



Submission template

DISCUSSION PAPER | Apiary sites on public lands:
a common policy framework for NSW

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Organisation (optional): NSW Apiarists Association Inc.

Discussion topic 1: Allocation of permits

Discussion Questions

1a. How should available sites be advertised?

RESPONSE:

On the on-line "portal" / website specifically dedicated to apiary sites on all public lands.

1b. How long do beekeepers need to inspect a site after it is advertised?

RESPONSE:

Twenty eight days.

1c. Are the assessment criteria appropriate? Are the weightings appropriate?

RESPONSE:

Both the criteria and the weightings must meet current industry expectations with the proviso that they are reviewed within the first twelve months of operation and under-go periodic review.

1d. For beekeepers that haven't completed formal training, what sort of evidence could they submit to demonstrate they have equivalent practical experience?

RESPONSE:

The NSW Apiarists Association (NSWAA) does not support the inclusion of 1d. And request that this requirement is removed.

1e. Are ballots the fairest way to determine allocation where more than one applicant returns the same score?

RESPONSE:

Yes.

Discussion topic 2: Renewals

Discussion Questions

2a. Do you support the proposal to allow ongoing renewals, provided permit holders meet a 'fit and proper person test' at the point of renewal?

RESPONSE:

This proposal meets with the NSWAA expectations for a reasonable degree of business / investment security for apiarists.

2b. Are there any additional criteria that should be assessed as part of the 'fit and proper person' test?

RESPONSE:

The inclusion of additional requirements should be left open for amendment as the process matures.

Discussion topic 3: Information and support

Discussion Questions

3a. What are the key areas that you would like to see improvement in, in relation to information and support for apiary sites on public lands?

RESPONSE:

That information that indicates whether sites are declared vacant or occupied is made available through the on-line portal in a timely fashion.

3b. Through what channels would you prefer to access general information about apiary sites on public lands (website, email, phone/SMS, face-to-face)?

RESPONSE:

Through the on-line portal / website.

3c. Through what channels would you prefer to send and receive notifications (e.g. about hazard reduction burns, biosecurity or other issues) (website, email, phone/SMS)?

RESPONSE:

When the proposed single desk operation is effected the use of the website, email and SMS would be the preferred methods of communication.

Discussion topic 4: Promoting improved biosecurity

Discussion Questions

4a. What are the most effective mechanisms to educate and communicate with small-scale operators, especially in peri-urban areas, about the biosecurity risks associated with beekeeping?

RESPONSE:

The NSWAA encourages NSW DPI Biosecurity to conduct an inclusive stakeholder assessment of the needs and preferred processes applicable for small scale operators across NSW regardless of their location. It is important to ensure that the NSW DPI web site is kept up-to-date in relation to the latest advice on pests and diseases affecting honey bees. Initiatives such as producing a series of brochures on biosecurity topics to be distributed through the various beekeeping equipment businesses is worthy of consideration.

4b. How should DPI encourage small scale operators to register their hives?

RESPONSE:

In the interest of developing a comprehensive data base of all NSW apiarists then a need exists to incentivise registration of hives. This can be achieved through the provision of free on-line registration for fewer than 5 hives. If this is not possible then the 1-5 hive group needs to be financially affordable to encourage registration.

The current charges for registration of bee hives provides an opportunity for NSW DPI to return to industry through appropriate research, development and biosecurity initiatives part or all of the \$ 165,000 per annum collected from the apiarist registration fees. This figure is likely to increase with more apiarists becoming registered.

The NSWAA recommends that NSW DPI consider the implementation of a trust fund to handle the collected beekeeping registration fees similar to the process followed with the current state fishing licenses. The NSWAA supports and encourages NSW DPI to employ a further Beekeeping Biosecurity Officer for the dominate purpose of catering for the peri-urban apiarist fraternity and managing the state's role in the National Surveillance Program.

