

SUBMISSION TO

**HOUSE OF REPRESENTATIVES AGRICULTURE,
FISHERIES AND FORESTRY COMMITTEE**

INQUIRING INTO

**THE FUTURE OF THE AUSTRALIAN HONEY BEE
INDUSTRY**

SUBMISSION PRESENTED BY

TREVOR AND MARION WEATHERHEAD



IT'S CURRENT AND FUTURE PROSPECTS

Introduction

Firstly, let us introduce ourselves. We are Trevor and Marion Weatherhead. We are commercial queen bee breeders who live at Peak Crossing in Queensland and have been full time in beekeeping since 1988. We run our business as a partnership and employ one full time and one part time employee. Our main income is from the sale of queen bees here in Australia and now, limited exports of queen bees, plus limited honey production which we sell to Capilano as we are shareholders in Capilano.

We have exported significant numbers of queen bees in the past but quarantine breaches in Australia have curtailed that market. We talk about this later under trade issues.

Our roles within the industry are outlined in Appendix 1.

Current prospects

Currently, prices paid to honey producers are low and would most likely be not covering the cost of production. There are several reasons why the price is low. Oversupply within a world market, high Australian dollar, low domestic consumption and high price on the supermarket shelf.

In 1949, Ted Evans, who had been President and Secretary of the Queensland Beekeepers Association, wrote "It is common knowledge that our trouble is not over-production, but rather under-consumption. We should take advantage of every opportunity to increase our sales. If all beekeepers' families and others connected with the industry would actually believe in and use honey as they should (instead of so much sugar), we would soon notice a big increase in the sales of honey, and the honey habit would soon creep into the ranks of the general public. How often when we visit a café or hotel for a meal do we make a request for honey? Not often enough I guess. Likewise, when we go visiting friends or relatives, that jar of honey we meant to take too often gets left at home." How true this is still today.

Prices to beekeepers from packers were very high a couple of years back and correspondingly, the price to the consumer in the supermarket rose. However, when the price to the beekeeper dropped, the price to the public did not drop on the supermarket shelf despite the packers telling us they had reduced prices to the supermarket. Should the supermarkets be allowed to keep this extra profit instead of passing the savings back to the customer?

Australia cannot have a great influence on the world price of honey but we do get a premium for our product because of our "clean green" image. However, there are issues of level playing fields for exports and imports which we address later in this submission.

Future prospects

Whilst many in the industry would have you believe that our industry is all doom and gloom, we firmly believe that there is an excellent future for our industry. This is not to say that there are not problems out there that we need to meet and that the road ahead will be easy.

Far from it. There are many challenges as we see it and will outline them. The road ahead is strewn with pitfalls that we must avoid and problems to be solved but we can do it.

Like any primary production, the beekeeping industry is subject to price fluctuations caused by such things as world prices, drought and public demand. If mites, which are pests of honey bees, arrive in Australia, the make up of the industry will change dramatically. There will be some who will exit the industry as they will not be able to cope with the change necessary to manage the mites.

The demand for pollination will increase to a scale not seen in Australia before and it is most probable that the beekeeping industry will not have the number of hives available to meet the demand. How the horticultural and other agricultural industries cope will remain to be seen but they need to be addressing these issues now. It is no good having massive expansion if there are not the bees available to pollinate the crops.

Beekeepers, under this scenario, will derive the majority of their income from pollination and not honey production.



IT'S ROLE IN AGRICULTURE

Pollination

It has only been in recent times that the role of the honey bee in agriculture has been receiving the recognition that it deserves. The Committee, I am sure, will be made aware by many submissions about the value of the honey bee to the agricultural industry. We are no exception.

In Queensland for instance, the most recent value of three commodities that rely entirely on honey bees for pollination to produce a crop, as published by the Australian Bureau of Statistics in "Value of Agricultural Commodities Produced by Area – year ending June 2005", are:-

Commodity	Australian \$value	Queensland \$value
watermelons	70,018,542	45,719,576
rockmelons	62,351,505	36,547,781
pumpkins	48,320,217	22,647,285

