



AUSTRALIAN HONEY BEE INDUSTRY COUNCIL INC

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2 August 2011

National Food Plan Unit
Department of Agriculture, Fisheries and Forestry
PO Box 858
CANBERRA CITY ACT 2601

Re: NATIONAL FOOD PLAN SUBMISSION

As you may be aware the Australian Honey Bee Industry Council (AHBIC) is the peak body representing the Apiary Industry in Australia. Members of the Australian Honey Bee Industry Council include:

New South Wales Apiarists' Association
Queensland Beekeepers' Association
South Australian Apiarists' Association
Tasmanian Beekeepers' Association
Victorian Apiarists' Association
Western Australian Farmers Federation - Beekeepers Section
Honey Packers' and Marketers' Association of Australia
National Council of Pollination Associations
Australian Queen Bee Breeders' Association

In 2008 the House of Representatives Standing Committee enquiry into the Honeybee Industry, found that the contribution of pollination to Australia's agriculture and horticulture industries was not only critical to production, but worth an estimated \$4 billion a year. Ref: *More Than Honey: the future of the Australian honey bee and pollination industries – May 2008*

The value for pollination dwarfs the value of production of honey and honey products of \$80 million a year for Australia. There exist some 2,000 commercial beekeepers. Further details in terms of size and makeup of the Industry can be found in the CIE Report: *Future Directions for the Australian Honeybee Industry, September 2005* which can be found on the AHBIC website.

We site the above submission to draw importance of the Honeybee Industry to Australian Agriculture and correspondingly the benefits to the greater community.

DEVELOPING A NATIONAL FOOD PLAN

Question 1: What is the most important thing you think a national food plan should try to achieve?

A national food plan should try and maintain the productive base of Australian agriculture to ensure that domestic consumers and our overseas customers can obtain sufficient produce with high hygienic standards, minimal bacterial contamination and residue levels. This will help reduce Australian and world health costs, the potential for increased famines from a growing world

population and international tensions. This will also lead possibly to increased illegal people flows which is another consequence of such an action.

Question 2: What do you think the vision and objectives for a national food plan should be?

The vision should be for Australia to continue to be a food exporter making our international contribution to world welfare and minimising the potential loss of world welfare from malnourishment of people in Australia and overseas. The objectives should focus on this vision and entail:

- maintaining the productive base by not forcing resources out of industries through government programs that do not recognise this vision, such as the restrictions on production arising from the honey bee industry losing access to forest resources;
- ensuring that we can meet the challenges by having the appropriate research and development base to deal with future productivity requirements and countering any deleterious changes such as biosecurity threats.

FOOD SECURITY

Question 3: What do you see as the major risks to Australia's food supply in the coming years and decades? How could they be avoided or managed more effectively?

Government pursuit of other objectives such as surrendering to environmental pressure groups for restricting access into forest resources without considering the bigger picture of Australian and World welfare will result in adverse consequences. Governments should take a much broader view of policy objectives in considering any action that may have an adverse impact on agricultural production.

In the globalising world economy, new biosecurity threats are always arising of which in many cases little may be known. These biosecurity threats can have extremely damaging effects on large parts of agriculture. For example biosecurity threats to the honeybee industry will have even greater effects upon pollination dependent industries with possibly extremely adverse production downturns in those industries for extended periods of time. Such threats also induce the widespread necessity for perpetual use of chemical controls in bee husbandry practices that limits Australian honeys marketability and introduces new pesticides to the food chain. In addition, greater costs of production are incurred. There is a need for greater preparedness and willingness to commit resources at an earliest stage as possible to counter these biosecurity threats before they become established.

Question 4: What does food security mean to you? How would this be achieved? How would we know if/when we are food secure?

Food security should mean that we produce firstly sufficient overall foodstuffs for our domestic market with high hygienic standards, minimal microbial contamination and residue levels eliminated of low enough to maintain a healthy population. Secondly, that we can make a contribution to feeding other people in the world by having a sufficient export surplus to minimise international tensions.

