

RESOLUTION 7-24
RE-REGISTRATION OF 2% LIQUID STRYCHNINE FOR CERTIFIED APPLICATORS

- WHEREAS:** Health Canada has completed the re-evaluation of 2% Liquid Strychnine. Under the authority of the *Pest Control Products Act*, Health Canada has canceled the registration of Strychnine, and all associated end-use products, used to control Richardson’s ground squirrels for sale and use in Canada; and
- WHEREAS:** Alberta producers have used alternative baiting, suffocates, and fumigant rodenticides to control Richardson ground squirrels but have not had the successes of Strychnine; and
- WHEREAS:** in an integrated pest management plan (IPM), there is a need for options of control like Strychnine dependent on different circumstances (time of year, area of land infected, infestation levels, pest being controlled, etc.); and
- WHEREAS:** the federal government has banned the use of Strychnine without providing producers any comparative alternative or financial support to deal with the Richardson’s ground squirrel pest; and
- WHEREAS:** training in the safe use of pesticides can be provided to agricultural producers in Alberta by participating in the Farmer Pesticide Certificate program.

THEREFORE, BE IT RESOLVED THAT
ALBERTA’S AGRICULTURAL SERVICE BOARDS REQUEST

that Alberta Agriculture and Irrigation propose to Health Canada and Pest Management Regulatory Agency (PMRA) to allow Strychnine to be used exclusively by certified applicators.

FURTHER THEREFORE BE IT RESOLVED
THAT ALBERTA’S AGRICULTURAL SERVICE BOARDS REQUEST

that the existing strychnine label be subject to meticulous review and amendment, with a specific focus on reducing the potential for off-target exposure and implementing enhanced control measures to mitigate any adverse environmental impact.

SPONSORED BY: Flagstaff County

MOVED BY: _____

SECONDED BY: _____

CARRIED: _____

STATUS: Federal and Provincial

DEPARTMENT: Health Canada Pest Management Regulatory Agency

Background:

The first recommendation is made with the utmost concern for environmental preservation and safety;

Subjecting the existing strychnine label to meticulous review and amendment, with a specific focus on reducing the potential for off-target exposure and implementing enhanced control measures to mitigate any adverse environmental impact would not only safeguard our surroundings but also ensure that the use of this substance aligns with the highest standards of environmental responsibility and safety amongst certified applicators.

Agricultural Service Boards (ASB's) have long brought forward resolutions concerning Strychnine, and this should underline its importance to agricultural producers in Alberta. It is an effective tool to control RGS because it is a single feed bait, and this allows producers to efficiently treat large infestations and help prevent small infestations from becoming large ones. Other options for gopher control are with the use of multi-feed baits such as Rozol and Ramik Green. However, these baits can be unproductive because they can take from 7 to 10 days to be effective. As such, other methods of control can be very time consuming during demanding times of production (seeding, calving, etc.). Strychnine has been used in Alberta for decades and has been effective in gopher control with little impact on the wildlife population. For effective gopher control, 2% Liquid Strychnine is an essential tool in any agricultural producer's integrated pest management plan and should be available for use.

In 2020, Health Canada and the PMRA concluded that the environmental risks associated with the use of strychnine for the control of Richardson ground squirrels were not shown to be acceptable when used according to label directions and that no further feasible mitigation measures could be implemented by users of this product. Consequently, the registration of products containing strychnine used to control RGS was canceled and a 3-year phase-out period was allowed until March 4, 2024. This decision was made to address significant environmental concerns and risks to wildlife caused by secondary poisonings.

In 2021, 4-21 Registration of 2% Liquid Strychnine-CARRIED

The Alberta government filed a Notice of Objection regarding this decision.

In March 2021, the PMRA informed AF that the re-evaluation decision was still under internal review following delays in completing the assessment. Until a final decision is made by PMRA on the use of strychnine for the control of Richardson's ground squirrels, the Farmer Pesticide Certificate Program is not looking to incorporate Strychnine training into the program.

In 2022, the Alberta government conducted an evaluation similar to the Government of Saskatchewan; however, conclusive evidence was not available due to inclement spring weather. Alberta then hoped to conduct a similar evaluation again in 2023.

March 4th, 2022, was the last day producers could legally purchase 2% Liquid Strychnine Concentrate.

In 2023, Resolution 11-23 Loss of 2% Strychnine-AMENDED

February 3rd, 2023, the Minister of Agriculture and Irrigation wrote to the federal government to request a reversal of the decision. The letter stated that the loss of this pesticide could cost hay and pasture producers nearly \$800 million per year. The Minister also advised that with no viable alternative to control Richardson's ground squirrel, the decision will create immense pressure for producers and potentially exacerbate the food affordability and security crisis. Furthermore, Agriculture and Irrigation officials have engaged Agriculture and Agri-food Canada (AAFC) officials on this issue to press AAFC to

support producers in the transition to alternatives. AGI expects that a key element of this transition would be federal compensation to cover crop losses and cost differentials of using alternative pesticides. The Government of Saskatchewan conducted an evaluation of available alternatives, including zinc phosphide products, ZP Rodent Oat Bait and Burrow Oat Bait. Some evidence indicated these alternatives **MIGHT** be as effective as 2% Liquid Strychnine Concentrate, and less expensive.

March 4th, 2023, was the last day producers could legally use 2% Liquid Strychnine Concentrate for gopher control.

May 10, 2023, Health Canada acknowledges the implications the cancellation of the pesticide product containing strychnine could have on agricultural producers in Alberta and Western Canada and takes them seriously.

Under section 18 of the Pest Control Products Regulations, the Minister of Health may register a pest control product or amend the registration of a pest control product to permit its use, for a period not exceeding one year, for the emergency control of seriously detrimental pest infestations. For information on emergency registrations, such as criteria and information requirements, please refer to Regulatory Directive DIR2017- 03, Registration of Pesticides for Emergency Use: Revised Procedures. With respect to strychnine, an Emergency Use Registration is not an option as there are alternative products registered for the control of RGS and the environmental risks have been shown to not be acceptable. Emergency registrations are not a tool to be used to extend access to the use of a pest control product that has been canceled. For known or ongoing pest problems where no registered product is available, the normal registration processes would apply to address such situations.