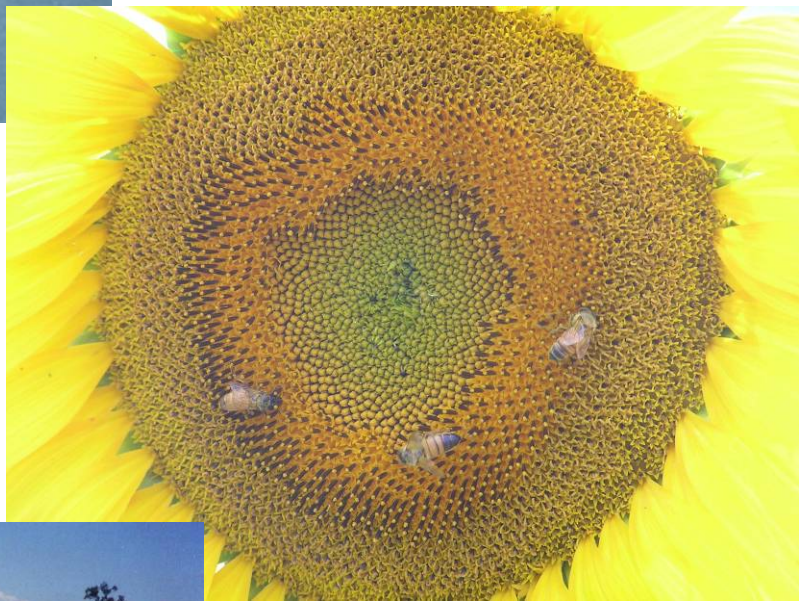
These are only a few examples of the value of the honeybee to agriculture and horticulture. The most recent figure quoted for the value of the honeybee to the agricultural and horticultural industries is 4 billion dollars.

With Australia looking to expand its horticultural industry, there will be a resultant increase in demand for pollination. In the past, there has been a tendency to overlook the need for pollination in any expansion program. The farmer would not overlook his fertilising regime but has been overlooking the pollination requirements by just relying on feral bees to do the job.

A survey of beekeepers and growers in Victoria several years ago showed that many growers were relying on feral hives for their pollination. At a Queensland Beekeepers Association Conference several years ago, a grower from the Stanthorpe area told of how he relied on feral hives plus hives hired by his neighbour to pollinate his apples. This reliance on feral hives is still the case today but this scenario will dramatically change if varroa mites come to Australia as varroa will wipe out all the feral hives as has happened in all other countries that have varroa.

Whilst on pollination, there is a quote which has been widely used in recent times which says that Albert Einstein said "If the bee becomes extinct, mankind will have only four years to live: no bees, no pollination, no plants, no animals, no humans." This was discussed on an overseas chat room that we are on and one of the people wrote to the Albert Einstein Archives, Jewish National & University Library, Hebrew University of Jerusalem to see if Einstein actually said this and the reply was "I found the following as a widely reported but unconfirmed quote. I am sorry to have to inform you that the quote you refer to is not authentic. I agree with you that Albert Einstein would probably have held your work in high esteem but I cannot offer you authentic words from him regarding the bee."

So it would seem that this quote, whilst most likely factual, did not come from Albert Einstein. We raise this here only as a point for clarification.



BIOSECURITY ISSUES

Recent breaches

Australia has had two (2) breaches of quarantine in the past that have affected our industry. In the early 1990's chalkbrood (*Ascopheara apis*) was found in Queensland and has since become endemic in most of Australia. In 2002, the small hive beetle (*Aethina tumida*) was found in New South Wales and Queensland. These breaches have resulted in quarantine lapses of some kind and have been costly for our industry.

The trade aspects will be discussed under "Trade Issues" but the cost to the beekeeper of the establishment of these unwanted pests has not really had a dollar figure put on it. However, chalkbrood causes loss of production through loss of brood and the actual cost is hard to quantify but is significant.

With small hive beetle, we are not yet really aware of the real damage this could cause our industry. Whilst we personally have not had any real hive losses, we feel that the drought may have been a factor in our favour in limiting the ability of the small hive beetle to reproduce. There is a school of thought that the small hive beetle will become a greater problem once the drought breaks and we get back to a more normal season. There are reports of beekeepers suffering significant hive losses as a result of infestation of the small hive beetle larvae.

Threats

Biosecurity is one of the big issues facing our industry. Trevor has spent many years as Chairman of the Quarantine Committee for the Australian Honey Bee Industry Council (AHBIC) so can speak from first hand experiences. Many hours were spent in Torres Strait, Darwin and meeting with both AQIS and Biosecurity staff in Canberra.

