

**National Farmers Union
Submission
to the
Canadian Food Inspection Agency (CFIA)**

**A response to Notice of Changes to the Honeybee Importation
Prohibition Regulations 2004**

May 4, 2004

Ottawa, Ontario

Preface

The National Farmers Union (NFU) welcomes this opportunity to present its views on proposed changes to the Honeybee Importation Prohibition Regulations 2004, as outlined in the Canada Gazette, April 10, 2004.

The National Farmers Union is a voluntary, direct-membership organization which represents thousands of farm families across Canada. Founded in 1969 and chartered under an Act of Parliament in 1970, the NFU is committed to developing economic and social policies which maintain the family farm as the basic food producing unit in Canada. Membership in the NFU includes all family members and provides an equal voice for men, women, and youth in setting policy. NFU members believe the family farm must be supported as the foundation for a healthy and sustainable food system in Canada. We also believe that governments are primarily responsible for determining the structure of food production by the philosophical approach reflected through legislation and public policy. Therefore, we believe that we as farmers bear the responsibility to assist governments in creating legislation that promotes justice for farmers and the survival of rural communities.

The NFU is made up of farmers who raise a variety of commodities. Many of our members are apiarists who possess a wealth of experience and knowledge of beekeeping and honey production.

Introduction

In the Canada Gazette edition of April 10, 2004, the Department of the Solicitor General and the Canadian Food Inspection Agency (CFIA) indicate the Federal Government's intention to implement changes to the Honeybee Importation Prohibition Regulations, 1999. The new regulations would allow the importation of honeybee queens and their attendants from the continental United States, while retaining the prohibition of importation of packaged bees from the US.

The CFIA cites the support of a majority of provinces and the “changing positions of Canadian stakeholders” including the provincial beekeeping associations, as evidence that this is an appropriate time to exempt honeybee queens and attendants from the ban on imports. The CFIA’s risk assessment concedes that while imported honeybee queens and their attendants may be contaminated with diseases and pests such as parasitic mites, the likelihood of such contamination is less than with packaged bees. The agency concludes, therefore, that such risk is acceptable because the alleged benefits outweigh the potential costs.

The evidence gathered by the NFU, however, casts serious doubts on both the “consensus” the CFIA claims to have reached among stakeholders, and the suggestion that the change represents a “minor regulatory initiative” undeserving of a full cost-benefit analysis. The implications of this regulatory change for beekeepers, provincial governments, and consumers are both immediate and far-reaching.

Are Canadian stocks diminishing?

The CFIA contends that the border needs to be opened to the importation of honeybee queens to allow Canadian honey producers access to a less-expensive supply of queens. The CFIA suggests “Canadian beekeepers are no longer able to adequately supplement their domestic honeybee numbers from other traditional sources for importation.” Allowing imports of continental US queens and attendants, according to the CFIA, would result in an increase in the number of bee colonies as well as boost honey production for both the domestic and export markets.

To understand the implications of the CFIA’s proposal, it helps to look back to 1987, when the Canadian Government decided to close the border to continental American honeybees. At that time, the varroa mite was widespread in US honeybee stocks and posed a significant threat to Canadian hives. The ban has been maintained since that time not only because of the continuing presence of treatment-resistant varroa mite strains, but also because of the introduction of small hive beetle and antibiotic-resistant American Foul Brood (AFB) pests. The presence of Africanized honeybees (African “killer bees”) in the southern states has also been a factor in keeping the border closed.

The border closure in 1987 disrupted the standard practice of many beekeepers who imported relatively cheap bee packages from California in the spring, established the packages into hives to raise a crop of honey, and killed the bees off in the fall. The hives were then cleaned out, stored over winter and new packages purchased the following spring. While the border closure may have proved an inconvenience in the short term, the ban on imports has actually strengthened the Canadian beekeeping industry over the long run.

