

Strychnine Frequently Asked Questions

The purpose of this document is to be a resource for Rural Municipality (RM) and Ministry of Agriculture (ministry) staff to address frequently asked questions regarding the Strychnine Stewardship Program. The document also serves as an educational resource for RMs and ministry staff.

Use the links below to review questions related to the following topics:

- A) [Species at Risk \(SAR\) Assessments](#)
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A) Species at Risk (SAR) Assessments

- **What is involved in completing a SAR assessment and who completes it?**
 - The pre-sale SAR assessment is used to determine whether there are critical habitats or documented occurrences of SAR that may consume RGS or strychnine bait in the area.
 - The purpose of the pre-sale assessment is to determine if additional risk mitigation measures are required to protect SAR.
 - These measures could range from no additional restrictions to twice daily monitoring to no permitted use of strychnine.
 - Strychnine use will only be prohibited when risk to SAR cannot be effectively mitigated through the implementation of additional risk mitigation measures.
 - The ministry provided RMs with a land location verification tool to support pre-sale SAR assessments for all treatment locations listed in a strychnine user's Treatment Plan and Declaration Form.
 - The tool is an Excel file that enables automated pre-sale SAR assessments by simply entering legal land locations to look up eligibility and applicable risk mitigation measures.
 - **The proper format (outlined within the tool) must be used for the tool to work properly.**
 - In addition to the pre-sale SAR assessment, all strychnine users must assess all treatment locations for SAR presence and avoid strychnine application in areas where SAR are present.
- **Who is responsible for pre-sale SAR assessments?**
 - The RM is responsible for completing pre-sale SAR assessments for all locations listed in a Treatment Plan and Declaration Form prior to selling strychnine. The RM is also responsible for informing the potential strychnine user of the outcome of the pre-sale SAR assessments and documenting any additional risk mitigation measures that are applied to each treatment location.
 - The strychnine user is responsible for providing accurate legal land locations for all locations to be treated with strychnine. The user must assess the application sites for SAR presence before using strychnine and monitor the treated area for the mandatory four-week monitoring period. At a minimum, all treatment locations must be monitored daily for the first week and weekly for three additional weeks. During monitoring, all carcasses must be collected and disposed of and the number of carcasses recorded on the Product Evaluation Form.
- **Is there further guidance on the pre-sale SAR land location assessment result of “no spring application permitted”?**
 - This result means that the application result is **prohibited Spring Application (March 1 to June 15)**:
 - Application during the spring window (March 1 to June 15) is prohibited. **Late summer application is strongly recommended to be delayed until mid-August.**
 - This pre-sale SAR assessment result occurs due to the documented presence of SAR that are highly sensitive to strychnine during spring and early summer months.
 - Producers who apply strychnine after the prohibited spring period are still required to follow the standard monitoring frequency and duration: daily monitoring for the first week after application, followed by weekly monitoring for three additional weeks

(total monitoring period of four weeks). Please refer to saskatchewan.ca.ca/rgs-control to view the monitoring protocol ([View PDF](#)).

- As with all strychnine applications, the producer must also assess the site for the presence of SAR before applying strychnine. If SAR are present, strychnine application is prohibited.

- **How should non-target strychnine poisoning, including poisoning of SAR, be reported by strychnine users?**

- Incidents of non-target strychnine poisoning identified during post-application monitoring events must be reported on the Product Evaluation Form. If any species at risk, hawk, owl, eagle or vulture carcasses are detected by the producer during the post-application monitoring, the producer must collect the carcasses and report the incident to the Ministry of Environment inquiry line at 1-800-567-4224. The Ministry of Environment will provide additional guidance regarding sample storage and diagnostic testing, if warranted.
- Producers are not required to report incidents directly to Health Canada unless the incident occurs before application (e.g. spills, human exposure, etc.).
 - In situations where the incident occurs prior to application, the producer or RM staff must report incidents to Agromax. The producer or RM staff may also voluntarily report through Health Canada's voluntary incident reporting program.
- The Ministry of Agriculture will use information documented on Product Evaluation Forms to provide a summary report to Health Canada of incidents involving non-target poisoning that occurred during post-application monitoring. This is a federal requirement under the Emergency Use Registration (EUR). If you have any questions on how to report non-target strychnine poisoning, please contact the Ministry of Agriculture by emailing rgs@gov.sk.ca.

B) Documentation and Forms

- **Will all required forms be provided by the Ministry of Agriculture?**

- There are two required forms posted on saskatchewan.ca: the Treatment Plan and Declaration Form and the Product Evaluation Form are available [here](#).
- Information on each form is described in the mandatory training.
- The records required under the strychnine Emergency Use Registration (EUR) include documentation of integrated pest management (IPM) strategies used, a list of all treatment locations and details on monitoring efforts, including the number of carcasses collected and how they were disposed.
- Monitoring is required once a day for the first week and weekly for three additional weeks. If there are SAR in the area or critical habitat present, and application is still permitted, monitoring twice a day for the first week may be required.
- Only official forms developed through the Strychnine Stewardship Program will be accepted to ensure that all required information is captured consistently.