Table 1: Beekeeper Registration Statistics Report 03 March 2017 (Source NSW DPI)

Class	Number	Registration Fee	Total
Business	729	\$100	\$ 72,900
Recreational	3,320	\$60	\$ 199,200
Recreational Concession	1,440	\$40	\$ 57,600
Beekeeper Registration	2	\$0	\$ 0
Total Biannually	5,491		\$329,700
Total Annually			\$ 164,850

Discussion topic 5: Improving access to public lands

Discussion Questions

5a. Do you support the idea of a platform for beekeepers interested in site loaning to connect with one another? If so, how likely would you be to use it?

RESPONSE:

NSWAA support the idea / concept of the platform for site loaning.

5b. Do you think it is important for Government to have a role in facilitating site loaning or is it better for the industry to manage this itself?

RESPONSE:

A whole of Government opportunity exists for NSW to be consistent with Victoria and Western Australia and implement a single desk service for the provision of access of public lands to apiarists. The NSWAA preference is for NSW DPI to be the lead agency responsible for this function through the appointment of a Manager Apiary Sites – Public Lands. An important responsibility of this role will be to ensure that any potential site recipient is biosecure and complies with all Apiary Permit conditions.

5c. What might encourage permit holders to consider loaning their sites when they are not utilising sites themselves (noting that it is not permissible for beekeepers to exchange money in return for site loaning)?

RESPONSE:

No comment.

5d. What sort of incentives could be offered to beekeepers to encourage them to scope out previously unused sites?

RESPONSE:

Information provided through the on-line portal on the availability of sites for the benefit of all apiarists. The ability to book or take up apiary permits on-line.

5e. Are there any other options that could encourage beekeepers to take up these sites?

RESPONSE:

That suitable set down sites are identified through the provision of GPS Coordinates and that they are registered as set down sites on the data base. Ideally suitable vehicular access to set down sites for apiaries would encourage the take up of sites.

Discussion topic 6: Pricing

Discussion Questions

6a. Do you have any feedback on the proposed flat pricing approach?

RESPONSE:

The NSWAA is in agreement with a flat price approach.

Despite the support of the flat price approach the following Table demonstrates the significance of the site fee increases over a twelve month period.

These fees are levied on a pivotal agricultural industry that provides significant direct and indirect benefits to regional and urban communities, the environment, livestock and cropping agricultural industries and the State of NSW's economy for the benefit of all its citizens.

Table 2 – Comparison of fees levied on apiary sites 2015/2016 to 2016/2017.

Land Tenure	Figure from Census	Adjusted Figure to include non respondents. (i)	2015 / 2016 Fees	2016 / 2017 Flat pricing fees	Increased returns	% increase over 12 months
Forestry Corporation	4,226	5,365	\$466,755	\$938,875	\$472,120	201%
NPWS	333	412	\$41,200	\$72,100	\$30,900	175%
Crown Land	569	749	\$56,175	\$131,075	\$74,900	233%
Local Land Services	2,349	2,972	\$258,564	\$520,100	\$261,536	201%
			\$822,694	\$1,662,150	\$839,456	202%

(i) Somerville 1999.

Table 2 clearly illustrates the financial capacity of the NSW Government to employ the services of a Manager Apiary Sites – Public Lands to assist the beekeeping industry and the various government agencies with the on-going management of apiary sites on public lands.

Other feedback

Please provide any further comments here:

RESPONSE:

NSW Apiarists Association's position on: - Apiary sites on public lands: a common policy framework for NSW

The NSW Apiarists Association as the peak industry body for apiarists in NSW welcomes the opportunity to comment on the discussion paper "Apiary sites on public lands: a common policy framework for NSW".

The NSWAA has been a significant facilitator with NSW Government Land agencies in their pursuit of an efficient and effective process to allow a consistent approach for fee for service access to public lands in NSW. These public lands are vitally important as they contain the diverse Australian native forests and woodlands that are unique in their capability to be highly productive in terms of nectar and pollen resources. This high level of resource production with its diversity allows honey bees to develop strength, vigour and health before and after pollination events that are so important to many of NSW's agricultural industries.

Through the NSWAA continual lobbying for efficiencies and consistency across agencies in accessing public lands it is important to note that their initiative has been consistent with the Coalition Government's mandate on business they introduced in 2014 through the then Premier's Priorities of Improving Government Services by Supporting businesses. This specifically highlighted

"where Government will make it easier to do business with a range of support services to help navigate regulatory requirements that are overly complex and poorly understood thereby creating a business-friendly environment for NSW entrepreneurs with a focus on reducing or removing barriers, costs and complexity and make regulatory obligations easier to understand and implement".

