



We are now accepting email submissions. The form below must be filled out and attached in an email and sent to [ifoa.remake@epa.nsw.gov.au](mailto:ifoa.remake@epa.nsw.gov.au) If this form is not attached or incomplete the submission will be lodged as confidential and will not be published.

**Make a submission – Contact Details**

**First Name:** Ben

**Last Name:** McKee

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**Postcode:** [REDACTED]

**Country:** Australia

**Stakeholder type (circle)\*:**

Community group	Local Government	Aboriginal group
<u>Industry group</u>	Other government	Forest user group
Environment group	Individual	Staff

**Other, please specify:** Australia's largest honey packer

**Organisation name:** Capilano Honey Limited

**What is you preferred contact method (circle):** Mobile, Email or phone? Email

**Would you like to receive further information and updates on IFOA and forestry matters?**  
Yes

**Can the EPA make your submission public\* (circle)?**

Yes No Yes, but anonymous

**Have you previously engaged with the EPA on forestry issues?** No



Capilano is first and foremost a company founded by, and still supporting, beekeeping families from across Australia. Since our humble beginnings in 1953, we've grown exponentially to become the largest honey packer in Australia. In addition to Australia-wide distribution, we export Australia's high-quality honey to over 30 countries across the globe, allowing families all over the world to enjoy honey from the world's healthiest bees\*.

As Australia's favourite honey brand, we have been packing honey for over 65 years. It goes without saying that we passionately care about our Australian bee population, our beekeepers and the environment. Because of this, we invest significantly in a range of initiatives including bee husbandry, bee welfare, biosecurity and education schemes that will benefit the future generations of beekeepers.

At Capilano, we are committed to securing a safe and viable world's best practice Australian honey industry, which will ensure a sustainable future for Australia's bees, our environment and the more than 600 Aussie beekeeping families that we support.

Source: <https://blogs.csiro.au/ecos/its-official-our-honey-bees-are-some-of-the-healthiest-in-the-world/>

### **Make a submission – Form**

#### **1. What parts of the draft Coastal IFOA are most important to you? Why?**

Capilano's chief concern in relation to the Coastal IFOA is the enduring retention of licensed beekeeping sites in NSW Forests. Such sites are essential for the on-going sustainability of our beekeeping operations and more importantly, for the over 600 Australian beekeepers that supply Capilano. These beekeepers and their bees are reliant on the diverse range of native flora and the pollen and nectar that is gathered throughout NSW's varied forest environments.

The diversity of species and flowering patterns of trees and plants housed within NSW Forests is vital for beekeepers to maintain and build hive strength, convey on-going health and disease resistance. NSW Forests deliver beekeepers a breadth of geographical and climatic choice, necessary to overcome increasingly difficult localised adverse seasonal effects such as drought.

In addition to providing colony health, survival and assisting with preparing colonies for the provision of pollination services to other agricultural industries, NSW Forests preserve some of the best eucalypt species of trees that yield nectar and generate surplus honey production for Australian consumers.

Access to crown owned floral resources and the uncertain substantiation of perpetuity of such access threatens the sustainability, growth and investment activities of our industry.



This industry is focused on the sustainability and protection of Australian native forests. World bee populations are reducing and are not maintainable in many overseas environments where their habitat has been eroded. Bees are forced to forage agricultural landscapes and monoculture pollen diets that are insufficient. Like humans, bees require a bio-diverse diet to survive.

Australian bees are renowned as some of the healthiest bee populations in the world, they need to be protected and supported and access to NSW Forests is fundamental to this aim and for the greater public good.

It should be noted, Capilano is in full support of the submission delivered by the NSW Apiarists Association (NSWAA), therefore we have made a deliberate undertaking in the essence of clarity not to replicate their position, facts and figures – as we are 100% supportive of their position, comments and recommendations made.

## **2. What parts of the draft Coastal IFOA do you think have a positive outcome on the management of environmental values or the production of sustainable timber? Why?**

The objectives of the new Coastal IFOA as specified (Section 2.2, Executive Summary, page 4, May 2018) are admirable and appropriate.

## **3. What parts of the draft Coastal IFOA do you think have a negative outcome on the management of environmental values or the production of sustainable timber? Why?**

There is a deficiency in the draft Coastal IFOA in the absence or acknowledgement of apiarists as forest users and stakeholders. Hopefully this submission and that of other apiarist organisations, as part of public consultation, will facilitate a greater inclusion of the honey bee industry and the acknowledgment/recognition of beekeepers as legitimate forest stakeholders. Some comment as to the permanency of bee sites and apiarist access would be valued by our industry.

Capilano and other related industry organisations are willing and equipped with the resources and skills to proactively support the development of sustainable policies with government, that can deliver an equitable framework for forest users.

Capilano is concerned about the retention rate for trees if harvesting is occurring on licensed bee-site foraging areas, as the rate is inadequate and unsustainable for effective post-operation of apicultural activities. Felling up to 70% of basal area renders mixed forests ineffectual as a pollen and nectar source for commercial beekeepers.

The review and reconsideration of retention rate measures is requested so that there is an emphasis on the seemingly forgotten utilisation of the forest resource by beekeepers post felling.

The introduction of procedural structural processes that consider selective harvesting is essential to provide a means of protecting apicultural significant tree species and aged populations of large trees. The option of selective harvesting non-bee significant species of trees is recommended for serious contemplation when approving harvesting areas and sites.



#### **4. What are your views on the effectiveness of the combination of permanent environmental protections at the regional, landscape and operational scales (multi-scale protection)?**

The pursuit of suitable permanent wildlife and landscape protections is admirable and appropriate for government and the EPA.

The honey and pollination industries are reliant on the landscape and flora aspects of these protections and would welcome the opportunity to be a part of the structured, on-going monitoring and evaluation of future environmental protections.

#### **5. In your opinion, would the draft Coastal IFOA be effective in managing environmental values and a sustainable timber industry? Why?**

Notwithstanding our opposition to retention rates and unselective harvesting outcomes, the effective management of environmental values, sustainability, ongoing continuous improvement and evaluation will require appropriate resources, policing and data collation by the NSW Government to make the Coastal IFOA effective. The scale of commitment of such resources is not evident in the draft Coastal IFOA.

#### **6. General comments**

The draft Coastal IFOA delivers the beekeeping, honey and pollination industries with heightened risks as to the access of honey bee beneficial resources in NSW Forests. This position is derived because of:

- in-existent reference to Apiarists as an existing stakeholder in NSW Forests and as a co-dependent industry;
- no recognition or acknowledgment of bee site licences or the intent on future permanency and protection of such licences;
- proposed tree felling retention rates that are inconsistent with on-going utilisation of the forest resource for beekeeping;
- ignorance of selective harvesting as a means of protecting bee dependent species of trees and larger trees that yield the lion share of nectar and pollen.

Commercial beekeepers and the timber industry in NSW can effectively co-exist as long as we have the ability to interact and work collectively. It is crucial that government ensures we are equitably included in policy formulation discussions and fosters such interaction between stakeholders.

It is in interest of Australia's collective public good that we encourage and ensure we have a healthy, sustainable commercial honey industry that supports rural and regional communities, pollination dependent industries and national food security.



**Ben McKee**  
Managing Director

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