- **Are digital records and electronic signatures acceptable?**

- All forms, whether they are digital or physical copies, must be kept by the RM until the Ministry of Agriculture advises the records can be disposed. For the Treatment Plan and Declaration Form, a fillable PDF form is available. For digital records that are emailed to the RM, a digital signature is permitted. In these situations, the RM is required to maintain a copy of the email and the form.

- RM offices are responsible for accurately inputting information from the forms into a digital record-keeping spreadsheet that was provided by the Ministry of Agriculture.
- The spreadsheet and all records collected through the Strychnine Stewardship Program may be subject to audit.
- **Do individuals need to prove that their name is on land in the RM to be able to use strychnine?**
 - Under the Emergency Use Registration (EUR), eligible users may purchase and apply strychnine to land that they own, rent/lease or otherwise have control over within the eligible use area. As a result, it is not required to ensure that the person's name is on title prior to selling them strychnine. All treatment locations must be listed and verified to ensure they are located within the eligible use area.
 - Users who farm in multiple RMs are asked to obtain strychnine from a single RM. This RM will be identified as their primary RM when the user registers for the mandatory strychnine training.
- **Does the completed Product Evaluation Form need to be returned before additional strychnine supply can be sold to the producer?**
 - **Previously submitted land locations:** If a producer has already purchased strychnine to treat the land locations identified in an approved Treatment Plan and Declaration Form, a completed Product Evaluation Form must be submitted before additional supply can be sold to treat these land locations. If a producer has used all the supply initially purchased to treat sites identified in the Treatment Plan and Declaration Form and requires additional supply to finish the initial treatment, more strychnine can be purchased **IF** certain requirements are met. Please refer to the *"What is the limit per producer (cases or bottles) and is it based on individual, household or farm?"* question in **Section D**, which outlines the requirements.
 - **New land locations:** If the producer has not previously purchased strychnine to treat the land locations provided on the Treatment Plan and Declaration Form, strychnine can be sold to the producer before the Product Evaluation Form is completed for different sites the producer has already purchased strychnine for.
- **If a producer chooses to retain unused strychnine purchased during 2026 for use in 2027, do they need to submit a new Treatment Plan and Declaration Form before applying strychnine in 2027?**
 - Yes, the Treatment Plan and Declaration Form is only valid for the year of purchase. The remaining supply needs to be reallocated to the sites the producer plans to treat in 2027, which requires the producer to fill out a new Treatment Plan and Declaration Form. The RM must follow all procedures as if the producer is purchasing strychnine, including the use of the SAR Land Location Verification Tool to determine potential additional risk mitigation measures.

C) Integrated Pest Management (IPM) Verification

- **What constitutes acceptable proof that a user has an appropriate IPM plan?**
 - Users must fill out the Treatment Plan and Declaration Form, which requires the user to outline IPM strategies they have used in the past 24 months. The use of an IPM strategy or strategies other than strychnine use fulfills this requirement.
- **If a producer has not demonstrated the use of IPM strategies for RGS management in the past 24 months, can they still purchase strychnine?**

- If the producer has noted they have not used RGS IPM strategies in the past 24 months, the RM is expected to provide education on the importance of IPM strategies, and the need to implement IPM strategies moving forward, before providing the producer with strychnine.
 - Evidence of the producer's adoption of IPM strategies will be reviewed when the Product Evaluation Form is submitted.
 - All strychnine users are expected to implement at least one additional IPM approach to control RGS in addition to strychnine use.
- **Do RMs need to retain copies of user IPM plans or is verbal confirmation sufficient?**
 - IPM information is collected on both the Treatment Plan and Declaration Form and the Product Evaluation Form. IPM information is to be entered by the RM into the record-keeping spreadsheet.
 - The original form submitted by the user must also be kept by the RM. Original copies contain more detailed IPM information compared to what is entered in the record-keeping spreadsheet. Forms, including additional details in the record-keeping spreadsheet, will be reviewed during audits.

D) Strychnine Product

- **Who can apply strychnine?**
 - The individual purchasing strychnine is responsible for ensuring that all requirements of the Strychnine Stewardship Program are followed and that strychnine is applied in a safe manner. Other farm members may apply strychnine and monitor for, collect and dispose of carcasses under the supervision of the strychnine purchaser.
 - All individuals using strychnine are strongly encouraged to take the training program.
- **How are strychnine bottles to be disposed of?**
 - Cleanfarms' small pesticide container recycling program (available through most retailers) will not accept empty bottles of strychnine. In the interim, please seal empty bottles in a plastic bag and store them in a chemical shed until direction is provided on how to properly dispose of the empty containers. The ministry is developing a strychnine disposal policy that will be shared once available.
- **Is there a minimum farm size required to purchase strychnine?**
 - No, there is no minimum farm size. However, to receive strychnine, the eligible user must provide at least one eligible land location with a need for RGS control. **Strychnine is prohibited on land that is not actively being used for agricultural production**, including acreages, residential areas and areas accessible to the public.
- **Can a producer that has rented/leased all their land out purchase and apply strychnine on the agricultural land that they own?**
 - Yes, they can still purchase and apply strychnine to agricultural land that they own; however, the owner should inform the land renter/leaseholder prior to purchasing strychnine to ensure the following does not occur:
 - Both the landowner and the renter/leaseholder purchase strychnine to treat the same land locations, which is not acceptable through the Strychnine Stewardship Program;

