



September 20, 2018

Pest Management Regulatory Agency
Health Canada
2720 Riverside Drive
Ottawa, Ontario
K1A 0K9

Re: Response to the Consultation on the Proposed Re-evaluation Decision PRVD2018-13, Strychnine and Its Associated End-use Products

To whom it may concern,

The Saskatchewan Association of Rural Municipalities (SARM) represents all 296 rural municipalities (RM) in Saskatchewan and has been legislatively mandated to support its members in advancing the interests of agricultural operations within their jurisdictions.

Richardson's Ground Squirrels ("pocket gophers") cause significant challenges for agricultural producers as their feeding habits damage crops and underground irrigation infrastructure and their tunneling and mound-building activities degrade crop quality, damage machinery, and cause livestock injuries. The result of an uncontrolled pocket gopher populations can cause large productivity losses and consequently have a major economic impact on Canada's agricultural sector.

Past studies on the efficacy of various gopher control methods have shown Strychnine, where applied according to the instructions, to be the most effective option. Adequate control measures reduce the negative impacts of large gopher populations on agriculture operations. Removing the ability for producers to use this product without offering a comparable substitute will harm the economic viability of agriculture production across the province.

SARM asks that the PMRA continue to allow Strychnine usage until such a time that an affordable and proven alternative is readily available to municipalities and agriculture producers. We believe that Strychnine must remain accessible while any alternative means of gopher control are piloted by an adequate sample of producers.

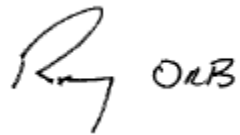
Previous research has also shown that the dangers of Strychnine to non-targeted organisms commonly result from its inappropriate application and storage. SARM asks that the PMRA and Ministry of Health evaluate the current measures to mitigate the already low numbers of primary and secondary poisonings by Strychnine and better

educate those applying the products on the importance of complying with label instructions.

Finally, SARM wants to take this opportunity to reiterate our concern that the timing of the consultation on the re-evaluation decision on Strychnine and its association end-use products is not conducive to the necessary participation from the agriculture sector. We believe that the consultation period on the PRVD2018-13 needs to be extended by an additional 30 days to give farmers an opportunity to submit comments post-harvest.

Thank you for considering our feedback on this re-evaluation process. Please do not hesitate to contact me directly if you have any questions regarding our requests.

Sincerely,

A handwritten signature in black ink, appearing to read "Ray Orb". The signature is written in a cursive style with a large initial "R" and "O".

Ray Orb
President