

Submission No:	88
Date Received:	29-8-07
Secretary:	<i>[Signature]</i>

*Tasmanian Beekeepers'
Association
Incorporated*

**Supplementary Submission to the Inquiry into the Future
Development of the Australian Honey Bee Industry**

**House of Representatives Standing Committee Agriculture, Fisheries
and Forestry**

29th August 2007

Mr Alby Schultz MP
Chair
House of Representatives Standing Committee on Agriculture, Fisheries & Forestry
P.O. Box 6021
Parliament House
Canberra ACT 2600

Dear Mr Schultz

Please find attached the Tasmania Beekeepers' Association Inc. supplementary submission to your inquiry into the future development of the Australian Honey Bee Industry.

Having contributed our submission (number 63) we have now reviewed other key submissions and believe that there are some important points to bring to your attention for your consideration and these are summarised below.

We are looking forward to assisting your Inquiry through the information provided in both our original submission, this Supplementary Submission and through the Public Hearing process scheduled for 3 September 2007 in Tasmania.

Yours faithfully

Mr. Julian Wolfhagen
President
Tasmanian Beekeepers' Association Inc.

Submission	Comments	TBA comment
<p>Forests and Forest Industry Council of Tasmania (FFIC) (Submission no 80)</p>	<p>Page 3 Land Use by apiarists states that hive placements on state forests managed by Forestry Tasmania account for 28% of all hive placements across all land tenures.</p>	<p>This statistic obscures the fact that 75% of leatherwood dependent hive placement is on state forest land (refer to page 7 of the Tasmanian Apiary Industry Profile based on the Apiary Working Group Census 2004).</p> <p>Approximately 70% of Australian honey is produced from native flora.</p> <p>As stated in our submission (No.63) the beekeepers in Tasmania are very reliant on Leatherwood as it is the only reliable resource available in the state. Over a 10 year average it can account for 80%.of the annual honey harvest.</p> <p>The dependence of the Tasmanian beekeeping industry on state forest leatherwood is illustrated in Appendix A.</p>
<p>As above</p>	<p>Page 12, 13 & 14 Other Tasmanian flora contends that there are many plant associations that are being accessed by beekeepers and that tea tree and eucalypts provide a major resource for beekeepers because of their collective wider distribution and longer flowering period than leatherwood. It also contends that tea tree bush is a little more efficient than leatherwood or eucalypts</p>	<p>This analysis is flawed for the following reasons.</p> <ol style="list-style-type: none"> 1. The discussion has been built from compilation of interview data sheets that identified the number of species at each apiary site. This information has been re-represented as sites per species, not as the data was gathered i.e. species per site. 2. The submission contends that there is an efficiency link between sites and hive numbers without referring to production rate or capacity. Tasmanian Beekeepers' Association (TBA) has data that shows that leatherwood-based honey production is 4 times more productive per hive than honey production from other Tasmanian flora. Moreover the analysis takes no account of the importance of the different species for hive health and strength. 3. Table 1 is confusing as it indicates there are a total of 68,618 hives where in actual fact the number is closer to 18,000. Similarly the % of sites and hives does not add to 100%.

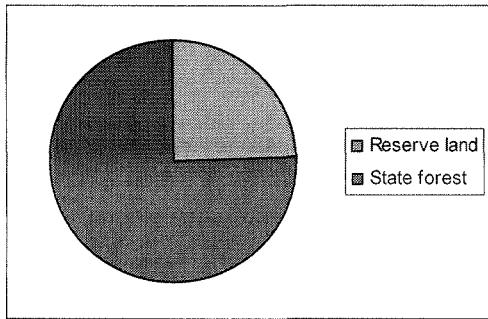
		<p>4. The conclusion does not take into account the differences for flowering sequences that occur within a region. Page 15 of the Tasmanian Apiary Industry Report notes that the flowering range for each species indicated by the bar chart is cumulative across the region, i.e. a species may flower for one month in the southern part and 2 months on the coast, and may appear as three months of flowering.</p>
<p>As above</p>	<p>Page 10 Vegetation mapping for the state shows there are 772,000 ha of leatherwood-rich forest of which 60% is in reserves, 35% in multiple-use state forest and 5% held in private tenure.</p>	<p>This statistic could give the impression that there is plenty of accessible and protected leatherwood resource.</p> <p>This is not the case.</p> <p>Our submission (No 63) details the significant land management issues facing the Leatherwood resource including excessive clearing of Leatherwood.</p> <p>While forest harvesting activities provides access to the timber resource including to the Leatherwood resource for beekeepers it would appear that there is very limited scope for opening up new access to further leatherwood resource.</p> <p>TBA contends that a detailed ground audit is needed to accurately monitor the potential loss of resource arising from current and future timber harvesting activities.</p> <p>We support Objective 3 of the Australian Government Rural Industries Research and Development Corporation <i>Honeybee R&D Plan 2007 – 2012</i> i.e. to ensure ongoing access to native forest on public land through performance indicators that include no further loss in bee sites in public lands (p25).</p>