- The landowner applies strychnine when the renter/leaseholder plans to have livestock present in the treated location. The landowner must communicate with the renter to ensure domestic animals, including livestock, are not present during strychnine application and the monitoring window.
- **Can individual bottles be sold?**
 - Yes, individual bottles can be sold, but they must be sold with the complete product label package, including the brochure, product label and bucket label.
It is also important to remind producers to print their own signage, which must be posted at treatment sites in accordance with the strychnine product label.
- **What steps should the RM take if a producer does not return unused strychnine?**
 - If the producer has remaining strychnine after they have applied in 2026, they may retain the remaining strychnine if they plan to apply strychnine in 2027. The producer must submit a new Treatment Plan and Declaration Form before using the remaining supply in 2027.
 - Producers cannot purchase supply for 2027 in 2026. The exception stated above is intended to prevent producers from having to return any remaining product if they unintentionally end up with more supply than needed in 2026.
 - Returning unused product at the end of the EUR, or if the producer does not intend to use the remaining strychnine in 2027, is a condition of the Treatment Plan and Declaration Form. If the user does not return unused product, they have broken the declaration and may no longer be able to access additional supply of strychnine.
 - Users could lose access to strychnine if they do not follow the requirements of the Strychnine Stewardship Program. The RM is responsible for monitoring the amount of strychnine distributed. Some details of the program are still under development, including how to proceed when unused strychnine is not returned at the end of the EUR period.
 - More information on the timeline of returning strychnine at the end of the Emergency Use Registration (EUR) period will be shared closer to the November 2027 deadline.
- **Who is responsible for handling and distributing strychnine at the local level?**
 - RMs in the strychnine eligible use area that have also confirmed with the Ministry of Agriculture that they would like to distribute strychnine are responsible for distributing strychnine to the product users.
- **What is the cost of strychnine?**
 - The cost per bottle will increase from the previous registration. In 2026, the expected price per case is approximately \$440 plus freight (Agromax). This price may fluctuate.
 - Many factors, including the cost of ingredients, impact the cost of the strychnine end-use product.
- **Can the RM determine sale price and how should taxes be handled?**
 - The Saskatchewan Ministry of Agriculture is not providing parameters on pricing or tax collection. Logistics related to pricing and tax collection for strychnine sales are the responsibility of individual RMs.
 - RMs can consult with SARM to discuss how tax collection can be handled.

- **Who is eligible to use strychnine and where can they purchase?**
 - Eligible users include producers and First Nation communities who have completed the mandatory training and own, rent/lease or otherwise have control over land with significant RGS populations located within the eligible use area. All criteria outlined within the Strychnine Stewardship Program and registered label must be met to remain an eligible user. Only eligible users who meet this definition can purchase strychnine.
 - All eligible users will purchase from participating RMs. Users must only purchase from a single RM. They are required to indicate which RM they will purchase from when registering for the online training.
 - First Nation communities can purchase strychnine from the closest RM participating as a distributor.
- **When will strychnine be available and in what form?**
 - Agromax, the supplier for Saskatchewan, was able to distribute a limited supply of strychnine starting June 19 after the recommended spring application window ending June 15.
 - Ongoing regional challenges in India have caused significant delays in the delivery of the raw strychnine ingredient. As a result, the second shipment of strychnine will not arrive before the end of the second recommended application window (July 15 to September 1).
 - All RMs that have placed strychnine orders will receive some strychnine once a second batch of strychnine is available. Due to delays outside of the control of the Ministry of Agriculture and Agromax, efforts will be focused on making supply available in time for spring 2027 application.
 - Strychnine will be available as two per cent liquid strychnine concentrate. Each 250 ml bottle will treat 1 kg of bait, which will treat approximately one acre, depending on the level of infestation.
- **Where can signage be purchased?**
 - A printable signage template is available on saskatchewan.ca/rgs-control. Printing and filling out required information on the form is the responsibility of the user. A limited number of weatherproof plastic sleeves have been provided to RM offices, which RMs will distribute to strychnine users.
 - If additional plastic covers are required, producers can use a ziplock bag or any other plastic cover that will protect the paper sign from rain and environmental damage.
 - Signs must remain in place and be readable for the entire duration that the bait is being placed in the treatment area. Signs are to be removed only at the end of the treatment period.
- **How should uneaten bait and animal carcasses be disposed of?**
 - Users must follow the disposal instructions on the product label, which outlines: “All carcasses and uneaten bait must be disposed of by incineration or burial in a pit no less than 46 cm (approx. 18 inches) deep, then covered to prevent scavengers from unearthing them.” This must be done throughout the monitoring period.
- **How does a producer that manages agricultural land in both Alberta and Saskatchewan go about purchasing strychnine?**
 - To ensure that all province-specific rules and regulations are adhered to, the producer must purchase strychnine in the province where it will be used.

