



The Honourable Patty Hajdu
Minister of Health
House of Commons
Ottawa, Ontario K1A 0A6

Sent via email: hcmminister.ministresc@canada.ca

June 30, 2021

Dear Minister Hajdu:

The Agricultural Producers Association of Saskatchewan (APAS) is writing concerning the Pest Management Regulatory Agency Re-Evaluation Decision (RVD2020-06) on Strychnine and Associated End-Use Products, specifically as it relates to a severe infestation of Richardson Ground Squirrel (RGS) populations in Saskatchewan.

APAS has been participating in the PMRA's Re-evaluation of Strychnine and End-Use Products. Our members are very concerned with the RVD2020-06 Decision to proceed with the cancellation of strychnine and its associated end-use products through a phase-out period that began this year at the registrant level and concludes with the cancellation of all permitted use by March 2023.

Strychnine is the most effective pest control option available to manage RGS populations and prevent severe outbreaks on Saskatchewan farmland. The cancellation of this pest control option in the absence of equally effective alternatives poses significant economic and environmental risks to our agricultural sector. APAS and other agricultural stakeholders detailed these risks in our submissions to the PMRA consultations and we are now beginning to see the negative impacts of uncontrolled RGS populations in the 2021 production season.

Ongoing drought conditions has led to widespread outbreaks of RGS across the province this spring. A lack of available supply of strychnine products in many areas has limited producers' ability to control populations and prevent severe damage to hay, crop, and pastureland. It has been a challenging production year in our province, and the RGS outbreak is pushing additional financial costs onto producers through yield loss, equipment damage, and the further deterioration of drought-affected pasture and hay land. There are growing concerns about the long-term environmental and economic impacts of the current RGS infestation, particularly if drought conditions persist and municipalities are unable to replenish supplies before the retail ban takes effect next year.

APAS is requesting that the PMRA consider these economic and environmental impacts as part of its the Notice of Objection phase of the RVD2020-06 consultations currently underway. We ask the PMRA to complete this re-assessment in an urgent and transparent manner to provide stakeholders clarity on next steps. In the absence of



strychnine, producers do not have access to equally effective pest control options. It is very important that steps are taken to avoid a re-occurrence of past instances where strychnine is de-registered only to be re-permitted for emergency use after years of uncontrollable RGS damage to agricultural land.

APAS is encouraged by recent federal initiatives to improve PMRA processes and we look forward to continuing to participate in Health Canada's 2020-21 Program Renewal Initiative. We believe our request for an urgent reassessment of RVD2020-06 that considers the economic and environmental impacts on the agricultural sector to be consistent with the federal government's goal of ensuring that Canada's pest management regulatory system is transparent, predictable, and based on the best science available.

Farmers and ranchers are stewards of the land and are committed to mitigating any environmental or health risks associated with their operations. While strychnine remains available on an emergency-use basis, APAS encourages continued collaboration between the agricultural community, federal, and provincial governments to develop effective replacement products.

Yours sincerely,

Todd Lewis
President, APAS