

18 March, 2022

To the State Development and Regional Industries Committee,

I write to the Committee in support of the Bill to extend Beekeeping in former State Forest Reserves that have been converted into the Protected Area Estate.

I'm a third generation Beekeeper, a Life Member and proud past President of the Queensland Beekeepers Association. While a 20-year extension is better than nothing, my hope is for better consultation and greater understanding of the importance of bees, so a much longer sense of security can be achieved for the next generation.

I had some involvement in 2004 when this Act was voted on. I can remember two main concerns were raised by members of Parliament when voting on the removal of Bees by 2024.

They were:

1. Could the removal of Bees lead to an increase of imported honey and
2. If alternative sites cannot be found, then the date should be removed.

Australia is now a Net importer of honey when we used to be a Net exporter of honey. This means that the Australian people now need to eat imported honey. The uncertainty of resource security has stalled the growth of our industry when we need it to grow. Now more than ever, Australia needs a healthy thriving bee industry to pollinate the food we eat.

Soon after the passing of the NCA with the 2024 end date, a Government committee was formed to investigate alternate sites for beekeepers. This committee was chaired by Peter Burns and had representatives from the Department of Primary Industries, Forestry and National Parks. The Queensland Beekeepers Association [QBA] was briefed on the findings. We were never given a copy of the report. I have been at Government meetings where this paper has been discussed and the findings showed 13 sites were found. When the Queensland Beekeepers Association investigated this area, we found that Beekeepers were already utilizing the area via bordering private properties. The only documented information on this is attached and highlighted. It states:

'The State has been unable to identify suitable alternative lands to compensate for the loss of access to National Parks, on which the transitional arrangement and eventual removal of beekeeping from National Parks was predicated.'

The 2 main points that members of Parliament back in 2004 were concerned about, have happened. An increase of imported honey and NO alternate sites have been found. This information alone should be enough for an extension or in my opinion the removal of the date altogether.

I do acknowledge we have a footprint from the 1,179 bee sites in the former State Forest Reserves that have been converted into the Protected Area Estate. However, it is very hard to put a size to this footprint. Each bee site was originally established on areas of natural clearings, old gravel pits or logging dump sites. Beekeepers have never cleared new sites in the Protected Area Estate. We have over the years maintained already cleared sites. So, what area do these sites take up in the estate? I had to google long and hard to try and put it in a way easily relatable. How do you explain an area that is .0004% even if this area was already cleared? The best I could come up with was the area a tennis ball would take up on a football field.

In conclusion,

Australia needs a strong healthy bee industry to form part of the important agriculture chain for food and fibre production. Australian honey is known around the world for its clean green image and has won multiple awards at world honey expo's. Around 2005, Landline did a story on this decision to remove bees by 2024. I was interviewed back then and was asked, 'soon you will be running your family business, what will you do if you have to remove your bees in 2024?'

"Move to NSW was my response. Now I'm not sure that is a real option."

It is my great hope that Government could one day back our small industry and the \$2b+ it's worth to agriculture. I believe we compliment the maintenance of State Lands through weed identification and the reporting of vandalism. As someone that's been involved with fighting bush fires, knowing there is a small area i.e., a bee site that you can turn a fire truck around is so reassuring and at times live saving.

The amount of anxiety this has caused and is causing needs to stop. Over the years it has put a lot of stress on many families and their businesses. We work hard, it's not a 9-5 job but we love the environment and what we do.

Just remember one small tennis ball and only half of that ball is currently used.

Regards,



Robert Dewar



Information sheet

Have your say—Beekeeping on national parks

The Department of Environment and Science is proposing changes to how beekeeping occurs on national parks. This information sheet provides a summary of the current situation and details of the proposed changes.

Please note that this information is being distributed for consultation purposes by the Department of Environment and Science, and is not current Government policy.

Background

Where does beekeeping currently occur on public land in Queensland?

