Response - Code of Practice for Beekeeping on QPWS Managed Areas 2023

National Parks Association of Queensland
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The National Parks Association of Queensland (NPAQ) welcomes the opportunity to provide comment on the *Code of Practice for Beekeeping on QPWS Managed Areas 2023*, and thanks the Department for its transparency and consultation process. The attached table provides NPAQ's specific feedback on the Code.

General NPAQ Position on Beekeeping in National Parks
NPAQ recognises the importance of bee keeping as an independent industry, it's contribution to the agricultural and horticultural industries, and to the people of Queensland who depend on the sustainability of these industries for their local food and food security. NPAQ also recognises the preference for natural areas by beekeepers due to their pesticide-free refuge for hives and plant pollen species.

NPAQ is opposed, however, to beekeeping in national parks, which it believes should be incompatible with the management principles for national parks under the *Queensland Nature Conservation Act 1992*. NPAQ is particularly concerned with:

- the removal by honeybees of (up to 80 per cent of) floral resources used by native birds and insects and the reduced seed-set of native plants caused by removal of pollen
- the introduction of honeybees can cause a reduction in the number of birds visiting some plant species (e.g. honeyeaters to Callistemon)
- the impact of honeybees on the less aggressive native bee, some of which are specialised as regards to the plants they access. As honeybees forage for longer periods and over greater distances (up to 2km) than their native counterparts, this can have adverse effects on the environment in situ and further away from the hives, not only in regard to floral resource depletion, but also the promotion of undesirable plant hybridisation
- honeybees are highly effective at pollinating weedy species, which can change the overall plant communities in national parks
- swarming could affect native species, other park users and neighbours to the park
- the risk of pathogen spillover from honeybee hives in national parks
- beekeeping in national parks increases the risk of feral bees becoming established in those parks or increasing in numbers if they are already there

NPAQ is also opposed to the amendment to the *Nature Conservation Act 1992* passed by the Queensland Parliament in October 2022 to allow beekeeping to continue to occur under permit in national parks until 31 December 2044, while alternate sites are investigated and beekeeping is transitioned off national park tenure. NPAQ would welcome further discussion about a more expedient transition of beekeeping off national parks in Queensland.

NPAQ also calls on DES through QPWS to take immediate action to conduct or fund the appropriate empirical research required to ensure a quick, efficient and sustainable solution to the phasing out of hives from national parks to more suitable areas, well before 2044. To ensure more appropriate locations are sort, research is required on:

- the diversity of native pollinators and their roles in pollination (media attention disproportionately covers honeybees over native pollinators)
- the impact of honeybees on native fauna and flora
- alternate foraging habits of native bees (differences in their active times of day or preferred plants), so potential competition with native species is identified and impacts are mitigated or minimised

- bee interactions with native flora studied to date have been limited to shrubs close to the ground where observation is relatively easy, there is little knowledge regarding tall trees (e.g. eucalypts) which are also targets of both honeybees, and native insects, birds and mammals
- honeybees are good pollinators and can be of assistance in degraded environments, rather than in pristine national parks that do not require their service. Locations requiring assistance to rehabilitate should be sort
- feral bees occupy nesting hollows used by native animals

Finally, NPAQ believes that the precautionary principle should be used in administering the *Queensland Nature Conservation Act 1992*. Extensive clearing has made the protection of the Queensland's forests and their fauna even more important, especially given that this State has the lowest proportion of national park of any Australian jurisdiction. The limited natural environment we have left needs to be protected from as many stressors as possible, including introduced bees. And under climate change, our natural ecosystems are already under ever-increasing and potentially irreversible stress.

