



June 27, 2018

RE: *New bee yard at Hamilton port lands to help level population* (June 11, 2018)

It's wonderful to see organizations, like Humble Bee and the Hamilton Port Authority, come together to support pollinator populations and educate Canadians on the importance of bees in our ecosystem. Honey bees, bumblebees, and many wild pollinators play a critical role in the production of fruits, vegetables, and other crops; and few value this more than Canada's farmers.

Despite the reported challenges that Canadian beekeepers have faced in recent years, data from Statistics Canada show that the number of honey bee colonies has actually increased by nearly 40% from 2011 to 2016. Bee health is complex and subject to a combination of factors. In a survey conducted by The Canadian Association of Professional Apiculturists (CAPA), Canadian beekeepers identified their four main concerns with respect to bee health as being harsh and unusual weather conditions, failure in monitoring for and managing the parasitic mite called *Varroa destructor*, inadequate fall food supply, and low quality of queen stocks. Factors that may also impact honey bee health include other pests and pathogens; climate change, habitat loss and poor hive management.

Concerns over neonicotinoids have overwhelmed the dialogue surrounding bee populations in recent years, with rhetoric that unfairly paints farmers as being at opposition with bee health; when nothing could be less true. In crop farming, neonicotinoids are often applied to seeds which are then planted directly in the ground. This approach reduces the risk to non-target organisms because the amount used is considerably less than would be needed for a foliar (spray) application and less likely to come in direct contact with foraging bees. Dust created during planting has been identified as a potential point of exposure to neonicotinoids. This risk is manageable, and farmers have made significant changes to their farming practices to further reduce this risk including the use of fluency agents, dust shields on planting equipment and improved communication with local apiarists.

Farmers understand their obligation to protect pollinators, and have adopted strategies such as Integrated Pest Management (IPM), that take this into consideration when making pest management decisions. IPM incorporates several methods of pest control including mechanical tools, biological and cultural controls, and pesticides. This approach considers what's best for the land, nearby wildlife and pollinators, weather conditions, the time of year, and what is going to be effective in managing the pest. Considerable effort has been made to boost and support pollinator populations on farms by incorporating flowering plants as cover crops or into buffer zones, riparian areas, and marginal land.

It's clear that agriculture has a role to play in bee health, but it's important to not undercut the effort made by Canadian farmers to protect and promote pollinators.

Sincerely,

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