Australia has been fortunate in that we do not have any of the following mites that are afflicting beekeepers stock around the world.

1. varroa mite – *Varroa destructor*
2. Asian mite – *Tropilaelaps clareae*
3. tracheal mite – *Acarapis woodi*

Most of the focus has been on the varroa mite but it is our belief that tropilaelaps poses a greater risk to our industry than does varroa. Not that varroa is not a big risk but if we put too much emphasis on varroa then we tend to let our guard down with regard to tropilaelaps and we do not want that to happen.

Australia has had incursions of Asian bees (*Apis cerana*) in the past and we have dealt successfully with these. Just this past month (May) we were again given a wake up call with the finding of several nests of Asian bees in Cairns.

In the 1990's, our main threat came from the north. This is why so much time was dedicated to the Torres Strait region and the co-operation with the Northern Australian Quarantine Strategy (NAQS). However, with the advent of varroa mite being found in New Zealand in 2000, the major threat is now in the south in places like Tasmania, Melbourne and Sydney. This is not to say that the north is no longer a threat, far from it. It is just that the major threat has now shifted.

Introduction of stock

Currently in Australia queen bees cannot be imported into this country without going through the quarantine station at Wallgrove. This is an essential, practical and workable system.

In a previous Inquiry by this Committee, it was identified that the quarantine station at Wallgrove was to cease existence in 2010. Even if Australia was to have varroa mites by the time this facility is due to close, there are still many other pests that are in existence around the world that our industry would not want and so a quarantine facility would still be needed.

Drone semen IRA

The next step was to be the development of a protocol to allow the importation of drone semen. This has progressed along the way but has now come to a grinding halt. Some background on this is:-

On 6 June 2002, Biosecurity Australia issued memo 2002/29 saying they were preparing an import risk assessment (IRA) for honey bee semen. The commencement advice said that this IRA was "a high priority".

In August 2002 a Technical Issues Paper, called "A draft generic import risk analysis (IRA) for honey bee semen", was produced.

Trevor was heavily involved in the development of these papers.

Our local Federal Member, Cameron Thompson, the Member for Blair, has made representation on our behalf and did receive a reply from the Acting Minister, Hon. Eric Abetz, back on 11 April, 2006. To quote from that letter, it says in part "Biosecurity Australia is unable to advise precisely when the draft IRA report for honeybee semen will be released, only that the IRA is a priority and will be completed as soon as possible. Mr. Weatherhead must appreciate that the more complex IRAs can take several years to complete." There has been no progress to date that we are aware of.

As you can see the Technical Issues Paper was issued back in August 2002 and, to date, no further progress has been reported to us.

We would ask the Committee to see if they can ascertain what the hold up is and maybe get this protocol moving again.

What if it gets here?

Everyone says that it is not a question of if but when varroa will arrive in Australia. Many years ago, Trevor worked with the late Dr. David Banks of Biosecurity Australia to have in place approvals for certain treatments if varroa did happen to arrive in Australia. When varroa was found in New Zealand in 2000, it took so long for the approvals of the acaricides to be approved that many more hives, than were necessary, were lost to the mite.

Dr. Banks put in place the necessary paperwork so that if varroa did turn up in Australia, it would only have taken the stroke of a pen to have these acaricides approved for use by the beekeepers.

Trevor has recently made enquiries of the Australian Pesticides and Veterinary Medicines Authority (APVMA) to make sure this was still the case. The reply received was that it was not the place of APVMA to do this but it was Biosecurity Australia that would put this in place. Enquiries to Biosecurity Australia say this is not their job. So where do we now stand? It would seem that the process Dr. Banks put in place is no longer in existence. It would also seem that Australian beekeepers will suffer the same way that New Zealand beekeepers did in approvals not being at the ready to put in place when varroa arrives.

There are current approvals with APVMA for fluvalinate (Apistan), flumethrin (Bavaryl) and thymol (Apiguard) to be used in a diagnostic and surveillance mode but there is no approval for general use which is understandable as we do not have the mites at the present time.

We would ask that this Committee recommends that a pre approval process be put in place so that, if varroa arrives, immediate steps can be taken to start coping with this pest.



TRADE ISSUES

Loss of markets because of quarantine breaches

As mentioned above, two pests have become established in Australia. These are the small hive beetle and chalkbrood. These breaches of quarantine have resulted in losses of markets overseas for our live bee exports.

