

Pesticide Truths

Chlorothalonil – Near-Total Prohibition Against The Golf Industry – Re-Evaluation Decision By Health Canada – 2018 05 10

June 27, 2018 WILLIAM H GATHERCOLE AND NORAH G [Leave a comment](#)



Overview

Health Canada's Imposition Of Near-Total National Prohibition Against Chlorothalonil

As expected, once elected to power on October 19th, 2015, Canada's Liberal Government quickly conspired to impose national-prohibitions against the golf industry's pest control products.

Chlorothalonil, the active ingredient found in Daconil, now has only ONLY TWO LIMITED TURF USES that Health Canada has allowed to remain on the label.

Health Canada, which has adopted the anti-pesticide resolutions of the Liberal Party of Canada, has DECIDED TO ALMOST ENTIRELY PROHIBIT THE USE OF CHLOROTHALONIL ON TURF.

Health Canada has also IMPOSED TOTAL NATIONAL-PROHIBITIONS against more of the golf industry's desperately-needed pest control products — carbaryl, iprodione, and quintozone — and neonicotinoids will be next !

Here is a summary of the attacks by Health Canada —

X — Carbaryl (Sevin)

Total National-Prohibition Imposed By Health Canada

According to allegations by Health Canada, certain carbaryl products or uses pose risks of concern to human health and DID NOT meet current standards for human health protection.

<http://pesticidetruths.com/wp-content/uploads/2018/06/Reference-chlorothalonil-2018-06-20-Iprodione-Turf-Uses-Cancelled.pdf>

<http://pesticidetruths.com/2016/04/23/the-end-of-the-golf-industrys-pesticide-ban-exception-status-goodbye-iprodione/>

X — Chlorothalonil (Daconil)

Near-Total National-Prohibition Imposed By Health Canada

Health Canada alleges its chlorothalonil prohibition is based on its human health risk assessment.

<http://pesticidetruths.com/wp-content/uploads/2018/05/Reference-chlorothalonil-2018-05-15-PMRA-Announces-Chlorothalonil-Final-Decision-Hsiang-WCTA-.pdf>

<http://pesticidetruths.com/wp-content/uploads/2018/05/Reference-chlorothalonil-2018-05-15-Re-Evaluation-Decision-Health-Canada-Hsiang-CGSA-.pdf>

<http://pesticidetruths.com/2016/04/23/the-end-of-the-golf-industrys-pesticide-ban-exception-status-goodbye-iprodione/>

<http://pesticidetruths.com/toc/chlorothalonil/>

X — Imidacloprid (Neonicotinoids)

Total National-Prohibition Proposed By Health Canada

Health Canada alleges that, under current conditions of use, the environmental risks for most products containing imidacloprid DO NOT meet current safety standards.

<http://pesticidetruths.com/2015/11/03/growers-across-canada-had-better-get-ready-for-the-pain-of-catastrophic-carnage-justin-trudeau-liberal-party-of-canada-2015-11-02/>

<http://pesticidetruths.com/wp-content/uploads/2018/06/Reference-chlorothalonil-2018-06-01-Neonicotinoids-About-Face-PMRA-Changes-Its-Mind-About-Imidacloprid.pdf>

<http://pesticidetruths.com/wp-content/uploads/2018/06/Reference-chlorothalonil-2018-01-09-Neonicotinoids-Health-Canada-Proposes-Some-Restrictions-NORAHG-RESPONSE.pdf>

<http://pesticidetruths.com/2016/04/23/the-end-of-the-golf-industrys-pesticide-ban-exception-status-goodbye-iprodione/>

<http://pesticidetruths.com/2018/01/20/there-is-no-proof-that-neonicotinoids-harm-honeybees-when-used-properly-dr-keith-ross-solomon-speaks-the-truth-2017-11-21/>

X — Iprodione (Rovral)

Total National-Prohibition Imposed By Health Canada

According to allegations by Health Canada, products containing iprodione used on turfgrasses DID pose an unacceptable risk to human health.

<http://pesticidetruths.com/wp-content/uploads/2018/06/Reference-chlorothalonil-2018-06-00-Carbaryl-De-Registered-For-Turf-Uses-Another-One-Bites-The-Dust.pdf>

<http://pesticidetruths.com/2016/04/23/the-end-of-the-golf-industrys-pesticide-ban-exception-status-goodbye-iprodione/>

X — Quintozene (PCNB)

Total National-Prohibition Imposed By Health Canada Before Liberals Were Elected To Power In 2015

According to allegations by Health Canada, products containing quintozene used on turfgrasses DID pose an unacceptable risk to human health and the environment, and, consequently, DID NOT have value since many other products could be used as alternatives to replace it for the control of Snow Mold Diseases.

<http://pesticidetruths.com/wp-content/uploads/2011/12/Force-Of-Nature-UPDATE-Quintozene-2010-06-24-Alternatives-Health-Canada-CGSA-pdf-300-dpi.pdf>

<http://pesticidetruths.com/wp-content/uploads/2011/12/Force-Of-Nature-UPDATE-Quintozene-2010-06-24-Environment-Safety-Health-Canada-CGSA-Leaders-pdf.pdf>

<http://pesticidetruths.com/wp-content/uploads/2011/12/Force-Of-Nature-UPDATE-Quintozene-2010-07-14-Quintozene-Cancellation-Schedule-PMRA-pdf.pdf>

<http://pesticidetruths.com/2016/04/23/the-end-of-the-golf-industrys-pesticide-ban-exception-status-goodbye-iprodione/>



LIBERAL CARNAGE

In 2016, we predicted ...

