



Department of
Primary Industries

Consultation Report

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



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Discussion Paper - Apiary sites on public lands: a common policy framework for NSW

First published August 2017

More information

www.dpi.nsw.gov.au

Acknowledgments

Cover image: An apiary site on public land, NSW DPI

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Disclaimer: The information contained in this publication is based on knowledge and understanding at the time of writing (August 2017). However, because of advances in knowledge, users are reminded of the need to ensure that information upon which they rely is up to date and to check currency of the information with the appropriate officer of the Department of Primary Industries or the user's independent adviser.

Overview

The NSW Department of Primary Industries (DPI) released a Discussion Paper 'Apiary sites on public lands: a common policy framework for NSW' on 18 May 2017 for public consultation. Feedback was invited via the Department of Primary Industries (DPI) website, email and the 'Have your say' website.

The consultation period was extended for over five weeks to 25 June 2017 to allow stakeholders ample time to put forward their submissions.

DPI received 56 submissions in total. Of these, 64 per cent of respondents identified themselves as recreational beekeepers (more than half identifying as members of the North Shore Bee Keepers Association), while 23 per cent identified themselves as commercial beekeepers (see Figure 1).

The peak industry body, the NSW Apiarists' Association (NSWAA), made a submission. The Victorian Apiarists Association provided a verbal recommendation for NSW to replicate the Victorian policy. Other submissions were from individual beekeepers and other interest groups.

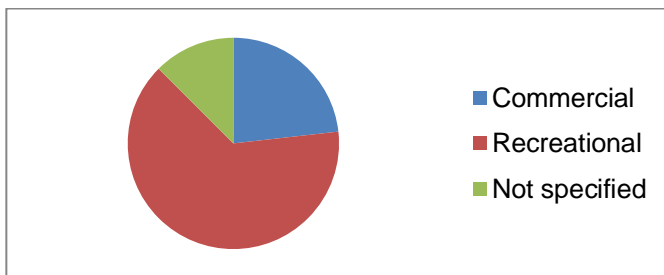


Figure 1: Breakdown of respondents

Feedback received was predominantly supportive of the proposed framework and its elements. Respondents were overwhelmingly in support of the process proposed for allocation of permits as well as the flat pricing structure. Consistent with industry concerns about limits on renewal rights, there was unanimous support for ongoing renewals subject to a new 'fit and proper person test'.

There was strong agreement across the submissions that promoting improved biosecurity was of vital importance and that biosecurity compliance should be a key factor in permit allocation and renewal assessment.

Discussion topic 1: Allocation of permits

How should available sites be advertised?

There was strong support for available sites to be advertised online on the DPI website or a purpose-built portal, as well as through trade publications (see Figure 2). Other suggestions included email, mailing lists, local newspapers and industry newsletters.

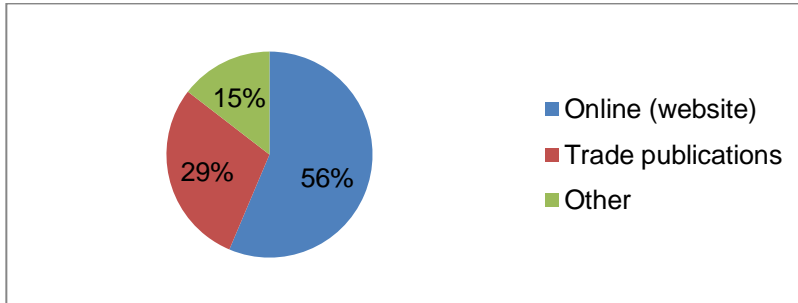


Figure 2: Preferred channels for advertising sites

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

A majority of respondents (64 per cent) stated that one month is an appropriate length of time for a site to be inspected, while 15 per cent proposed a lesser time and 21 per cent proposed a longer time.

Are the assessment criteria appropriate? Are the weightings appropriate?

There was very strong support (86 per cent) across the submissions for the proposed assessment criteria and weightings (see Table 1).

Table 1: Proposed assessment criteria

Proposed Assessment Criteria	Weighting (%)	Supporting evidence
Compliance history	60	<ul style="list-style-type: none"> Record of compliance with the Biosecurity Act and associated regulations Record of compliance with apiary permit conditions
Management practice	40	<ul style="list-style-type: none"> Certificate of completion of the Australian Honey Bee Industry <i>Biosecurity Code of Practice</i> Completion of DPI Pests & Diseases of Honeybees training course OR demonstrated equivalent experience

The focus on compliance history and management practice was welcomed by respondents, with some commending the easily demonstrable criteria.

Additional or alternative criteria suggested included more weighting on experience, more weighting on quality assurance program completion, preference to site by locality of beekeeper or by Australian owned beekeeping businesses, preferential access for entry level beekeepers over medium or large scale commercial operators, and membership to NSWAA or other beekeeping associations.

It was also recommended the criteria be reviewed periodically to take account of changing industry practices.

