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November 27, 2013

National Institute Environmental Health Sciences
Office of the Report on Carcinogens
Room 2138
530 Davis Drive
Morrisville, NC 27560

**Subject: Chlorothalonil Nomination to the National Toxicology Program Carcinogen List:
National Institutes of Health: NIH_FRDOC_0001-8332**

Dear Office of the Report on Carcinogens:

On behalf of Michigan Farm Bureau's nearly 49,000 farming families, thank you for the opportunity to comment on Chlorothalonil. We are concerned that the fungicide chlorothalonil is targeted for inclusion in the Report on Carcinogens (ROC) list. The fungicide is used in Michigan in the production of potatoes, tomatoes, cucurbits, cherries, and some vegetable crops.

Not only are existing pests and diseases a concern for Michigan's specialty crop industry, but the new onslaught of invasive diseases threaten future crop production. Michigan farmers have safely used Chlorothalonil to provide healthy fruits and vegetables for decades.

EPA already has assessed more than 400 studies concerning environmental and human safety, as part of chlorothalonil's current registration review. Additional evaluation by NTP for potential carcinogenicity is redundant and, quite frankly, a waste of taxpayers' money.

Fungicides play an enormously important role in modern agriculture, reducing spoilage and ensuring a wholesome product, especially in Michigan. Chlorothalonil is a non-systemic foliar fungicide with protective action against a broad spectrum of plant diseases. This quality makes chlorothalonil an excellent resistance-management partner for fungicides with single-site modes of action.

The fact is, it has been used to protect a large variety of crops from a multitude of diseases without incident. Michigan farmers are close to the ground — they care about the land they tend and their friends and family who tend it, paying keen attention to the PPE worker instructions on the label.

Michigan Farm Bureau remains worried a listing on the ROC would deter the use of chlorothalonil. Please let EPA complete its job of registration review first.

Sincerely,

[Redacted]

Ryan Findlay
National Legislative Counsel