NATIONAL

Prohibition

**Will Be Imposed By
The Trudeau Government**

FORCE OF NATURE | DARING TO DEFY BY EXPLORING WITH THE WHOLE TRUTH FROM AN INDEPENDENT AND RESPECTFUL
National Organization Responding Against HUIE that conspire to destroy the Green space and other industries worldwide

<http://pesticidetruths.com/2016/04/23/the-end-of-the-golf-industrys-pesticide-ban-exception-status-goodbye-iprodione/>

Overview (continued)

Health Canada Has Adopted The Anti-Pesticide Resolutions Of The Liberal Party Of Canada

It come as NO surprise that these prohibitions by Health Canada are being imposed (and proposed) within mere months after Liberal Party won in the Canadian General Election.

In essence, Health Canada has adopted the anti-pesticide resolutions of the Liberal Party of Canada —

X — Liberal Party of Canada Policy Resolution [Against] Cosmetic Use of Pesticides, March 16-19, 2000

BE IT RESOLVED that the Liberal Party of Canada urge the federal government to introduce an IMMEDIATE MORATORIUM [i.e. PROHIBITION] ON THE COSMETIC USE OF CHEMICAL PESTICIDES until such a time as their use has been scientifically proven to be safe and the long-term consequences of their application are known.

X — Liberal Party of Canada Policy Resolution [Against] Neonicotinoid Insecticides, 2014

BE IT RESOLVED that the Liberal Party of Canada call for the Pest Management Regulatory Agency (PMRA) to SUSPEND [i.e. PROHIBIT] IMMEDIATELY its registration of all NEONICOTINOID-BASED COMPOUNDS, resulting in an IMMEDIATE MORATORIUM [i.e. PROHIBITION] on the sale and use of this class of technology in Canada.

<http://pesticidetruths.com/2015/10/16/norahg-responds-to-those-imbeciles-planning-to-vote-for-liberal-party-of-canada-a-k-a-world-wildlife-federation-2015-10-16/>

A woman with long brown hair, wearing a light-colored bikini top and a matching sheer skirt, poses against a dark, starry background. To her left, a large, glowing planet is partially obscured by a large, textured golf ball. The text is overlaid on the left side of the image.

In 2018, we predict ...

**The Collision Of The
Golf Industry Is**

IMMINENT

FORCE OF NATURE | DARING TO DEFY BY EXPLORING WITH THE WHOLE TRUTH FROM AN INDEPENDENT PERSPECTIVE
National Organization Responding Against HWE that conspire to destroy the Green space and other industries (NORAHG)

Overview (continued)

The Trade Associations Have Betrayed Golf Superintendents & Their Facilities

Golf industry leaders must immediately address several critical issues.

They must strongly adopt the position that conventional pest control products and fertilizers are scientifically-safe and will cause NO harm.

They must also adopt the policy that the only course of action against fanatxcal anti-pesticide prohibition is through litigation.

Additionally, golf industry leaders must openly and financially SUPPORT all Conservative political candidates who oppose any prohibition against pest control products and fertilizers.

Whenever successfully elected to power, Liberals, New Democrats, and Greens WILL ALWAYS conspire to impose fanatxcal national-prohibition against ALL pest control products, including those desperately-needed by the golf industry.

Golf industry leaders must be pressured by superintendents to immediately address these critical issues, and many more.

<http://pesticidetruths.com/2018/06/21/the-golf-industry-is-on-a-collision-course-the-critical-issues-that-must-be-addressed-by-the-golf-industry-now-2018-06-21/>

Unfortunately, golf industry leaders and their trade associations, like CGSA and WCTA (see below), CANNOT BE CONSIDERED COMPETENT to handle public affairs issues concerning pest control products.

They have NO credibility whatsoever in public affairs, and are NOT FIT to lobby against the national-prohibitions against the golf industry's desperately-needed pest control products.

<http://pesticidetruths.com/2016/06/15/the-road-so-far-can-the-golf-industrys-trade-associations-be-trusted/>

In fact, golf industry leaders and their trade associations HAVE ACTUALLY CONTRIBUTED to the END of the Golf Industry's Pesticide Ban Exception Status.

The BLACK DEATH was, or will be, THEIR fault !

<http://pesticidetruths.com/wp-content/uploads/2016/10/Force-Of-Nature-CGSA-2011-01-31-Terror-NEVER-Ends-Supported-Prohibition-Death-Of-Lawn-Care-The-Black-Death.pdf>

The following FAILED trade associations have BETRAYED golf superintendents and their facilities —

X — Canadian Golf Superintendents Association (CGSA)

Officially Supports The Prohibition Of Pest Control Products Used In The Urban Landscape

<http://pesticidetruths.com/toc/canadian-golf-superintendents-association/>

<http://pesticidetruths.com/wp-content/uploads/2016/10/Force-Of-Nature-CGSA-2009-12-09-CARD-Happy-Holidays-Cousineau-1.pdf>

<http://pesticidetruths.com/wp-content/uploads/2016/10/Force-Of-Nature-CGSA-2010-02-15-Collision-Course-CGSA-Response-to-British-Columbia-Prohibition-Part-2-2.pdf>

<http://pesticidetruths.com/wp-content/uploads/2016/10/Force-Of-Nature-CGSA-2010-02-15-Collision-Course-CGSA-Response-to-British-Columbia-Prohibition-Part-1-1.pdf>

X — Golf Canada (a.k.a. Royal Canadian Golf Association)

