



Sept 26, 2025

Pest Management Regulatory Agency  
Health Canada  
2 Constellation Drive  
Ottawa, Ontario  
K1A 0K9

RE: Support for Emergency Use Registration of 2% Liquid Strychnine for Richardson's Ground Squirrel Control

To Whom It May Concern,

On behalf of Alberta Beef Producers, I am writing to emphasize the urgent need for reinstating 2% liquid strychnine under an emergency use registration for the control of Richardson's ground squirrels (RGS).

Across Alberta, RGS infestations continue to cause significant and deteriorating challenges for producers. Their burrowing destabilizes soils and infrastructure, damages equipment, and creates mobility hazards for livestock. At the same time, their aggressive feeding pressure reduces forage and crop yields at a scale that can directly threaten farm viability. These losses are especially severe in dry years, when every acre of forage and every bale of feed is critical.

While some alternative control measures exist, they are neither practical nor effective when infestations reach high densities. Trapping and shooting are too labour-intensive at scale, and other baits have proven less reliable, and not immune to off-target effects. Without access to strychnine, producers are left with limited tools that do not adequately protect their operations.

We believe strychnine can be used responsibly when paired with clear guidelines, proper oversight, and safe handling requirements. For many producers, it is the only tool capable of addressing RGS at the landscape level. Restoring access through an emergency registration would help safeguard Alberta's croplands, pastures, and rangelands against escalating damage.

In recent years, producers have reported losing the equivalent of hundreds of dollars per acre in forage and feed value to RGS infestations. These are not losses that insurance or risk management programs cover, meaning producers bear the full cost. Without timely action, these pests will continue to spread, compounding the economic and environmental impact.

For these reasons, we urge the Pest Management Regulatory Agency to reinstate 2% liquid strychnine under an emergency use registration. Alberta producers need effective, practical tools to protect their land, livestock, and livelihoods.

Thank you for your consideration.

Sincerely,

Brad Dubeau  
Alberta Beef Producers, General Manager