



Idaho Farm Bureau Federation

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November 26, 2013

National Institute of Environmental Health Sciences
Office of the Report on Carcinogens- Rm. 2138
530 Davis Drive
Morrisville, North Carolina 27560

Re: Chlorothalonil Nomination to the National Toxicology Program Carcinogen List: National Institutes of Health: NIH FRDOC 0001-8332

Dear Sir or Madam:

I am contacting you today to express the Idaho Farm Bureau Federation's (IFBF) opposition to the inclusion of the fungicide chlorothalonil (fungicide) in the Report on Carcinogens (ROC) list. IFBF is comprised of over 70,000 member families throughout Idaho and represents almost 60% of our state's farmers and ranchers. Chlorothalonil is a valuable chemical tool for a large number of our members and the Idaho agriculture industry in general.

Chlorothalonil has been registered with the United States Environmental Protection Agency (EPA) since 1970 and is registered for use in Canada, Mexico, Brazil and Europe. It is used on 65 different crops for protection against more than 125 plant diseases. The fungicide is an important disease-management tool for integrated pest management (IPM). Use restrictions in the United States could well put Idaho and United States' agriculture at a significant production disadvantage.

As part of the fungicide's current registration review, EPA has already assessed more than 400 studies concerning environmental and human safety. Additional evaluation for potential carcinogenicity is redundant and a waste of taxpayer dollars.

Idaho is the nation's leading potato producing state. More than one-third of the Pacific Northwest's 180,000 acres of potatoes are treated with this fungicide and a great many of these acres are in Idaho.

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Chlorothalonil reduces spoilage and ensures a quality product. It is a vital key to a successful crop year, as newer fungicides are prone to eventually promoting disease resistance. This is not the case with chlorothalonil, which protects against a broad spectrum of plant diseases.

This fungicide protects a large number of crops from a variety of diseases. PPE worker instructions on the label are noted and practiced. Listing chlorothalonil on the ROC could deter its use. EPA must be allowed to complete this fungicide's registration review before any other steps are taken.

Thank you for the opportunity to express our thoughts on chlorothalonil's addition to the ROC list.

Sincerely,

[Redacted]

Frank Priestley, President
Idaho Farm Bureau Federation

cc: Senator Mike Crapo
Senator Jim Risch
Congressman Mike Simpson
Congressman Raul Labrador