



May 27, 2016

Pest Management Regulatory Agency Publications Section
Pest Management Regulatory Agency (PMRA)
Health Canada
2720 Riverside Drive
OTTAWA, ON K1A 0K9

Re : Response to the Amendment to the Proposed Re-evaluation Decision regarding Chlorothalonil - Note REV2016-06

To whom it concerns,

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

Chlorothalonil, the active ingredient in products such as Daconil 2787, Daconil Ultrex, QP Chlorothalonil and Instrata, is a key active ingredient that is part of integrated pest management programs on golf courses throughout the country and is a key component in resistance management strategies. Golf course superintendents are trained professionals that understand the specific environments of each site on their properties, keep records of pest infestation, manage damage thresholds limits, use cultural practices to affect the growing environments and reduce the incidence of pest damage before using, with the utmost professionalism and by certified applicators, registered pest control products.

We are encouraged by the PMRA's indication that chlorothalonil would still be allowed for use on turf to control snow mould diseases however, it should be recognized that chlorothalonil is also an important active ingredient for the control of other diseases such as anthracnose and dollar spot. It is the only multisite contact fungicide on the market and is one of the most efficient active ingredients to stop a disease when it has exceeded threshold levels. The availability of this product eliminates the reliance on preventative fungicide applications and we would strongly encourage continued access for use on golf course turf which is applied on an entirely grass covered soil.

Removing the accessibility of this tool, especially while no other fungicides with the same multi-site contact mode of action are available and efficient for the same registered use, would leave golf courses vulnerable to both negative financial and agronomic impacts.

According to the 2014 National Allied Golf Associations "economic impact study", golf courses contribute greatly to local economies and are small businesses that employ over 300,000 people across the country. Canadian golf's total direct economic activity is estimated at \$19,7 billion and accounts for about \$14,3 billion of our country's GDP. Golf courses need to have the proper tools to ensure that we protect the investments made by golf businesses across the country.

The CGSA does have significant concerns with some of the new restrictions that will negatively affect the business of many golf courses across the country. The first concern is the discontinued use of this product on specific and important turf diseases such as dollar spot and anthracnose. Equally concerning is restricting the re-entry interval to 22 days. It will not be manageable by most golf courses in Canada who cover their greens for winter protection. This re-entry interval would eliminate the use of this essential product due to significant loss of revenue while closing the golf course. Furthermore, the requirement for an enclosed cab for applicators will be cost prohibitive for many golf businesses across the country. We also hope that you will consider the fact that there are no other products on the market with the same mode of action.

We are confident and urge the PMRA to use science and evidence based information in making its final decision concerning the re-evaluation of Chlorothalonil. We sincerely hope that you will consider the golf industry's concerns in this matter.

Regards,

A handwritten signature in black ink, appearing to read 'James Beebe', written over a horizontal line.

James Beebe
President, CGSA