Heavily Finances Organization That Conspires Against The Golf Industry & Pest Control Products

<http://pesticidetruths.com/toc/canadian-cancer-society-demands-no-golf-exception-status/>

<http://pesticidetruths.com/wp-content/uploads/2011/11/Force-Of-Nature-Canadian-Cancer-Society-2011-05-05-Enviro-PROFIT-Golf-Fore-The-Cure-Complaint-Channels-pdf-300-dpi.pdf>

<http://pesticidetruths.com/wp-content/uploads/2012/07/Force-Of-Nature-Golf-2010-09-17-Enviro-PROFIT-CCS-Golf-Fore-The-Cure-Golf-Canada-pdf-300-dpi.pdf>

X — United States Golf Association (USGA)

Officially Promotes The Go Brown Anti-Cosmetic Golf Course Doctrine, Which Is Golf-Hating Anti-Pesticide & Anti-Fertilizer Terrxrism

Go Brown Golf Courses Look Dead

<http://pesticidetruths.com/2018/04/13/go-brown-failure-of-anti-cosmetic-go-brown-anti-cosmetic-pesticide-hating-golf-course-doctrine-chambers-bay-golf-course-the-u-s-open-golf-championship-2017-07-08/>

<http://pesticidetruths.com/toc/golf-go-brown-anti-cosmetic-golf-maintenance/>

X — Western Canada Turfgrass Association (WCTA)

Supports Anti-Pesticide Prohibition, Torpedoes Professional Lawn Care Businesses, Conspires With Canadian Cancer Society, Pays Anti-Pesticide Speakers For Its Conferences, & Squanders Vast Sums Of Money For Peddling Green Alternative Pesticides

<http://pesticidetruths.com/toc/wcta-reports-blogs-references-cards/>

<http://pesticidetruths.com/wp-content/uploads/2017/05/Force-Of-Nature-WCTA-2011-01-31-Terror-NEVER-Ends-Black-Death.pdf>

<http://pesticidetruths.com/2011/11/01/the-failure-of-western-canada-turfgrass-association/>

<http://pesticidetruths.com/wp-content/uploads/2017/05/Force-Of-Nature-WCTA-2011-11-25-Anti-Pesticide-Presentations-Part-3.pdf>

<http://pesticidetruths.com/wp-content/uploads/2017/05/Force-Of-Nature-WCTA-2011-11-12-Letter-of-COMPLAINT-Demand-For-Official-Retraction.pdf>

<http://pesticidetruths.com/wp-content/uploads/2017/05/Force-Of-Nature-WCTA-2011-05-09-STRIKING-BACK-BC-Allied-Golf-Association-Lobbying.pdf>

<http://pesticidetruths.com/wp-content/uploads/2017/05/Force-Of-Nature-WCTA-2011-10-31-Consequences-Rousseau-Resign-Now.pdf>

<http://pesticidetruths.com/wp-content/uploads/2017/05/Force-Of-Nature-WCTA-2011-10-26-Letter-of-COMPLAINT-Rousseau.pdf>

<http://pesticidetruths.com/2011/10/29/calling-for-the-dismissal-of-wcta%E2%80%99s-jerry-rousseau/>

The golf industry's superintendents must recognize that they are on a collision course with the looming shipwreck of golf-hating and anti-pesticide terrorism !

Superintendents are facing the end of the Golf Industry's Pesticide Ban Exception Status !

Superintendents must PLAN for the inevitable and total revocation of this exception status, and must EXPECT the total national-prohibitions against their desperately-needed pest control products.

The End Of The Golf Industry's Pesticide Ban Exception Status

Canadian Golf Superintendents Association
Golf Canada (Royal Canadian Golf Association)
United States Golf Association
Western Canada Turfgrass Association



was THEIR FAULT !

FORCE OF NATURE | DARING TO DEFY WITH THE WHOLE TRUTH FROM AN INDEPENDENT PERSPECTIVE
National Organization Responding Against HWE that seek to harm the Green space and other industries. (NORAHG)

Please explore the following links ...

The Critical Issues That Must Be Addressed By The Golf Industry

<http://pesticidetruths.com/2018/06/21/the-golf-industry-is-on-a-collision-course-the-critical-issues-that-must-be-addressed-by-the-golf-industry-now-2018-06-21/>

The Complete Media Library On Chlorothalonil Fungicide

<http://pesticidetruths.com/toc/chlorothalonil/>

Only Two Turf Uses Remain For Chlorothalonil

Re-Evaluation Decision By Health Canada

**Near-Total National-Prohibition
Imposed By Health Canada**

FORCE OF NATURE | DARING TO DEFY BY EXPLORING THE WHOLE TRUTH FROM AN INDEPENDENT PERSPECTIVE
National Organization Responding Against BUREAUCRATS that conspire to destroy the Green space and other industries (NORABG)

May 12th, 2018

Trade Association Newsletters

Re : Re-Evaluation Decision By Health Canada

Selected And Adapted Excerpts

<http://pesticidetruths.com/wp-content/uploads/2018/05/Reference-chlorothalonil-2018-05-15-PMRA-Announces-Chlorothalonil-Final-Decision-Hsiang-WCTA-.pdf>

<http://pesticidetruths.com/wp-content/uploads/2018/05/Reference-chlorothalonil-2018-05-15-Re-Evaluation-Decision-Health-Canada-Hsiang-CGSA-.pdf>

Only Two Turf Uses Remain For Chlorothalonil

Health Canada's Final Decision On Chlorothalonil Restrictions Amounts To A Final Stage Of Total Prohibition For The Golf Industry

Final Re-Evaluation Decision By Health Canada —

The commonly-used fungicide, chlorothalonil, found in a large variety of turf fungicides including Daconil, has been undergoing review by the Canadian Government.

