



Opening Remarks

To

The House of Commons' Standing Committee on Agriculture
and Agri-Food

For their study on Bee Health Monitoring in Canada

Presented by:

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Good afternoon. The Ontario Beekeepers' Association thanks the Chair and Honourable Members for inviting us to present to the House of Commons' Standing Committee on Agriculture and Agri-Food.

The OBA is an agricultural association incorporated under the Government of Ontario's Agricultural and Horticultural Organizations Act. Our mission is to ensure a thriving and sustainable beekeeping industry in Ontario. To that end, we support honey bee health research, promote the value of Ontario honey and deliver practical training and information to Ontario's beekeepers.

While Ontario's honey production at \$33.9 million represents only about 15% of the value of Canadian honey, Ontario's beekeeping industry plays a significantly larger role in the pollination of Canada's fruits and vegetables. Fully 37% of Canada's produce is grown in Ontario, more than any other Province. Ontario's honey bee industry is not only responsible for much of the fresh food Canadians eat, but contributes nearly three-quarters of a billion dollars to the Canadian economy through the pollination services we provide to Ontario fruit and vegetable growers and to the blueberry and cranberry growing regions of Quebec, New Brunswick, Nova Scotia and Prince Edward Island.

The OBA accepted the opportunity to present to the Standing Senate Committee on Agriculture and Forestry in 2014, and appreciates the progress that has been made following the committee's report and recommendations last year. We particularly appreciate the fact that PMRA has discontinued granting conditional registrations to new pesticides. However, there is still much work to do.

In the spirit of collaboration and the importance of managed and wild pollinators, the OBA submits the following comments and recommendations for your consideration:

1. NOW IS THE TIME FOR THE GOVERNMENT OF CANADA TO TAKE A LEADERSHIP POSITION ON SYSTEMIC PESTICIDES.

The much-publicized threat from the overuse of neonicotinoid and other systemic pesticides has not abated. This year, reports of bee kills in Ontario have continued at the same rate as last year. Canada must step up its efforts to significantly reduce or eliminate improper use of pesticides as a preventative measure. Our food security depends on a reliable and viable source of insect pollinators. PMRA has stated that they will evaluate the EPA position when making decisions on pesticides, however, EPA action or non-action should not be the primary

determinant of decisions relevant to Canada, particularly when the EPA is under such intense pressure from the agriculture industry, and is under threat of disbanding from partisan forces.

2. WE ARE ASKING FOR AN INDEPENDENT PANEL OF BEE HEALTH EXPERTS TO PROVIDE OVERSIGHT FOR THE REVIEW OF ALL SYSTEMIC PESTICIDES.

Pesticide manufactures have pushed new systemic pesticides into the pipeline in reaction to restrictions on the use of neonicotinoids in Europe and some North American jurisdictions. In some cases they have been granted restrictions after a cursory public consultation. The criteria for new registrations refer to LD50 based on short-term exposure to pesticides. Substantial evidence now points to chronic exposure from systemics as a major cause of bee mortality. Even low concentrations can put bees at risk. Neonicotinoids are thousands of times more lethal to bees than older insecticides like DDT. Research shows that bees experiencing sub-lethal effects encounter complications such as changes in foraging behaviour or delayed development. As well, it is important to stress that neonicotinoids are not separate from the other problems facing honey bees such as varroa, viruses and nutrition. Exposure to these pesticides makes other problems worse by compromising the bees' immune systems, reducing navigation skills and destroying habitat.

Ontario has been particularly hard-hit by the over-use of systemic pesticides. Since 2007, coinciding with the extended use of neonicotinoids on soy and corn, Ontario beekeepers have lost an average of 30% of their colonies each winter, compared to an average of 15% prior to 2007. However, this does not reflect the full impact. Colonies weak from exposure to toxic pesticides cannot recover from winter damage. Ongoing exposure, even to sub-lethal doses, causes colonies to decline throughout the spring, summer and fall. Bee losses now have to be assessed year round. Despite these losses, Ontario beekeepers manage to maintain their inventory by purchasing queens and bees and dividing surviving colonies. However, these hives are less populous and less productive for the season. As well, the additional costs associated with this practice erode the ability of beekeepers to make a living.

We need to trust that our regulators have the scientific capacity to conduct independent assessments. We urgently call on the Ministry to support Health Canada and Environment Canada to revamp PMRA and the process for assessing and approving pesticides. We need a systematic approach to assessing pesticides that is open, transparent and independent of industry.

3. CANADA MUST MAINTAIN THE POLICY OF A CANADIAN BORDER CLOSED TO IMPORTS OF U.S. BEES INTO CANADA.

OBA supports the conclusions in CFIA's most recent assessment that stated, "There is still a high probability of introducing diseases and pests into Canada due to importation of honey bees from the continental United States." Specifically, we are most concerned about three areas:

- a. **Africanized bees (AHB).** CFIA considers AHB "a threat to public and animal health as well as to the Canadian beekeeping industry because of the significant impact on productivity and potential trade issues with live honey bee material." The introduction of Africanized bees could serve to dilute, if not destroy, the generations of non-defensive, productive honey bees bred by Canada's beekeepers.
- b. **American Foulbrood** is a worldwide bacterial disease of the larval and pupal stages of bee development. Treatment with antibiotics will destroy the vegetative bacteria, but will not kill the spores. According to CFIA, American foulbrood occurs in the continental U.S. and Canada; however, strains resistant to oxytetracycline treatment have been widely reported in the U.S., leading the CFIA to consider the import of U.S. bees a potential hazard.
- c. **Treatment resistant varroa mites.** Although varroa mites are widespread in both the continental U.S. and Canada, mites resistant to fluvalinate, coumaphos and amitraz are present in the U.S. where there is an intense migratory beekeeping industry with no interstate controls on honey bees. Given the prevalence of varroa mites in colonies, it is reasonable to expect that imported bees will carry varroa, including those resistant to miticides.

We believe that opening the border to U.S. bees will compromise the stability and future sustainability of the beekeeping industry in Ontario and other provinces. We agree with the risk assessment undertaken by CFIA in 2013 and see no reason to reopen this issue.

4. WE CALL ON THE GOVERNMENT TO REASSESS THE MANDATE AND MISSION OF THE BEE HEALTH ROUNDTABLE ASSEMBLED BY THE FORMER GOVERNMENT'S MINISTER OF AGRICULTURE. Although Ontario has the largest number of beekeepers in Canada and the highest rates of bee mortality due to neonicotinoid pesticides, the OBA was excluded from the roundtable while seats were given to representatives of the agricultural chemical industry and to Grain Farmers of Ontario. In addition, environmental NGOs have also been left off the Roundtable despite their knowledge and expertise in the area of non-managed bees. We believe a reconstituted roundtable that reflects the full range of societal interests and expertise would be more likely to chart a positive and long lasting course for bee health in Canada.

We believe our recommendations support the Ministry's mandate "to help Canada's agriculture sector be innovative, **safer** and stronger." And by safer, we include pollinators, the environment, Canada's water supply and our food system.

On behalf of the Ontario Beekeepers' Association, I thank you for this opportunity to present to the committee and welcome any questions.