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December 13, 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 on behalf of the more than 41,000 member families of the Washington Farm Bureau who are hard working families committed to raising the food, feed, fiber, and fuel for our state, the nation, and the world. We wish to express concern about the fungicide chlorothalonil being targeted for the Report on Carcinogens (ROC) list. 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 and a poor use of taxpayers' money.

This product, and fungicides in general, play an important role in modern agriculture, reducing spoilage and ensuring a wholesome product. As an industry that is dependent on global markets, we need all tools available to ensure a safe, healthy, cost effective crop.

Chlorothalonil is a non-systemic foliar fungicide with protective action against a broad spectrum of plant diseases. This quality makes it an excellent resistance-management partner for fungicides with single-site modes of action. It has been used to protect a large variety of crops from a multitude of diseases without impact on land or water. Farmers live on the land on which we raise our crops. We care about the environment we tend and our workers who tend it. We take great efforts to ensure all plant protection products are applied according to their labels.

We are very concerned that listing on the ROC would deter the use of chlorothalonil. Please let EPA complete its job of registration review first.

Sincerely,  
Redacted

John Stuhlmiller  
Chief Executive Officer