



Health
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Pest
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Santé
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Agence de
réglementation
de la lutte
antiparasitaire

February 10th, 2021

Corey Beck
Chair, Provincial ASB Committee
c/o Jane Fulton, Secretary, Provincial ASB Committee
PO Bag 100
Didsbury, AB T0M 0W0

Dear Corey Beck:

Thank you for your correspondence of February 1, 2021, regarding the following resolutions passed at the Provincial Agricultural Service Board Conference on January 21, 2021:

Resolution 3-21: An Effective Solution for Control of Richardson Ground Squirrels in Alberta requesting the Strychnine registration be extended until a safe and effective alternative is found, and Resolution 4-21: Registration of 2% Liquid Strychnine regarding the reinstatement of 2% liquid strychnine on a temporary basis for control of Richardson Ground Squirrels.

As per the *Pest Control Products Act*, before a new pesticide is allowed to be used or sold in Canada, it must undergo a rigorous scientific assessment process to determine that the health and environmental risks of using the product are acceptable, when used according to label directions. The same is true when pesticides that are on the market are re-evaluated to assess whether they continue to meet the Department's health and environmental standards, and whether they should continue to be permitted for use in Canada. Health Canada must take regulatory action at any time should unacceptable risks to human health or the environment be identified.

As per the regular process for the re-evaluation of pesticides, the public was consulted on the proposed decision for strychnine (Proposed Re-Evaluation Decision, PRVD2018-13: Strychnine and Its Associated End-use Products (Ground Squirrel Use)). Multiple lines of evidence (risk assessment based on available information, incident reports, information from provinces including information generated through the Integrated Pest Management Committee) indicated that risks of concern for non-target poisonings continue to occur with the use of strychnine.

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In the final re-evaluation decision (RVD2020-06), Health Canada reviewed and took into consideration all comments, data and information received from the Canadian public and stakeholders, including Agricultural Service Boards. However, the environmental risks associated with the use of strychnine for the control of Richardson's ground squirrels (RGS) remained due to the lack of practical mitigation measures to protect non-target organisms, including species at risk. As a result, Health Canada concluded that cancellation of the use of strychnine for the control of RGS was necessary.

Health Canada recognizes that products to control RGS populations are needed and acknowledges the value of strychnine to agricultural users. The following registered alternatives to strychnine were provided previously, although it is understood that these alternatives have their limitations as well:

- chlorophacinone and diphacinone (multi-feed anticoagulant baits);
- zinc phosphide (non-anticoagulant bait);
- aluminum phosphide (fumigant); and
- white mustard seed powder and sodium alpha-olefin sulfonate (foam).

Health Canada encourages grower groups to contact the registrants of potential alternative products, Agriculture and Agri-Food Canada (AAFC), and their provincial representatives to discuss the possibility of pursuing further research into RGS control.

Please note that the Province of Alberta and several regional municipalities have submitted Notices of Objection (NoO) to request a "Reconsideration of Decision" following the re-evaluation decision. The NoOs are currently being assessed, and the outcome will be posted to Health Canada's PMRA website in the Public Registry.

Sincerely,

2021-02-10

X 

Peter Brander

Executive Director

Signed by: Brander, Peter