



February 13, 2019

Pest Management Regulatory Agency Publications Section
Pest Management Regulatory Agency (PMRA)
Health Canada
2720 Riverside Drive
Ottawa, Ontario
K1A 0K9

Re. Consultation: Humane Vertebrate Pest Control

It is the position of the Vancouver Humane Society (VHS) that humaneness must be a consideration in the pesticide registration process.

The humane treatment of animals is a central value of Canadian society, as evidenced by existing legislation that protects animal welfare (eg. provincial and territorial animal protection acts, Canada's Criminal Code, Health of Animals Act, Canada Wildlife Act) and by animal care guidelines (eg. Canadian Council on Animal Care and Canadian Veterinary Medical Association).

Wildlife management practices, including predator control, must too be reflective of this core value. VHS opposes the use of predacides, including sodium fluoroacetate (Compound 1080), sodium cyanide and strychnine, on the grounds that they are not only inhumane and violate animal welfare guidelines, but that they also pose an unacceptable risk to biodiversity, the environment and public safety. Therefore, we are calling on the Minister of Health and the Pest Management Regulatory Agency (PMRA) to prohibit predacides under the Pest Control Products Act (PCPA).

These predacides, which are used to control large vertebrate predators, including wolves, coyotes and bears, cause unjustifiable and prolonged suffering to the animals that fall victim to them. Ingestion of these toxins results in extreme pain and distress until death, which typically occurs within 1-2 hours, but depending on the dose ingested it may take up to 24 hours or longer for the animal to die.ⁱ This does not meet the Canadian Council on Animal Care guidelines, which defines a killing method as humane if it causes rapid (immediate) unconsciousness and subsequent death without pain or distress.ⁱⁱ Similarly, it fails to meet the guidelines of humane pest control outlined by the Canadian Veterinary Medical Association.ⁱⁱⁱ

In addition, predacides kill indiscriminately, resulting in the death of many non-target species, including those that scavenge on poisoned carcasses.^{iv} Not only does this pose an unacceptable risk to biodiversity and ecosystem health, but also to public safety. The case, which made headlines last summer, of a dog named Ruby who died after ingesting strychnine is a prime example of the risk to the general public and their pets.^v The same bait used to hide the toxin and attract the target species can just as easily attract unintended victims, with the same lethal results.

In conclusion, we have an ethical obligation to consider humaneness in how we interact with animals, and wildlife management should be no exception. As species face increased human pressure and extirpation, we must maintain ethical standards in how we address these conservation crises. Non-lethal strategies should always be prioritized in dealing with wildlife conflict and it's crucial to address root causes of conflict, which are typically tied to human activity (eg. habitat destruction). Inhumane lethal methods, including predicides, are not condoned by existing animal welfare guidelines and should not be permitted under the Pest Control Products Act.

Thank you for the opportunity to participate in this consultation.

Sincerely,

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ⁱ<https://www.researchgate.net/publication/280029193> Poisoning wolves with strychnine is unacceptable in experimental studies and conservation programmes

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ⁱⁱⁱ <https://www.canadianveterinarians.net/documents/pest-control>

^{iv}<https://www.researchgate.net/publication/280029193> Poisoning wolves with strychnine is unacceptable in experimental studies and conservation programmes

^v <https://www.cbc.ca/news/canada/calgary/dog-death-alberta-strychnine-pest-control-ban-poison-farms-1.4773270>