



Health  
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Pest  
Management  
Regulatory  
Agency

Agence de  
réglementation  
de la lutte  
antiparasitaire

November 24, 2021

Chad MacPherson  
Saskatchewan Stock Growers Association  
[ssga@sasktel.net](mailto:ssga@sasktel.net)

**RE: Saskatchewan Stock Growers Association Resolution #17 passed at the 2021 Annual General Meeting to lobby the Government of Canada to extend the license for strychnine to control Richardson Ground Squirrel.**

Dear Mr. MacPherson,

Thank you for sharing the Saskatchewan Stock Grower Association's 2021 resolutions with us. As you know, Health Canada's Pest Management Regulatory Agency (PMRA) periodically re-evaluates pesticides that are on the market to assess whether they continue to meet the Department's health and environmental standards, and hence whether they should continue to be permitted for use in Canada. Consistent with this requirement an assessment of the Richardson's Ground Squirrel use of strychnine was conducted and, following a public consultation, PMRA published its final strychnine re-evaluation decision in March 2020. PMRA concluded that the environmental risks associated with the use of strychnine for the control of Richardson's ground squirrels (RGS) were not shown to be acceptable when used according to label directions and that, no further mitigation measures could be implemented that are feasible to users of the product. Consequently, the registration of the end-use product containing strychnine used to control RGS was cancelled with the following phase-out schedule:

Last date of sale by registrant:	March 4, 2021
Last date of sale by retailer:	March 4, 2022
Last date of permitted use:	March 4, 2023

The framework for the cancellation of pesticide products following a re-evaluation is presented in Regulatory Directive DIR2018-01, Policy on Cancellations and Amendments Following Re-evaluation and Special Review (<https://www.canada.ca/en/health-canada/services/consumer-product-safety/reports-publications/pesticides-pest-management/policies-guidelines/regulatory-directive/2018/dir2018-01-policy-cancellations-amendments.html>).

In general, implementation dates of cancellation may be delayed if no suitable alternatives to the use of a pesticide is available, and a determination is made that human health and environmental risks and value of the product are considered acceptable until the effective date of the cancellation. The suitability of potential alternatives as replacements is determined by factors such as whether they can provide a reasonable level of control of the pest or the economic impact of the change. However, this situation does not apply to strychnine used to control RGS as there are several alternative active ingredients registered to control RGS (e.g. chlorophacinone, diphacinone, zinc phosphide, aluminum phosphide). Considering the above information, the phase out schedule for strychnine end-use product used to control RGS was not extended.

The Pest Management Regulatory Agency (PMRA) received 42 Notices of Objection (NoO) to reconsider the re-evaluation decision when the re-evaluation decision was published. Some of these notices objected to the cancellation of the products while others requested immediate cancellation rather than the phase out over a 3-year period. These NoOs and the information submitted in support of these objections are currently under review. Objectors will be informed of the outcome of this review once completed.

Sincerely,

2021-11-24

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Signed by: Bissonnette, Frederic

Frédéric Bissonnette  
Chief Registrar  
PMRA