



Health
Canada

Santé
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Pest
Management
Regulatory
Agency

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de la lutte
antiparasitaire

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Canadian Honey Council
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OBJECT: Pesticide misuses by beekeepers across Canada

To whom it may concern,

Health Canada's *Pest Management Regulatory Agency* (PMRA) is responsible for the application of the *Pest Control Products Act* (PCPA) and its *Regulations*. The PCPA regulates the importation, sale and use of pesticides in Canada.

An inspection program was launched by PMRA in September of 2008 to verify the compliance level of beekeepers to the PCPA. This program included inspections of beekeeping facilities across Canada to ensure proper pesticide uses, as well as contacts with provincial apiarists.

The vast majority of beekeepers inspected were in compliance with the PCPA, but there were unfortunately a few pesticide misuses found across Canada. The pesticides used in violation of the PCPA in beekeeping operations are listed in the following table :

TABLE 1 : Pesticides used in violation of the PCPA by Canadian beekeepers

Pesticide (trade name)	Active ingredient	Targeted pest	Registration status
Wax moth crystals / Moth crystals	Paradichlorobenzene	Greater wax moth	Product not registered for use in beekeeping
Moth balls (many brand names)	Naphtalene	Greater wax moth	Product not registered for use in beekeeping
Certan, B401	<i>Bacillus thuringiensis</i>	Greater wax moth	Product not registered in Canada
Thymovar / Apiguard	Thymol	<i>Varroa destructor</i>	Product not registered in Canada

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Concerning the use of unregistered pesticides, Section 6.(1) of the PCPA states that :

6.(1) "No person shall manufacture, possess, handle, store, transport, import, distribute or use a pest control product that is not registered under this Act"

This section of the Act applies directly to the products containing *Bacillus thuringiensis* (Certan / B401) or *thymol* (Thymovar, Apiguard) listed in Table 1, since they are being sold as pest control products to beekeepers, even though they are not currently registered in Canada.

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Concerning the unregistered use of pesticides, Section 6.(5) of the PCPA states that :

6.(5) "No person shall handle, store, transport, use or dispose of a pest control product in a way that is inconsistent with :

(a) the regulations; or

(b) if the product is registered, the directions on the label recorded in the Register, subject to the regulations."

This section of the Act applies to the products containing paradichlorobenzene ("Wax Moth Crystals") and naphthalene (moth balls sold under various trade names) as listed in Table 1, since these pest control products are not registered for use in beekeeping operations in Canada.

The use of any of the four products listed in Table 1 in beekeeping operations is a contravention to Sections 6.(1) and / or 6.(5) of the PCPA and is therefore forbidden. Illegal use of pesticides can lead to legal actions under the PCPA, such as administrative monetary penalties and prosecution.

Use of these products in beekeeping could also lead to pesticide residues in honey above the acceptable maximum residue limits (MRLs). A commodity found to contain pesticide residues above a set MRL will be deemed unfit for human consumption under the *Food and Drugs Act* (FDA), before being seized and disposed of by federal or provincial authorities.

We ask that you provide your members with the information contained in this letter in order to ensure they comply with the PCPA by only using registered pesticides, in accordance with their use instructions. Should you require additional information on the PCPA in general or how it affects pesticide use in beekeeping operations, please feel free to contact the undersigned.

Please accept our utmost regards,



Bill Brass
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