

R.M. of Buffalo No. 409

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June 10, 2020

Pest Management Regulatory Agency
Health Canada
2720 Riverside Drive
Ottawa, Ontario
K1A 0K9

Re: Notice of Objection regarding deregistration of strychnine for control of Richardson's ground squirrel

To whom it may concern,

The Rural Municipality of Buffalo No. 409 supports the Saskatchewan Association of Rural Municipalities and therefore submits this Notice of Objection regarding the Pesticide Management Regulatory Agency's (PMRA) decision to deregister strychnine for control of Richardson's ground squirrel (RGS).

In Saskatchewan, controlling RGS remains a priority to protect the commodities our crop and livestock producers grow and that the Canadian public relies on as not only a food source but also a large contributor to Canada's Gross Domestic Product. The RM of Buffalo knows that strychnine when used as part of an integrated pest management program remains the most effective product for the control of RGS with limited impacts on the environment and species at risk. There is currently no equivalent alternative to strychnine in safety or effectiveness.

In 1992 to 2001, 2% liquid strychnine wasn't available causing RGS populations to explode resulting in millions of dollars in losses to agriculture producers in Saskatchewan. RGS feed on crops and their burrows result in livestock with broken limbs and damage to farm equipment. In years strychnine has been made available RGS populations have declined. Dry years with no effective method of control means the progress made on reducing RGS populations will be lost and will result in compounding agriculture losses as the population grows each season.

The science PMRA is using to support their decision includes a 2019 study by the Saskatchewan Ministry of Agriculture (SMA). This research study indicated that despite a large number of non-target species present, death from strychnine was limited to only four deer mice. This same study found less than 2 percent of RGS expired above ground

and very few incidents where bait was ejected from the burrow proving a very small risk for non-target poisoning.

The RM of Buffalo has worked with the SMA and PMRA to minimize the potential impact of 2% liquid strychnine on unintended species by promoting integrated pest management and monitoring conditions of registration including how the product is applied, who can purchase the product and reporting requirements through the Saskatchewan RGS Stewardship Program (SRSP). The 2019 SMA study proves that these conditions are effective in minimizing the environmental impacts of strychnine use therefore we would like to see the PMRA use this study to justify its continued registration for RGS control.

The RM of Buffalo agrees that public health and ensuring minimal impacts on the environment are of great importance but believe PMRA isn't considering the effectiveness of the SRSP and the results of SMA's research study. The PMRA as a federal agency should be making science-based decisions that are in the best interests of the health and wellbeing of the Canadian public. PMRA should be looking at the bigger picture and realizing that the value of the agriculture commodities that feed our country's people and economy are going to be greatly impacted by this deregistration therefore not serving the overall best interests of Canadians.

Thank you for the opportunity to provide comment.

On Behalf of the

A handwritten signature in blue ink, consisting of a large, stylized 'S' or 'B' shape with a loop at the end.

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