

**From:** Charla Scheidler <[charla@miagbiz.org](mailto:charla@miagbiz.org)>

**Date:** Thursday, November 14, 2013 11:55 AM

**To:** "Lunn, Ruth (NIH/NIEHS) [E]" <[lunn@niehs.nih.gov](mailto:lunn@niehs.nih.gov)>

**Subject:** Chlorothalonil Nomination to the National Toxicology Program.docx



## **Michigan Agri-Business Association**

1501 North Shore Drive, Suite A  
East Lansing, Michigan 48823

[www.miagbiz.org](http://www.miagbiz.org)

Telephone (517) 336-0223

Fax (517) 336-0227

November 14, 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'm writing to express my 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, quite frankly, a waste of taxpayers' money.

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, for a variety of crops, in addition to potatoes.

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. We all care about the environment we tend and the people who tend it, this is a good tool for our industry..

I'm worried a listing on the ROC would deter the use of chlorothalonil. Please let the EPA complete its job of registration review first.

Sincerely,

[Redacted]

James Byrum, President