- For example, strychnine intended for use in Alberta must be purchased from the Alberta municipality in which the agricultural land is managed. Similarly, strychnine intended for use in Saskatchewan must be purchased from the producer's primary Saskatchewan RM.
- The producer training only needs to be completed once, as the training is the same for both provinces. However, the following steps must be completed:
 - If the producer has completed training for Alberta, their primary Saskatchewan RM will not be reflected in their training certificate. To identify a primary Saskatchewan RM, the producer must contact their primary Saskatchewan RM to inform them that they have completed their training as an Alberta producer, and they are now identifying their primary Saskatchewan RM.
 - The RM must inform the Ministry of Agriculture to confirm the producer's primary Saskatchewan RM by emailing rgs@gov.sk.ca.
 - The identified primary RM must also verify the producer's training certificate before the sale of strychnine. The identified primary Saskatchewan RM must reach out to the Alberta municipality with access to the user's training record to confirm that training has been completed by the user.

- **Can strychnine be used on agricultural land within urban municipality borders?**

- No, strychnine is not to be used on agricultural land within urban municipal borders. This is due to the application of strychnine in these areas posing a greater risk to the public and domestic animals.

- **How should strychnine be stored?**

- Strychnine must be stored in a locked compartment with no public access. Strychnine may be stored with other pesticides. All storage instructions on the product label must be followed.
- Storage temperature should be kept below 30 C and above freezing.
- Freezing negatively impacts how well strychnine works.

- **What is the limit per producer (cases or bottles) and is it based on individual, household or farm?**

- The maximum an individual can purchase at one time is two cases (48 bottles). If additional product is required, certain steps must be taken, depending on the situation:
 - **Situation One:** If additional strychnine is required for sites for which a producer has already purchased product during the same application window, the following steps must be completed before additional supply can be purchased:
 - ❖ Producer submits a Treatment Plan and Declaration Form with all land locations with RGS infestations at the time of the initial purchase.
 - ❖ Producer purchases up to two cases of strychnine for the initial purchase.
 - ❖ Producer uses two cases of strychnine to treat as many locations as the supply allows and fills out the initial use and monitoring information on the Product Evaluation Form.
 - ❖ Producer presents the partially completed Product Evaluation Form to their primary RM demonstrating that the previously purchased strychnine has been used and additional product is required to complete the treatment of the listed land locations.

- ❖ RM reviews the partially completed Product Evaluation Form and updates the Record-Keeping Spreadsheet to reflect the new total number of bottles purchased.
- **Situation Two:** If the producer is purchasing strychnine for unique sites that they have not previously purchased strychnine for:
 - ❖ A new Treatment Plan and Declaration Form must be provided with unique land locations.
- Stocks of strychnine are limited and RMs that have placed orders may not have received their order or may only have received a limited supply. As a result, RMs may choose to further limit initial limits per producer.
- The RM is responsible for tracking all bottles of strychnine that are sold.
- The RM is also responsible for monitoring what proportion of bottles sold are used at the end of each application window prior to selling all additional bottles of strychnine.
- **Can an RM impose its own limit or stage purchase (e.g. smaller quantities at one time)?**
 - Yes, an RM may impose its own limit on the maximum amount that can be purchased at one time.
 - This could be used as a mechanism to prevent stockpiling and reduce the number of bottles that need to be returned at the end of the EUR period.
- **Are there restrictions on when strychnine can be sold?**
 - Strychnine can only be sold to producers who hold valid training certification.
 - Strychnine can be sold to producers between the end date of the spring application and the start date of the late-summer application window (June 15 to July 15); however, use during this period is not recommended. Once green-up has occurred, there are ample food sources for RGS, which limit the efficacy of rodenticides, including strychnine.
 - The recommended late-summer application window closes September 1. Application after this time is not recommended due to the biology of RGS. In fall, active RGS populations are dominated by juveniles. RGS adult females began overwintering in late July, and adult males follow shortly thereafter. Adults are below ground and unavailable for control. Population control requires targeting reproductive adults.
 - It is important to discuss the limitations and risk of using strychnine outside of the recommended windows with producers. Adherence to the recommended windows will help reduce risk to SAR and support future access to strychnine.
- **Is there a minimum treatment area required for a producer to purchase the maximum two cases in a single purchase? (For example, could a producer obtain two cases to treat a single quarter section?).**
 - Under conditions of high RGS populations, one bottle of two per cent liquid strychnine can treat up to one acre. As a result, under high populations, a producer may require the maximum of two cases to treat a single quarter section.
 - The producer will also be required to fill out the Product Evaluation Form with details on the number of acres treated, estimated RGS population and what proportion of the strychnine purchased was used.
 - This information will be considered during desk audits and may trigger a field audit.

