of Parties to the Convention on Biological Diversity and which is also a stated policy goal of the Queensland Government.

It is time to take a stand and demonstrate care for our natural heritage. The cardinal principle of management of national parks must be reinstated. With reluctance, honour the current commitment until 31st December 2024 but take the initial step to reinstate the cardinal principle of management of national parks. It is strongly recommended that the *Nature Conservation Act 1992* not be amended to allow beekeeping on national parks after 31st December 2024. This is stated noting that the prime purpose of this Bill is to deliver an election commitment. Wildlife Queensland appreciates that political parties frequently make every effort to endeavour to deliver on election commitments. However, history does reflect that election commitments are

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not always delivered for a variety of reasons. This would not be the first time the Palaszczuk Government has not delivered on an election commitment.

However, there are other objectives of the Bill. Wildlife Queensland has no hesitation in strongly supporting the amendments proposed. The proposed action to be taken to enhance the Department of Environment and Science's capacity to respond to misconduct on managed areas is supported. Similarly there is support to relocate powers of officers to seize and deal with things seized. Amendments to the *Wet Tropics World Heritage Protection and management Act 1993* are supported as is simplifying the process for consequential amendments to the Wet Tropics Management Plan 1998. It is appropriate that minor errors in the relevant legislation are corrected.

Thank you for the opportunity to comment.

Yours sincerely



Des Boyland, Policies & Campaigns Manager
11/03/ 2022.