



# Re-evaluation Decision Document

RRD2006-23

## Sodium Cyanide

The purpose of this Re-evaluation Decision Document (RRD) is to notify registrants, pesticide regulatory officials and the Canadian public that Health Canada's Pest Management Regulatory Agency (PMRA) has re-evaluated the active ingredient sodium cyanide and its associated uses as a vertebrate pest control product for coyote control in outdoor settings in the province of Alberta only.

On 16 March 2006, Proposed Acceptability for Continuing Registration document [PACR2006-01](#), *Re-evaluation of Sodium Cyanide*, was published for consultation. The PMRA has reviewed the comments received and provides a response in Appendix I of this RRD. These comments did not result in substantive changes to the regulatory decision as described in PACR2006-01.

The PMRA has determined that this active ingredient is acceptable for continued registration. Mitigation measures to further protect handlers, bystanders and the environment are specified in this RRD (Appendix II). The registrants have been informed by letter of the specific requirements affecting their product registrations and the regulatory options available to comply with this decision.

*(publié aussi en français)*

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## Appendix I Comments to PACR2006-01 and Response

### 1.0 Comment Regarding Proposed Precaution Section Label Amendment

The proposed label amendment “Do not use in areas where exposure to people or pets is probable” is not necessary because Alberta Agriculture, Food and Rural Development maintains strict guidelines and training standards for the responsible use of toxicants. The specialists who use sodium cyanide in the province of Alberta are trained in proper placement of sodium cyanide. If there is any probable risk to people or pets, the specialists are instructed not to set out toxicants. In addition, the present label use limitation specifies a 400 metre distance from any residence as well as keeping dogs and other domestic animals away from field set applications.

#### Response

The PMRA acknowledges that sodium cyanide is a restricted product only used by trained specialists and that the current label specifies a 400 metre distance from any residence as well as keeping dogs and other domestic animals away from field set applications. In addition, as per PACR2006-01, the registrant is required to add the statement “Keep children, unauthorized personnel as well as dogs and other domestic animals away from set cyanide cartridges.” to the label. Therefore, the PMRA agrees that the statement “Do not use in areas where exposure to people or pets is probable” is not required and does not need to be added to the sodium cyanide label.

### 2.0 Comments Regarding Proposed Environmental Hazard Label Amendment

- 2.1 The proposed label amendment, presented below, would restrict use of sodium cyanide for Alberta farmers and ranchers suffering from livestock predation over huge geographical areas.

Use of this product is prohibited in areas where it might jeopardize the existence of endangered, threatened, vulnerable, special concern or indeterminate status species. Contact the local office of the Canadian Wildlife Service to determine locations of habitats occupied by these species occurring in or near the intended area of use.

Sodium cyanide is used only by trained specialists, and there are few, if any, concerns or records substantiating the occurrence of endangered species on livestock grazing systems within agricultural production zones (i.e., most of the larger mammalian predatory species categorized as “Species at Risk” do not populate agricultural ecosystems as these areas are devoid of their biological needs).

2.2 The swift fox is listed as “*Endangered*” by the Canadian *Species at Risk Act* and has only been recently reintroduced. The use of sodium cyanide in swift fox habitat would jeopardize the recovery of this species in Canada since poisoning is believed to be one of the primary factors that caused the extirpation of the swift fox from Canada. Due to the extreme vulnerability of this animal, it is proposed that the swift fox be specifically mentioned on the sodium cyanide label and that sodium cyanide use should be prohibited in areas where the swift fox is found. It is proposed that the following be provided on the sodium cyanide label:

- a map of the probable extent of occurrence of swift fox;
- a statement requiring that the proponent must prove to Alberta Fish and Wildlife that swift fox does not occur where the sodium cyanide will be used; and
- a requirement that a Alberta Fish and Wildlife office be consulted before the device is deployed in the mapped area of the swift fox.

### Response

The above comments have highlighted two main points, namely that:

- a) there is no indiscriminate use of the product as only trained specialists of the Alberta Agriculture, Food and Rural Development and Alberta Sustainable Resource Development use the product, and
- b) the swift fox (*Vulpes velox*) is an endangered species that has been re-introduced in southern Alberta and Saskatchewan and must be protected from any potential poisoning by use of sodium cyanide.

It is not feasible to include a range map on the product label. However, to address these points, the proposed label statement has been revised to the following.

Endangered species such as the swift fox (*Vulpes velox*) inhabit the same ranges as coyotes. Prior to using this product in areas likely to be inhabited by the swift fox (for location see: [www.pnr-rpn.ec.gc.ca/nature/endspecies/sar/db08s06.en.html](http://www.pnr-rpn.ec.gc.ca/nature/endspecies/sar/db08s06.en.html)), users must consult with the Alberta Fish and Wildlife Office in Medicine Hat or Lethbridge for approval.

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## Appendix II      Revised Label Amendments

Canadian end-use product labels must be amended to include the following statements to further protect handlers, bystanders and the environment.

To further minimize risk to handlers and bystanders, the following label statements are required in the **PRECAUTIONS** section:

When handling, setting or inspecting cyanide cartridges, always carry an antidote kit containing at least 6 pearls of amyl nitrite in case sodium cyanide is swallowed or inhaled.

Keep children, unauthorized personnel as well as dogs and other domestic animals away from set cyanide cartridges.

The following label statement is required in the **TOXICOLOGICAL INFORMATION** section:

Patient should breathe the contents of an amyl nitrate pearl 15–30 seconds each minute if necessary until 5 pearls have been used.

The Canadian end-use product label must include the following statement in a section entitled **ENVIRONMENTAL HAZARD**:

This pesticide is **TOXIC TO WILDLIFE**. Keep out of lakes, ponds or streams. Do not contaminate water by cleaning of equipment or disposing of wastes.

Endangered species such as the swift fox (*Vulpes velox*) inhabit the same ranges as coyotes. Prior to using this product in areas likely to be inhabited by the swift fox (for location see: [www.pnr-rpn.ec.gc.ca/nature/endspecies/sar/db08s06.en.html](http://www.pnr-rpn.ec.gc.ca/nature/endspecies/sar/db08s06.en.html)), users must consult with the Alberta Fish and Wildlife Office in Medicine Hat or Lethbridge for approval.

To allow the natural movements of endangered, threatened, vulnerable or indeterminate status species that may venture outside provincial or national parks or conservation areas, a buffer zone of 400 metres must be strictly obeyed.

The following statement in the **RESTRICTED USES** section of the label must be reworded from:

Place up to 3 cyanide cartridges on land where coyote control is required.

to the following:

Place up to 3 cyanide cartridges on land where a site is identified for coyote control.