



27 February 2016

Newfoundland and Labrador Beekeeping Association
429 Windgap Road
Flatrock, NL , A1K 1C4

Hon. Christopher Mitchelmore
Minister Responsible for the Forestry and Agrifoods Agency
West Block, Confederation Building
P.O. Box 8700
St. John's, NL, A1B 4J6

Dear Minister Mitchelmore,

In addition to promoting the expansion of commercial and hobby beekeeping in Newfoundland and Labrador (NL), the Newfoundland and Labrador Beekeeping Association (NLBKA) includes in its mandate the protection of NL honeybees, in particular their current status as free of diseases and pests such as *Varroa destructor*. Closely related to this is the protection of bee ecosystems in NL including that of native/wild pollinators. We believe strongly in systematically monitoring beekeeping productivity, honeybee health, and other matters of relevance to bees and beekeeping in Newfoundland and Labrador. For more on our mandate, please see <http://www.nlbeekeeping.ca/about-us/our-mission/>

I write to you on behalf of NLBKA with the view to encouraging you to renovate existing legislation and regulations pertaining to honeybees and beekeeping as soon as possible; specifically to create a *Bee Act* for Newfoundland and Labrador. I would also like to invite your partnership in other ways to promote beekeeping in NL.

Beekeeping is regulated under the Government of Newfoundland and Labrador's *Animal Health and Protection Act, Animal Health Regulation 33/12*. Perhaps the most important regulation relates to the importation of honeybees which cannot be brought into the province without a permit from you. However, regulation of honeybee imports alone will not provide sufficient protection for our honeybees, and our commercial and hobby beekeepers. We need additional mechanisms to ensure that our province remains free of the parasites and diseases that are causing serious problems for honeybees and beekeeping elsewhere in the world.



The vampire parasite – *Varroa destructor*

For example, we are deeply concerned that importing used beekeeping equipment and products such as beeswax and pollen could transmit Varroa and tracheal mites, American foulbrood, hive beetles, wax moths and other pests to our honeybees. Regulations are required to control such imports. In addition, we note that all provinces in Canada, with the exception of NL and P.E.I. require mandatory registration of beekeepers and/or apiaries. Registration is a useful tool in the battle against parasites and diseases. The NLBKA encourages you to adopt similar regulations in our province as soon as possible, and we gladly offer our expertise and experience to you and your staff to assist you with regulatory reform.

A provincial apiary inspector is another useful tool. This person's role is to inspect honeybee colonies for pests and diseases and to ensure that beekeepers operate in a socially responsible manner, particularly in urban settings.

As for urban beekeeping, we note that most arable land and bee pasture in this province are adjacent to populated areas, which means that beekeepers need to work cooperatively with our Municipalities to promote safe and responsible beekeeping practices. There is a real and meaningful opportunity for our Municipalities to help protect and enhance our unique status as a safe haven from the storm of pests and diseases raging elsewhere in North America, while at the same time enjoying the benefits of local pollination of gardens, fruit trees, and blueberry crops. NLBKA would like to work with you and the Municipalities to put in place and an all-encompassing municipal Urban Beekeeping Ordinance, so that beekeeping can be conducted in a safe and responsible manner in urban or suburban areas, while also protecting beekeepers from random, nuisance complaints.

The matter of importing bumble bees and other insect pollinators into NL is not currently the responsibility of your department, although it has an important bearing on the future of beekeeping in our province. Importation of these species is prohibited under the *Wild Life Regulations, Wild Life Act, Part VI, section 83*, except with the prior written permission of the Minister of Environment and Conservation.

The **Common Eastern Bumble Bee** (*Bombus impatiens*), which is not native to NL, is used extensively in mainland North America as a commercial pollinator for greenhouse crops

including tomatoes, muskmelons, and sweet peppers as well as various field crops such as watermelon, and cucumber, in addition to lowbush blueberry and cranberry.

Unfortunately, these bumble bees and other *Bombus* species across mainland North America are known to harbour several parasites and diseases such as *Nosema bombi*, the microorganism *Crithidia bombi*, the tracheal mite *Locustacarus* (= *Bombacarus*) *buchneri*, and hymenopteran brood parasitoids such as *Melittobia acasta* and *M. chalybii*. Commercial colonies of *Bombus impatiens* have spread some of these pathogens to native species. We at the NLBKA are deeply concerned that importing bumble bees and other insect pollinators could transmit these pathogens to our native bees and honeybees as well.

Another major concern to beekeepers in NL as well as other parts of the world is the widespread use of systemic pesticides, in particular the neonicotinoid class of pesticides. Neonicotinoids are used in many parts of North America as “seed treatments, soil applications, and foliar sprays on a wide variety of agricultural crops such as oilseeds, grains, pulse crops (for example, peas and beans), fruits, vegetables, greenhouse crops (food and ornamental), ornamental plants, and Christmas trees,” etc.¹ Neonicotinoids are a neurotoxin as far as honeybees are concerned, having sub-lethal effects, which combined with other stressors can kill entire colonies. Moreover, these chemicals can accumulate in soil and water leading to additional exposure to insects, birds and fish. Neonicotinoids have been banned by the European Union, and are heavily restricted in Ontario.² The Government of Quebec has also moved recently to control the use of these chemicals. We encourage your government to take similar action, by seriously restricting and monitoring the use of neonicotinoids in the province, if not banning them outright.

While there are currently fewer than 50 beekeepers and less than 400 colonies in the entire province, increasing numbers of people are interested in taking up hobby beekeeping and several people are running commercial operations with the view to expansion. **The future of beekeeping in the province points to expanded production of honey and other products, commercial pollination services and other benefits.**

We believe there is some urgency to creating a robust regulatory framework to help us in the battle against invasive parasites and diseases, and prevent other problems such as those related to neonicotinoid pesticide use elsewhere in North America. When we see the rapidity with which honeybee pathogens spread across mainland North America, we understand better the reasons for regulation and other mechanisms that will help protect our unique honeybee populations.

¹ Source – Health Canada http://www.hc-sc.gc.ca/cps-spc/pubs/pest/_fact-fiche/neonicotinoid/neonicotinoid-eng.php

² See, for example, <http://www.ontariobee.com/issues-and-advocacy/ongoing-issues-and-actions/spring-2012-bee-poisonings/the-obas-position-on-neonicotinoid-pesticides>, and <http://www.cbc.ca/news/canada/nova-scotia/bees-honeybee-die-off-colony-collapse-acadia-neonicotinoid-1.3281622>

In sum, we believe that the best course of action with respect to the matters raised above is for your government to create a *Bee Act* that brings together regulations that are currently the responsibility of two or more departments. This new Act would include improved regulations to protect honeybees and the native bees of NL, a honeybee inspection program, a honeybee colony registration process, mechanisms for the restriction of neonicotinoid pesticides, and a framework for an all-encompassing municipal Urban Beekeeping Ordinance.

Our unique disease and pest free status here in NL has already attracted national and international attention.³ With the support of you and your government we can hopefully maintain this status well into the future while at the same time building a healthy and prosperous beekeeping industry.

We welcome your attention to the matters raised above at your earliest possible convenience.

Sincerely,

Dr. Dan Price, President

c.c. Honourable Perry Trimper, Minister of Environment and Conservation, Government of NL

³ See <http://www.cbc.ca/news/canada/newfoundland-labrador/newfoundland-bees-drawing-international-scientific-attention-1.2712922>