The Pest Management Regulatory Agency just recently issued **Re-Evaluation Decision By Health Canada RVD2018-11 [FULL COPY], Chlorothalonil And Its Associated End-Use Products For Agricultural And Turf Uses – Final Decision)**.

<http://pesticidetruths.com/wp-content/uploads/2018/06/Reference-chlorothalonil-2018-05-10-Health-Canada-Re-Evaluation-Decision-RVD2018-11-FULL-COPY-Final-Decision.pdf>

There are ONLY TWO LIMITED TURF USES remaining on the label, which represents a NEAR-TOTAL NATIONAL-PROHIBITION Imposed By Health Canada —

- for TURF DISEASES DURING [GROWING] SEASONS, there will be up to TWO PERMITTED APPLICATIONS at a minimum 14 day interval, with up to 9.5 kg a.i./ha or 95 grams per 100 square meters per application on GOLF COURSES.
- for TURF SNOW MOLD DISEASES, a SINGLE APPLICATION per year will be permitted, containing up to 12 kg a.i./ha or 120 grams per 100 square meters (or about 4 ounces per thousand square feet of active ingredient).
- for SOD FARMS, there are also TWO PERMITTED APPLICATIONS, but at 7 day intervals with up to 4.8 kg a.i./ha

RE-ENTRY into treated sites can occur when the sprays have DRIED.

Manufacturers have 24 months to change their labels on products containing chlorothalonil to reflect these requirements.

Failed Western Canada Turfgrass Trade Association (WCTA)

WCTA Editor's Note —

The **Re-Evaluation Decision By Health Canada RVD2018-11 [FULL COPY]** is under « *review* » [?!?!] by WCTA staff.

<http://pesticidetruths.com/wp-content/uploads/2018/06/Reference-chlorothalonil-2018-05-10-Health-Canada-Re-Evaluation-Decision-RVD2018-11-FULL-COPY-Final-Decision.pdf>

If you have questions, please email [exec.director\(at\)wctaturf.com](mailto:exec.director(at)wctaturf.com).

[What kind of « *review* » can be performed by anyone operating WCTA, which is a trade association ?!?! WCTA is NOT a science, NOT a research, and NOT an educational organization. There is NO ONE at WCTA with ANY expertise on matters concerning the assessment of pest control products. WCTA is a DISMAL FAILURE !]

<http://pesticidetruths.com/wp-content/uploads/2018/05/Reference-chlorothalonil-2018-05-15-PMRA-Announces-Chlorothalonil-Final-Decision-Hsiang-WCTA-.pdf>

Failed Canadian Golf Superintendents Trade Association (CGSA)

CGSA Staff Note —

Additional items of note for reference added by CGSA staff following «review» [?!?!] —

<http://pesticidetruths.com/wp-content/uploads/2018/05/Reference-chlorothalonil-2018-05-15-Re-Evaluation-Decision-Health-Canada-Hsiang-CGSA-.pdf>

Note that additional information is found by « reviewing » [?!?!] the entire **Re-Evaluation Decision By Health Canada RVD2018-11 [FULL COPY]**, other items of note will be added to the end-use product labels and will include —

<http://pesticidetruths.com/wp-content/uploads/2018/06/Reference-chlorothalonil-2018-05-10-Health-Canada-Re-Evaluation-Decision-RVD2018-11-FULL-COPY-Final-Decision.pdf>

- Applications should be done with consideration of wind speed, wind direction, temperature inversions, application equipment and sprayer settings due to potential drift to non-target areas of human habitation and areas of human activity.
- For products with ornamental uses — not for use on greenhouse ornamental cut flowers nor roses grown for cut flowers.
- For products with golf course uses — do not allow the public to enter into treated golf courses following late fall application for Snow Molds.

[What kind of « review » can be performed by anyone operating CGSA, which is a mere trade association ?!?! CGSA is NOT a science, NOT a research, and NOT an educational organization. This is NO ONE at CGSA with ANY expertise on matters concerning the assessment of pest control products. CGSA is a DISMAL FAILURE !]



Goodbye Chlorothalonil

FORGE OF NATURE | DARING TO DEFY BY EXPLORING WITH THE WHOLE TRUTH FROM AN INDEPENDENT PERSPECTIVE
National Organization Responding Against HUIE that conspire to destroy the Green space and other industries (NORAHG)

Re-Evaluation Decision By Health Canada

RVD2018-11 [Short Version]

**Chlorothalonil And Its Associated
End-Use Products For Agricultural
And Turf Uses – Final Decision**

May 10th, 2018

Pest Management Regulatory Agency (PMRA)

Re-Evaluation Decision By Health Canada RVD2018-11

Selected And Adapted Excerpts From Short Version

<http://pesticidetruths.com/wp-content/uploads/2018/06/Reference-chlorothalonil-2018-05-10-Health-Canada-Re-Evaluation-Decision-RVD2018-11-Short-Version-.pdf>

The following segments contain the **Short Version** of the **Re-Evaluation Decision By Health Canada RVD2018-11**.

<http://pesticidetruths.com/wp-content/uploads/2018/06/Reference-chlorothalonil-2018-05-10-Health-Canada-Re-Evaluation-Decision-RVD2018-11-Short-Version-.pdf>

[See segments below.]

