



Requests for Special Review of Wildlife Poisons: Executive Summary

Health Canada has registered three poisons for use in Canada to kill large, native mammals including wolves, coyotes and black bears: strychnine, Compound 1080 (sodium monofluoroacetate), and sodium cyanide. Health Canada issues permits to the provinces of Alberta and Saskatchewan every five years, allowing the poisons to be used in those provinces subject to requirements set out in the products' labels.

Wolf Awareness and Animal Justice, with support from the International Fund for Animal Welfare, Animal Alliance of Canada, the B.C. Society for the Prevention of Cruelty to Animals, Born Free USA, Cochrane Ecological Institute, Coyote Watch Canada, the Fur-Bearers, Predator Defense, Zoocheck, World Animal Protection, Ecojustice, the David Suzuki Foundation, and Humane Society International Canada, submitted three requests under the *Pest Control Products Act* on December 14, 2020, asking the Minister of Health to conduct a special review of the registration of all pest control products containing strychnine, Compound 1080, and sodium cyanide.

In our requests, we explain that Health Canada failed to collect enough information in order to determine whether the serious environmental and health risks posed by wolf, coyote, skunk, and bear-killing products containing strychnine, Compound 1080, and sodium cyanide are acceptable. We also argue that the value of these products is unacceptably low and highlight a lack of compliance with, and enforcement of, rules for the use, storage, and handling of these products. Non-compliance with label requirements increases risks to human health and the environment.

These significant flaws in the process for registering and monitoring products containing strychnine, Compound 1080, and sodium cyanide, as well as enforcing conditions on use, put the health of Canadians, animals, and the environment at risk. This is an issue that Canadians care deeply about, with 69% agreeing that the use of these poisons to kill wildlife poses unacceptable risks to the environment.

Unacceptably high risks to non-target animals

- These poisons are highly toxic to all birds and mammals, including people.

- Strychnine and Compound 1080 cause secondary poisoning, meaning that these poisons travel through the food chain when scavengers consume and are poisoned by poisoned carcasses.
- Detailed records obtained from the Government of Alberta show that wildlife routinely removed strychnine and Compound 1080 baits between required weekly site checks without carcasses being recovered. For example, between 2006 and 2009, strychnine baits were unrecovered at 93% of bait sites (totalling 1,203 baits).
- These poisons are being used within ranges of sensitive species and species at risk.
- Non-target animals killed by these poisons include: dogs, lynx, weasels, foxes, and species at risk such as grizzly bears and golden eagles.
- Hundreds of companion dogs have suffered agonizing deaths after ingesting strychnine, Compound 1080, and sodium cyanide directly and by consuming the poisoned bodies of other animals. A teenager in Idaho nearly died in 2017 after attempting to save his dog who died after biting into a sodium cyanide bait intended to kill coyotes.

Non-compliance with Product Label restrictions is common and exacerbates environmental risks

- Published scientific data and private records obtained from the Government of Alberta demonstrate that staff fail to check strychnine bait sites at least weekly. Furthermore, in 2018, data suggests that they placed almost double the maximum number of strychnine baits at each bait site. Field investigations by members of the public discovered bait and intact snow bait piles at supposedly deactivated sites, unrecorded carcasses at active sites, and carcass remnants at sites several months after deactivation dates.
- Sodium cyanide and Compound 1080 use reports demonstrate that Government of Alberta staff fail to complete reporting requirements and fail to recover baits and carcasses.

Strychnine, Compound 1080, and sodium cyanide are inhumane

- These poisons cause significant and prolonged suffering on the part of target and non-target animals.
- The Canadian Veterinary Medical Association, American Veterinary Medical Association, American Society of Mammalogists, and other expert bodies have explicitly condemned the use of strychnine and Compound 1080 because they are inhumane. Sodium cyanide is also inhumane, causing severe pain and distress prior to death.
- Strychnine poisoning causes prolonged, agonizing muscular convulsions and contractions, sensitivity to light and sound, temporarily clenched muscles which cause cessation of breathing, clenched jaw and spinal extension. Poisoned animals can suffer from one to 24 or more hours before ultimately dying from exhaustion or suffocation during seizures.

- Compound 1080 poisoning causes vomiting, anxiety, frenzied behaviour (ie. running and screaming fits), tetanic seizures, and death from cardiac failure or respiratory arrest due to lack of oxygen to the brain. Poisoned animals suffer for hours before being killed.
- Sodium cyanide poisoning causes dizziness, weakness, labored breathing, nausea, weak/irregular heartbeat, unconsciousness, convulsions, and death. Victims exhibit intense anxiety. They can die within minutes or suffer for hours.

The purported value of these poisons lack evidential support and are disputed in the scientific community

- Although products' value must be evaluated before they are registered for use in Canada, Health Canada has failed to collect data required to enable these valuations.
- The registrants have failed to use these poisons and collect data from monitoring in order to be able to evaluate the risks and purported benefits of using them.
- Poisoning wildlife is not a necessary or effective way to protect livestock or at-risk caribou. Non-lethal, effective alternatives exist both for preventing predation on livestock and for addressing threats to at-risk species of caribou, including habitat loss in particular.