- Beekeeping is currently permitted in **49 national parks in Queensland (refer to the map in Attachment 1)**.
- The majority of national park beekeeping is located in the South East Queensland region, with small numbers of apiary sites also located in central Queensland and North Queensland.
- Commercial beekeepers rely on areas of high quality, undisturbed vegetation for the production of honey and for the rehabilitation of hives depleted by the provision of crop pollination services. Public lands provide an ideal location for beekeeping due to their protection from land clearing, conflicting land uses and pesticides.
- **1088 apiary sites** are located on national park tenure (**refer to the list in Attachment 2**).
- In comparison, State forests, which have long been used for beekeeping, and on which beekeeping is considered a compatible use, contain approximately 4500 sites. Beekeeping also occurs on a range of other State land tenures, including road reserves and unallocated State land, as well as on freehold land.

Why does beekeeping occur on national parks?

- **Beekeeping is permitted on certain national parks as a legacy of the transfer of forestry areas** (principally State forest) to national park, in particularly the 1999 South East Queensland Forest Agreement (SEQFA) and other similar formal forest transfer processes in the early 2000s.
- **Commercial beekeeping is considered inconsistent with the cardinal management principle of national parks** – the permanent preservation and protection of natural and cultural values. This is due to beekeepers' use of an introduced species, the European Honeybee (*Apis mellifera* (L)) and its reliance on large network of heavy vehicle access tracks and cleared sites for placement of hives.
- As part of any protected area tenure transfer process, all existing land uses must be identified and adequately resolved – uses considered consistent with the new tenure are accommodated, while inconsistent uses are removed (either immediately or through a gradual phase-out process). During the SEQFA (and other similar processes), commercial beekeeping was identified as one such inconsistent use.
- The loss of apiary sites to national parks was expected to have an **impact on the commercial beekeeping industry in Queensland**, due to the value of these sites to the industry and the paucity of alternative locations to replace their loss.
- In 2004 the Queensland Government implemented a transitional arrangement for the phase out of beekeeping in these areas. Under these arrangements, **beekeepers would be guaranteed continued access to apiary sites on areas transferred to national park for 20 years, until 31 December 2024**. No further access to national parks would be provided, and beekeeping was not permitted to exceed the footprint and number of sites available immediately prior to the areas becoming national park.

- **In the interim period, the Queensland Government and industry would cooperate to identify and secure appropriate replacement land to compensate for the loss of areas transferred to national park, and the beekeeping industry would completely transition national park operations to these areas by 31 December 2024.**

What is the current status of beekeeping on national parks?

- The law currently is that **commercial beekeeping is due to cease on national parks on 31 December 2024**. No permit granted can currently extend beyond 31 December 2024, and no new permits can be granted from 1 January 2025.
- To date, land with suitable floristic characteristics, accessibility and land tenure security to replace national park apiary sites has not been identified or secured.
- The beekeeping industry claims that the loss of access to national parks, without suitable alternative arrangements in place, will directly **threaten the viability of the industry in Queensland, and will likely have flow on impacts on the agricultural sector due to a reduction in the industry's capacity to provide agricultural pollination services.**
- The loss of access to national parks is also likely to **exacerbate the significant impacts on the industry and agriculture due to ongoing drought conditions** across much of Queensland, as well as from **loss of vegetation and hives due to the recent bushfires** in Queensland, New South Wales and Victoria.
- In early 2019 the Department of Environment and Science **commissioned a review of the current scientific literature to investigate the ecological impacts of the European Honeybee and the commercial beekeeping industry**, which was undertaken by the University of Sydney. The review examined more than 200 scientific papers, including both Australian and international studies. The review concluded there is insufficient evidence to attribute specific ecological impacts to the commercial beekeeping industry, and therefore justify the complete removal of beekeeping from national parks. However, the reviewers recommended that beekeeping in national parks be tightly regulated, and the decision to allow beekeeping to remain on national parks should be made on a case by case basis.

