

The Hon. Ginette Petitpas Taylor
Minister of Health
House of Commons
Ottawa, Ontario K1A 0A6

An open letter to the Minister of Health and Canada's Pest Management Regulatory Agency regarding the use of strychnine, sodium monofluoroacetate (Compound 1080), and sodium cyanide to kill wildlife in Canada

September 27, 2018

Dear Minister Petitpas Taylor and Canada's Pest Management Regulatory Agency,

We, the undersigned scientists and organizations, oppose the use of strychnine, sodium monofluoroacetate (referred to henceforth in this document by its common name Compound 1080), and sodium cyanide to kill wildlife in Canada and request that the registration of these compounds and products containing them be cancelled under the *Pest Control Products Act* (2002; hereafter PCPA).

These 3 chemicals are the most toxic poisons currently in use to kill wildlife in Canada. Under the PCPA, the Minister's primary statutory objective is to prevent unacceptable risks to individuals and the environment, including harm to living organisms and biodiversity. Federal regulations and policy controlling the evaluation, distribution, use, handling, and record-keeping of these pesticides are unable to mitigate public and environmental safety hazards associated with their use.

Evidence suggests that:

- I. Strychnine, Compound 1080 and sodium cyanide are inhumane wildlife killing methods, causing undue pain and distress;
- II. The environmental risks posed by these products are unacceptable because they pose a threat to non-target species, including species at risk of extinction, and biodiversity;
- III. Current conditions for use are not adequately enforced and sometimes impossible to adhere to;
- IV. The health risks of these products are unacceptable because they pose a threat to the health and safety of Canadians, as well as pets and livestock;
- V. The effectiveness of these products is questionable because indiscriminate killing of wildlife does not often solve the conflicts the poisons are intended to address, results are not scientifically evaluated assessed and/or are poorly documented, and better alternatives exist; and
- VI. Wolves, coyotes, and black bears are not "pests" for the purposes of the Pest Control Products Act (2002), as they do not pose risks to human health or the environment, and in fact provide important ecosystem functions.

These arguments are presented in greater detail in the addendum and supplementary material of this letter.

We urge you to cancel the use of strychnine for ground squirrel control, as proposed in PRVD2018-13 and without delay. Furthermore, we hereby request, under PCPA s. 17(4), that you initiate special reviews of all pest control products containing strychnine, Compound 1080, and sodium cyanide. In light of the evidence presented here, we believe that Health Canada should cancel the registration of these active ingredients and end-use products containing them, and ban their use. These pest control products endanger human health, safety and the environment and pose threats that are both serious and irreversible.

Sincerely,

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