

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

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, as soon as possible.

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.

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

References - Research provided by Becky Ellis

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

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),

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