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November 21, 2013

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

RE: 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 the Agricultural Retailers Association (ARA) and its members, I am writing to express concern regarding the targeting of the fungicide chlorothalonil to be added to the Report on Carcinogens (ROC) list.

Statement of Interest ARA is a not-for-profit trade association that represents America's agricultural retailers and distributors. ARA members provide goods and services to farmers and ranchers which include: fertilizer, crop protection chemicals, seed, crop scouting, soil testing, custom application of pesticides and fertilizers, and development of comprehensive nutrient management plans. Agricultural retailers and distributors are scattered throughout all 50 states and range in size from local family-held businesses and farmer cooperatives to larger companies with hundreds of retail outlets across the USA. ARA members play an important role feeding the world.

Important Fungicide with No Readily Available Substitutes

Chlorothalonil, first registered in the United States in 1966, is a non-systemic foliar fungicide with protective action against a broad spectrum of plant diseases. EPA has already 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 unnecessary use of scarce taxpayers' money.

In the agricultural retail business, chlorothalonil is an essential crop protection tool for a successful crop year. It is an excellent resistance-management partner for fungicides with single-site modes of action. Chlorothalonil has been used to protect a variety of crops from numerous diseases without any known incidents. Agricultural retailers and their farmer customers are excellent stewards of the land, implementing up-to-date pesticide stewardship practices, utilizing state of the art precision agricultural technology, and closely following the personal protective equipment (PPE) worker instructions on the Federal Insecticide Fungicide Rodenticide Act (FIFRA) required label. A listing of chlorothalonil on the ROC would be a disservice to the work being done by the EPA, the users of this essential crop protection product, and consumers who demand a safe and healthy crop.

Thank you for your review and consideration of this important matter!

Sincerely,

[Redacted]

Richard D. Gupton
Senior Vice President, Public Policy & Counsel