To review the **FULL COPY** of the **Re-Evaluation Decision By Health Canada RVD2018-11**, please explore the following link ...

<http://pesticidetruths.com/wp-content/uploads/2018/06/Reference-chlorothalonil-2018-05-10-Health-Canada-Re-Evaluation-Decision-RVD2018-11-FULL-COPY-Final-Decision.pdf>

Re-Evaluation Decision By Health Canada

Under the authority of the Pest Control Products Act, all registered pesticides must be regularly re-evaluated by Health Canada's Pest Management Regulatory Agency (PMRA) to ensure that they continue to meet current health and environmental safety standards and continue to have value.

The re-evaluation considers data and information from pesticide manufacturers, published scientific reports, and other regulatory agencies.

The PMRA applies internationally accepted risk assessment methods as well as current risk management approaches and policies.

Chlorothalonil is a contact and protectant fungicide with a multi-site mode of action.

It controls a broad range of fungal diseases on a large number of field and orchard crops, conifers, greenhouse vegetables, greenhouse and outdoor ornamentals and TURF.

In agriculture, chlorothalonil is applied by both aerial and ground application equipment.

Re-Evaluation Decision By Health Canada RVD2018-11 [Short Version], Chlorothalonil And Its Associated End-Use Products For Agricultural And Turf Uses – Final Decision) will focus on agricultural and turf uses.

<http://pesticidetruths.com/wp-content/uploads/2018/06/Reference-chlorothalonil-2018-05-10-Health-Canada-Re-Evaluation-Decision-RVD2018-11-Short-Version-.pdf>

Chlorothalonil is also used as a material preservative in paint; however, the PMRA plans to publish a separate document in the future examining the material preservative use of chlorothalonil.

The regulatory approach for the re-evaluation of chlorothalonil was first presented in **Proposed Re-Evaluation Decision PRVD2011-14**.

<http://pesticidetruths.com/wp-content/uploads/2018/05/Reference-chlorothalonil-2011-10-07-Proposed-Re-Evaluation-Decision-PRVD2011-14-Health-Canada.pdf>

<http://pesticidetruths.com/wp-content/uploads/2018/06/Reference-chlorothalonil-2011-11-01-Health-Canada-Proposed-Re-Evaluation-Decision-PRVD2011-14-FULL-COPY-.pdf>

The amended proposed re-evaluation decision was presented in **Re-Evaluation Note REV2016-06, Chlorothalonil Amendment To The Proposed Re-Evaluation Decision**.

<http://pesticidetruths.com/wp-content/uploads/2016/02/Reference-chlorothalonil-2016-02-11-Health-Canada-Re-Ev-Note-REV2016-06-Re-Evaluation-Decision.pdf>

Comments received during the consultation process were taken into consideration.

These comments and new data/information resulted in REVISIONS to some parts of the RISK ASSESSMENTS.

See the **Science Evaluation Update** in **RVD2018-11 [FULL COPY]**.

<http://pesticidetruths.com/wp-content/uploads/2018/06/Reference-chlorothalonil-2018-05-10-Health-Canada-Re-Evaluation-Decision-RVD2018-11-FULL-COPY-Final-Decision.pdf>

See also the subsequent changes to the proposed regulatory decision as described in **PRVD2011-14** and **REV2016-06**.

<http://pesticidetruths.com/wp-content/uploads/2018/06/Reference-chlorothalonil-2011-11-01-Health-Canada-Proposed-Re-Evaluation-Decision-PRVD2011-14-Short-Version.pdf>

<http://pesticidetruths.com/wp-content/uploads/2016/02/Reference-chlorothalonil-2016-02-11-Health-Canada-Re-Ev-Note-REV2016-06-Re-Evaluation-Decision.pdf>

Appendix II of **RVD2018-11 [FULL COPY]** summarizes comments received during consultation periods and provides the PMRA's response. [See later segments.]

<http://pesticidetruths.com/wp-content/uploads/2018/06/Reference-chlorothalonil-2018-05-10-Health-Canada-Re-Evaluation-Decision-RVD2018-11-FULL-COPY-Final-Decision.pdf>

RVD2018-11 [FULL COPY] presents the re-evaluation decision, describing this stage of the PMRA's regulatory process for the re-evaluation of chlorothalonil and summarizes the Agency's decision and the reasons for it.

<http://pesticidetruths.com/wp-content/uploads/2018/06/Reference-chlorothalonil-2018-05-10-Health-Canada-Re-Evaluation-Decision-RVD2018-11-FULL-COPY-Final-Decision.pdf>

A reference list for all data used as the basis for the re-evaluation decision is included in **RVD2018-11 [FULL COPY]**, as well as in **PRVD2011-14** and **REV2016-06**.

<http://pesticidetruths.com/wp-content/uploads/2018/06/Reference-chlorothalonil-2018-05-10-Health-Canada-Re-Evaluation-Decision-RVD2018-11-FULL-COPY-Final-Decision.pdf>

<http://pesticidetruths.com/wp-content/uploads/2018/06/Reference-chlorothalonil-2011-11-01-Health-Canada-Proposed-Re-Evaluation-Decision-PRVD2011-14-Short-Version.pdf>

<http://pesticidetruths.com/wp-content/uploads/2016/02/Reference-chlorothalonil-2016-02-11-Health-Canada-Re-Ev-Note-REV2016-06-Re-Evaluation-Decision.pdf>

Regulatory Decision

The Continued Registration Of Chlorothalonil Products Is Acceptable In Canada

The PMRA has completed the re-evaluation of chlorothalonil.