Even prior to the border closure, many progressive Canadian beekeepers had begun the practice of successfully over-wintering their hives in an effort to become more self-sufficient. These hives had to be “re-queened” periodically, usually every two years, to

ensure sufficient populations for the colonies. Over a number of years, these beekeepers discovered they could successfully raise their own queens. These home-grown queens, through a process of selection over many generations, gradually emerged with better genetic qualities than imported queens. These home-grown queens have actually helped increase average honey yield.¹

If beekeepers feel they cannot raise their own queens, Canadian queens are available on the market for Canadian hives. However, many of the beekeepers who are making the most noise about the importation of queens seem to be unwilling to change their management practices to take advantage of Canadian queens that become available from mid-May through July and into August. Instead, they order queens from off-shore in the spring (April – early May), and divide their overwintered hives, using these purchased queens. To take advantage of Canadian queens, hive management must be changed so that hive numbers are increased in the late summer using those young Canadian queens. Hives with young Canadian queens are more able to survive the winter. This higher survival rate reduces the need for early spring queens.

Canadian beekeepers are at a competitive disadvantage due to long winters and a relatively short season in which the bees are actively producing honey. However, these conditions also produce an unexpected side-effect which has worked to our advantage. Canadian bee stock genetics have improved dramatically since 1987. Canadian bee-breeding stock must survive the winter and then have a population explosion in the spring to capitalize on the short honey season. Even those beekeepers who feel they need to bring in package bees from Hawaii, Australia or New Zealand recognize the value of replacing the queens in those hives with Canadian stock as soon as they can. Some American beekeepers are also recognizing the superiority of Canadian bee stock and are importing it from Canada.² There is potential for market expansion into the US for Canadian queens, but this will not happen if the ban on US queen imports is lifted and Canadian stocks are contaminated.

Producers who raise their own queens have also found a ready market within Canada for the sale of those queens.³ Saskatchewan and Ontario beekeepers have also been working for the past several years with Russian queen bee stocks in an effort to have a varroa resistant line of honeybees that also produce a large quantity of honey.⁴ Clearly, imported queens from the United States are not necessarily the best, or even the least expensive, option for Canadian beekeepers.

¹ John Pedersen, Pedersen Apiaries, Cut Knife, SK. Critique of Honeybee Importation Prohibition Regulations 2004, April 15, 2004. On the Pedersen farm, average honey production between 1966 and 1984 was 140 pounds per hive. Average production in recent years is approximately 250 pounds per hive.

² Karen Pedersen, Pedersen Apiaries, Implications to the Repeal of the Honeybee Importation Prohibition Regulations, 2004, April 2004.

³ Ibid. John Pedersen. The Pedersens raise enough replacement queens for their own 900 hive enterprise, and also sell between 1200 and 1500 queens to other beekeepers annually.

⁴ Medhat Nasr and Geoff Wilson. Interim progress report – Importation of Russian Honey Bees for enhancing resistance to varroa mites in honey bees in Canada. Rutgers University, Chatsworth, NJ, USA and University of Guelph, Guelph, Ontario. SK Beekeepers Association Newsletter Winter 2001.

The CFIA document suggests that increased honey production, one of the supposed benefits of allowing imported continental US queens, will boost exports of honey and therefore “have a positive impact on the income of producers.” At the same time, it also states in another section of the same document that “increased honey production may foster competition in the marketplace, which may lower prices of honey and honey products for the consumer.” Canada is already a net exporter of honey, so Canadian honey prices are already dictated by world honey prices. Merely increasing exports does not automatically translate into improved net farm incomes.⁵ Moreover, the CFIA’s assertion that honey prices will decline as a result of the border opening can hardly be seen as a benefit to farmers.

