



WCTA Chlorothalonil Submission to Health Canada



May 30, 2016

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

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

Dear Sir or Madam:

On behalf of the Western Canada Turfgrass Association (WCTA), allow this letter to serve as our response to the proposed re-evaluation decision regarding the active ingredient, chlorothalonil.

The WCTA is a 700+ member, not-for-profit industry organization representing professional turfgrass managers and the associated industry supply network in western Canada. Areas under the management of these professionals include beneficial greenspace infrastructure such as golf courses, sports fields, parks and other maintained turf spaces, along with sod farms.

As a professional industry organization, the WCTA has a longstanding track record of supporting and promoting the safe use of pesticides in our work environments through proven IPM practices and close cooperation with government regulatory bodies.

- In 2002, our organization partnered with the BC Ministry of Agriculture to publish the comprehensive resource, 'IPM Guide for Turfgrass Managers'.
- Since 2002, the WCTA has acted as an official Credit Coordinator for Pesticide

Applicator Certificate 'Continuing Education Credits' in British Columbia, currently tracking points for over 300 individuals and designing many annual educational offerings to include CEC's toward maintaining an active pesticide applicator certificate.

- Our organization actively participates in the PMRA NOMULE committee helping represent the turf management industry.
- Since 2009, the WCTA has worked with the BC provincial government to craft Integrated Pest Management (IPM) legislation aimed at enhancing environmental protection.
- In 2009, the WCTA organized and chaired the national 'Turf Industry Steering Committee' in cooperation with the PMRA.

These ongoing efforts help ensure turf managers are well trained in all aspects of pesticide storage, handling, application and disposal, and are conscientious about choosing the appropriate product, proper equipment calibration, ensuring that applications reach target areas, and following specific label instructions with regards to the use of personal protective equipment, applying the correct rates and adhering to required re-entry intervals.

Chlorothalonil is used extensively around the world and, although the product has had an established history of safe and effective use for more than 45 years, the proposed amendment would restrict its use to a single yearly application for the control of snow mould. The proposed amendment will have a **significant negative impact** on the turfgrass management industry, in particular golf courses, whose business relies on the proper care and health of turf.

Based on participation, golf is the number one recreational activity in Canada with an estimated yearly participation of 5.7 – 6.0 million and direct spending of \$19.7 billion. The golf industry contributes \$2.8 billion to the province of British Columbia's GDP, \$2.4 billion in Alberta, another \$446 million in Saskatchewan and 104,000 jobs across the three provinces. In addition, Swedish research from 2008 showed golfers are healthier and live longer than the average population.

Currently, there are four products registered for various diseases on golf courses that are either a standalone product (Daconil 2787/Ultrex and Equus 82.5), or multiple active products (Concert and Instrata). These products are intended to control various summer and winter diseases, although Instrata is only registered for snow mould.

A survey of golf course Superintendents in British Columbia revealed that summer diseases controlled by chlorothalonil included dollar spot, anthracnose, leaf spot and fusarium patch while winter diseases were grey and pink snow mould. Summer disease pressure in the prairie provinces is reduced due to a drier climatic, although winter snow moulds are often just as devastating.

Typically, summer diseases are treated monthly. In order to prevent disease resistance, chlorothalonil is rotated with chemistries from other fungicide groups. If a rotational application strategy is employed, **three applications would be the maximum** number applied in summer. For snow mould prevention, two fall applications are typically applied and seldom as a single active ingredient product. Maximum application rates for summer diseases are 140 g/100m² of active ingredient, while winter disease prevention rates of application are 108 g/100m² of active ingredient based on the product, Instrata.

Re-entry periods are less than 12 hours for summer application. Fall applications are typically conducted after golf courses close for the winter and therefore pose no re-entry risk. In-season post application activities where workers might handle plant material would include mowing, hole location changing and turf repair. Golfer exposure would occur as they handle equipment during the course of play. Because chlorothalonil is a contact fungicide, long-term exposure from a single application is minimized because golf greens are typically mowed daily, removing leaf clippings.

The WCTA considers the PMRA a valuable partner and appreciates the opportunity to present some of the concerns of our industry and membership. If you would like to speak with us further, contact Jerry Rousseau, Executive Director, at the WCTA office or speak to Jim Ross directly at 250-586-1487.

Yours sincerely,

James B. (Jim) Ross
Chair – Research Committee
Western Canada Turfgrass Association

Jason Pick
President
Western Canada Turfgrass Association