



WASHINGTON STATE POTATO COMMISSION
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November 25, 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 Washington State potato growers, I am writing to provide comments regarding the tentative addition of chlorothalonil to the National Toxicology Program carcinogen list.

Our farmers will produce over 9 billion pounds of potatoes on 160,000 acres this year. That harvested crop is mostly used in processing applications, for example the production of frozen french fries, potato chips and dehydrated potatoes or instant mashed potatoes. We also have a robust fresh potato industry and both support a resilient food security presence, domestically and around the globe. We estimate that 9 out of every 10 potatoes grown will leave the state. This provides \$4.6 billion dollars in direct and indirect economic benefit while supporting over 23,500 jobs.

We are concerned about the fungicide chlorothalonil being targeted for the Report on Carcinogens (ROC) list. To our knowledge 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.

Currently more than a third of the Pacific Northwest potato acres are treated with chlorothalonil. Fungicides play an important role in modern agriculture and this tool is critical in the management of late blight. Late blight is a devastating potato disease that caused the 1845 Irish potato famine, left unchecked has the ability to destroy a potato crop within hours of infection.

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.

Chlorothalonil has been used to protect a large variety of crops from a multitude of diseases without incident. Our growers adhere to the labeled safety requirements, protecting the environment and applicators. Please let EPA complete its job of registration review first before considering listing any product on the ROC.

Sincerely,

[Redacted]

Matt Harris
Assistant Executive Director
Director of Governmental Affairs
Washington State Potato Commission