



December 30, 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 the 200 members of Washington Friends of Farms & Forests, I am writing to express our concern about the fungicide chlorothalonil being targeted for the Report on Carcinogens (ROC) list.

This product is already under registration review by EPA, which has assessed more than 400 studies concerning its environmental and human safety. Further evaluation of chlorothalonil by the National Toxicology Program for potential carcinogenicity is a duplication of effort and not an efficient use of taxpayers' money.

Currently more than a third of the Pacific Northwest region's 180,000 acres of potatoes are treated with chlorothalonil. Fungicides have a significant role in modern agriculture, reducing spoilage and ensuring a wholesome product. We have no effective alternative for this long-standing critical management tool to ensure a safe and healthy crop.

Chlorothalonil is especially important for potato production to guard against developing disease resistance.

Chlorothalonil is also an important tool to control turf diseases in our damp climate. Approximately 15% of our golf turf — greens, tees, fairways, rough — are treated with chlorothalonil. However, almost all greens are treated, because diseases spread rapidly and damage greens compromising play.

Chlorothalonil also prevents thinning grass, brown patches and bare spots that pose significant cost to repair. Golf is a significant industry in Washington. We host national tournaments and bring much needed tourism dollars to the region. Diseased courses will not be able to attract these tournaments.

Listing chlorothalonil on the ROC would do a disservice to both our farmers and our turf professionals, both of whom are trained to follow best management practices and ensure the use of personal protective equipment. Please allow EPA to complete its job of registration review first.

Sincerely,

[Redacted]

Heather Hansen
Executive Director