

January 27, 2016

The Honourable MaryAnn Mihychuk
Minister of Employment, Workplace Development and Labour
House of Commons
Ottawa, Ontario
K1A 0A6

Dear Honourable Minister:

The Canadian Honey Council would like to congratulate you on your electoral victory and subsequent appointment as Minister. As background we had written the previous administration numerous times to express our concern over the developments in the Temporary Foreign Workers Program. Beekeepers are true users of temporary seasonal workers and for many operations the workers who are employed by beekeeping operations continue to come back year after year for temporary work. These workers are trained and experienced in beekeeping and provide a valuable tool for the economic success of many operations. As you may well know, honey production and pollination services are key contributors to the agricultural sector and the recent focus on bee health has caught the public's attention. Not only does the access to foreign workers allow for healthy commercial beekeeping operations to exist thereby ensuring both domestic and international sales, there are considerable restrictions on business expansion plans when labour is not sufficient or secure. Furthermore, the lack of knowledgeable staff increases the risk of potential bee health issues.

Beekeepers first choice is always to hire locally. However since most commercial beekeeping operations are in rural locations, the potential pool for workers is limited and many of those seek full time employment. Therefore, temporary foreign workers are not an alternative for Canadian workers, they are the only option. Beekeeping is a specialized and highly seasonal occupation and the knowledge that many current employees in the workplace have will be lost if the "four in four out" rule is not immediately changed or altered. Temporary foreign workers brought in through the Agriculture Stream should be treated the same as those brought in through the Seasonal Agricultural Worker Program, for example, allowing an exemption to the "four in four out" rule providing that Agriculture Stream workers are in Canada for no more than 8 months. In many commercial operations, the same workers come back year after year thereby ensuring that the businesses remain viable. Occasionally, Canadians can be found to round out staffing requirements.

Operational Bulletin 523 (commonly known as the 4 in/4 out rule) puts limits on the ability for experienced seasonal foreign workers to return. This will have major impacts on business viability and production outputs for the honey and pollination industry. Labour Market Impact Assessments already clearly identify that there are not enough Canadian workers to fill these positions which require skill and experience. We know of beekeeping operations that are already considering downsizing or closing operations next year if suitable employment alternatives are not brought forward. This point cannot be emphasized enough as beginning in the fall of this year and going forward the cumulative four year

employment cap will be reached by many temporary foreign workers and their expertise will be lost. Adding insult to injury these well-trained staff, which Canadian employers have taken years to develop, are already securing positions with our international competitors for when they are no longer eligible to work in Canada.

We propose that if employers do not require a foreign worker for a period of more than eight months of the year, these TFWs no longer fall under the "4 in/4 out rule. Employees under this new program would return home and reside within their country's borders for a minimum of four months. Within the beekeeping industry, there would be many instances where the employee would be required here for far shorter time frames, in some cases spending more time in their home country than they would in Canada.

The Canadian Honey Council is a member of the Canadian Agriculture Human Resource Council and supports its work involving the Labour Action Plan. The Action Plan calls for cooperation across commodities and regions, goals we wholeheartedly support. However, if the "four in four out" rule is not immediately addressed, a labour action plan for many operations will be a moot point as there will be no operation to support.

Respectfully,

A handwritten signature in blue ink, appearing to read "Kevin Nixon".

Kevin Nixon
Chair
Canadian Honey Council

c.c. Honourable Lawrence MacAulay