

Date: January 10th 2017

To the City of London's Planning and Environment Committee and City Council,

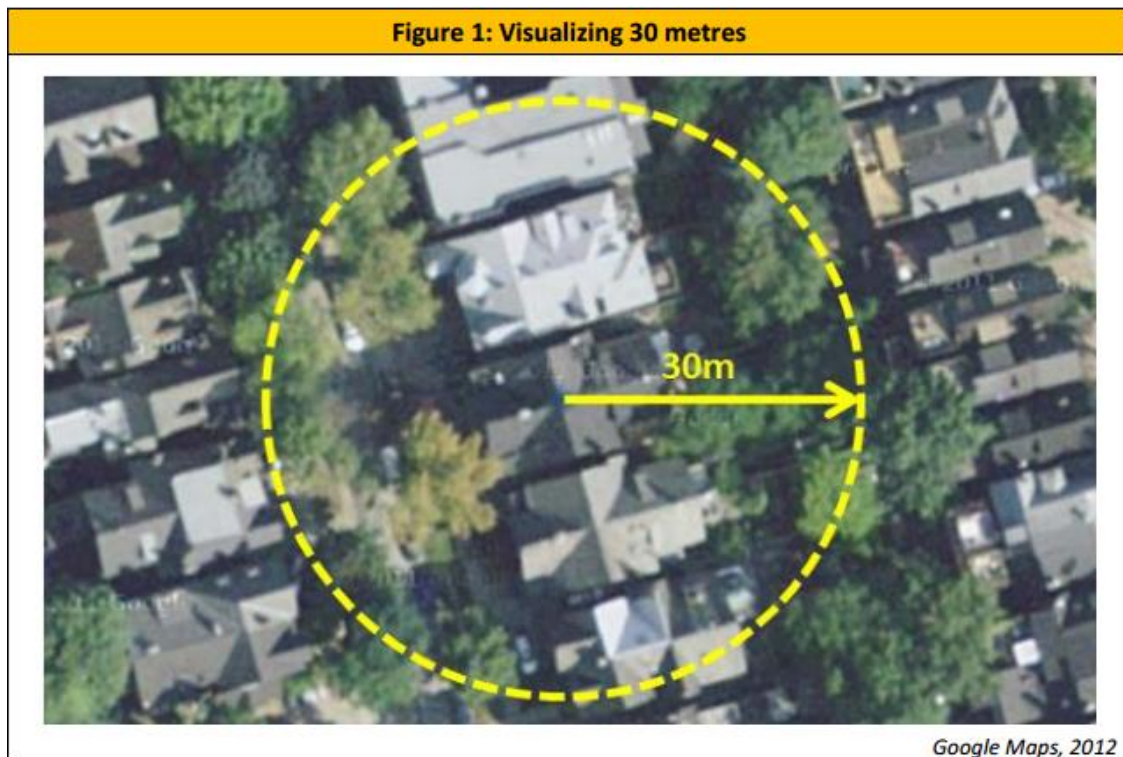
The Agricultural Advisory Committee to the City of London recommends that Council request the Ontario Ministry of Agriculture, Food and Rural Affairs review and amend the *Ontario Bees Act* to remove the 30 metre setback requirement regarding the location of hives, thereby allowing Ontario municipalities to create their own bylaws which could permit urban beekeeping.

Pollinators are in decline across North America (Kerr, 2015; Packer, 2011) and many parts of the world, to an extent that the UN Food and Agriculture organization has identified this as a major threat to global food security (FAO 2016). Bees are the most important pollinators in many parts of the world, and the decline of both domesticated and wild bee populations has begun to have very damaging impacts on agriculture on a world scale, and could lead to potentially catastrophic disruptions in ecosystem function (Steffan-Dewenter and Potts, 2005; Packer 2011), with risks greatly amplified by climate change. Agriculture is one the main economic activities within the municipalities surrounding the city of London. Urban agriculture is also a growing practice within the city. For these reasons, we are very concerned with the plight of both domesticated (honey) and wild bees.

There is growing evidence that urban beekeeping is excellent for bees: cities, often imagined as concrete wastelands, are full of plant diversity that offer ample pollen and nectar for bees (Packer and Willis, 2009; Kaluza et al, 2016; Frankie et al, 2009; Westrich, 2016; Garbuzoy et al; Larson and Kesheimer, 2015). Pesticides, which kill harmful as well as beneficial insects, are used far less in cities than rural areas. A city that buzzes with honeybees from backyard hives will also be an excellent place for wild bees, who are more at risk than their domesticated cousins, because beekeepers tend to plant gardens and create habitats that benefit all bees.

In the province of Ontario most urban beekeepers are violating the *Ontario Bees Act*, because they violate the 30 m rule which states that "No person shall place hives or leave hives containing bees within 30 metres of a property line separating the land on which the hives are placed or left from land occupied as a dwelling or used for a community center, public park or other place of public assembly or recreation" (Ontario Ministry of Agriculture). This rule effectively makes backyard beekeeping in cities almost impossible.

Although we understand that this part of the *Ontario Bees Act* is only enforced on a complaint basis, of which the Ministry receives very few each year, we feel the rule hinders the growth of urban beekeeping in Ontario. People excited to begin beekeeping are discouraged from setting up a backyard hive because they do not want to violate legislation. The 30 m rule keeps some backyard beekeepers from registering their hives with the Ontario Ministry of Agriculture, a practice that may be disastrous if a disease such as Foul Brood, strikes a nearby hive. Although the Ministry requires all beekeepers to register their hives, even if they violate the 30 m rule, many beekeepers are afraid of having their hive removed if they do so.