For chalkbrood, we have basically lost the market in Japan because they changed their protocol to insist that upon inspection, the apiaries must be free from chalkbrood. There are few apiaries in Australia that, when inspected at the time of the year we would export to Japan, an Inspector would not find some chalkbrood. This is despite the fact that Japan has chalkbrood.

The other losses are due to small hive beetle. We have lost markets in Canada, the EU and other countries which were French colonies as these colonies still use the French, therefore the EU import protocols. The major losses here are Canada and the EU. Although the chances of small hive beetle being sent to Canada in queen cages which have been stocked with a queen and escorts that are hand caught are very small, we are currently being denied access if small hive beetle is found in an apiary upon inspection. Canada now has small hive beetle, which they claim came in Australian package bees, so it is hoped that they will soon come to a reasoned position where they will again allow in caged, hand caught queen bees and escorts. Biosecurity Australia is the one that would need to be making these approaches and we would appreciate the Committee making a suitable recommendation in this regard.

Royal jelly

Another trade issue for us is the marketing of royal jelly overseas and most of the problems are tied up with the labelling laws as they exist in Australia and in particular the "Made in Australia" label.

We run a queen bee breeding business at Peak Crossing. One of the things we could do is produce royal jelly but the price we would have to charge far exceeds the price of imported royal jelly, mainly from China.

Trevor has made many representations to people like AQIS and the Therapeutic Goods Administration Authority re the importation of the royal jelly. We are not against importation but we believe it should be on a level playing field and the product should be correctly labelled and tested.

Firstly, royal jelly from China is not checked for any residues. The Australian authorities refuse to do this. Why? We don't know. So we most likely have royal jelly coming in with residues. How do we know this? Because, in Europe it is checked and they regularly find chloramphenicol in royal jelly. Other possible contaminants of royal jelly are tetracyclines, trimethoprim and sulphamethoxazole as these have been found in honey imported into the EU from China. AQIS does not check for all of these in imported honey despite their being found in the EU.

Back in 2005, there was royal jelly which was exported to the EU from Australia. According to the Rapid Alert Food System in the EU, this contained chloramphenicol. We are not sure if AQIS ever followed this up or if any prosecutions ever eventuated. Trevor have asked in the past and received no answer. Maybe this Committee can find out.

It is most likely that the source of the royal jelly used in this product “from Australia” was Chinese. We are aware of another case of royal jelly from Australia that was picked up by Japanese authorities as having residues of chloramphenicol.

Sorry for being long winded but we thought we should fill you in on the background. Now, the royal jelly is imported from China and most commonly sold in capsules. Because the extender used, the capsule case and the packaging are from Australia, it is allowed to be called “Made in Australia”. This is very misleading as the main label on the product is royal jelly and this is not Australian.

Now when these are found overseas to have residues, then it is assumed that the residues are from the Australian content when this is incorrect. A couple of years back, China was banned from sending apiary products, along with other products, to the EU because of residues of chloramphenicol. At that time, the royal jelly was being imported into Australia, not tested, repackaged as “Made in Australia” and sent to the EU which assumed it was Australian royal jelly because of the labelling. Hence the finding of residues in the “Australian” royal jelly.

The same sort of thing is done with propolis which is imported from China, processed in Australia and then labelled as Made in Australia.

We know we have to compete with imports and cannot ban them just because they are cheap but surely we can make sure that the labelling is such that it tells the customer what is the source of the product that is being sold. In this case, if the royal jelly is coming from China then it should not be called “Made in Australia”. If the customer is willing to buy the product knowing full well it comes from other than Australia, so be it. At least there is truth in labelling to allow them to make that choice.

Also, there should be testing of royal jelly coming into Australia. The EU Rapid Alert System contains many examples of royal jelly from China with unacceptable residues in it. So why would the royal jelly coming to Australia from China not also contain these residues?

Honey imports and exports

As the Committee is no doubt aware, there are amendments to the Export Control Act so that we can meet the standards, for honey, of several countries including the EU, Canada, Brazil, Papua New Guinea and New Zealand. This will then allow us to export to these countries if we meet these standards.