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

Feedback varied as to how, and if, equivalent experience should be considered in the absence of formal training. A majority of respondents (67 per cent) supported the proposal, and suggested evidence could be in the form of: references from other beekeepers and duration of

beekeeper registration, prior beekeeping experience/work history and membership in beekeeping organisation, and biosecurity compliance history (see Figure 3).

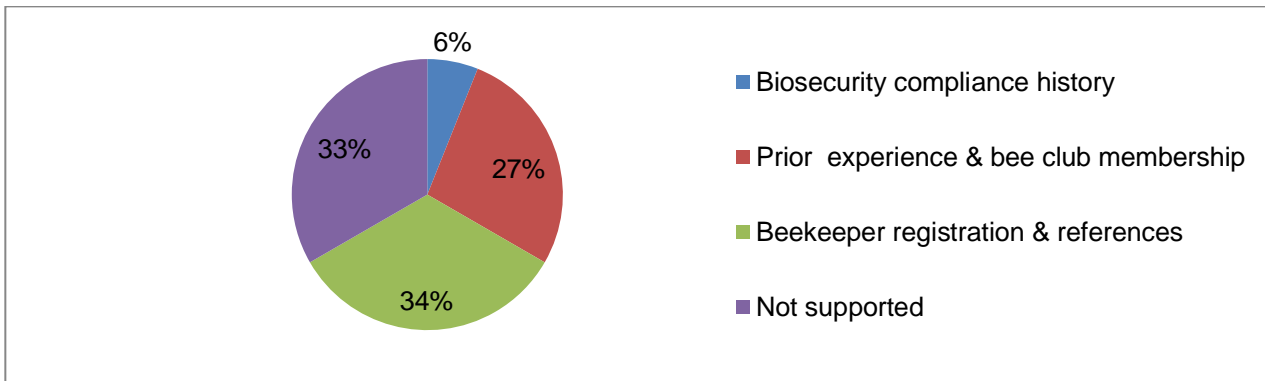


Figure 3: Recommendations on supporting evidence in absence of formal training

It should be noted that 33 per cent of respondents, including the NSWAA, did not support an applicant being able to demonstrate equivalent experience, suggesting that all applicants should be required to complete the training identified.

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

There was overwhelming agreement across the submissions (91 per cent) that ballots were the fairest method of determining allocation where more than one applicant returns the same score. Both commercial and recreational respondents responded positively.

Discussion topic 2: Renewals

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

There was unanimous support from both commercial and recreational beekeepers for the need for ongoing renewal rights, subject to the permit holder meeting a new test on renewal. Some respondents qualified their support by stating that an appeals process would be needed, in light of this test.

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

NSWAA noted that the criteria for the test should be reviewed as the framework implementation evolves. There was some concern of permit holders hoarding sites without using them or loaning them out and it was suggested the test consider this as well. Permit holders' residential status was also suggested as an additional criterion to ensure sites are allocated to Australian operators.

Discussion topic 3: Information and support

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?

There was near unanimous agreement among respondents that a central online portal would improve information and support for apiary sites on public lands. Other areas suggested included information on the DPI website, more planning or discussion around harvesting events

in State Forests, improved spatial information and better incident notification (e.g. notifications of breakouts or illegal dumping of hives on site).

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

Respondents overwhelmingly identified websites as the preferred communication channel to access general information about apiary sites on public lands, followed by email (see Figure 5). Other channels were phone/SMS and face to face, with newsletters garnering very limited support. It was suggested that online communications, whether website or email, should be supported by a specific contact person.

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)?

The most preferred channel for sending and receiving notifications about more immediate issues like hazard reduction and biosecurity outbreaks was email by a large margin, followed by phone/SMS and then, to a lesser extent, websites (see Figure 4). This preference was reported by both commercial and recreational respondents.

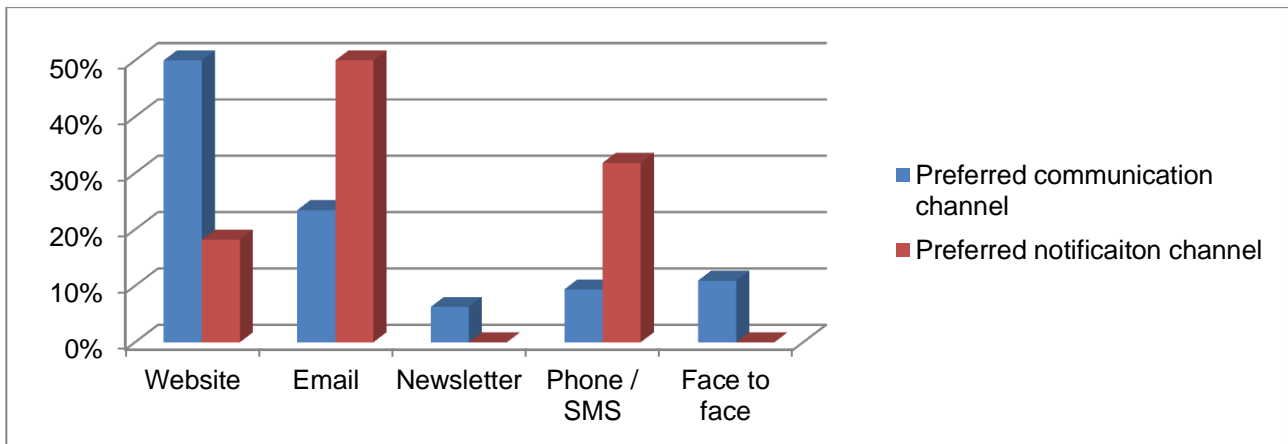


Figure 4: Comparison of preferred communication channels for general information and notifications

Discussion topic 4: Promoting improved biosecurity

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?

