



311 – 471 Queensway Ave  
Kelowna, BC V1Y 6S5

September 30, 2009

Dear BCHPA Executive Member

In recent years BC bee keepers have been faced with the scourge called Varroa mite which has had a significant impact on health and productivity of bee hives. Hives weakened by mite infestations have become susceptible to winter kill, and more disease and virus problems.

Pesticides used for the control of mites and other pests in hives and on bees are regulated by Health Canada's Pest Management Regulatory Agency (PMRA) under the federal Pest Control Products Act (PCPA). The PCPA requires that pesticides must be used according to the Canadian label and can only be imported if they have been registered in Canada. Beekeeper's hives are subject to inspections and sampling to ensure label directions have been followed. Drug use to control disease problems is regulated under different legislation and so the rules for import and use are different. Import of drugs for own use is permitted and regulatory monitoring, conducted by Canadian Food Inspection Agency (CFIA) is done to ensure there are no prohibited residues or residues that exceed legislated limits (MRL) in marketed product (honey, wax etc).

This letter summarizes the current situation with regard to the regulation of pesticides and what bee keepers need to know to ensure they are not in violation of the Pest Control Products Act.

Inspections of bee yards by PMRA have been conducted in BC since 2001 to ensure only registered pesticides were being used in hives and used according to label. Inspections of bee hives began when it was suspected that pesticides were being used incorrectly and not according to label directions. These inspections have been conducted with expert advice and help from provincial apiculturists.

Since inspections of BC bee yards started in 2001 there have been many enforcement actions taken to correct misuse of pesticides by bee keepers. The most severe actions have been the issuing of ten Notice of Violations under the Agriculture Administrative Monetary Penalties Act. When a Notice of Violation is issued, the infraction can be published along with the name of company and a brief description of what happened.

Most of the violations involved leaving pest strips in the hives longer than the label prescribed period. However other violations found, included use of unregistered pesticides and unsafe use of pesticides in the bee yard.

The following table summarizes when and where these NOV's were issued:

Date NOV issued	No. & Type of NOV's issued	Home Location of Bee Keeper
2002	1 NOV Warning	BC
	2 NOV Warnings	Alberta
2003	3 NOV Warnings	Alberta
2006	1 NOV Warning	BC
	1 NOV Penalty (\$4,000)	Alberta
2007	1 NOV Penalty (\$4,000)	Alberta
2008	Min.of Env - Ticket	BC
2009	1 NOV Warning	BC

Formic acid is a product used by beekeepers to control mites in hives. Beekeepers have been able to purchase and use formic acid if it is used as directed in the CAPCO C94-05 note published by the PMRA. In June of 2009 PMRA issued a notice of its intent to cancel the provisions allowing the use of 65% liquid formic acid by December 31, 2010. This means that after that date only **registered formic acid** will be legal for use. Currently a final decision has not been reached and there have been requests by industry to extend the cancellation date.

The following table lists products that are classified as pesticides and subject to the Pest Control Products Act and Regulations and have been used by bee keepers. Also indicated in this table is whether or not the product is registered and therefore legal to use.

<b>Pest</b>	<b>Product Name</b>	<b>Active</b>	<b>Registration Status</b>	<b>Comments</b>
Varroa	Apistan Pest Strips PCP 23023	fluvalinate-tau 10.25%	Full Registration	Treatment period 42 days
Varroa	Check Mite + Pest strips PCP 27147	coumaphos 10%	Full Registration	Treatment period 42-45 days. Wait 14 days before replacing honey supers
Small Hive Beetle	CheckMite + Pest Strips PCP 27147	coumaphos 10%	Minor use Registration	Treat 42-45 days. Wait 14 days before replacing honey supers
Varroa	Apivar Pest Control Strip PCP 29092	amitraz 3.33%	Emergency Registration Aug 08-Apr09	Treatment period min 42 days max 56 days
Varroa	NOD 65%	formic acid	Full	

<b>Pest</b>	<b>Product Name</b>	<b>Active</b>	<b>Registration Status</b>	<b>Comments</b>
Tracheal Mites	Formic Acid PCP 27834	65%	Registration	
	NOD Formic Acid Pad PCP 27835	formic acid 47.65%	Full Registration	
	Nod Away II Formic acid PCP 27836	formic acid 47.65%	Full Registration	
	Formic acid CAPCO 94-05	formic acid 65%	Interim until Scheduled under PCP regs	Direction for use on CAPCO note
Varroa	Oxalic Acid	Oxalic acid 99.6%	Exempt from registration provided it is used according to CHC label	Directions for use provided on CHC website
Varroa	Sucroside	sucrose octanoate	<b>Not Registered</b>	
Varroa	Apilife Var Apiquard	Thymol	<b>Not Registered</b>	
Tracheal mite	Menthol CAPCO 92-05	menthol >99%	Interim until scheduled under the PCP Regulations	Directions for use on the CAPCO note
Ants		insecticides	<b>None Registered</b>	No registered pesticides for ants in bee hives or empty hive equipment
Wax moths		Para dichlorobenzene Moth balls fumigants	<b>Not Registered</b>	No registered pesticides for wax moths in empty hive equipment
Rodents		Rodent baits in storage rooms	Many registered actives	Rodent baits must be placed in tamper resistant bait stations and away from food contact surfaces.

Some of the above uses are prepared from generic active ingredients and the bee keeper can apply them in a variety of ways. For example oxalic acid can be applied as a liquid injection or as a powder that is heated and vapourized into the hive. All the actives have some guidelines that must be followed. The registered active ingredients must be used in the format and formulation for which they are registered. For example fluvalinate , coumaphos and amitraz can only be used as the commercially available pest strips. You can not prepare your own delivery method using liquid formulations of these actives.

A registered label (e.g. Apistan) or scheduled label (e.g. Oxalic acid) directions must be followed. Vendors of these products cannot promote or advertise or re-label these products with claims to control other pests. For example formic acid cannot be sold with claims to control small hive beetle or bee diseases. Pesticides can only be sold and advertised to do what is claimed on the registered or approved label. The registration process is based on the evaluation of data which proves that the pesticide will control the pest without harming bees, people and the environment when used as directed.

Mite strips must be disposed as outlined on the product label. The disposal directions vary from product to product so it is important that beekeepers read the instructions carefully.

The PMRA will continue to monitor hives for compliance with these requirements. Bee keepers with bees in BC can expect that there hives will be inspected and sampled, weather permitting, at anytime.

If you have any questions please contact Irene Wilkin 604-666-7730 or Yvonne Herbison 250-470-4890. We will be pleased to attend any meeting that you have to discuss pest control by beekeepers or this inspection program.

Sincerely,

Yvonne Herbison