As above	<p>Page 32</p> <p>Two options to grow the honey industry:</p> <ul style="list-style-type: none"> • Retention of leatherwood through optimal silviculture; • Finding new and better pathways to market 	TBA supports these options identified in the FFIC submission to grow the honey industry.
Tasmanian Department of Primary Industries and Water (DPIW) (Submission No. 72)	<p>Page 5</p> <p>Recommendation for Research and Development into alternative species to leatherwood <u>as a basis</u> for a commercial apiary industry (our underlining).</p>	<p>TBA believes that leatherwood has been, and will continue to be, the underpinning basis of the Tasmanian apiary industry.</p> <p>We consider that research into non-leatherwood resource should be considered supplemental to, not in place of, the leatherwood resource as the basis for the bee keeping industry.</p>
As above	<p>Page 5</p> <p>DPIW have recommended R&D be undertaken into what insects other than honey bees could act as vectors for pollination.</p>	TBA recommends that any consideration of insects other than honeybees for pollination is undertaken with full analysis of the biosecurity risks posed by these alternatives.
As above	<p>Page 3</p> <p>This submission refers to actions that have been taken to minimise the impact of forestry operations on the leatherwood resource.</p> <p>Specifically the submission refers to the development of a Community Forest Agreement which includes guidelines for beekeeping in state forests. Further, the submission refers to measures to protect leatherwood-rich forests in the planning of harvesting operations contained in the Forest Practices Code (2000).</p>	<p>TBA refutes the conclusion that enough is being done to adequately protect the leatherwood resource.</p> <p>While TBA has appreciated the inclusion of consultation of Beekeeping interests in the planning of forestry operations, there remain fundamental process issues to be improved to ensure the ongoing protection of the leatherwood resource.</p> <p>These include:</p> <ul style="list-style-type: none"> • Prescriptive and enforceable protection provision in the Forest Practices Code for Leatherwood; and • A right of appeal or access to an independent third party for resolution of problems

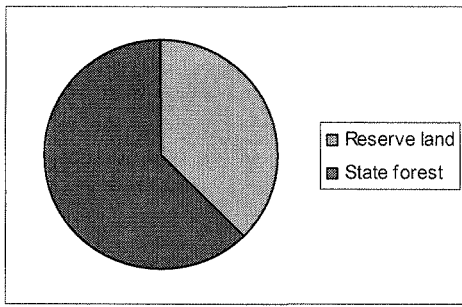
	<p>The submission implies that the leatherwood resource is being adequately protected and refers to less than 3% of leatherwood-rich State forest having been harvested.</p>	<p>The TBA is gravely concerned by the inference that only minimal leatherwood-rich state forest has been harvested when this is based on predictive modelling. Uncertainty remains about an accurate estimate of the actual leatherwood resource.</p> <p>To this end, TBA support the initiative by FFIC and Forestry Tasmania to undertake further work to infer localised leatherwood occurrence at a larger scale to be submitted to the Tas Community Forest Agreement Research into alternatives to clearfelling in old Growth Forest implementation committee, (Page10 of FFIC submission).</p>
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Appendix A

Leatherwood sites
No of sites by land tenure



Leatherwood sites
Hive placement by land tenure



Compiled from data provided in Tasmanian Apiary Industry Profile 2004