However, there is no requirement for countries sending honey to Australia to meet these standards. Why? Looking at the EU Rapid Alert System for Food and Feed, it is fairly obvious that there is a lot of honey out there in the world that contains unacceptable residues and would not meet the requirements imposed on Australian

exporters by the Export Control Act. Australian beekeepers will be required to have a Food Safety Plan and be audited for these QA standards. Why then will beekeepers in countries sending honey to Australia not also be required to have equivalent standards in their operations?

Members of the Committee are no doubt aware of the problems that faced Australia with nitrofurans in honey imported into Australia several years ago. We do not want a repetition of that event.

AQIS does not test honey for a lot of the chemicals found in the EU Rapid Alert System for Food and Feed and have expressed the view that they will not test for these. Is Australia to become the dumping ground for this unacceptable honey?

Several years ago when China was banned from sending honey to the EU because of contamination with chloramphenicol, Singapore suddenly became a big exporter of honey. As there are not a lot of beehives in Singapore, it was obvious that Singapore was being used as a country of convenience to send out Chinese honey which was found to have chloramphenicol in it. Even Australia was caught up in this when some people brought honey from Singapore to Australia then exported it as Australian honey to the USA. Australian authorities alerted the USA to this and the people concerned were caught in Australia. I am not sure if this ever came to trial. Maybe the Committee knows.

Currently the price of honey to producers in Australia has not made the importation of honey a profitable business but with the drought causing a shortage and the hope that prices to the producer from the packer will increase, then importing honey becomes more attractive. This honey is allowed to come in under our trade obligations but why will it be allowed in without suitable scrutiny by AQIS or equivalent certification as required by Australian beekeepers?



THE IMPACT OF LAND MANAGEMENT AND BUSHFIRES

Queensland legislation

As Queenslanders, we are currently under the cloud of the State Government legislation which says that we will not have access after 2024 to new National Parks they are presently creating. Most of these new National Parks were previously State Forests, with a high usage rate by beekeepers. We still currently have access to State Forests without limitations although there are many stories floating around that could change this status.

The changing of the status of these conserved areas has been done without any real consideration as to their worthiness to be called a National Park and in a lot of cases contrary to what the local consultative groups recommended when the South East Queensland Forest Agreement (SEQFA) was being put into practice. The beekeeping industry, although it participated at all stages of the initial consultation prior to the signing of the SEQFA, was not consulted when the SEQFA was finally developed and signed. This was despite the fact that we are a major stakeholder in the areas being considered.

Currently, there is another area, called the Western Hardwoods, being considered and again, despite being a major stakeholder, our industry is being shut out of the consideration process. There are so called token committees but these are not meeting or suddenly come to a halt when it is evident that a decision might be made in favour of our industry.

There was a process put in place to try to identify other suitable areas for the beekeepers when the 2024 date came and the National Parks were no longer available but this has come to a grinding halt, in our opinion, because they are now beginning to realise that industry was correct in saying that these alternative areas do not exist.

Many of these new and proposed National Parks are crucial to our business in building up strong, healthy bees for our queen rearing operation. These areas are also crucial to build up hive strength prior to and after pollination. This build up of hive strength in numbers and health, prior to and after pollination, is essential firstly to make sure that there are sufficient bees in the hive to carry out successful pollination. Secondly, bees often dwindle in numbers during pollination due to the overstocking of the area to ensure successful pollination and occasionally because of the use of pesticides by the grower. These forest areas, which are proposed to be denied to us after 2024, are vital in building up hive strength so that the hives can either go to further pollination or honey production.

Bushfires are not as big a threat to our forests here in Queensland when compared to States such as Victoria. However we do have many State Forests that occasionally burn through either controlled burns getting out of control or wild fires. We do have concerns that, with many areas now being made National Parks, the new managers will not carry out the same hazard reduction burns that the previous Forestry Department managers did. This will result in more wild fires and the consequences

being that many forests will not have flowering trees that the beekeepers can work for many years.



THE RESEARCH AND DEVELOPMENT NEEDS OF THE INDUSTRY

General

Currently, our industry is served by the Honey Bee Research and Development Committee (HBRDC) which comes under the umbrella of the Rural Industries Research and Development Council (RIRDC). We believe that industry is being well served by this Committee despite its meagre funds.

