Follow Up from AAC Meeting:

That the Chair of the Agriculture Advisory Committee (AAC) BE REQUESTED to draft a letter to the Hon. J. Leal, Ministry of Agriculture, Food and Rural Affairs with respect to when Ontarians can expect consultation opportunities related to The Bees Act; it being noted that the letter will be provided for the March agenda of the AAC, for review.

Draft of Letter - Information and references provided by Becky Ellis

To: Hon. Jeff Leal Minister of Agriculture, Food and Rural Affairs 11th Flr, 77 Grenville St Toronto, ON M7A 1B3

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 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 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.

The Government of Ontario's Pollinator Health Action Plan (PHAP), which was released on December 15, 2016 proposed a number of potential actions that the province could take to address honey bee diseases, pests and genetics, including a recommendation that the government release for consultation a discussion paper to modernize the province's legislative framework on beekeeping. Among other components, these modernization proposals could include provisions related to updated requirements for the location of hives.

As representatives of Agricultural Advisory Committee to the City of London, we recommend the London City Council urge the Ontario Ministry of Agriculture to let Ontarians know when they can expect consultation opportunities related to The Bees Act, as outlined in the PHAP.

We would like to know when these expected consultations could occur and would like to provide input on the Bees Act in regards to the above aforementioned issues. We would also like to circulate to the urban and rural stakeholders who would like to provide feedback on the Bees Act.

Sincerely,

Agricultural Advisory Committee
City of London

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