



CANADIAN VETERINARY
MEDICAL ASSOCIATION
L'ASSOCIATION CANADIENNE
DES MÉDECINS VÉTÉRINAIRES

February 11th, 2021

The Honourable Patty Hajdu, Minister of Health
Health Canada
Address Locator 0900C2
Ottawa, ON
K1A 0K9

Re: Health Canada Strychnine Response

via e-mail: hcminister.ministresc@canada.ca

Dear Minister Hajdu,

The Canadian Veterinary Medical Association (CVMA) is the voice of the Canadian veterinary profession and considers animal welfare to be among its highest priorities. As such, our association is extremely concerned that Health Canada has elected to legitimize the use of strychnine and similar compounds as agents to kill nuisance animals and thereby, to ignore the existing body of evidence regarding the pain and suffering that these agents are known to cause.

A recent media release stated that the Pest Management Regulatory Agency is planning to disregard “humaneness” in how it assesses toxins such as strychnine and appears to have refuted the existence of relevant veterinary medical and physiological data. The CVMA holds that evidence of animal sentience and their ability to suffer are clearly demonstrated in the scientific literature as acknowledged in a previous decision by Health Canada regarding a ban on the use of strychnine to kill prairie gophers less than a year ago.

Compounds such as strychnine are known to lead to prolonged inhumane death by their mechanisms of action in the target species, as well as in non-target species. Sub-lethal doses may result in permanent damage to vital organs such as the brain, heart, lungs, kidneys, and liver. The accidental lethal poisoning of peoples’ pets and livestock, and of children, has been documented with the use of strychnine. Practicing veterinarians have recognized the fear, pain and intense distress these compounds cause in animals.

The World Organization for Animal Health (OIE) lists the use strychnine and similar chemicals for nuisance animal control as “unacceptable on animal welfare grounds”. Both the CVMA and the American Veterinary Medical Association (AVMA) concur with OIE and the scientific evidence in opposing the use of strychnine and similar agents due to the distress and conscious perception of pain they cause prior to death. The continued use of strychnine would therefore contravene the guidelines of the CVMA, the AVMA and the OIE.

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The CVMA acknowledges that wolf control is a complex issue. We recognize that lethal and non-lethal pest control measures may need to be used against nuisance animals to reduce damage or conflict, promote sustainable agricultural production, control diseases, and/or to ensure the conservation of biodiversity. However, such measures should be assessed on the basis of scientific evidence to be humane and be shown to have minimal environmental and human health impacts. The CVMA asserts that the use of the aforementioned chemicals as killing agents does not meet these criteria.

The CVMA strongly recommends that you consider the pain and suffering caused by an agent used to control nuisance animals as critically important criteria in your evaluation procedures.

The CVMA proposes that we facilitate a discussion between your evaluators and appropriate veterinary subject matter experts to add our expertise to your assessment of the impacts to animal welfare of killing agents used on nuisance animals. In this regard, we respectfully request that your staff contact our Chief Executive Officer, Mr. Jost am Rhyn at jamrhyn@cvma-acmv.org.

Respectfully,

A handwritten signature in black ink, appearing to read "Enid Stiles". The signature is fluid and cursive, with a large initial "E" and "S".

Dr. Enid Stiles
President
Canadian Veterinary Medical Association

Cc: jamrhyn@cvma-acmv.org, enid.stiles@gmail.com