NUTRITIOUS AND SAFE FOOD SUPPLY MEETING CONSUMER NEEDS

Question 5: What are the most important benefits that Australian consumers get or should get from our food supply? Why?

They should be able to get the nourishment to ensure that they can maintain a productive healthy lifestyle that contributes to the overall good of the nation with less chance of people becoming a health welfare burden on the rest of society, especially with an ageing population. Hygienic standards and microbial contamination of food should be at world's best practice and residue levels should be eliminated or controlled to ensure no food safety risk. Food supply should be diverse enough to maintain high health standards.

Question 6: What two or three actions:

- **by the government sector would most benefit food consumers?**
- **by the non-government sector would most benefit food consumers?**

Ensuring that all foodstuffs domestic or imported meet the appropriate hygienic standards and residue levels.

It is noted that in some instances honey that has been rejected by other countries has been legally imported into Australia even though it would have also failed domestic production standards in terms of residues.

Ensuring a competitive market for the delivery of food to consumers.

Concentration of market power at the retail level can reduce the opportunity for providing the appropriate hygienic foodstuffs as the retailer concentration can limit the variety of products. Standards can be reduced to the lowest common denominator without the ability of producers to get the shelf space or promotional avenues for higher quality/ healthy products.

FSANZ are focused on high risk food health risks and are therefore not prepared to address commodity based Standard deficiencies that require greater specificity and action for non-conformance to existing standards. The honey industry has requested greater standard detail for honey, which has been denied despite international standards in the EU and Codex exhibiting such detail.

The non-government sector needs continued support to drive productivity of agricultural products through mechanisation and best practice initiatives in the primary production sector. The mechanisms of delivery to the consumer and the retailer expected margin results in a disproportionate return to the producer, who is investing, researching, managing and delivering the foods production into the future.

A COMPETITIVE, PRODUCTIVE AND EFFICIENT FOOD INDUSTRY

Question 7: What do you see as the major opportunities for Australia's food industry in the coming years and decades? How could they be realised?

The growing world population and economic growth in large parts of the world will create a bigger market for higher quality products. Higher quality should be equated with hygiene standards and minimal chemical residue levels. Australia has a 'clean & green' image and this reputation needs to be preserved through activities that retain a low reliance on chemicals and pristine production environments.

Opportunities for Australia can be realised if the production potential of the industry is at the least maintained, if not enhanced. This requires a continuing research and development effort to boost production and quality levels and removing barriers to expansion.

**Question 8: What two or three actions:
- by the government sector would most benefit businesses that make, distribute and sell food?**

- Encourage and develop competition in a concentrated retail market.
- A high degree of government support to the primary production sector to extend knowledge of best practice, undertake research and provide on-going sustainability, such as succession planning.
- Ensure the integrity of biosecurity actions to eliminate and control incursions of foreign pests and diseases.
- Ensure on-going access to natural resources, such as State and National Parks for beekeepers hives to survive and prosper.
- Enforcement of country of origin labelling.
- Proper enforcement of organic standards and associated deceptive and misleading conduct.

- by the non-government sectors would most benefit businesses that make, distribute and sell food?

- On-going consumer education and support of the benefits of supporting locally grown produce.
- Strong industry based national Associations that are well funded and able to attract and retain skilled staff to assist agricultural industries prosper.

Question 9: What specific food policy and regulatory functions within or between governments: - overlap? - are at cross-purposes? - have gaps?

State governments ensure that Australian honeys meet high standards. AQIS are responsible for imports and the standards are meant to be the same but they rarely test for them. There is insufficient control of imports arising from origins of known adulteration and residue risk as the food safety concern is considered minimal. FSANZ has a minimalist honey standard that has less detail than most other countries in the world, which industry has requested to be upgraded with no action taken. The AQIS managed National Residue Survey conducted for industry market access to the EU provides the primary function for control and review of honey, and there is no other government initiated controls evident to industry.