Response to Code of Practice

Topic		Govt Recommendation	NPAQ Response
ENVIRONMENTAL AND CULTURAL PRINCIPLES	**General principles**	Best practice land management and apiculture can be achieved when beekeeping is practiced in such a way that it: • recognises First Nations cultural heritage interests and practices cultural heritage duty of care • protects biodiversity (flora, fauna and ecosystems) • reduces the risk of un-planned fire impacts • prevents the spread of pests and diseases • protects soils and integrity of landscape • protects watercourses and water quality • minimises air and noise pollution • prevents pollution from waste and hazardous materials • maintains landscape amenity and minimises impacts on visitors, and • prevents environmental harm or damage	• NPAQ supports this element of the code. **Additional feedback** • As well minimising impacts on neighbours and their property • The precautionary principle should also be noted
	Native Title	QPWS recognises, respects and values First Nations peoples and cultures, and is committed to progressing self-determination by working with First Nations peoples to incorporate their priorities and perspectives in decision-making and operations.	• NPAQ supports this element of the code.
	Aboriginal and Torres Strait Islander (First Nations) Cultural Heritage	Beekeeping activities are to be conducted in a manner consistent with cultural heritage protective management and duty of care obligations. Apiary sites on QPWS protected areas that are located on traditional Aboriginal lands and apiarists and industry representatives are encouraged to connect with the Traditional Owners of the land upon which (their) apiary activities are located.	• NPAQ supports this element of the code. **Additional feedback** • Apiarists exercising their private interests on Traditional Owner land should not be 'encouraged to connect', but rather, it should be a requirement. • Any employment opportunities for First Nations people should be 'encouraged'
ACCESS TO APIARY SITES	**General access provisions**	Permit holders must use existing access roads/tracks for placing and managing hives on the apiary site/s identified on their apiary permit/s. No new temporary or permanent roads/tracks/ramps are to be established. • Gates on or leading to apiary sites must be left as they are found. • Locks cannot be placed on gates. • Where access to a site is beyond a QPWS locked gate, the permit holder is responsible for gate keys with QPWS. • Based on environmental, safety or management concerns, QPWS may need to close tracks, roads or entire parks	• NPAQ supports this element of the code. **Additional feedback** • QPWS should conduct regular inspections of areas where apiary sites are permitted to ensure no new roads/tracks have been established

		temporarily. • Periodically road maintenance is undertaken by QPWS that may affect a route required to access an apiary site.	
	Road and track management	**Maintenance:** Apiary permit holders may undertake minor maintenance on an existing track, which provide immediate access to a site held on their permit. Minor maintenance involves removal of weeds or mowing or slashing of grass to a height no less than 100 mm. Removal of fallen debris if blocking access. Minor maintenance does not include • importation and application of gravel, stone or other surface materials. • earth works/excavations that change the width or gradient of a road or track. • earth works/excavations that change existing drainage patterns or damage QPWS placed drainage channel, whoa boys or other drainage infrastructure. • earthworks to change surface conditions to smooth out ruts and corrugations. Vegetation may only be removed to access existing tracks and does not include the removal of mature forest re-growth. **Road management and operational restrictions:** Vehicle access to apiary sites on unsealed roads must cease when travel on unsealed roads is unsafe, causes, or has the potential to cause, damage due to one or more of the following reasons: • vehicles cannot move unassisted along the road • wet weather will lead to increased rutting and damage to road drainage • a dust hazard is, or will be, created	• NPAQ supports this element of the code. **Additional feedback** • Fallen debris (such as large branches, especially those with hollows) should be left on site to provide species habitat • QPWS should conduct regular inspections of areas where apiary sites are permitted to ensure any maintenance is done in accordance with the Code
APIARY SITE MANAGEMENT	**Hive Management**	**Hive deployment:** All beehives placed on an apiary site must be the property of the permit holder. • An apiarist may only use an apiary site or sites listed on a valid, in date apiary permit for which they are the primary holder. • Hives may only be deployed at the permitted apiary site. Hives may not be left on access tracks or roads. • All hives and beekeeping stands are the responsibility of the permit holder. **Site capacity, hive placement and hive identification:** No more than 150 beehives are permitted on any one apiary site. The permitted site must not be more than 600 sqm in area. • A minimum of 2 and a maximum of 3 metres of firebreak must be accommodated within the 600 sqm and not additional to it. • Hives must not be placed in the firebreak – there must 2-3 metres between the hives and the adjacent	• NPAQ supports this element of the code.

