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November 29, 2022

Re: Public Consultation

PRVD2022-18: strychnine and sodium monofluoroacetate

Please accept this submission of AEL Advocacy in response to Health Canada's Proposed Re-evaluation Decision 2022-18.

A. About AEL Advocacy

Animal Environmental Legal Advocacy ("AEL Advocacy") is a public interest law practice and not-for-profit organization. Our lawyers understand the important interconnection between humans, animals, and the environment. We combine our in-depth knowledge of the legal and political landscape with a commitment to supporting individuals and organizations working to protect animals and the environments where they live.

B. Comments on the Proposed Continuation of Strychnine for Predicide Use

AEL Advocacy is strongly opposed to the continued registration of the predicide uses of strychnine and sodium monofluoroacetate and all associated end-use products registered for the use of sale in Canada because of the inhumane suffering these compounds cause to its victims.

There are copious studies demonstrating that strychnine causes gruesome and prolonged suffering to its victims (both target and non-target animals).¹ That is, strychnine causes agonizing symptoms including convulsions, vomiting, hallucinations and respiratory arrest which eventually kills the animal (after extensive time ranging from hours to days).² Moreover, non-target animals are often subjected

¹ "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", (27 September 2018), online: <https://docs.wixstatic.com/ugd/4bd11b_3e153cee4f654cf4b65d47f7e7faf707.pdf>.

² Katherine L Peterson, "Strychnine Toxicosis in Animals" (November 2022), *Merek Manual Veterinary Manual*, online: <<https://www.merckvetmanual.com/toxicology/strychnine-toxicosis/strychnine-toxicosis-in-animals#:~:text=Strychnine%20is%20a%20pesticide%20that,to%20respiratory%20arrest%20and%20death>>.

to this tragic fate including both people's beloved companion animals, as well as endangered species.³

C. Conclusion

We urge Health Canada to withdraw this proposal and instead ban these extreme predicide products forthwith.

We welcome the opportunity to discuss the above comments and recommendations.

Sincerely,



Kira Berkeley
Co-Director & Counsel, AEL Advocacy

³ Olivia Stefanovich, "After watching their dog die 'a painful death,' owners want ban on strychnine used by Sask., Alta. farmers" (5 August 2018), *CBC News*, online: <<https://www.cbc.ca/news/canada/saskatchewan/health-canada-considers-strychnine-ban-go-phers-1.4771402>>.