



BRIEFING

September 2025

**SUBJECT: URGENT ACTION REQUIRED TO ADDRESS REGULATORY FAILURES
HARMING THE CANADIAN BEEKEEPING INDUSTRY AND THREATENING FOOD
SECURITY**

Executive Summary

The Canadian commercial beekeeping industry is foundational to national food security and the agricultural economy, enabling the pollination of crops that contribute over \$43 billion annually. However, the industry's viability is being severely undermined by a pattern of detrimental decisions and a lack of meaningful engagement from federal regulators, specifically the Canadian Food Inspection Agency (CFIA) and the Pest Management Regulatory Agency (PMRA). Outdated policies, regulatory inaction, and unfair trade practices are inflicting direct economic harm on Canadian beekeepers. We need immediate government intervention to implement a collaborative framework that addresses critical failures in stock replacement, honey adulteration, and access to essential treatments.

Introduction: Honey bees are essential to Canada's food and feed security

Commercial beekeeping is not a niche sector; it is an **essential** service for Canadian agriculture. Honey bees are critical for the pollination of 21 distinct crop types, including fruits, vegetables, oilseeds, and forage. High-value crops, such as hybrid seed canola and blueberries, are entirely dependent on bee pollination. The blueberry industry on both coasts is heavily dependent on bees for pollination and is chronically under-pollinated and is facing higher than required costs and lower production than would occur with a healthy bee industry in Canada. Honeybees contribute \$4 - \$5 billion in additional harvest value to hybrid canola seed, which the canola industry then amplifies to more than \$43 billion annually to the

Canadian economy. The stability of these sectors and the security of Canada's food supply chain are directly linked to the health and sustainability of our nation's bee populations. Without a healthy domestic beekeeping sector, yields and food security are at risk.

The Challenge: A Systemic Disconnect Between Regulators and Industry

Despite the industry's critical importance, federal agencies such as CFIA and PMRA consistently develop and enforce policies without adequate expertise or consultation with commercial beekeepers. It is becoming increasingly clear that the advice they are getting is from people with their own agenda that is not based on current scientific fact. It is important for policy makers and regulators to understand that bees are unlike any other livestock animal. The current Ottawa-centric approach has resulted in a regulatory environment that is disconnected from the realities of modern beekeeping. Decisions concerning bee health, stock replacement, trade, and business risk management have proven to be not just ineffective but actively harmful to the producers they are meant to support. The mandates of the CFIA and PMRA—to protect health, the environment, and the food supply—are failing the very producers who form the backbone of that supply.

Key Issue 1: Failures in Colony Health and Survival (Stock Replacement & Mite Treatments)

Canadian beekeepers face enormous operational challenges due to interconnected regulatory failures that cripple their ability to maintain healthy colonies.

- **Crippling Restrictions on Stock Replacement:** The CFIA continues to enforce an obsolete 1987 prohibition on packaged bees from the United States, citing pest concerns. This policy persists despite clear evidence that the border restrictions did not stop the introduction of tracheal or varroa mites into Canada. There is clear scientific evidence that both Small Hive Beetle and Africanized Bees are climate-restricted and do not pose a threat to Canada, yet they are falsely listed as risks. The CFIA's refusal to meet with industry leaders to develop a modern, science-based importation protocol is unacceptable. While access to U.S. stock is denied, imports from other nations carrying the same pests of concern continue, revealing a deep inconsistency in regulatory application.
- **Delayed Access to Essential Miticides:** The PMRA's prolonged approval process for safe and effective organic Varroa mite treatments, such as Oxalic Acid and Glycerin, is jeopardizing the health of bee colonies nationwide. As beekeepers struggle with Varroa mite resistance to existing treatments, this regulatory delay restricts their ability to

protect their colonies, leading to preventable losses. Instead of expediting these approvals, the PMRA is penalizing beekeepers trying to keep their bees alive in a hostile environment caused by government inaction.

Key Asks:

- We want to work towards regaining industry viability and success as a focus, rather than focusing on the agencies keeping themselves safe.
- We request that a working group be established between representatives of the Commercial Beekeeping industry with the representatives of CFIA.
- Establish a collaborative, science-based protocol for the safe importation of honey bee packages from the United States.
- Utilizing the same assumptions and Monte Carlo Simulation applied to the 2023/24 risk assessment, conduct risk assessments for bee stock from Australia and Italy, and a first-ever risk assessment for New Zealand, applying consistent standards across all import sources.
- Working with the United States, support the development economically viable north American bee stock.
- Expedite the PMRA's approval of safe, proven organic Varroa mite treatments and provide funding for the development of new synthetic miticides.

