

Mr. John Hannaford  
Deputy Minister – International Trade  
Global Affairs Canada  
125 Sussex Drive  
Ottawa, Ontario  
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c.

The Hon. Mary Ng, Minister of Small Business, Export Promotion and  
International Trade

Ms. Marta Morgan, Deputy Minister, Foreign Affairs

**Subject: Adulterated and fraudulent honey imports to Canada**

Our objective: Global Affairs Canada will impose a 5-year moratorium on all imports of honey with a 99% duty on speciality honey.

Our complaint is as follows:

Counterfeit honey imports have damaged honey-bee trade in Canada, both in terms of Canadian-produced honey and in other agricultural markets served by Canadian beekeepers, notably pollination services. This adulterated and fraudulent imported product seriously damages both domestic pricing and the good reputation of Canadian producers. Nutritional food fraud and quality are the secondary damages to Canadian consumers.

We are not seeking any agricultural trade subsidy. We are seeking to eliminate the impacts of unfair trade practices on Canada. We are seeking to eliminate unfair honey collection by foreign governments strictly for export purposes (Argentina). This practice is not based on price or quality and is of no benefit to those foreign beekeepers. The moratorium measure we are requesting should not serve to highlight China as a primary problem. Chinese honey export volumes have significantly decreased and we understand that trade issues with China are sensitive these days. Nevertheless, other exporting sources have quickly filled into the Canadian market behind China with equally suspect products.

Niagara Beeway has met with beekeepers across Canada and all agree that a 5-year moratorium on imports of all liquid honey products is necessary. Any specialty liquid honey could be allowed with a 99% duty as these products have very elastic price frontiers.

The CFIA tested imported honey last year and found high levels of adulterated or counterfeit honey. Apimonia, which held its world bee conference recently in Montreal, tested and confirmed the high levels of fake honey imported into Canada. Our own honey testing in Port Colborne, Ontario, clearly indicates that this food fraud has penetrated our main commercial and retail food-distribution corporations.

CFIA has reported that it intends to increase import testing at an estimated cost of \$12 million. However, we see that the Canada Border Services Agency is not supported by CFIA adequately to prevent honey-related food fraud. The current testing approval screening is not adequate to prevent this high level of corruption. Border Services reputation is compromised and Canadian consumers are not adequately protected.

With the support of Global Affairs on an import moratorium, CFIA can save millions of dollars in operational expenditures. A portion of these savings could be devoted to improving the nutritional food labeling of honey in Canada. The current colour classification system provides no quality-specific nutritional information and is only a generic product estimate of content. We must make honey like other foods and provide consumers with typical nutritional labelling and not simply a cosmetic colour classification system that falls short of any meaningful information.

Canada is a net exporter of honey and imports are not needed, such that no domestic consumer will be negatively affected by lack of supply.

We ask you to join Niagara Beeway in this push from Niagara. We are in position and staffed with experienced trade experts. We have also been advised that other bodies such as Ontario Beekeepers Association (OBA) and Canadian Honey Council require direction from their respective AGMs to propose such an effort. I will be making this presentation to the OBA in late November at their AGM. Our resolution will be to direct the Canadian Honey Council to support this effort.

We are asking Global Affairs to assign resources to this file and a contact name that we can work with. This collective effort will be used to help OBA make a resolution to support this initiative. We do not want to leave OBA or Canadian Honey Council to do this work as they have no trade-related experience or history as we do here in Niagara.

Sincerely,  
George Scott  
President, Niagara Beeway Inc.