- **Where can information on the ordering process be found?**
 - Agromax provided information to all RMs in the eligible strychnine use area that have expressed interest in distributing strychnine. The province is not involved in the logistics of purchasing supply. Purchasing strychnine is a transaction between the manufacturer (Agromax) and the vendor (RM).
- **Is distribution first come, first served?**
 - At the RM level, it is up to RM to determine how best to distribute strychnine to its ratepayers to ensure that all producers with high RGS populations have access to strychnine as a management tool.
 - RMs can estimate demand using several approaches, including historical demand from when strychnine was previously registered, the number of producers who have completed training, or by requiring all potential strychnine users to submit their Treatment Plan and Declaration Form in advance.
- **Can the RM set up a policy to give priority and sell to ratepayers first? For example, to limit situations where a producer would like to purchase strychnine from a jurisdiction where they do not own land to avoid surcharges?**
 - At the RM level, it is up to RM to determine how best to distribute strychnine to its ratepayers to ensure that all producers with high RGS populations have access to strychnine as a management tool.
 - Ministry of Agriculture guidance is for producers to identify their primary RM based on where they rent or own land. If there is evidence that producers are identifying RMs where they do not own, rent or lease land as their primary RMs to avoid surcharges, please notify rgs@gov.sk.ca so that we can address these situations as they come up.
 - Though strychnine stocks were unavailable in the spring and limited in early summer 2026, it is expected that additional product will be available for 2027 to meet demand.
- **As a landowner, can I prohibit my renter or lessee from using strychnine?**
 - If you would like to prohibit the use of strychnine on land that you lease or rent out, please contact the renter or lessee to discuss your concerns and/or amend the rental and lease agreements.
- **Can strychnine be used by RMs to treat road allowances for RGS?**
 - This is not acceptable under the current Emergency Use Registration (EUR) and Strychnine Stewardship Program. Here are the reasons why:
 - Use of strychnine to treat road allowances poses an increased risk of non-target poisoning due to public access to these areas.
 - The product label states that strychnine is not to be used in areas open to the public. Road allowances fall under this description.
 - The Treatment Plan and Declaration Form specifically states that the user must manage agricultural land and only use strychnine on agricultural land.
 - The SAR Land Location Verification Tool does not account for road allowances.

E) Audits and Consequences for Misuse

- **How frequently will audits occur, and will they be scheduled or unannounced?**
 - Field audits will occur during both the spring and late-summer application windows.
 - Field audits will be prioritized on locations that have a high RGS population areas combined with high SAR risk.
 - All field audits will be scheduled with the strychnine user to ensure that they are aware that someone will be accessing the land and to obtain permission. If a strychnine user does not grant access to the property for a field audit, they may lose access to strychnine in the future.
 - Desktop audits on records will occur without notice to the strychnine user.
- **What documents or records will be requested by auditors?**
 - Desktop audits on records will include a review of distribution records and all other documentation associated with the Strychnine Stewardship Program, including the Treatment Plan and Declaration Form and Product Evaluation Form.
 - The Ministry of Agriculture has provided RMs with a Strychnine Stewardship Program Record-Keeping Spreadsheet and an associated Standard Operating Procedures document to maintain a database of all records. The Record-Keeping Spreadsheet will be audited.
 - Strychnine supply will be one of the focus areas of record-keeping audits. RMs are responsible for monitoring the amount of strychnine distributed. They must track the amount of product used (reported by the user) and the amount of product returned. At the end of the EUR, all unused products must be returned to the RM office where it was purchased.
- **What is the process for regaining access to strychnine if an RM fails an audit?**
 - The RM may lose access to strychnine. Depending on the violation, the RM may need to complete additional training before renewed strychnine access is considered.
- **How will product stockpiling or misuse realistically be prevented?**
 - Sales and product-use records, as well as a two-case maximum purchase at one time, will be used as mechanisms to reduce the risk of stockpiling.
 - All users are required to submit a Product Evaluation Form that will state the number of bottles purchased and used. These must be returned at the end of each application.
 - Producers are also required to sign a declaration form in which they agree to:
 - Only use strychnine on sites where RGS represent a significant economic threat.
 - Provide contact information, application locations and IPM used on-site in last 24 months.
 - Follow the label, use only for RGS control and allow field access to officials to audit use.
 - Avoid exposing SAR and use product as part of an IPM program, rather than relying on it as the only control method.
 - Monitor sites after application for non-target and RGS carcasses at least daily for the first week and weekly for the next three weeks. Additional (twice-daily) monitoring for the first week is required on SAR critical habitat or where likelihood of SAR is high.
 - Complete the Product Evaluation Form, documenting any non-targets killed, within the timeline outlined and allow the RM and Saskatchewan Ministry of Agriculture access to all information for reporting to Health Canada.
 - Not transfer product to anyone except the RM that sold it and return all unused product to that RM by November 1, 2027.

- It is important to remember and communicate that the likelihood of long-term access will depend on the success and data collected through the EUR. Any stockpiling or misuse will greatly reduce the likelihood of the EUR being renewed or long-term access being granted.
- **Who is responsible for on-site enforcement or verifying compliance?**
 - As per the signed declaration form, all strychnine users are required to follow all label restrictions and meet all requirements of the Strychnine Stewardship Program.
 - Under the Strychnine Stewardship Program, the Ministry of Agriculture is responsible for completing record and field audits.
- **What happens if producers do not submit the Product Evaluation Forms?**
 - If a producer fails to submit a Product Evaluation Form, they may no longer be eligible to purchase strychnine during the duration of the EUR and potentially in the future.
- **What happens if RMs are missing documentation during audits?**
 - The outcome will depend on the extent of missing information and may range from education to loss of eligibility to distribute strychnine.
- **What happens if an untrained person comes to pick up or purchase strychnine?**
 - Strychnine is not to be sold or distributed to anyone who has not completed the mandatory training.
- **What happens in cases where strychnine is used on unapproved land?**
 - Situations like these will be dealt with on a case-by-case basis. Please contact rgs@gov.sk.ca to discuss approaches as situations arise.

