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Re-evaluation Decision

RVD2020-06

Strychnine and Its Associated End-use Products (Richardson's Ground Squirrels)

Final Decision

(publié aussi en français)

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Re-evaluation Decision

Under the authority of the *Pest Control Products Act*, all registered pesticides must be regularly re-evaluated by Health Canada's Pest Management Regulatory Agency (PMRA) to ensure that they continue to meet current health and environmental standards and continue to have value. The re-evaluation considers data and information from pesticide manufacturers, published scientific reports and other regulatory agencies. Health Canada applies internationally accepted risk assessment methods as well as current risk management approaches and policies.

Strychnine is an active ingredient used in restricted-class products which may be applied as baits to control predators, Northern pocket gophers and ground squirrels (Richardson's, Columbian, Franklin's, and thirteen-lined). Since the uses on predators and Northern pocket gophers were re-evaluated separately in 2007,¹ this re-evaluation decision focusses only on ground squirrels, specifically Richardson's ground squirrels. Uses on other ground squirrel species were recently discontinued by the manufacturer. Currently registered products containing strychnine used to control Richardson's ground squirrels can be found in the Pesticide Label Search and in Appendix I.

The regulatory approach for the re-evaluation of strychnine (ground squirrel use) was first presented in the Proposed Re-evaluation Decision PRVD2018-13,² which underwent a 90-day consultation period ending on 27 September 2018. PRVD2018-13 proposed the cancellation of strychnine used to control ground squirrels due to environmental risks of concern for non-target organisms, including species at risk.

Health Canada received comments relating to the environmental and value assessments. These comments are summarized in Appendix II along with responses by Health Canada. Respondents are listed in Appendix III. These comments and new data/information did not result in revisions to the risk assessments (see Science Evaluation Update), and did not result in changes to the proposed regulatory decision as described in PRVD2018-13. A reference list of information used as the basis for the proposed re-evaluation decision is included in PRVD2018-13, and further information used in the re-evaluation decision is listed in Appendix IV of this document.

This document presents the final regulatory decision³ for the re-evaluation of strychnine (Richardson's ground squirrels), including the required risk mitigation measures to protect the environment. All products containing strychnine that are registered to control Richardson's ground squirrels in Canada are subject to this re-evaluation decision.

¹ Re-evaluation Note REV2007-03, *Update on the Re-evaluation of Strychnine*.

² "Consultation statement" as required by subsection 28(2) of the *Pest Control Products Act*.

³ "Decision statement" as required by subsection 28(5) of the *Pest Control Products Act*.

Outcome of Science Evaluation

An evaluation of available scientific information confirmed that there are risks of concern for non-target organisms, including species at risk, for products registered to control Richardson's ground squirrels.

Regulatory Decision for Strychnine (Richardson's Ground Squirrels)

Health Canada has completed the re-evaluation of strychnine (Richardson's ground squirrels). Under the authority of the *Pest Control Products Act*, Health Canada is cancelling the registration of strychnine, and all associated end-use products, used to control Richardson's ground squirrels for sale and use in Canada. An evaluation of available scientific information has not shown that risks to the environment are acceptable when strychnine is used according to the current conditions of registration, or when additional mitigation is considered. No additional data are requested.

Risk Mitigation Measures

The mitigation measures required, as a result of the re-evaluation of strychnine (Richardson's ground squirrels), are summarized below.

Environment

- Cancellation of strychnine used to control Richardson's ground squirrels.

Next Steps

To comply with this decision, products that are cancelled will be phased out following the implementation timeline outlined below. Refer to Appendix I for details on specific products impacted by this decision.

- One (1) year of sale by registrant from the publication date of this decision document, followed by;
- One (1) year of sale by retailer from the last date of sale by registrant, followed by;
- One (1) year of permitted use from the last date of sale by retailer.

Other Information

Any person may file a notice of objection⁴ regarding this decision on strychnine (Richardson's ground squirrels) within 60 days from the date of publication of this Re-evaluation Decision. For more information regarding the basis for objecting (which must be based on scientific grounds), please refer to the [Pesticides](#) section of the Canada.ca website (Request a Reconsideration of Decision) or contact the PMRA's Pest Management Information Service by phone (1-800-267-6315) or by e-mail (hc.pmra.info-arla.sc@canada.ca).

⁴ As per subsection 35(1) of the *Pest Control Products Act*.