**Example of distance that a 30m setback requires (Toronto neighbourhood).
Credit: Sustain Ontario, 2012, Towards a New Approach to Beekeeping Policy in Ontario.**

Other regions in Canada offer models for how beekeeping can be regulated within cities. Calgary allows bees to be kept as long as they are 20ft from an adjacent property and only have 2-4 hives (Sustain Ontario, Urban Beekeeping Policy). Vancouver allows for urban bees under the City Beekeeping Guidelines and requires a 25ft setback from adjacent properties and only 2-4 hives as well (Sustain Ontario, Urban Beekeeping Policy).

Edmonton, for example, allows beehives within 3 metres of the property line and waives this rule if the property owner installs a 6 ft. high fence or hedge. In addition, they regulate and license urban beekeepers to make sure they follow best practices (City of Edmonton, Urban Beekeeping). The city of Edmonton has also launched an impressive bee education campaign to encourage residents to feel comfortable living in close proximity to bees (City of Edmonton, Bee Myths). On their website the city of Edmonton states,

“Urban beekeeping can help improve pollination for plants in Edmonton, which in turn helps to improve the overall biodiversity and resilience of our city. Urban beekeeping can also provide valuable educational and recreational opportunities for people to connect to nature and to our food system. Beekeeping is a completely safe activity in residential areas with good management practices” (City of Edmonton, Urban Beekeeping).

Although this is just one of many models for urban beekeeping, we feel the urgency of the pollinator crisis and the importance of bees to urban, peri-urban, and rural agriculture requires a change in the *Ontario Bees Act* to allow for small-scale beekeeping in urban centres.

Our recommendation also ties in well with the London Plan, as it would support policy that contributes to urban beekeeping and pollinator health. In the Food Systems chapter there are numerous references to pollinators, including to;

“Promote London as a pollinator sanctuary, considering how we can create and support environments that are conducive to pollinators in all of the planning and public works we are involved with, recognizing the important role that pollinators play in our long-term food security.”(City of London, London Plan)

This recommendation would support already existing plans that London has to be a greener city that cares about food security and pollinator health. Overall this recommendation would put London on the map as a green, pollinator friendly city and help our local food system.

Sincerely,

References

- City of Edmonton. Urban Beekeeping.
https://www.edmonton.ca/city_government/urban_planning_and_design/beekeeping-pilot-project.aspx Accessed Oct 22, 2016
- City of Edmonton. Bee Myths.
https://www.edmonton.ca/city_government/urban_planning_and_design/beekeeping-video-gallery.aspx. Accessed Oct 22, 2016
- City of London. (2016). The London Plan, Food System. <http://www.london.ca/business/Planning-Development/Official-Plan/Documents/London-Plan-Final-July2016-spreads-reduced.pdf>. Accessed on January 3, 2017
- FAO (2016). Pollinators Vital to our food supply under threat.
<http://www.fao.org/news/story/en/item/384726/icode/>, accessed Sept 6, 2016
- Frankie, G.W., Thorp R.W., Hernandez, J., Rizzardi, M., Ertter, B., Pawelek, J.C....Wojcik, V.C. (2009). Natives bees are a rich natural resource in urban California gardens. *California Agriculture*, 63(3), 113-120
- Frankie, G.W. (2009). Ecology of Urban Bees: A review of current knowledge and direction for future study. *Cities and the environment*, 2(1), 3-15
- Garbuzov, M., Schurch, R., & Ratnieks, F. (2015). Eating locally: dance decoding demonstrates that urban honey bees in Brighton, UK. Forage mainly in the surrounding urban area. *Urban Ecosystems*, 18(2), 411-418
- Kaluza, B.F., Wallace, H., Heard T.A, Klein, A.M, & Leonhardt, S.J. (2016). Urban gardens promote bee foraging over natural habitats and plantations. *Ecology and Evolution*, 6(5), 1304-1316
- Kerr, J, Pindar, A., Galpern, P., Packer, L., Potts, S.G., Roberts, S.M....Pantoja, A. (2015). Climate change impacts on bumblebees coverage across continents. *Science*, 349(6244).
- Larson, J.L. & Kesheimer, A.J. (2014). Pollinator assemblages on dandelions and white clover in urban and suburban lawns. *Journal of Insect Conservation*, 18(5),
- Ontario Ministry of Agriculture. (2009). Bees Act. <https://www.ontario.ca/laws/statute/90b06>, accessed August 25, 2016
- Packer, L. (2011). *Keeping the Bees: Why all bees are at risk and what we can do to save them*. Harpers-Collins Press.
- Packer, L. & Willis, E. (2009). Can green roofs provide habitat for urban bees. *Cities and the Environment*, 2(1),
- Peters, K.A. (2012). Keeping bees in the city? Disappearing bees and the explosion of urban agriculture inspire urbanities to keep honeybees: why city leaders should care and what they can do about it. *Drake Journal of Agricultural Law*, 17(3),
- Steffan-Dewenter, I. & Potts, S.G. (2005). Pollinator diversity and crop pollination services are at risk. *Trends in Ecology & Evolution*, 20(12),

Sustain Ontario. (2012). Urban Beekeeping Policy in Ontario.

<https://sustainontario.com/custom/uploads/2012/12/FINAL-REPORT-Urban-Beekeeping-Policy-in-Ontario-December-2012.pdf>, accessed January 10, 2017

Westrich, P.A. (2016) Influence of the reduction of urban lawn mowing on wild bee diversity. *Journal of Hymenoptera research*, 49(1), 51-63