Under the authority of the Pest Control Products Act, the PMRA has determined that CONTINUED REGISTRATION OF PRODUCTS CONTAINING CHLOROTHALONIL IS ACCEPTABLE.

An evaluation of available scientific information found that MOST USES of chlorothalonil products meet current standards for protection of human health or the environment when used according to the conditions of registration, which include required amendments to label directions.

Certain uses of chlorothalonil will be cancelled to address POTENTIAL RISKS OF CONCERN FOR HUMAN HEALTH.

Risk mitigation measures, as summarized below as well as outlined in **Appendix III** of **RVD2018-11 [FULL COPY]**, are required for all end-use products. [See later segments.]

<http://pesticidetruths.com/wp-content/uploads/2018/06/Reference-chlorothalonil-2018-05-10-Health-Canada-Re-Evaluation-Decision-RVD2018-11-FULL-COPY-Final-Decision.pdf>

Risk Mitigation Measures

Final Re-Evaluation Decision By Health Canada —

Registered pesticide product labels include specific instructions for use.

Directions include risk reduction measures to protect human health and the environment.

These directions must be followed by law.

The key risk-reduction measures required are summarized below. Refer to **Appendix III** of **RVD2018-11 [FULL COPY]** for details. [See later segments.]

<http://pesticidetruths.com/wp-content/uploads/2018/06/Reference-chlorothalonil-2018-05-10-Health-Canada-Re-Evaluation-Decision-RVD2018-11-FULL-COPY-Final-Decision.pdf>

Human Health

Final Re-Evaluation Decision By Health Canada —

- CANCELLATION of chlorothalonil uses on greenhouse cut flowers, greenhouse pachysandra, and field grown roses (for cut flowers).
- All chlorothalonil products currently registered as dry flowable or water dispersible granules MUST BE PACKAGED IN WATER SOLUBLE PACKAGING.
- Additional measures to mitigate EXPOSURE of mixers/loaders/applicators, including personal protection equipment and/or engineering controls.
- Additional measures to mitigate EXPOSURE of post-application workers, including REDUCED NUMBER OF APPLICATIONS and RESTRICTED-ENTRY INTERVALS.
- Additional label statements to clarify use directions.
- Standard precautionary label statement to mitigate a potential drift into residential areas.

Environment

Final Re-Evaluation Decision By Health Canada —

- REVISED buffer zones
- Requirement for a vegetative filter strip

Next Steps

Final Re-Evaluation Decision By Health Canada —

To comply with this decision, the required mitigation measures must be implemented on all product labels sold by registrants no later than **24 months** after the publication date of this decision document.

Appendix I of **RVD2018-11 [FULL COPY]** lists the products containing chlorothalonil that are registered under the authority of the Pest Control Products Act.

Please note that water soluble packaging is required for all chlorothalonil products registered as dry flowable or water dispersible granules.

Should registrants of these specific products wish to keep their chlorothalonil registration, an application to register a new product in water soluble packaging is required as soon as possible so that the new formulation will be approved and available for sale no later than **24 months** after the publication date of **RVD2018-11**.

Additional label requirements are outlined in **Appendix III** of **RVD2018-11 [FULL COPY]**. [See later segments.]

Other Information

Final Re-Evaluation Decision By Health Canada —

Any person may file a notice of objection regarding this decision on chlorothalonil within 60 days from the date of publication of this re-evaluation decision (**RVD2018-11**).

For more information regarding the basis for objecting (which must be based on scientific grounds), please refer to the Pesticides and Pest Management section of Canada.ca

Request a Reconsideration of Decision or contact the PMRA's Pest Management Information Service.

International Context

The Continued Registration Of Chlorothalonil Products Is Acceptable Not Only In Canada, But Also In The United States, The European Union, & Australia

Chlorothalonil is currently acceptable for use in member countries from the Organisation [*sic*] for Economic Co-operation and Development (OECD), including the United States, Australia, and member states of the European Union.

No decision by an OECD member country to prohibit all uses of chlorothalonil for health or environmental reasons has been identified at this time.

Chlorothalonil is under registration review at the United States Environmental Protection Agency (US EPA).



Goodbye Chlorothalonil

FORCE OF NATURE | DARING TO DEFY BY EXPLORING WITH THE WHOLE TRUTH FROM AN INDEPENDENT PERSPECTIVE
National Organization Responding Against HUE that conspire to destroy the Green space and other industries (NORAHG)

Science Evaluation Update

RVD2018-11 [FULL COPY]

**Chlorothalonil And Its Associated
End-Use Products For Agricultural
And Turf Uses - Final Decision**

FORCE OF NATURE | DARING TO DEIFY BY EXPLORING THE WHOLE TRUTH FROM AN INDEPENDENT PERSPECTIVE
National Organization Responding Against BLM that conspire to destroy the Green space and other industries (NORAHQ)

May 10th, 2018

Pest Management Regulatory Agency (PMRA)

Re-Evaluation Decision By Health Canada RVD2018-11

Selected And Adapted Excerpts From FULL COPY

<http://pesticidetruths.com/wp-content/uploads/2018/06/Reference-chlorothalonil-2018-05-10-Health-Canada-Re-Evaluation-Decision-RVD2018-11-FULL-COPY-Final-Decision.pdf>

Re-Evaluation Decision By Health Canada

This re-evaluation considers data and information from pesticide manufacturers, published scientific reports, and other regulatory agencies.

The PMRA applies internationally accepted risk assessment methods as well as current risk management approaches and policies.

