



# TEAMALBERTA

## ADVANCING ALBERTA'S CROP SECTOR TO 2025 AND BEYOND

June 30, 2020

Pest Management Regulatory Agency Publications Section  
Pest Management Regulatory Agency (PMRA)  
Health Canada  
2720 Riverside DR  
Ottawa, ON K1A 0K9  
[hc.pmra.publications-arla.sc@canada.ca](http://hc.pmra.publications-arla.sc@canada.ca)

### **Re: Re-evaluation Decision RVD2020-06, Strychnine and Its Associated End-use Products (Richardson's Ground Squirrels)**

To Whom It May Concern,

Team Alberta submits this notice of objection to the *RVD2020-06, Strychnine and Its Associated End-Use Products (Richardson's Ground Squirrels) Final Decision*. On behalf of Alberta's crop sector, we would like to make it known that this decision is not sustainable. The PMRA needs to make responsible decisions based on credible, peer-reviewed science that is relevant to the Canadian context. Cancellation of 2% Liquid Strychnine Concentrate (LSC) is not a long-term strategy for sustainable control of Richardson's Ground Squirrels (RGS) or gophers. The PMRA must weigh the environmental and economic impacts for all final decisions if Canada is to help the environment and compete globally.

Team Alberta is a collaboration between Alberta Barley, Alberta Canola, Alberta Pulse Growers and the Alberta Wheat Commission. Collectively, we represent over 20,000 Alberta farmers who grow 20 million acres of grains, oilseeds and pulses with exports that contribute over \$5 billion to our economy. Farmers and ranchers in Alberta and Saskatchewan have the most to lose when this important pest management tool is gone. Without a practical alternative control method to prevent RGS populations from exploding, we can expect repeat scenarios where damages can cost in the hundreds of millions annually.

Team Alberta requests the PMRA to strongly reconsider the decision to end the use of LSC or delay the phase out until there is a truly effective and feasible replacement product. Farmers and ranchers need LSC to remain available for emergency use in agricultural production areas where Canada has historically experienced severe outbreaks across the Prairies. On two other occasions, the PMRA has cancelled LSC in the past only to reverse its' decision for emergency registrations in Alberta and Saskatchewan. Strychnine products are currently distributed under controlled measures through the municipalities in cases where farmers do not have an alternative to prevent massive crop destruction.

Strychnine is the best option to prevent devastating RGS damage to crops and pastures. There is no alternative for controlling RGS that is as timely, safe, effective, feasible and less labour intensive in severe

#### TEAM ALBERTA

Team Alberta is a collaborative initiative led by four of the province's crop commissions. Our commissions are producer elected, directed and funded organizations established to represent the interests of our producers across the province.



outbreaks as LSC when it is used according to the label. When infestations occur, they are often widespread and can go underestimated or unknown until the RGS come out of their burrows to feed on the new crop when seedlings emerge. When RGSs are detected, farmers use strychnine to control them quickly and reliably to reduce the crop loss, swiftly, as physical controls, alternative products and measures are not effective at this stage.

Agricultural Fieldmen are authorized to provide agricultural services and enforce the provincial Pest Act in Alberta's municipal districts and counties. They are qualified to provide the regulatory oversight required to use the highly restricted LSC pest control product. These fieldmen work with farmers to assess the severity of outbreaks and provide training for proper use to assure that the risks to the environment stay within the acceptable range. Farmers and ranchers are stewards of the land and are committed to mitigating any risk associated with their operations that could impact humans, animals or the environment.

In closing, we urge you to reconsider the final decision on Strychnine, delay the phase out until there is a replacement product, and to maintain the emergency use registration for future outbreaks that are certain. Team Alberta asks the PMRA to consider the environmental and economic impacts on the agriculture sector in all future decisions. A regulatory system that is predictable, transparent and accesses the best available science is essential for the competitiveness of Canadian farmers. Please contact Shannon Sereda, Government Relations and Policy Manager with the Alberta Wheat and Barley Commissions at [ssereda@albertawheatbarley.com](mailto:ssereda@albertawheatbarley.com) for any follow up on this notice of objection. Thank you for your consideration.

Sincerely,



Dave Bishop  
Chair, Alberta Barley Commission



John Guelly  
Chair, Alberta Canola Producers Commission



Don Shepert  
Chair, Alberta Pulse Growers Commission



Todd Hames  
Chair, Alberta Wheat Commission

Cc: Hon. Patty Hajdu, Minister of Health  
Hon. Marie-Claude Bibeau, Minister of Agriculture and Agri-Food  
Hon. Devin Dreesen, Minister of Agriculture and Forestry, Alberta

#### TEAM ALBERTA

Team Alberta is a collaborative initiative led by four of the province's crop commissions. Our commissions are producer elected, directed and funded organizations established to represent the interests of our producers across the province.

