

November 24, 2022

**Re: Proposed Re-evaluation Decision PRVD2022-18, Predacide Uses of Strychnine and Sodium Monofluoroacetate and their Associated End-use Products**

Established in 1953, The Fur-Bearers is a registered charity dedicated to promoting coexistence with wildlife and protecting fur-bearing animals. We are a national non-profit representing more than 60,000 supporters across Canada. The Fur-Bearers welcomes the opportunity to provide comments on the public consultation for the re-evaluation decision regarding the predacide use of strychnine and sodium monofluoroacetate (compound 1080).

We express firm opposition to the continued use of strychnine and compound 1080 and instead recommend a prohibition of their use in Canada. The harmful impacts that these predacides have on animals must be a primary consideration in their continued use. It is well established that these poisons cause intense suffering and prolonged death to both target and non-target animals. The Canadian Veterinary Medical Association (CVMA) position statement on pest management states that these chemicals do not meet the scientific criteria for humaneness.<sup>1</sup>

Strychnine results in extraordinary suffering as it causes seizures, hyperthermia, asphyxiation, exhaustion, and death can take up to 24 hours after initial symptoms. The use of this poison to kill wolves contravenes numerous association's guidelines, including the CVMA and the American Veterinary Medical Association.<sup>2</sup> Compound 1080 results in serious harms to animals as well, as this poison results in convulsions, vomiting, twitching of body parts, involuntary contractions, manic running, and muscle spasms. Research shows that some animals will suffer for days before finally succumbing to the poison.<sup>3</sup>

The risk mitigation measures in the proposed re-evaluation decision fail to include the harmful impacts that these poisons have on target species such as wolves, skunks, bears, and coyotes. As an organization focused on finding non-lethal, humane solutions for coexistence and wildlife management, we urge Health Canada to prohibit the use of these poisons and work with its federal, provincial, and industry partners to explore non-lethal, humane alternatives to the issues identified in the re-evaluation decision. The use of predacides does not address underlying problems that they're attempting to solve, nor is their use a reasonable or ethical long-term solution.

In 2022, it is unacceptable that ethical considerations such as the pain and suffering caused by strychnine and compound 1080 to wildlife are being ignored, and that the use of these poisons is still being considered. We urge Health Canada to consider the animal welfare implications caused by these poisons to wildlife and end their use in Canada. Thank you for considering our submission.

Sincerely,

Aaron Hofman  
Director of Advocacy and Policy  
The Fur-Bearers

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<sup>1</sup> <https://www.canadianveterinarians.net/policy-and-outreach/position-statements/statements/pest-management/>

<sup>2</sup> Proulx, G., Brook, R., Cattet, M., Darimont, C., & Paquet, P. (2016). Poisoning wolves with strychnine is unacceptable in experimental studies and conservation programmes. *Environmental Conservation*, 43(1), 1-2. [doi:10.1017/S0376892915000211](https://doi.org/10.1017/S0376892915000211)

<sup>3</sup> Sherley, Miranda. (2007). Is sodium fluoroacetate (1080) a humane poison. *Animal Welfare*. 16.