Respondents identified that the most effective mechanisms to educate and communicate with small-scale operators about the biosecurity risks associated with beekeeping was through amateur bee clubs such as the NSW Amateur Beekeepers Association.

Respondents also suggested other effective mechanisms could be through workshops, trade stands at field days and emails to registered beekeepers on the DPI database. NSWAA also suggested distribution of brochures on biosecurity topics via various beekeeping equipment businesses as a potential initiative.

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

There was strong support for DPI to offer free registration for beekeepers with less than five hives as a way of encouraging amateur beekeepers to register their hives. Other suggestions included enforcement of higher penalties for non-compliance, and a publicity campaign.

Registration fees are outside the scope of the apiary site policy framework, as they fall under the *Biosecurity Act 2015* and associated regulation which came into effect on 1 July 2017.

Discussion topic 5: Improving access to public lands

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?

The idea of a platform for site loaning was largely opposed by recreational respondents on the basis of it presenting a high level of pest and disease risk. This is in contrast to commercial respondents, the majority of which supported the idea.

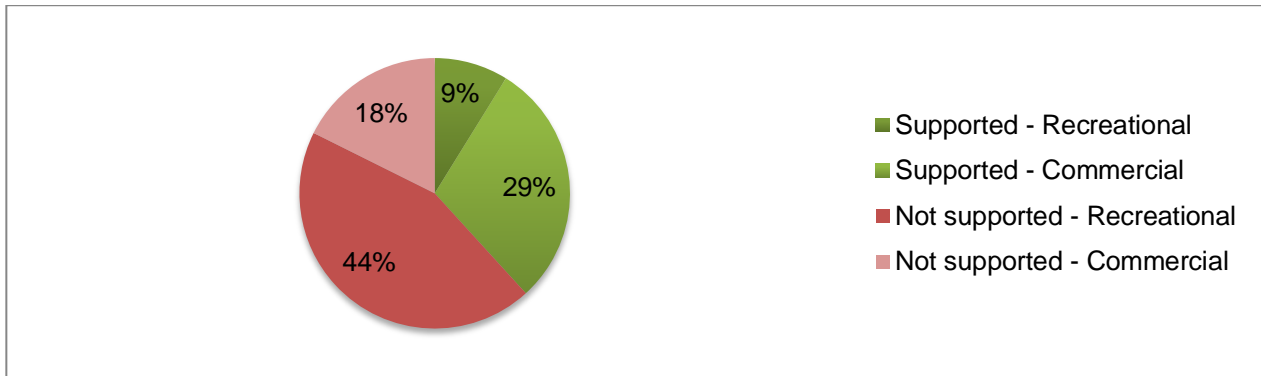


Figure 5: Support for a platform to facilitate site loaning

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?

There was strong agreement across respondents that the industry should manage any site loaning process, rather than it being a role for Government. Commercial respondents were split evenly on this issue, with the NSWAA supportive of a Government role, while recreational respondents were strong supporters for industry ownership.

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)?

Suggestions to encourage permit holders to consider loaning sites if not using them included penalties for non-activity on sites except in mitigating circumstances such as fire, subsidised costs and fees on sites loaned, and a 'credit' system whereby credits are received for sites released by beekeepers and used for other sites taken up (maintains no monetary profit rule).

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

Suggestions for incentives to encourage beekeepers to scope out previously unused sites included publishing their locations online or in industry magazines, a reduction or waiver of permit fees for a certain period in recognition of their effort, and direct allocation to the beekeeper responsible for scoping out the site.

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

Other options suggested to encourage beekeepers to take up these sites included publishing online a description of the site (including majority flora present and vehicular access details) and a reduced permit fee.

Discussion topic 6: Pricing

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

There was very strong support (over 81 per cent) for the proposed flat pricing approach, with an annual fee of \$175 per site, including from the NSWAA.

Of the very small minority who opposed the fee structure, some noted the need for fee waivers or reductions to account for variables such as lack of access to a site due to roadworks or logging/harvesting, fluctuating yields on the sites and beekeepers' expense in maintaining access routes.

Next steps

Feedback from the consultation process has been used to finalise the policy framework, which will be implemented over the latter half of 2017 and 2018. Please refer to the DPI website for updates: <https://www.dpi.nsw.gov.au/animals-and-livestock/bees/compliance>