Chlorothalonil is a contact and protectant fungicide with a multi-site mode of action.

It controls a broad range of fungal diseases on a large number of field and orchard crops, conifers, greenhouse vegetables, greenhouse and outdoor ornamentals and turf.

[The excerpts from this] document will focus on turf uses.

Risks In Residential & Other Non-Occupational Environments

Residential handler EXPOSURE is NOT EXPECTED as there are no domestic-class products containing chlorothalonil registered in Canada.

There is, however, a potential for EXPOSURE to chlorothalonil RESIDUES on commercially treated TURF (GOLFERS) and plants, and to spray drift from agricultural applications (BY-STANDERS).

As indicated in **REV2016-06**, potential risks to individuals from pick-your-own activities and to BY-STANDERS are NOT OF CONCERN.

<http://pesticidetruths.com/wp-content/uploads/2016/02/Reference-chlorothalonil-2016-02-11-Health-Canada-Re-Ev-Note-REV2016-06-Re-Evaluation-Decision.pdf>

Potential risks for GOLFERS and individuals handling retail plants are NOT OF CONCERN under the REVISED conditions of use

See **Appendix V, Table 1** and **Table 2**. [See later segments.]

For BY-STANDERS, potential aggregate non-cancer and cancer risks, where EXPOSURE from food and drinking water was combined with possible INHALATION EXPOSURE from drift, are NOT OF CONCERN

See **Appendix V, Table 3**. [See later segments.]

For GOLFERS and individuals handling retail plants (See **Appendix V, Table 3**), NON-CANCER AGGREGATE RISK ASSESSMENTS were not required, as a common end-point of concern was not identified for the relevant routes of EXPOSURE.

The potential aggregate cancer risk is NOT OF CONCERN for individuals handling retail plants when combined with dietary EXPOSURE.

For GOLFERS, the AGGREGATE CANCER RISK ESTIMATES (2×10^6) slightly exceed the PMRA's LEVEL OF CONCERN (1×10^6) when combined with dietary EXPOSURE, however, this is considered acceptable given the conservatism in the input values used in both the dietary and GOLFER assessments, including —

- Monitoring data used in the dietary EXPOSURE assessment are based on the current registered use pattern. As a result of the re-evaluation whereby the maximum number of applications is reduced, these levels are expected to be LOWER.
- For the GOLFER assessment, peak chlorothalonil RESIDUES are assumed. Chlorothalonil RESIDUES dissipate over time and GOLFERS WILL NOT be exposed to the peak RESIDUES every time they play GOLF.

Furthermore, conservative default values for EXPOSURE duration are used (e.g., **63 years for adults** and **5 years for children and youth**).

A close-up photograph of a woman's face, focusing on her eyes, nose, and lips. She has dark, wavy hair, heavy eye makeup including long eyelashes and dark eyeshadow, and bright red lipstick. A small mole is visible on her right cheek. The background is dark and out of focus.

Goodbye Chlorothalonil

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Appendix II

Comments & Responses

RVD2018-11 [FULL COPY]

**Chlorothalonil And Its Associated
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Residential & Occupational Exposure

Comments & Responses —

In response to the consultation for **REV2016-06**, comments related to the residential and occupational EXPOSURE assessments were received from the registrant, individual growers, grower groups and associations, industries related to agriculture, such as packing plants, agronomy services, consultants, suppliers, distributors, and wholesalers, GOLF COURSE SUPERINTENDENTS, SUPERINTENDENT ASSOCIATIONS, TURFGRASS TRADE ASSOCIATIONS, researchers (university and research institute), provincial ministries related to agriculture, and one municipality.

Comments recommended that the occupational and residential mixer, loader, applicator and POST-APPLICATION RISK ASSESSMENTS be REVISED based on a REVISED DERMAL END-POINT, UPDATED USE INFORMATION, REVISED POST-APPLICATION ACTIVITIES, and REVISED APPLICATION FREQUENCIES.

The PMRA REVISED the occupational handler and POST-APPLICATION RISK ASSESSMENTS taking into consideration the comments received.

These RISK ASSESSMENTS were REVISED for most crops using the short-term DERMAL END-POINT as well as the use description information received during the consultation period.

The results of the REVISED RISK ASSESSMENTS are presented in **Appendix VII**.

<http://pesticidetruths.com/wp-content/uploads/2016/02/Reference-chlorothalonil-2016-02-11-Health-Canada-Re-Ev-Note-REV2016-06-Re-Evaluation-Decision.pdf>

Specific comments are addressed below.

Gloves

Comment —

It was stated that GLOVES are typically worn by POST-APPLICATION workers and can result in a **90 per cent** EXPOSURE REDUCTION.

PMRA Response —

The PMRA acknowledges that GLOVES may be worn during certain POST-APPLICATION activities for some crops, as protection (e.g., thorns) or to prevent the transmission of micro-organisms from the worker to the plant commodity.

However, the type of GLOVE worn may not be CHEMICAL-RESISTANT, so the level of chemical protection afforded by the GLOVES worn by POST-APPLICATION workers is unknown.

(**90 per cent** is a factor used for handlers who have only brief contact with concentrated products during mixing and loading, rather than for POST-APPLICATION workers who have much longer contact with RESIDUES over an **8-hour workday**, which can result in greater EXPOSURE.)

While the use of CHEMICAL-RESISTANT GLOVES may be a « *best practices* » measure, the consideration of Personal Protection Equipment (PPE) as mitigation for POST-APPLICATION workers in the risk assessment is NOT APPROPRIATE for regulatory purposes since there are no reliable data to indicate the degree of protection GLOVES may provide to POST-APPLICATION workers, or conversely, the extent that GLOVES may enhance EXPOSURE under certain conditions.

