



March 23, 2009

John Worgan  
Director General  
Re-evaluation Management Directorate  
Pest Management Regulatory Agency  
Tupper Building C390, Health Canada AL 6603B  
2720 Riverside Drive  
Ottawa ON  
K1A 0K9

Re: Response to the Proposed Re-evaluation Decision Document of Quintozene.

Dear Mr. Worgan.

On behalf of the Canadian Golf Superintendents Association (CGSA), please accept our thanks for the opportunity to respond to the proposed re-evaluation decision document for quintozene, particularly as it relates to the use of this ingredient on golf course turf.

As you are no doubt aware, quintozene, the active ingredient in Terraclor Flowable, Terraclor 75WP and various fertilizer combination products, is an important tool for the control of snow mould. Snow mould is the most prevalent and potentially most devastating of all turf diseases in Canada. Our long Canadian winters with abundant snow fall provide the perfect conditions for the development of snow mould. Therefore, golf courses across Canada must apply a fungicide or run the risk of facing significant turf loss once the snow recedes in the spring. Turf loss or death results in unacceptable playing conditions which, in turn, results in lost revenue until such time as the conditions are repaired. Repairing the turf requires time and significant, unbudgeted, input costs (seed, fertilizer, labour, etc.) to re-establish damaged areas. To summarize, excessive snow mould damage can have a dramatic economic impact on a golf course operation.

Further, the snow mould application is the most costly of all applications made during the season. Therefore, it is imperative that golf course superintendents have reliable and cost effective options available. The quintozene-based products provide consistent disease control at prices that are significantly more cost effective than alternative chemistries currently registered for snow mould. The loss of quintozene will significantly limit the ability of some golf courses to adequately protect their courses from this disease.

Although there are alternative fungicides available to golf superintendents for snow mould control, quintozene is a major tool in a resistance management program. Quintozene is one of only a few contact fungicides and has a multi-site mode of action. Most of the newer fungicides have a single site mode of action. If quintozene is no longer available these single site products will have to be used more often. This will cause a significant increase in the risk of resistance occurring.

The loss of quintozene would have dramatic financial and agronomic impacts on golf courses across Canada. The CGSA respectfully requests that, as part of the re-evaluation process, the PMRA give consideration to the value of quintozene within the turf industry and to the continuation of its availability to the golf course sector.

Regards,

**Pat Moir**  
**President**

205-5520 Explorer Drive, Mississauga, Ontario, Canada L4W 5L1  
Tel: 905-602-8873 . Toll Free 800-387-1056 . Fax 905-602-1958  
Email: [cgsa@golfsupers.com](mailto:cgsa@golfsupers.com) Website: [www.golfsupers.com](http://www.golfsupers.com)