F) RM-Specific Questions and Liability

- **Are RMs liable if the user fails to comply with the Strychnine Stewardship Program and product label?**
 - No, RMs are not responsible for users that do not comply with the Strychnine Stewardship Program and product label. It is the RM's responsibility to ensure that strychnine is only provided to users who have provided the required documents and information.
 - The RM is responsible for ensuring that all records are maintained, providing oversight of the sale of strychnine, ensuring that all forms are accurately completed and certifying the Treatment Plan and Declaration Form. The RM will also ensure that all previously purchased strychnine has been used before selling more to the same strychnine user.
- **If SAR are harmed or found deceased at a treatment site following the use of strychnine, does liability rest with the RM, the user or both?**
 - If the RM has adhered to all aspects of the Strychnine Stewardship Program, including SAR assessment of locations planned to be treated, that are required before sale, the responsibility would rest solely with the user.
- **Do the RMs require RGS management plans or policy/bylaw?**
 - No, specific policy development or bylaws are not required.

- **Are RMs required to have a pesticide vendor licence?**
 - No, RM offices are exempt from requiring a vendor licence. RMs must complete the mandatory strychnine administrator training and adhere to all requirements under the Strychnine Stewardship Program.
- **What is the liability of not following the product label?**
 - Fines and liability for misuse are consistent with fines and liability associated with the misuse of all pest control products and are outlined under the federal *Pest Control Products Act*.
- **Can an RM opt in next year but not this year?**
 - Yes, this is possible, however, the recommended application window ends September 1. It is important to note that if an RM does not opt in to distribute, their producers will not have access to strychnine unless their RM arranges with another RM to distribute strychnine on their behalf. If this arrangement is made between RMs, the Ministry of Agriculture must be informed.
- **Do producers return unused product to the RM or Agromax?**
 - At the end of the EUR, producers and all strychnine users will return the unused product to the RM.
 - Collection will then be arranged for disposal. The specifics of this process are still under development and will be refined as we move into 2027.
 - If producers and RMs only purchase based on demand and need, the volume of unused product to be returned will be minimal.
- **Should RMs refund producers for full bottles and partial bottles?**
 - The Ministry of Agriculture does not have a policy or specific guidance on how an RM should approach refunds for returned product. The RM has flexibility to determine what approach works best for their jurisdiction.
- **Will RMs be reimbursed for returned product?**
 - The Ministry of Agriculture will not reimburse RMs for returned product.
 - If producers and RMs only purchase based on demand and need, the volume of unused product to be returned will be minimal.
- **Who pays the shipping or returned costs?**
 - For all purchases from the supplier, Agromax, the RM will be responsible for covering the shipping costs.
 - At the end of the EUR, the strychnine user will be responsible for returning all the unused product to the RM.
 - The specifics regarding collection and disposal of all unused product at the end of the EUR is still under development and will be refined as we move into 2027.
- **What happens if a producer does not return unused product in practice?**
 - If a producer fails to return unused product, they may lose the ability to purchase strychnine in the future if the EUR is renewed or a full registration is granted.
 - It is also important to note that records collected under the Strychnine Stewardship Program will be shared with Health Canada's Pesticides Regulatory Directorate. Failure to return unused product may lead to compliance enforcement by Health Canada.

- It is also important to note that the likelihood of long-term access to strychnine will be reliant on the outcome of the EUR. Stockpiling or misuse of strychnine will reduce the likelihood of long-term access in Saskatchewan.
- **Do producers need to return unused strychnine at the end of the 2026 growing season?**
 - If the producer plans to apply strychnine during the EUR period in 2027, they do not need to return unused strychnine at the end of the 2026 growing season.
 - Before the producer uses the remaining stock in 2027, they must fill out a new Treatment Plan and Declaration Form. The form must be completed before they use their existing supply.
 - All strychnine will need to be returned at the end of the EUR period in 2027. Timelines will be communicated to RMs at a later date.
- **Should orders be revised based on the limited availability in 2026?**
 - This is at the discretion of the RM; however, RMs, especially those who have not received strychnine, should consider whether the original order needs to be revised to reflect a single application year.
- **How should RMs estimate how much strychnine to order?**
 - To minimize the amount of strychnine left at the end of the EUR, RMs are encouraged to order based on demand.
 - Some tools that a RM may use to estimate demand are as follows:
 - Sales records under the previous registration: If the RM distributed strychnine when it was previously registered, these sales records could be used to estimate demand.
 - Training records: The number of producers who have identified the RM as their primary RM can be used to estimate demand. This will provide an idea of how many users plan to order strychnine.
 - Treatment Plan and Declaration Form: Requiring producers to submit the Treatment Plan and Declaration Form in advance will provide the most accurate estimate of demand, though this may not be practical in all cases.
- **Should RMs wait for the Treatment Plan and Declaration Form to be submitted before ordering?**
 - This is a decision that needs to be made at the RM level.
 - The value in requiring the submission of the Treatment Plan and Declaration Form prior to ordering strychnine is that it will provide the most accurate estimate of demand.
 - If this approach is taken, RMs are encouraged to communicate broadly with ratepayers and those who have taken the training to ensure they are aware and know how to submit the forms.
- **Can RMs combine orders to reduce shipping costs?**
 - The Ministry of Agriculture has no concerns with this approach and encourages collaboration between RMs.
 - If this approach is taken, please notify rgs@gov.sk.ca so that the Ministry of Agriculture is aware of the accurate number of strychnine bottles that each RM will be obtaining. This will simplify desk audits (where applicable).
- **What is the exact step-by-step process at the time of sale?**
 - In general, the step-by-step process at the time of purchase is the following:
 - User fills out and submits signed Treatment Plan and Declaration Form to the RM office.