Key Issue 2: Unfair Competition and Fraud in the Honey Market

The current federal framework systematically disadvantages Canadian honey producers in their own market. Domestic producers are subject to direct, prescriptive oversight, while importers rely on paperwork verification, a system vulnerable to fraud. The absence of a mandatory, robust testing program for honey adulteration allows cheaper, fraudulent products to flood the market, undercutting Canadian beekeepers and deceiving consumers. We have seen massive increases in fraudulent imports where many are found non-compliant, yet Canadian honey is consistently pure. This regulatory asymmetry has created an unlevel playing field that erodes the integrity of and trust in the Canadian honey market.

Key Asks:

- Implement a mandatory honey adulteration testing program for all imported honey at the importer's expense, with clear and enforceable penalties for non-compliance.
- Establish and enforce uniform definitions of honey adulteration for both domestic and imported products.

Emerging Threats: Government Unpreparedness for Tropilaelaps Mite

It can be useful to think about two contributors to risk: the likelihood of a bad outcome occurring, and the severity of that outcome. It can be helpful to consider these components

of risk separately. Considering the potential arrival of parasitic mites to North America, different actions are required to address the likelihood of arrival and the severity of impacts. For *Varroa*, it is too late to manage the likelihood of arrival, as it has arrived and spread across all of North America. For *Varroa*, all we can do is manage the second component of risk – the severity of its impacts.

Tropilaelaps mites have not gotten to North America – yet. Therefore, we, in the U.S. and Canada, have an opportunity to manage both the likelihood of its arrival and prepare to manage the severity of its impacts.

The *Tropilaelaps* mite represents a catastrophic, near-term threat to Canada's bee population. The CFIA has already nearly allowed its introduction through a poorly conducted risk assessment, combined with the opening of the border to Ukrainian imports. The continued import of bees from Australia poses a severe threat; this source has a demonstrated history of poor biosecurity, having introduced *Varroa* mites into Canada before the pest's arrival was even formally acknowledged in Australia. Despite Australia sending investigators to Canada to identify this failure, there has been no followup by the CFIA with Canadian beekeepers who received the contaminated packages. *Tropilaelaps* will be far worse than anything we have seen before, and there is no chance of eradication once it arrives. The industry sees no evidence of a coordinated federal strategy to prepare for its arrival or management, once it is here. This lack of preparation puts the entire agriculture sector at risk in both North and South America.

Key Asks:

- Halt imports from Australia and Italy entirely until a proper scientific risk assessment is performed that addresses the significant threat of *Tropilaelaps* mite.
- Establish a formal, funded working group—modeled on Animal Health Canada—to develop and implement a comprehensive national surveillance and rapid response plan for the *Tropilaelaps* mite.

The commercial beekeeping industry is a partner in Canada's success. We expect to be treated as such. We are prepared to work with the government, but inaction is no longer an option.

Summary & Call for Immediate Action

To reverse the ongoing damage and secure the future of Canadian beekeeping, the Alberta Beekeepers Commission requests that the federal and provincial governments take the following actions:

1. **Using the Animal Health Canada model, establish a collaborative, science-based protocol** for the importation of honeybee packages from the United States, mandating that the CFIA work directly with the commercial beekeeping industry.
2. **Conduct updated risk assessments** for bee stock from Australia and Italy, and a first-ever risk assessment for New Zealand, applying consistent and stringent standards across all import sources.

3. **Halt imports from Australia and Italy** until a proper scientific risk assessment is performed that addresses the current threat of *Varroa* mite and the significant threat of *Tropilaelaps* mite.
4. **Expedite the PMRA's approval** of safe, proven organic *Varroa* mite treatments (e.g., Oxalic Acid and Glycerin) and provide federal funding for the development of new synthetic miticides.
5. **Implement a mandatory honey adulteration testing program** for all imported honey at the importer's expense, with clear and enforceable penalties for non-compliance.
6. **Re-establish a National Bee Health Survey that CFIA and AAFC support and endorse**
7. **Establish a formal, funded working group**—modeled on Animal Health Canada—to develop and implement a comprehensive national surveillance and rapid response plan for the *Tropilaelaps* mite.

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