In addition, simply increasing the number of queen bees or the number of colonies does not necessarily result in increased honey production. Adverse weather conditions, insecticide spraying at inopportune times, and diseases or pests are other factors which influence honey yield from year to year. After peaking in 1998, for example, Canadian honey production dropped dramatically the following year,⁶ while at the same time, the number of hives across Canada increased.⁷ In 1999, a long, cold wet spring and dry conditions in the Peace River area of Alberta played a big role in reducing honey yield by almost 50% from the previous year.⁸

It is questionable whether the border closure has had any significant negative impact on Canadian honey production. While the overall number of hives declined between 1987 and 1994 due primarily to disastrously low prices for honey, that trend has been reversed in the past decade. Since 1994, the total number of hives in Canada, and western Canada in particular, has continued to increase despite the closed border.⁹

The CFIA contends that because “difficulties were encountered by beekeepers in obtaining the necessary number of honeybees for the 2003 spring season due to the deterioration in the health of Canadian honeybees, over-wintering losses and limited availability of replacement honeybees” from overseas, the border should be opened to US queens. But as with any farming operation, there are annual variations in production due to a variety of factors. Overall, the continuing rise in colony numbers over the past decade indicates that, rather than suffering a decline, the Canadian honeybee population

⁵ National Farmers Union brief, “The Farm Crisis, Bigger Farms, and the Myths of “Competition” and “Efficiency”, November 20, 2003. While Canadian exports and gross farm revenues have climbed, net farm incomes have plummeted. Operating expenses have effectively eaten up the difference.

⁶ Statistics Canada and Canadian Honey Council. In 1998, Canadian beekeepers produced approximately 46.1 thousand tonnes (101.4 million lbs) of honey. In 1999, production fell to approximately 37.1 thousand tonnes (81.8 million lbs) of honey.

⁷ Statistics Canada. In 1998, there were 563,614 hives in Canada. In 1999, the number of colonies had increased to 588,824.

⁸ Ibid. Agriculture and Agri-Food Canada.

⁹ Statistics Canada and Canadian Honey Council. Between 1994 and 1999, the number of hives rose by 87,559 units, from 501,265 hives to 588,824 hives. Colony numbers peaked at 602,328 hives in 2001 before falling again in 2002 to 585,683. Despite the drop in the number of hives, however, honey production in 2002 was nearly 2000 tonnes higher than the year before.

is thriving. In some instances, over-winter kill losses can reach as high as 25% without the farm suffering any adverse impact on total colony numbers.¹⁰

Opening the border endangers the health of Canadian stocks

While Canadian bee colonies have generally increased in population strength and production, the same cannot be said for the continental US honeybee population. The US colony count has been on a gradual decline for many years¹¹ due in large part to varroa mite, antibiotic-resistant AFB, small-hive beetles and Africanized honeybees.¹²

The most important step the CFIA can take toward expanding bee stocks is to ensure that the current domestic bees are allowed to exist in an environment which is free of diseases and pests. Alternately, the CFIA could support Canadian beekeepers' efforts toward strengthening domestic bees' genetic traits to allow them to combat these diseases and pests. Importation of Russian stocks which are resistant to Varroa mite is one example. It is essential that the border remain closed to the importation of bee stocks which can permit the spread of pests and diseases. In addition, the commercial transport of bees within Canada itself must remain subject to provincial regulations to prevent the spread of pests and disease.

The CFIA's risk assessment clearly admits that queens from the continental US are likely to be contaminated with treatment-resistant varroa mites, antibiotic resistant AFB and small-hive beetles. However, the CFIA justifies their importation because the risk is somewhat lower than bringing in boxed bees. This is unacceptable. By allowing the importation of queens from the US, the CFIA will be implementing a policy that deliberately accelerates the contamination of existing Canadian hives with deadly bee diseases and pests. This hardly sounds like a sound method of boosting the health, or the quantity, of bee stocks in Canada.

Rewarding the smugglers won't stop illegal imports

While varroa mites have been detected in Canada, this cannot be entirely attributed to natural drift across the border. If that was the case, one would expect the majority of cases to be found close to the US border. In fact, the Peace River region of Alberta was

¹⁰ John Pedersen. Ibid. Pedersen Apiaries suffered a 25% winter loss in 2002-03, but was still able to replace the loss and expand the overall hive count by almost 100 hives by the end of 2003, without buying any outside bees or queens. Not only did this farm re-queen its own hives, it also sold 1200 queens and 1600 queen cells to neighbouring beekeepers. By raising their own replacement queens, farmers would have a better chance of having their bees survive the winter.