**Question 10: Which regulation or regulatory regime poses the greatest burden on the food industry along the food supply chain (production, processing/manufacturing, transport and logistics, wholesale, retail)?
What could be done to reduce this burden?**

With respect to honey, the production and food supply chain lacks any great regulatory burden and this is considered appropriate for this commodity.

The major regulatory regime is external, with trade access issues and tariffs restricting a free market in honey, honeybees and apiary products. Greater efforts by the government in addressing these matters would achieve an enormous upside for industry. Trade issues are a problem in the USA market for live bees, Japan for Nosema, Korea and New Zealand honey access to name but a few.

The Apiary Industry, like most agricultural industries is a price taker and any increase in production costs through regulation or other forms of cost burden need to be absorbed by the industry hence it is important that any regulatory regime not impose additional costs on the food supply chain.

SUSTAINABLE FOOD INDUSTRY

Question 11: What two or three actions:

- by the government sector would most benefit communities that are highly dependent on food production, processing, distribution or sale?

- On-going support for primary production business development, mechanisation, education and succession.
- Access to natural resources to ensure the on-going viability of primary production businesses (e.g. State & National Parks).
- Existing and greater tax concessions and fuel excise subsidies for primary producers in regional and rural areas.
- Support for biosecurity measures need to protect existing food producing activities.
- Encouragement and incentives to set up regional and rural food production and processing facilities.
- Better capability to set-up statutory levies to support significant industry interests.
- Maintenance of a quarantine facility to ensure genetic stock is maintained at the highest level.

- by the non-government sector would most benefit communities that are highly dependent on food production, processing, distribution or sale?

- On-going national industry association involvement to support industry-government based activities and those instigated by the industry to develop and support the industry.
- Greater support and integration of symbiotic industries, such as horticultural industries requiring pollination and the honey bee industry to progress mutually in the interests of both parties.

CONCLUSION

The Australian Honeybee Industry welcomes the opportunity to have input into the development of a National Food Plan and is happy to further expand on issues raised. In responding to the questionnaire industry has sought to tease out issues of importance to the Apiary Industry however we felt these are also important to the wider agricultural industry.

A risk-impact analysis clearly points to the industry needing to address two key issues as a matter of priority. These are: first, to ensure that everything possible is being done to protect the industry from an exotic incursion of *Varroa* mite or other serious exotic diseases; and second, to influence governments to ensure that access to native flora resources is not further restricted and hopefully reversed. The latter will require a concentrated effort by industry leaders to influence policy makers on sound, professional and well-presented arguments and will also require the industry to establish its own environmental credentials through the adoption of an EMS.

It is also noted the current debate in respect of Oil & Gas Exploration/Production has the potential to affect access to resources which the industry needs to maintain production.

Because of its mobility and the large number of non-commercial beekeepers, the industry is vulnerable to spread of endemic diseases. With state governments withdrawing resources in this area, the industry needs to address how it can minimise this risk. Better hive management and

increased productivity is one way, but the challenge is to discipline the activities of the few who have high disease risk management practices. Any increase in use of chemicals or antibiotics to control broad diseases runs an increased risk of honey contamination.

On the market development side, there are many opportunities and it is more a question of there being sufficient supplies to meet demand. This applies particularly to queen bees and pollination. The industry's challenge on honey is to maintain or enhance its reputation as a supplier of top grade branded honey which is 'clean and green' - and so continue to command a premium on the domestic and international markets. This means being able to differentiate Australian honey by brand. Australia cannot compete on price alone against honey from China and Argentina. Efforts by packers and marketers need to continue to export more honey in retail pack form and less in export bulk form. There are exciting prospects for developing and marketing honey for medicinal purposes.

Yours sincerely

**STEPHEN WARE
EXECUTIVE DIRECTOR**