

**From:** [REDACTED]  
**To:** [submissions](#)  
**Subject:** Submission - 271-23 - Application A1257  
**Date:** Wednesday, 17 January 2024 6:34:18 pm

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To whom it may concern,

I am a trawlwoolway pakana from northeast lutruwita Tasmania [REDACTED] and accountable to the Tasmanian Aboriginal community. Through marriage in Yuru Law (northern Queensland) I have cultural responsibilities to protect sugarbag bee honey gaba – similar to many Indigenous peoples throughout the continent who have responsibilities to native bees and their honey. Indigenous peoples have a connection to native bees that stretches back millennia, evidenced in our songs, dances and stories of native bees, as well as our scientific knowledge of them and ongoing custodianship. My cultural responsibilities foregrounds my interest in the recent Food Standards Australia New Zealand (FSANZ) [call for comment to permit the sale of honey](#) produced by Australian stingless bees.

Although FSANZ is not really the forum to air cultural considerations, as it is more concerned with food safety and contamination issues etc, I feel that my submission might hopefully bring the cause of Indigenous Cultural Intellectual Property (ICIP) to their consideration because FSANZ decisions on this matter still interact with the cultural / sociopolitical landscape, and it might benefit them know how the proposed changes concern Indigenous peoples in the context of honey.

In Australia, it has been illegal to sell gaba as food laws around the sale of honey were written for European bee honey which is very different to gaba. The Australian Native Bee Association Inc. (ANBA) have been leading the charge to get the sale of honey legalised for several years with FSANZ. ANBA are a not-for-profit association with multiple objectives, including caring for native bees and their natural environment and engaging with Indigenous Australians in mutual respect and knowledge sharing.

With the possible change of laws developing a honey standard around the sale of gaba, the commercialisation of native bee honey is imminent. This will have a number of positive influences, including for Indigenous businesses who will be able to further develop their business models. I believe this is a good thing. However, I have immediate concerns about ‘opening the flood gates’ to gaba commercialisation. Even with good intentions, once the commercial value of Indigenous foods grows, the cultural values often erode. This is evident throughout the bush foods industry, and is part of the justification for the formation of the [First Nations Bushfood and Botanical Alliance Australia](#) (FNBBA). FNBBA highlight areas of concern for bush foods that do not empower Indigenous peoples who have inherent and unique rights associated with Indigenous plants and animals that constitute Indigenous Cultural and Intellectual Property (ICIP).

To prevent potential misappropriation and harm to culture and community through the commercialisation of native bee honey, I firmly believe that the relevant Aboriginal legal advice around ICIP should be sought before these flood gates are opened. This could lead to ensuring structures are in place to prevent black cladding, promoting and supporting Indigenous enterprises, and respecting rights to access and use native bees for traditional purposes. Ultimately, myself and other totem holders of gaba and native bees do not want to see gaba owned and commodified by mostly non-Indigenous folks without our permission with little to no

acknowledgement of our cultural heritage or benefits flowing back to the custodians of bees.

Nayri nina-tu (thank you),

[REDACTED]

[REDACTED]

[REDACTED]

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