¹¹ United States Department of Agriculture - Agricultural Statistics Board – Honey. The most recent peak in US honey production was in 2000, when 221 million pounds of honey were produced from 2.63 million colonies. In 2003, there were 2.59 million colonies which produced 181 million pounds of honey.

¹² Gil Pedersen, Pedersen Apiaries, Letter to Dr. Samira Belaisaoui, Canadian Food Inspection Agency, April 16, 2004.

where varroa mites were first found. This indicates that smuggling was the likely cause. When varroa was detected in Saskatchewan, the area was quarantined and the borders subsequently closed, resulting in virtually no spread of the mites. In Alberta, by contrast, the spread of varroa mites has been a constant problem because of smuggling by individuals who have been very vocal in their calls for an open border.

By opening the border to honeybee queens from the US, the CFIA document suggests the incidence of smuggling of honeybees into Canada will decrease. Obviously, when smuggling is legalized, it ceases to be a crime. But it doesn't alleviate the underlying problem. In fact, it opens up the possibility of even greater problems in the future. By legitimizing the smuggling which has been taking place over the past decade, the federal government is simply encouraging those beekeepers who are unwilling to accept regulations of any kind.

While the CFIA notes in its proposal that “any shipment of bees” which “does not meet the regulatory requirements... will be required to be removed from Canada”, it does not spell out the regulatory requirements. If we assume that the border inspection regulations which are put in place are enforceable, this will no doubt translate into additional costs for Canadian beekeepers who import the continental US queens. This will wipe out one of the supposed advantages of these queens – namely that they will be cheaper than competing stock.

In addition to facing increased challenges from outside the law, the Canadian Government could also face new challenges through the courts. If the import restrictions are lifted on queen bees, the US may have grounds to challenge the continuing ban on packaged bees under the North American Free Trade Agreement (NAFTA) and the World Trade Organization (WTO). Since the queens will have a likelihood of contamination from pests and diseases, Canada would no longer be able to claim the restrictions are to prevent the spread of those pests and diseases. In the long run, the border may have to be opened under these trade rules to allow American or Canadian “migratory operators” bringing hives from the southern US states to Canada every summer. This would prove disastrous for the Canadian beekeeping sector because of the very serious threat posed by the introduction of Africanized killer bees through this method.

Africanized stock poses a threat

The presence of the Africanized bee population in the southern United States is a confirmed fact, and the potential for introducing this genetic strain into Canada is a primary reason for retaining the ban on continental US queens and bee imports. Since their escape from test hives in Brazil in 1956, Africanized bees have been spreading both south and north at a rapid rate. The Africanized or “killer” bee is known for its extremely aggressive behaviour and its propensity to propagate. Africanized colonies will swarm three or four times in a season, producing several “afterswarms” in the process. This

results in ten to fifteen swarms per year from a single Africanized hive.¹³ The “killer bee” moniker was attached to this strain of honeybee because of its tendency to be easily provoked. Simply walking past a hive can result in a swarm of thousands of bees descending on the passerby. This massive overdose of bee venom can kill the victim. For example, between 1975 and 1988, 350 Venezuelans were killed by Africanized bees.¹⁴

While these Africanized bees are thriving in the warm climates of Texas, Nevada, Arizona, New Mexico and California, and could spread into Louisiana, Florida, Georgia and Alabama, it is unlikely they will make their way naturally into Canada. Mark Winston, a prominent bee researcher, believes this strain will be unable to survive the harsh Canadian winters. He points out the southward spread of killer bees was halted in northern Argentina because of the cooler climate.¹⁵ However, the bee flying season in Canada corresponds to the summer months. If Africanized bees are brought to Canada during the summer, Canadians have every reason to be concerned. Through the importation of continental US queens from regions near Africanized bees, the Africanized bee strain could be brought to Canada. Additionally, if the US were to successfully challenge the Canadian restrictions on importation of bee packages based on the exemption for continental US queens, this would open the border to migratory operators bringing in hives from the southern US.