Extraordinary funding

There is one area that we would like to identify that has had an impact on our industry. As mentioned before, we have had a breach of quarantine by the small hive beetle. Trevor was to the fore in the industry response to this incursion in 2002. The one area that was very disappointing was that HBRDC did not have enough funding to be able to carry out all the necessary research to help industry cope with the small hive beetle. Despite Government assurances at meetings in Canberra in 2002, there was no real additional funding available for research other than that provided by HBRDC.

It is our submission that in the event of a breach of quarantine, Government should make available to the appropriate research body *ex gratia* funding to enable it to carry out the necessary research to help industry cope with the new pest.

Climate change

One emerging area that will need research is the effect of climate change on the flowering patterns of trees. Also, there will need to be work done on how climate change will affect the nectar and pollen producing capabilities of these trees as well as some of the crops that are worked by beekeepers e.g. canola.

Varroa jacobsoni

Dr. Dennis Anderson, in 1999, described the various varroas and showed that what was originally being called *V. jacobsoni* was in fact several species and described the varroa which was wreaking havoc in *Apis mellifera* as *V. destructor*. *Jacobsoni* was now found to be not able to reproduce on mellifera bees. This was great news as the main varroa to our immediate north is *jacobsoni*.

Whilst incursions of the Asian bee in places like Cairns is tempered by the fact that the bee was found to be the Java strain and thus is the natural host of *jacobsoni* which does not reproduce on mellifera, will this always be the case? We have the *Nosema ceranae* which has suddenly jumped from *cerana* to mellifera in the past few years despite exposure to mellifera for many years.

NAQS has a monitoring program in many South East Asian countries and it would be beneficial for our industry to have NAQS monitor hives of mellifera bees in these countries where they co-exist with *jacobsoni* to make sure that *jacobsoni* has not suddenly found a way to reproduce on mellifera.

EXISTING INDUSTRY AND GOVERNMENT WORK THAT HAS BEEN UNDERTAKEN FOR THE HONEY BEE INDUSTRY

Bees as livestock

Recently the Tax office made a draft ruling, which can be found at <http://law.ato.gov.au/view.htm?DocID=DXT/TD2007D7/NAT/ATO/00001&PiT=99991231235958> which classified bees as livestock and thus we are required to do a stocktake of our bees each financial year as part of our tax return.

Comments were invited and we sent in a submission which we have had acknowledged but no reply to the questions we raised. Our submission is listed in Appendix 2.

We would ask that your Committee examine this issue carefully to see why it is necessary to list bees as livestock. We can see no real revenue raising for the Tax Office by this ruling, only unnecessary, time consuming and expensive tasks for the beekeeper.



OTHER ISSUES

Whilst there was no section for this mentioned in the terms of reference, there are several topics which we wish to raise which do not come under the headings listed.

Perceptions

One of the biggest problems facing the beekeeping industry is the perception that it is not a commercial industry and people do not make living from keeping bees. It is seen at best as a cottage industry or mainly a hobby where you keep a few hives in the backyard to supply the table and a few friends with honey.

How do we change this? We are involved in programs such as Rural Discovery Days and Food and Fibre Trails where we talk with school children about beekeeping. Whilst the children are the main target, it is interesting to see the response of the school teachers and the parents who are accompanying the children on the excursion.

These programs we are involved in are worthwhile and must be seen as a long term approach. However, it is not easy to take time out of a commercial business nor for the Queensland Beekeepers Association to be able to finance this sort of education. We have seen where the Federal Government is funding certain industry groups to have Educational Officers. What we would like to see is some funding made available to groups such as the Queensland Beekeepers Association to help run these programs.

Marketing

Whilst the selling of goods comes under the Trade Practices Act, we would outline some points that your Committee can take up and clarify for us.

We know that supermarkets are all powerful when it comes to price setting. This includes the price paid to the supplier and the price on the shelf. With honey, there are several brands on the shelf including the supermarkets "own brands". These generics are usually sold at a cheaper price than the branded product. We know that the generic is purchased by the supermarket at a lower price than the branded product and this is claimed to be good for the consumer and reflects the power of the supermarket.

However, we are told that the supermarket does not put on as big a margin on their branded product than on the other branded products. Should this be the case? Is this not pricing discrimination? Why should the supermarket be allowed, as we are told, to put the bigger margin on the branded product, thus making it not as attractive, price wise? We would have thought that there would be rules under the Trade Practices Act to not allow this discriminatory mark up price. We would have thought that the percentage mark up on a line, e.g. honey, should be the same. This way it is the level playing field.

