

April 2026

The Honourable Minister of Health  
Health Canada  
Ottawa, Ontario

**Re: Emergency Authorization of Strychnine and Regulatory Consistency**

Dear Minister Michel,

On behalf of a broad coalition of animal protection and environmental conservation organizations, including: AEL Advocacy, Animal Alliance of Canada, Animal Justice, Cochrane Ecological Institute, Coyote Watch Canada, Ecojustice, Friends of the Earth Canada, Humane World for Animals Canada, IFAW, The Fur-Bearers, WeHowl, Wildlife Rescue Society of Saskatchewan, and Wolf Awareness, we are writing to express our serious concern regarding Health Canada's recent authorization of the emergency use of rodenticidal strychnine in Alberta and Saskatchewan, following Canada's 2020 decision to cancel the registration of strychnine, and all associated end-use products, used to control Richardson's ground squirrels due to unacceptable environmental risks. We would like to take this opportunity to request a meeting with you or your advisors to discuss this critical issue at the earliest convenience.

In March 2020, Health Canada's Pest Management Regulatory Agency concluded, after formal reevaluation, that strychnine does not meet statutory requirements for environmental protection. That decision was grounded in evidence demonstrating the poison's extreme toxicity, its indiscriminate nature, and its well documented risks of secondary poisoning to nontarget animals, including species at risk. The cancellation of strychnine was widely celebrated as a clear, science-based regulatory outcome.

The recent emergency authorization represents a troubling reversal of that determination. While described as temporary and controlled, the decision effectively reintroduces a substance that Health Canada itself found could not be used without causing unacceptable harm. The ecological risks associated with strychnine, including secondary poisoning via carcasses, are inherent to the compound and are not eliminated through geographic limits or stewardship conditions.

This decision raises concerns about regulatory certainty and public confidence in Canada's pesticide management framework. Emergency authorizations should not undermine established risk assessments or create pathways for political or economic pressure to override scientific conclusions reached through formal review. It also risks setting a precedent whereby previously banned substances may be reintroduced without new scientific evidence demonstrating improved safety, thereby weakening the integrity of Canada's regulatory system.

While we recognize the challenges faced by agricultural producers, reauthorizing a poison previously deemed environmentally unacceptable is inconsistent with both precautionary regulation and federal commitments to biodiversity protection and Integrated Pest Management. In addition, the use of indiscriminate poisons raises ethical concerns and may conflict with the values of many Canadians who expect wildlife management practices to be humane, targeted, and evidence based.

We are also concerned that the reintroduction of strychnine may disproportionately impact

Indigenous communities and rural residents who rely on healthy ecosystems and wildlife for cultural, subsistence, and economic purposes. Meaningful consultation and consideration of these impacts are essential.

We respectfully urge Health Canada to reaffirm the scientific basis of the 2020 ban and prioritize investment in nontoxic, ecologically responsible and humane approaches to human-wildlife conflicts. Such approaches, including maintaining vegetation heights that deter ground squirrels and supporting natural predators and their habitat, have demonstrated effectiveness and align with Canada’s broader environmental and climate commitments.

We would welcome further engagement on humane science-based solutions that protect both agricultural interests and Canada’s wildlife and would greatly appreciate a meeting to discuss the evidence and rationale used to justify this emergency authorization, and how it aligns with the conclusions of the 2020 review.

Respectfully,

Michael Bernard  
Deputy Director



Sheryl Fink  
Director, Canadian Wildlife



Sadie Parr  
Founder



Kaitlyn Mitchell  
Director of Legal Advocacy



Lesley Fox  
Executive Director



Lia Laskaris  
Chief Executive Officer



Hannah Baron  
Conservation Director



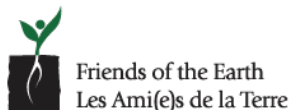
Lesley Sampson  
Executive Director



Bronwyn Roe  
Program Director, Healthy Communities



Beatrice Olivastri  
Chief Executive Officer



Krystal-Anne Roussel  
Co-Director and Counsel



Cilo Smeeton  
President



Bonnie Dell  
Executive Director