It is not enough to distinguish the parentage of US continental queens as a means of filtering out the Africanized strain. It is also important to know whether the queen was mated to Africanized drones. As experienced queen breeders are quick to point out, it is physically impossible to completely control which drones a queen will mate with while they are flying. A queen mates with an average of 10 drones, and it only takes a single drone from a wild Africanized colony to create a serious problem.

By opening the border to this problem, the Canadian Government is opening itself, and Canadian beekeepers, to very serious potential liabilities. If a swarming incident by Africanized bees occurred near a Canadian beekeeper’s hives, it is likely that beekeeper would be held responsible, even if the bees involved were wild and did not come from those hives. The Canadian Government, knowing full well that the only way Africanized bees can enter Canada is through legal regulated importation (or illegal unregulated smuggling encouraged by the partially-open border), may be held liable for not preventing this situation.

The threat of inevitability forces “consensus”

The CFIA suggests that the proposal to partially open the border is the result of “changing positions” of the provinces and key stakeholders in the industry. In fact, there is no consensus for removing the ban on continental US bee imports. At the beekeepers

¹³ Mark Winston. “Invader from the South: The Africanized ‘Killer’ Bee” in Bee Masters Short Course, 1998. Simon Fraser University.

¹⁴ Mark Winston, Ibid.

¹⁵ Mark Winston, Ibid.

industry conference held in Kelowna, BC in October, 2003, a “consensus of sorts” was hammered out, but it was “based on some agreement between the CFIA and the various provincial authorities regarding information sharing as to who was importing queens from the continental US.”¹⁶ At present, there appear to be no plans on the part of CFIA to share import information with the provinces.

In addition, there are a number of provincial beekeepers associations, including Saskatchewan and Ontario, which are opposed to the reopening of the border to bee imports. The consultation that the CFIA engaged in was done under the threat of inevitability. Stakeholders were told the border would open, and that the only way to influence how it was done was to agree to participate in the “consensus”.

Clearly, the provinces and provincial beekeeping associations are not unanimous in their positions with respect to these proposed regulations. Aside from the issue of information sharing, provinces also have their own existing legislation aimed at controlling the entry of honeybees across their boundaries. Existing provincial legislation enables any concerned province to prohibit the entry of unwanted honeybees into the province. The proposed regulations will seriously undermine provincial jurisdiction in this area. But while provinces will have less say in the importation of honeybees, they will be expected to carry the additional costs associated with the inevitable spread of pests and diseases. As the CFIA document states: “There may also be increased costs to provincial governments for disease control if there occurs a faster dissemination of treatment resistant pests and diseases which already exist in Canada.” This is clearly another example of the Federal Government downloading costs onto the provinces.

Conclusion

In summary, the National Farmers Union opposes the Honeybee Importation Prohibition Regulations, 2004 for a number of reasons:

1. Canadian bee stocks are relatively healthy, with an abundant supply of queens from breeders in Canada. There is no need at this time to lift the restrictions on queens and attendants from the continental US.
2. The closing of the border in 1987 has done much to prevent the spread of treatment-resistant varroa mites and other pests and diseases across Canada. Opening the border to US queens will accelerate the spread of diseases and pests prevalent in the United States.
3. The potential introduction of Africanized killer bees poses serious threats to the health of Canadian bee stocks and the health of Canadian citizens.
4. Any economic benefits to producers will be more than offset by the costs – including direct costs to producers who import queens, neighbouring beekeepers whose colonies could be exposed to imported pests and diseases, and to provincial governments who must pick up the costs of dealing with the accelerated spread of pests and diseases.

¹⁶ John Pedersen, Letter to CFIA, April 15, 2004, *ibid*

5. Legitimizing the current smuggling practices of some unethical beekeepers will only reward them for past behaviour, and whet their appetite to smuggle in packaged bees.

**All of which is respectfully submitted by
The National Farmers Union**