

Wisconsin Potato & Vegetable Growers Association, Inc.

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November 18, 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:

I am writing to express my concern over unnecessary duplication of efforts related to product review(s). The EPA already has assessed more than 400 studies concerning environmental and human safety, as part of chlorothalonil's current registration review. I am writing to express my concern about targeting the fungicide chlorothalonil for the Report on Carcinogens (ROC) list. Additional evaluation by NTP for potential carcinogenicity is redundant, duplicative and a waste of taxpayers' money.

Currently more than a third of the Pacific Northwest region's 180,000 acres of potatoes are treated with chlorothalonil. Fungicides play an enormously important role in modern agriculture, maintaining plant health, reducing spoilage and ensuring wholesome products. As someone with dirt under my fingernails, I can tell you I've seen no ready substitutes for this long-standing critical management tool to ensure a safe and healthy crop.

In the potato business, especially, chlorothalonil is key to a successful year, because any substitutes, including the newer fungicides, are prone to eventually promote disease resistance.

This is not the case with chlorothalonil, which 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 on land or sea. Farmers are close to the ground — we care about the environment we tend and the people who tend it, paying keen attention to the PPE worker instructions on the label.

The attempt of listing the use of chlorothalonil on the ROC would deter its use. Please let EPA complete its job of registration review first. The ROC review I / listing is unnecessary and does nothing to protect humans or the environment.

Sincerely,

[Redacted]

Duane W. Maatz, Executive Director