Proposed policy position

- The Department of Environment and Science is seeking views on the proposal to **extend the current arrangements for a further 20-year period, allowing commercial beekeeping to continue on former forestry areas of national parks until 31 December 2044**. This extension is proposed on the basis that:
 - **the loss of access to national parks is likely to have significant impacts on the commercial beekeeping industry and agricultural sector** (due to a likely reduction in pollination services). These impacts would be particularly significant at the present time when the industry is facing significant pressure due to the ongoing drought and recent bushfires in south-eastern Australia;
 - **there is insufficient evidence of the ecological impacts** of commercial beekeeping to justify its complete removal from national parks (and the subsequent impacts on the industry and agricultural sector). Conversely, there is also insufficient evidence of a lack of ecological risk associated with commercial beekeeping, and therefore justify an indefinite continuation of beekeeping.
 - **the State has been unable to identify suitable alternative lands** to compensate for the loss of access to national parks, on which the transitional arrangement and eventual removal of beekeeping from national parks was predicated; and

- **industry has been unable to secure suitable alternative lands** to offset any loss of access to the national park sites.
- This proposal provides for the continuation of beekeeping on national parks as per current arrangements. **Beekeeping will continue to only be permitted on those areas where it was an existing use prior to transfer to national park.** This includes areas already dedicated in national park, and any areas transferred to national park as part of future national park dedications. **Beekeeping would not be permitted to occur in any other national park areas, and would not be permitted to expand** beyond the footprint and number of sites authorised pre-national park dedication.

Implementation

- Specific provisions of the *Nature Conservation Act 1992* (NCA) permit beekeeping on former forestry areas of national park until 31 December 2024, and currently prevent beekeeping from continuing beyond this date. Should an extension of beekeeping in national parks to 31 December 2044 occur, amendments to the NCA will be required.
- The Queensland Parks and Wildlife Service and Partnerships (QPWS&P) division of the Department of Environment and Science will continue to work with the Queensland Beekeepers' Association to review beekeeping sites in national parks to identify any sites that may present inconsistency in maintaining national park values. The QPWS&P will also conduct a review of standard apiary permit conditions to ensure that beekeeping in national parks occurs in manner that does not further jeopardise natural and cultural values of national parks

Consultation

- Key stakeholders are invited to provide their views on the proposed changes, as well as First Nations Peoples, representatives of the beekeeping industry, agricultural sector, conservation groups, local and State Government.
- Submissions on the proposed policy changes should be sent to:
 - Dr Lachlan Griffin
 - Major Projects and Estate Management
 - Queensland Parks and Wildlife Service and Partnerships
 - Department of Environment and Science
 - PO BOX 15187
 - CITY EAST QLD 4002
 - Or by email to [REDACTED]
- **The consultation period ends Monday 22 June 2020.**



Attachment 2 – list of apiary sites by national park

Current as of 1 March 2020

| National Park | Number of apiary sites |
|--------------------------|------------------------|
| Bania NP | 5 |
| Bellthorpe NP | 26 |
| Bingera NP | 1 |
| Blackdown Tableland NP | 14 |
| Bulburin NP | 7 |
| Bunya Mountains NP | 12 |
| Cherbourg NP | 7 |
| Conondale NP | 227 |
| Cordalba NP | 5 |
| Crows Nest NP | 9 |
| D'Aguiar NP | 145 |
| Dan Dan NP | 1 |
| Danbulla NP | 2 |
| Deer Reserve NP | 4 |
| Dularcha NP | 4 |
| Gatton NP | 3 |
| Geham NP | 1 |
| Glass House Mountains NP | 13 |
| Glenbar NP | 1 |
| Goomboorian NP | 19 |
| Great Sandy NP | 8 |
| Grongah NP | 30 |
| Gympie NP | 18 |
| Kirrama NP | 3 |
| Kondalilla NP | 1 |
| Kroombit Tops NP | 32 |
| Littabella NP | 6 |
| Lockyer NP | 38 |
| Main Range NP | 11 |
| Maleny NP | 4 |
| Mapleton NP | 42 |
| Mooloolah River NP | 3 |
| Mt Barney NP | 4 |
| Mt Binga NP | 2 |
| Mt Walsh NP | 2 |
| Nangur NP | 12 |
| Nerang NP | 22 |
| Nour Nour NP | 9 |
| Oakview NP | 8 |
| Pidna NP | 2 |
| Springbrook NP | 14 |
| Tamborine NP | 10 |
| Tewantin NP | 22 |
| Tuchekoi NP | 4 |
| Warro NP | 11 |
| Wongi NP | 53 |
| Woocoo NP | 2 |
| Woondum NP | 21 |
| Wrattens NP | 188 |
| Total | 1088 |