To progress the NSWAA objective of streamlining the process and system involved with apiary sites on public lands a position paper was developed in February 2015 titled "Apiary Sites on Public Lands". In the foreword the then President of the NSWAA, Mr Casey Cooper, highlighted that access to floral resources was of greater significance to the commercial beekeepers of NSW than any other issue. However he also highlighted that

"The extreme variability between government departments in their view of commercial beekeeping and willingness to work with our association has made our job extremely difficult".

This call for help from a peak industry body whose commercial apiarists' activities are on a scale that require access to public lands cannot be ignored.

The position paper, "Apiary Sites on Public Lands", clearly stipulated six requests to government.

1. Provide an "all of government approach" to dealing with apiary sites on government land tenure.
2. Provide a policy on beekeeping from each government agency managing lands traditionally utilised by apiarists for apiary sites.
3. Provide a consistent set of apiary site use permit conditions across all government land tenures.

4. Grant access to any government lands for apiary sites where this does not cause public risk or undue damage to the area in gaining access.
5. Recognise the “National Best Management Practice Guidelines for Beekeeping in the Australian Environment”.
6. Provide long term permits of 5 years or greater.

The required outcomes and current status of each of these six requests is tabled as follows.

Table 3 - Apiary Sites on Public Lands”, 2015 - six requests to government.

2015 Requests	Required Outcomes	Current status
1. Provide an “all of government approach”.	Single desk for apiarists dealing with apiary sites on public lands	No movement on this front
2. Provide a policy on beekeeping.	All of government policy on beekeeping	No progress
3. Provide a consistent set of apiary site use permit conditions.	Version 7 of the standard terms and conditions developed by the NSW AA was tabled to ... in September 2016.	No further progress since Sept 2016
4. Grant access to any government lands for apiary sites	The common policy framework to allow the re-opening of water board lands, crown land reserves and the consideration of all crown lands if they are suitable for beekeeping	No progress
5. Recognise the “National Best Management Practice Guidelines for Beekeeping in the Australian Environment”.	This was published in 2007 with the Australian Honey Bee Industry Council and the Australian Government as the main partners. Require acknowledgement of this document and acceptance of the key elements	Discussion but no formal acceptance by current NSW Government Apiary Sites working group
6. Provide long term permits of 5 years or greater.	Apiary sites must be held by beekeeping business for the life of that business to encourage and provide confidence for business investment in the beekeeping industry	At present this seems to have been achieved with the current committee but the industry requires this to be confirmed by appropriate legislation

The NSW apiary industry needs, as a matter of priority, the creation of a single desk to register

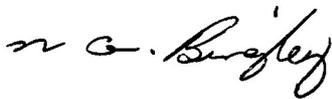
and manage apiary sites on public lands on behalf of government for the direct benefit of commercial apiarists and the indirect benefit of the Government land agencies, the NSW community and its economy.

This position would ideally be located within NSW DPI, funded from a percentage of the increase in fees, see Table 2 above. In line with the recruitment process and the NSW Capability Framework the knowledge, skills and experience required would be at a high level for Relationships requiring an effective communicator, collaborative worker and ability to effectively influence and negotiate. An occupation specific capability for this role would be knowledge of the apiary industry.

Examples for the role and a model of the process and procedures for a single desk function is available from the Victorian and Western Australian Governments who already have in place similar functions. <http://agriculture.vic.gov.au/agriculture/livestock/honey-bees/public-land-apiary-bee-sites>

Commercial apiarists are not shooters or fishers; their requirement for access to public land is not predicated on a recreational need it is based on a need to sustain healthy honey bee stocks that are gentle on the environment. Beekeeping has extensive benefits for all of the citizens of NSW and their communities, environment and economy. This need is not to be ignored or trivialised but supported and enhanced. This submission provides a clear unambiguous way forward for the State of NSW in how it effectively manages public land for the apiary industry with benefits accruing to Government and the whole NSW community.

Signed by President NSWAA



Neil Bingley
