

Ontario Golf Superintendents' Association

OGSA

ONTARIO GOLF
SUPERINTENDENTS'
ASSOCIATION



March 23, 2016

Pest Management Regulatory Agency
Health Canada
2720 Riverside Drive
Ottawa, Ontario K1A 0K9

Dear Sir or Madam:

Re: Amendment (REV2016-06) to the proposed re-evaluation decision (PRVD2011-14) regarding chlorothalonil

I am writing on behalf of the Ontario Golf Course Superintendents' Association (OGSA) in response to the PMRA's recently published amendment to the proposed re-evaluation decision regarding the use of the chemical chlorothalonil. The OGSA represents golf course superintendents around the Province of Ontario. We have a membership of 900 members.

Our membership is concerned that if the PMRA's amended proposal regarding chlorothalonil is adopted, it will have a significant deleterious impact on the turf industry, particularly golf courses.

We understand that if this proposed amendment is adopted, chlorothalonil uses will be significantly restricted, and in particular, the use of chlorothalonil on turf would be restricted to a single time per year and just for snow mold control, which will not be adequate to address the large variety of turf diseases which exist on Canadian golf courses.

Chlorothalonil (active in Daconil and other products that we currently use) is a very important and necessary fungicide that is integral to the turf industry. This chemical is required to control a number of turf diseases such as Dollar spot, Helminthosporium leaf spot, Brown patch, and Anthracnose. Of particular concern to golf course superintendents in Canada is the control of a destructive mold that lives under the snow (Snow mold). Our industry cannot do without this defense against Snow mold, and these other turf diseases, which if left untreated can destroy a golf course.

Chlorothalonil plays a key role in resistance management as it is the only multi-site control option and is absolutely necessary when a severe disease outbreak occurs. Without the availability of chlorothalonil, turf managers would be forced to use preventative treatments repeatedly during the growing season resulting in overall increased chemical applications.

If the amended proposed re-evaluation decision were to be implemented, some of our members would be at a competitive disadvantage to their American neighbouring golf courses, who would be able to continue with certain chlorothalonil uses that would no longer be available to Canadian courses, putting them at a clear disadvantage in the North American marketplace.

This is an even more pressing concern, given the state of the Canadian dollar relative to the American currency, and the recent trend of US citizens crossing the border to take advantage of the situation by golfing at Canadian courses.

Our industry is already governed by legislation, which is in place in most jurisdictions of Canada (and certainly here in Ontario), which requires golf course staff to be trained in the judicious use of such chemicals, and meticulous records are required to be kept as to its use. The products containing chlorothalonil that golf course superintendents currently use have an established history of safe and effective use for more than 45 years. We would point out that unlike other agricultural uses for this chemical, the turf industry is not applying it to a consumable product.

Golf courses play a substantial role in the economy of Canada. A Key Findings Report prepared by SNG Solutions dated May 2014 concludes:

- The golf industry in Canada accounts for about \$19.7 billion in direct spending;
- The total direct economic activity (total direct sales) resulting from Ontario's Golf Industry is estimated at \$7.46 billion. Of this total, the revenues generated directly by golf courses, and their associated facilities is estimated at \$1.70 billion.

We thank you for your consideration of our submission addressing some of the concerns of our industry and membership. We would be pleased to speak to you in person, by teleconference (cell # 647 268-1155) or email, (mark@trafalgargolf.com) in order to answer any questions that you may have regarding the position of our organization on this very important issue.

Yours sincerely,

Ontario Golf Superintendents' Association



**Mark Prieur, President
Golf Course Superintendent,
Trafalgar Golf & Country Club.**