Training

Just recently some competencies for beekeeping have been approved. This now gives a recognised course that people can use to become qualified in beekeeping. This will be particularly important for trainees as the industry has not had a way, in the past, to be able to have trainees taught specific beekeeping subjects.



APPENDIX 1

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Academic record:-

I have a Certificate in Business Studies from the Royal Melbourne Institute of Technology.

I am a qualified Timber Technician having qualified by completing the prescribed study required by the Queensland Forestry Department

I have a Certificate IV in Assessment and Workplace Training

I am registered as an Associate Auditor with RABQSA International Inc. for the B-Qual program. I will become a full Auditor when I complete 10 audits in one year.

I have a Statement of Attainment from AQIS for completing the unit of competence, Conduct an external audit of a quality system, Unit code MTMPS413A.

Employment:-

I worked for the Queensland Forestry Department from 1967 to 1983

I worked for the Queensland Department of Primary Industries in the beekeeping section from 1983 to 1988 as a District Experimentalist and Inspector

Since 1988, I have been working in a partnership with my wife, Marion, as a commercial queen bee breeder and honey producer

Experience:-

Within the beekeeping industry I have held the following positions:-

Member on the Executive of the Australian Honey Bee Industry Council (AHBIC)

Chairman of the Quarantine Committee for AHBIC which involved travelling to such places as Torres Strait to lecture and liaise on Biosecurity matters

Served on AHBIC Committees for the National Residue Survey, Animal Health Australia

President and Secretary of the Australian Queen Bee Breeders Association

Vice President of the Queensland Beekeepers Association (QBA) and currently President of the Brisbane Branch of the QBA

Treasurer of the Federal Council of Australian Apiarists' Associations (FCAAA)

Member of the FCAAA

Secretary for the Organising Committee of the Second Australian and International Bee Congress

Currently a member of the Organising Committee for Apimondia 2007 looking after developing countries, overseas publicity and pre and post Congress tours

I led the industry response to the Asian bee incursion in Darwin in 1998 and the many incursions in Brisbane since 1999. I played a major part in the small hive beetle incursion in 2002. I funded myself to look at small hive beetle in Florida in the USA in 2003.

I have been involved in accessing markets for queen bees to Canada, the USA and keeping the Canadian market open in 1995.

I have been involved in the review of the Ausvetplan plus developing and participating in training for beekeepers to become part of a response team in the advent of an incursion of exotic bees.

I carried out a review and proof reading for the teacher's manual of the Kondinin book "Honey", the B-Qual quality assurance program and the Biosecurity plan for the Australian beekeeping industry.

In 2005, I trained two (2) beekeepers, from Fiji, in queen bee breeding and general beekeeping practices.

I regularly attend beekeeping conferences in Australia run by the various State Beekeeping Associations. I have given presentations at several of these conferences on the use of copper naphthenate and queen bee breeding.

I acted as a consultant to Max Winders and Associates when they were looking into identifying alternate resources for Queensland beekeepers.

I have lectured at various beekeeping courses for various beekeeping competencies.

I have attended the following conferences overseas:-

1995 – Canadian Honey Council Annual General Meeting (gave presentation)

1999 – Apimondia in Vancouver, Canada (gave presentation)

2003 – Ontarian Beekeepers Association Conference (gave presentation)

2005 – Apimondia in Dublin, Ireland

I attended the Asian Apicultural Association conference in Perth in 2006.

I have carried out research when I was employed by the Queensland Forestry Department. For the beekeeping industry, it was on the use of copper naphthenate to protect beekeeping equipment from decay. This work was published in several issues of the Australasian Beekeeper magazine.

I have been the Program Leader for two joint research projects with the Queensland Department of Primary Industries funded by Honeybee Research and Development Committee. They were:-

QBA – 1A Heat treatment to kill American Foulbrood (*Bacillus larvae*) spores in beekeeping equipment

QBA -2A Laboratory and field trials relating to heat treatment of AFB infected bee equipment

I am in regular contact with bee researchers from around the world. I have been able to secure the services of several overseas researchers to give presentations at the Queensland Beekeepers Association Conferences. I have given freely to the industry in Australia from the knowledge I have gained from these researchers as well as other overseas beekeepers.

I have also been responsible for arranging courses in Instrumental Insemination of queen bees in Australia.