- RM reviews form for accuracy and completeness.
 - RM confirms the producer has completed training and verifies the primary RM noted in training records of where the producer must purchase strychnine.
 - RM certifies the Treatment Plan and Declaration Form.
 - RM conducts a pre-sale species at risk (SAR) assessment utilizing the provided SAR Land Location Verification Tool and informs the producer of the outcome for all land locations listed in the Treatment Plan and Declaration Form.
 - Strychnine can be sold to the producer if the pre-sale SAR assessment permits.
 - RM provides protective signage plastic covers to the producer. Once the RM's supply of plastic bags that the ministry has provided is exhausted, producers can use a ziplock bag or any other plastic cover that will protect the paper sign from rain and environmental damage. RM ensures that all records are entered into the record-keeping spreadsheet.
- For further details, please refer to the Strychnine Stewardship Program RM Checklist.
- **Must all land locations be confirmed using the species at risk (SAR) assessment tool before selling?**
 - Yes, all land locations must be confirmed using SAR assessment tool prior to sale to ensure treatment locations are within the eligible-use area and assess if additional risk mitigation measures are required following the SAR assessment.
 - Every location must have a pre-sale SAR assessment conducted by the RM utilizing the provided SAR assessment tool (Excel file) to determine if any additional risk mitigation measures are required.
 - The pre-sale SAR assessment may result in no permitted strychnine use on the location; in such cases, strychnine cannot be sold to treat that specific site.
 - Locations listed on the Declaration and Treatment Plan Form may be outside of the RM of sale as producers may farm in multiple RMs.
- **Should RMs print off important documents (product label, safety data sheet, signage, monitoring protocol and forms) on behalf of the producer?**
 - It is the responsibility of the producer to access these documents and print as needed; however, it is best practice to remind producers about these important documents.
 - RMs can consider printing documents on behalf of the user, especially if the producer does not have a convenient means of doing so themselves.
- **How should staff handle producers claiming training but who are not listed in the training spreadsheet?**
 - Unless a record of training completion has been obtained by the RM office, strychnine cannot be sold to the producer, even if they claim that they have completed training.
 - RM staff should remind the producer that they are to wait 48 hours before attempting to purchase strychnine to ensure their record is received.
 - The RM office can direct any issues related to accessing training to learning@sarm.ca and inquiries related to the need for training to rgs@gov.sk.ca.
- **Can RM staff purchase as producers?**
 - Yes, if the RM staff member has completed the mandatory strychnine training and manages agricultural land, they may purchase strychnine from the primary RM they noted in the training

documentation. If the RM staff member has completed the administrator training, they do not also need to complete the producer training, as the administrator training covers all content in the producer training.

- **Can licensed applicators purchase and apply strychnine?**

- As the declaration form and IPM are tied to the land and integrated pest management practices, the producer or First Nations community, should purchase the strychnine and complete the Treatment Plan and Declaration Form.
- Following the purchase of strychnine, the producer can hire a licensed applicator to apply the strychnine and complete all monitoring under the supervision of the purchaser.
- The producer who purchases strychnine will remain responsible to ensure that all requirements under the Strychnine Stewardship Program are met.

G) Richardson's Ground Squirrel (RGS) Management

- **What does an RGS Treatment plan entail?**

- A RGS treatment plan is required for all strychnine users and includes documentation of all RGS management strategies implemented over the last 24 months. RGS is best managed through an IPM approach where strychnine is one tool available to producers. The treatment plan will also include the location and approximate acreage of all sites where strychnine will be applied.
- Following the application of strychnine, users are required to complete a Product Evaluation Form that documents how strychnine was applied and all monitoring efforts.
- There is no requirement for the RM to complete a RM-specific RGS management plan.

- **What is the status of the Gopher Control Program?**

- The Gopher Control Program will continue to be available through the Saskatchewan Association of Rural Municipalities (SARM) in 2026-27 and 2027-28. Program guidelines will be publicly available soon.
- Strychnine will not be eligible for rebate under the Gopher Control Program.

- **Do RMs pay for the strychnine upfront? Are they out money if the farmers return products before Nov 27?**

- This is still being determined. Details will be shared as soon as they are available.
- If users only obtain enough strychnine to control RGS present within each treatment year, it is expected that the amount of product returned will be minimal.

H) Training for RMs and producers

- **What are the training requirements?**

- Mandatory training is required for all RMs distributing strychnine and all users obtaining and using strychnine for RGS management. The training includes information on strychnine use restrictions, species at risk (SAR) protection, pesticide safety and storage.

