Newfoundland & Labrador Beekeeping Association

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15 May 2019

Joanne Sweeney
Director, Environmental Assessment Division
Department of Municipal Affairs and Environment
Government of Newfoundland and Labrador
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Re. Environmental Assessment Legislative Review

Dear Ms. Sweeney,

I write to you on behalf of the Newfoundland and Labrador Beekeeping Association (NLBKA).

Apiculture is growing rapidly across Newfoundland and Labrador (NL) with more than 100 people currently managing honey bee colonies across the province, several of whom are now operating commercially. The protection of honey bee health is a priority for the apicultural industry. In other parts of North America, honey bee health has been negatively affected by the introduction of exotic species such as the notorious varroa mite, small hive beetle, wax mouth, tracheal mite, and various viruses. Honey bee health has also been affected by extensive and/or inappropriate pesticide use (insecticides, herbicides, and fungicides), and loss of forage plant species. The NLBKA regards environmental assessment (EA) legislation as one potentially useful tool for the protection of honey bee health, which is a prerequisite for the expansion of the apicultural industry in the province.

Also, please note that the NLBKA includes native pollinators such as bumble bees (*Bombus* spp.) in its mandate because we recognize that honey bees and these other species share the same flowers and in many cases the same pathogens (e.g., Deformed wing virus).

We would like to see apiculture, honey bees, other managed bee species, and native pollinators given proper consideration in future environmental assessment in NL in the following ways:

1. Honey bees (*Apis mellifera*), other managed bee species, and native pollinators (e.g., *Bombus* spp.) should be considered Valued Components for EA. This would enhance the thoroughness

with which EA is currently conducted in NL, and will help protect the interests of the beekeepers represented by our association.

2. The possible affects of proposed commercial forestry, the application of herbicides, and other forest management activities on apiculture should be considered in future EA. It is our understanding that silviculture strategies related to forest management in Newfoundland and Labrador (NL) may at times require the application of herbicides. For example, the draft "Crown Five Year Operating Plan Forest Management Districts 02 and 03 (Zone 02) 2017-2021" notes that,

> [t]reatment to prepare sites that have been overgrown with hardwoods and other herbaceous species has been done with herbicides to reduce this competition and make the site more accessible and suitable for planting. Release herbicide treatment is also done which reduces the competition for a few years to allow planted seedlings to get established and 'get the jump' on the non crop tree species that occupy the site. In other instances, herbicides are used to control Kalmia either before or after planting. Herbicides, while used sparingly, are sometimes a necessary tool to help establishment of a new forest, particularly on the better sites (Government of Newfoundland and Labrador, 2016:107).

While the draft plan does not identify the herbicide(s), it is our understanding that the herbicide commonly in use in silviculture applications is glyphosate (aka Vision, Roundup). This is a concern to beekeepers given that herbicides can have lethal or sublethal effects on honey bees as well as wild pollinators (see Balbuena, 2015; Colopy, 2015; Morse, 1997).

Please note that most honey bee foraging occurs within 6 km of colonies (Winston, 1987:171). It appears that honey bees may benefit from commercial and domestic forest cutting activities, the reason being that conifer forests normally provide little in the way of nectar and pollen. Maple trees, pussy willow, and alder are seasonally important, but the wild forage species most attractive to honey bees are fireweed, lance-leaved goldenrod, rough-stemmed goldenrod, and bog aster. In managed forests, this type of "bee pasture" is found primarily along the margins of forest access roads, and in relatively new cutovers. Were it not for these disturbed landscapes and the forage species that grow up there, there would probably be very little of value to honey bees in our managed forest landscapes.

Advance notification of planned herbicide application would enable the NLBKA and the provincial apiarist to contact beekeepers whose colonies may be affected by the proposed activity. Potentially affected beekeepers could work with the Forestry Services Branch on appropriate mitigation and monitoring measures.

3. The possible affects on honey bees and native pollinators of other proposed projects or land uses involving the application of pesticides should also be considered in future EA. For example, the application of herbicides along transportation and power transmission right-of-ways may affect apicultural operations adjacent to the sprayed areas, and for this reason, local

beekeepers should be contacted in advance so that appropriate safety measures can be adopted.

4. NL has an *Animal Health and Protection Act* and associated regulations that are intended to protect the health of honey bees. The *Act* and regulations urgently need updating but they include restrictions on the importation of honey bees. Importation of other managed bee species such as *Bombus* spp. is covered under the *Wild Life Act*. In the past, importation of packaged honey bees into NL has caused considerable distrust and acrimony in the beekeeping community. Beekeepers did not properly understand the rationale for the importation, the importation process, or the testing regulations and protocols to which the imported bees were subject. Many aspects of the importation were not transparent which lead to distrust of government and the importers. Importation from international sources is handled primarily through the Canadian Food Inspection Agency in consultation with the provincial government which has the final say on the importation.

Future proposals to import honey bees and other managed bee species should be included in EA. This will greatly improve the transparency of the importation process and hence reduce the possibility of distrust and acrimony. It should be noted that importation proposals in other provinces (e.g., Ontario and PEI) have been fully transparent to the beekeeping community. Inclusion in EA will ensure that proper risk assessment is conducted with respect to the proposed importation. We note that other proposals related to agriculture in NL are subject to EA, for example, the recent Harcourt Farm Expansion (Reg. 1996).

Please do not hesitate to contact me should you have any questions about our EA recommendations. We look forward to seeing the outcome of this consultation process.

Sincerely,
Catherine Dempsey

Catherine Dempsey,
President

References

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