I have been Manager of the Honey Court at the Brisbane Exhibition Show (Ekka) for many years as well as serving for many years as an Honorary Council Steward and Steward for the Apiculture section at this show.

I am regularly called upon to do TV, radio and newspaper interviews for the beekeeping industry

I am a recipient of the Goodacre Memorial Award for meritorious Service to Apiculture in Australia and also have been awarded Life Membership of the Queensland Beekeepers Association.

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Academic record:-

I have a Diploma from the Brisbane Kindergarten Teachers College (The Crèche and Kindergarten Association of Queensland)

Employment:-

I have been employed as a Director of Kindergartens run by The Crèche and Kindergarten Association of Queensland at Boonah and Sunnybank

I have been a Director of a Child Care Centre in Atherton

I have worked as an office employee and spare parts assistant of Northlands International Harvesters, Atherton

Experience:-

I am currently the Manager of The Honey Court for the Queensland Beekeepers Association at the Brisbane Show (Ekka). I am also a Steward for the Apiculture section.

I am currently co-ordinating, on behalf of the Queensland Beekeepers Association, the delivery of programs by the beekeepers at the Rural Discovery Day, Food and Fibre Trail and Cotton Week

I have prepared for the Queensland Beekeepers Association an information leaflet which is used at education days, agricultural shows and for use by the media.

I am a member of AgAware and also attend meetings for the Promotion of Agriculture in Schools.

I regularly attend beekeeping conferences in Australia run by the various State Beekeeping Associations.

I have attended Apimondia Conferences in Vancouver, Canada in 1999 and in Dublin, Ireland in 2005.

I attended the Asian Apicultural Conference in Perth in 2006.

APPENDIX 2

The comments I would make are basically in the form of questions to which I would like an answer.

1. Question - How am I going to count the number of bees in my hives for my stocktake?

Comment - Your point 1. says "bees kept for use in a honey production business are trading stock". So this means I must count every bee I have during my "stocktake". To count the number of bees in my hive I must physically count each one somehow. Does the Tax Office know how long it will take for a stock count? In my operation, it would take me weeks to do a stocktake. I have heard it said that maybe the queen could be counted but that then is different to your ruling as I have quoted from your document "bees kept for use in a honey production business are trading stock". So that would mean all bees, including workers as these are the ones responsible for "their bodily produce" which makes them "the bees kept for use in that honey production business, are livestock." So all livestock must be "stocktaked" so that means I have to count every bee.

How do I count the number of bees in a hive when they are continually flying, dying and new bees are emerging all the time. I cannot pen them like cattle, as they will most likely die of suffocation in a locked up hive. If they do survive when I open the hive to count them, they will fly out.

2. Question - Does the Tax Office currently require other keepers of invertebrates, which are also animals, e.g. parasitic wasps, butterflies or native bees (to name but a few), to treat them as livestock?

Comment - If bees are livestock, then these others must also be classed as livestock. Native bees would already be covered in your definition that you gave from the Macquarie dictionary.

3. Question - When it comes to an audit, how will the Tax Office be able to spend the time necessary to verify that the stocktake is correct?

Comment - A beehive is a dynamic community. It's numbers are changing all the time. So in my tax return, the figure I give for the number of stock I hold, which will be in the millions, will not be the same as when the audit is done. There is no way that I can account for the difference in numbers, in the same way I can with a cattle return, because bees, when they die in the hive, are carried out and dumped, no carcass left like a cow, and how do I account for those who die in the field and don't come back?

Overall

I think I have shown that it is a physical impossibility to count the number of bees, i.e. livestock, that I have. It would take hundreds of hours to attempt to do this and for what? If I could do it, then it would be wrong an hour later. If I have to do the stocktake, then it will be a massive impost of hundreds of hours every year on my business and for what? I cannot recoup the cost of this stocktake of livestock i.e. bees.

When it comes to the audit, does the Tax Office have people who are not afraid of bees as auditors will have to "stick their nose in the box" to verify the stocktake which I have pointed out will, be dramatically different to when the stocktake was done. This does not take account of the actual time, hundreds of hours, for the audit.

I am only too willing to speak with anyone from your office and also show them what would be involved in this stocktake of bees (livestock) so that you can see and understand the magnitude of the task you are looking at imposing on me and the beekeeping industry.

I look forward to your reply to my questions.

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