- **When is training available and how do I access it?**
 - The training program is now available through a virtual, self-paced course offered on SARM's website. The course includes five chapters, including a video and short knowledge check. It is expected that the entire training course will take approximately 90 minutes to complete.
 - Training can be accessed here: [Strychnine Stewardship Training - SARM | Saskatchewan Association of Rural Municipalities](#).
 - Online training will remain open until September 1, 2026.
- **Is there a cost associated with training?**
 - Training is free.
- **How can a user complete training if they do not have access to the internet?**
 - Training is only offered virtually. If the user's primary RM office is willing, the user could use a computer in your RM office to create an account and take the training. Alternatively, users may use a public library to access a computer.
- **Does training have to be taken multiple times by an administrator who is the administrator for multiple RMs?**
 - No, the administrator will only need to complete training once. Agromax will be in communication with participating RMs. Once Agromax initiates communication, the administrator must inform Agromax of all RMs the administrator is responsible for.
- **Does an administrator who is also a producer need to take producer training in addition to the administrator training?**
 - The administrator training covers all information included in the producer training. An administrator who is also a producer is only required to take the administrator training if the RM they are employed at is their primary RM and the following is completed: The administrator must inform the Ministry of Agriculture by emailing rgs@gov.sk.ca that they are an administrator who is also a producer interested in purchasing strychnine from the RM office they are employed.
- **Do strychnine users with land in multiple RMs need to take training multiple times?**
 - No, they do not. Users must purchase all strychnine from the primary RM they identified during training. Strychnine purchased from the primary RM can be used in other RMs the user has land in, provided it is used within the eligible use area.
- **Does training need to be retaken in 2027?**
 - No, if a producer or administrator has already taken training, they no longer are required to retake training in 2027. Training completed in 2026 will remain valid for the duration of the Emergency Use Registration (EUR). Producers and administrators who have not yet taken training are still required to take the mandatory strychnine training in 2027.
 - The current training certificate that individuals have received outlines that their training expires September 1, 2026. Individuals will be informed that the training will remain valid for the 2027 application season.
 - If updates are required to certain aspects of training, they will be shared with producers and administrators as a notification via email.

- **Who in the RM is responsible for taking the training?**
 - It is up to the RM to determine how they will handle and assign the roles associated with the Strychnine Stewardship Program amongst RM staff members. The expectation is that the training will be completed by whoever will be responsible for maintaining the strychnine records and distributing strychnine to users. There must be coordination in the RM to ensure that all RM responsibilities, including eligibility assessments and record collection, are completed prior to distributing strychnine and throughout all stages of strychnine use.
- **Do all individuals working on the farm need to complete strychnine training?**
 - The person purchasing strychnine is responsible for ensuring that all requirements of the Strychnine Stewardship Program are followed, and that strychnine is applied in a safe manner. Under the Emergency Use Registration (EUR), eligible users may purchase and apply strychnine to land that they own or occupy within the eligible-use area. Other farm members may apply strychnine and monitor for, collect and dispose of carcasses under the supervision of the strychnine purchaser.
- **Do strychnine users need to retake strychnine training if they entered the wrong primary RM in their training or need to purchase strychnine in an alternative RM that they manage agricultural land in due to the primary RM not distributing strychnine?**
 - To avoid the need for the user to retake the training, the user can contact the alternative RM where they manage agricultural land and from which they would like to purchase. The RM can then make an agreement with the producer to acknowledge the primary RM change. The producer can then purchase all strychnine supply from this RM. A notification of the agreement must be sent to the RGS inbox (rgs@gov.sk.ca), so the Ministry of Agriculture has a record.
- **Can producers take training multiple times to identify several primary RMs?**
 - No, the producer can only identify one primary RM. They must purchase all strychnine from the primary RM they identified in their training. Identifying multiple primary RMs is in contravention of the Strychnine Stewardship Program.

I) Strychnine Stewardship Program Record-Keeping Spreadsheet

- **Does the RM administrator need to view a hard copy of the producer training certificate before providing strychnine?**
 - No, a hard copy is not required. There is misleading wording in the Record-Keeping Spreadsheet (columns AK and AL colour-coded in red), which refers to the mandatory training check.
 - RMs can check the records online through a link provided by SARM. RM staff can fulfill the requirements outlined in columns AK and AL by checking the online database provided by SARM to ensure the producer has completed their training and their primary RM matches the RM they are purchasing strychnine from.
 - ❖ This is more secure, as training certificates can be modified, and reduces the burden on RMs to collect and store printed certificates.
 - If the records in the SARM online database show that the producer has completed mandatory training, RM administrators may enter Y (for yes) for both columns AK and AL.

❖ This eliminates the need for a producer to provide the RM administrator with the certificate.

- **How should the number of bottles sold be recorded when the producer has included multiple treatment sites in their Treatment Plan and Declaration Form?**
 - To avoid confusion regarding the total number of bottles purchased, only report the total number of bottles for the entire purchase in column K in the first row for the producer. At the time of sale, it will be difficult for the producer to know exactly how many bottles are needed per land location. This approach prevents producers from providing inaccurate estimates.
 - For example, if the producer has provided six land locations and purchased 24 bottles of strychnine, the number of bottles sold for the first land location reported for the producer would be 24 and column K would be blank for the next five land locations.
 - The producer will note how many bottles are used per treatment site in the Product Evaluation Form. It is critical to record the bottle usage and return information for each location once the Producer Evaluation Form is returned (columns BR to BT).