		forest. If hives cannot be deployed on the site without placing them into the firebreak fewer hives are to be deployed. Hive registration and hive marking must conform to the Biosecurity Act 2014, If a tree is used for the display of information, it must be tied, not nailed, to the tree. **Food and water supplementation:** The use of food supplementation is permitted only when necessary and must be delivered via in-hive feeding mechanisms only. Open food sources are prohibited. • An artificial water source may be used if a suitable, naturally occurring water source such as a dam, stream, or river is not within 500 metres. An artificial water source supplied must be inaccessible to wildlife consumption and be covered to prevent accidental drowning. **Pest management:** use of chemical pest control is permitted via in-hive pest systems only. In-hive pest treatments must be disposed of responsibly off the QPWS managed area. **Site Management and infrastructure:** No fences or other structures, except for beekeeping stands, are to be erected unless approved. • No infrastructure or equipment may be left on an apiary site when beekeeping activities are concluded. **Safety and security matters:** All beekeeping and related activities must be suspended or restricted where human safety, infrastructure or environmental values are threatened by weather or ground conditions.	
	Site hygiene and biosecurity	**Biosecurity:** The biosecurity of apiary sites is subject to the Biosecurity Act 2014. The Code does not provide biosecurity advice. Permit holders are advised to review the biosecurity requirements provided on the Business Queensland website covering topics including: • Hive placement, distance between hives and minimum distance from a queen bee breeding apiary • Equipment sterilisation • Notification of diseases and pests • Identifying different bee types • Moving bees into and within Queensland. **Swarm management:** This Code does not cover swarm management in detail as this is a biosecurity and safety matter managed by DAF. Advice should be sought from Biosecurity Queensland, and on the Business Queensland web page.	• NPAQ supports this element of the code. **Additional feedback** • 'Advising' permit holders to look at a website is not adequate, considering the devastating potential impacts to the natural environment and the industry that a biosecurity breach could have. The cost of eradicating a pest species falls back on QPWS and taxpayers' dollars, and the damage may be irreparable. Stronger words are required here that ensure

		Pests, weeds and diseases: All vehicles, plant and equipment or materials must be clean prior to entry in line with QPWS Operational policy - Pest plant and pathogen spread prevention. All activities must be managed to prevent or minimise the introduction and spread of pests, weeds and diseases. All persons have a general obligation under the Biosecurity Act 2014 to manage biosecurity risks that are: • under their control; and • that they know about or should reasonably be expected to know about. **Waste Management:** Apiary sites must be kept waste free. All beekeeping equipment must be removed from the site on expiration of a permit. Where the site is to be vacated, but the permit is still current, all beekeeping equipment must be removed from the site within 7days of the hives being removed. • All wastes are to be continually collected, contained in bins or other suitable receptacles, must be kept a min of 40m from any watercourse protection zone • Vegetation material should be dispersed away from the immediate area. • Care must be taken in the handling of weeds to prevent seed dispersal. Weeds removed must not be disposed on QPWS managed area. Removal of plants from the protected area estate is an offence under the NCA. **Toxic or hazardous substances:** The use of toxic or hazardous substances should not be necessary in the management of apiary sites on QPWS managed areas and is strictly prohibited without the written approval	apiarists are aware it is a 'requirement' and penalties will apply if they are found to not meet their duty of care. See Code Administration.
CODE ADMINISTRATION	-	If the permit holder fails or neglects to comply with the terms and conditions of their permit or this Code, the permit can be cancelled, and the beekeeper directed to vacate their site or sites by QPWS. This Code of practice will be reviewed at 5-yearly intervals. Corrective and preventative requirements will be included in revisions to achieve continual improvement in environmental management.	• NPAQ supports this element of the code. **Additional feedback** • Penalties should apply and be enforced commensurate to any damage on the natural environment and species.