Moreover, GLOVES may not be worn consistently in hot weather, and delicate tasks such as hand thinning often cannot be adequately performed while wearing GLOVES.

Dislodgeable Foliar Residues (DFR)

Comment —

Comments suggested that DISLODGEABLE FOLIAR RESIDUES would dissipate and rapid growth of the plant would decrease the contact potential to treated surfaces.

Furthermore, due to the sticky nature of the end-use product, transfer of RESIDUES would be minimal after application.

PMRA Response —

A chemical specific dislodgeable foliar residues (DFR) study was not available to the PMRA to determine the dissipation of chlorothalonil on treated plant foliage.

In lieu of this data, the default PEAK DISLODGEABLE FOLIAR RESIDUES (DFR) VALUE OF **25 PER CENT** OF THE APPLICATION RATE BEING DISLODGEABLE AFTER APPLICATION and the default DAILY DISSIPATION RATE OF **10 PER CENT** was used in the updated risk assessment.

Mitigation Measures For Golf Course Workers

Statement —

A Re-Entry Interval (REI) of **22 days** is NOT FEASIBLE for many GOLF COURSES, as winter protection activities (such as topdressing, tarping, and fencing) take place following the application.

Without further winter protection, GOLF COURSES would sustain substantial damage to the TURF that would result in financial hardships.

The proposed Re-Entry Interval (REI) is likely to reduce, if not even prevent, the use of chlorothalonil on GOLF COURSES.

In addition, the requirement of ENCLOSED CAB APPLICATION EQUIPMENT with ground-boom equipment for applications to TURF would add UNREASONABLE COSTS to many GOLF COURSES, and may have a NEGATIVE ECONOMIC IMPACT on the smaller clubs across Canada.

PMRA Response —

The PMRA considered all comments received during consultation and REVISED the risk assessment using the best available information. Based on the REVISED risk assessment, the PMRA supports a continued registration of all TURF USES with mitigation measures.

ENCLOSED CAB APPLICATION EQUIPMENT is NO LONGER REQUIRED for ground-boom applications to TURF.

Honeybees

Comment —

In **PRVD2011-14 [FULL COPY]** on **Page 54** (**Page 53** of the published document), the acute honeybee (*Apis mellifera*) 48-h LD50 identified in **Table 3** was not consistent with the most current data identified by the United States Environmental Protection Agency[**US EPA**] (> 181 µg/bee; Atkins *et al* 1973).

<http://pesticidetruths.com/wp-content/uploads/2018/06/Reference-chlorothalonil-2011-11-01-Health-Canada-Proposed-Re-Evaluation-Decision-PRVD2011-14-FULL-COPY-.pdf>

Please see Atkins, E L, Greywood, E A, and Macdonald, R L 1973. Toxicity of Pesticides and Other Agricultural Chemicals to Honeybees — Laboratory Studies. Department of Entomology, University of California, Riverside. September 1973-SM, Rev.

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Table 3 Environmental Toxicity of Chlorothalonil

Organism	Study Type	Species	Test material	Endpoint	Value	Toxicity Category
Terrestrial Species						
Invertebrates	Acute	Earthworm (<i>Eisenia foetida</i>)	Chlorothalonil technical	14-day LC ₅₀	515 mg a.i./kg substrate	—
	Acute	Honey bee (<i>Apis mellifera</i>)	Chlorothalonil technical	48-h LD ₅₀	> 40 µg a.i./bee	Relatively non-toxic

PMRA Response —

The acute honeybee (*Apis mellifera*) 48-h LD₅₀ of > 40 µg/bee used in the risk assessment was obtained from the European Commission Health and Consumer Protection Directorate-General review for chlorothalonil.

Although this value is more conservative than the value reported by the EPA (> 181 µg/bee; Atkins *et al* 1973), the LEVEL OF CONCERN was still NOT EXCEEDED in the screening level risk assessment for honeybees indicating negligible risk (**PRVD2011-14**, **Appendix VIII, Table 4**).

<http://pesticidetruths.com/wp-content/uploads/2018/06/Reference-chlorothalonil-2011-11-01-Health-Canada-Proposed-Re-Evaluation-Decision-PRVD2011-14-FULL-COPY-.pdf>

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Table 4 Screening Level Risk Assessment for Terrestrial Invertebrates

Organisms	Exposure	Endpoint Value	Application Rate	EEC ¹	RQ ²	LOC ³ exceeded
Invertebrates						
Earthworm	Acute	14-day LC ₅₀ + 2 258 mg a.i./kg soil	12660 g a.i./ha × 1 9500 g a.i./ha × 4 (14 day interval)	15.7 mg a.i./kg substrate	0.06	No
Bee	Acute	48-h LD ₅₀ > 40 µg a.i./bee	2500 g a.i./ha × 23 (7 day interval)	6504 g a.i./ha	0.15	No

¹⁾ Environmental Exposure Concentration (Soil: calculated based on a soil density of 1.5 g/cm³, soil depth of 15 cm and the label rates taking into consideration dissipation between applications; Bee: maximum application rate (application rate × no. of applications)).

²⁾ Risk Quotient (RQ) = exposure/toxicity

³⁾ Level of Concern (LOC) = RQ = 1; a calculated RQ > 1 exceeds the LOC

Toxicity in µg/bee converted to the equivalent kg a.i./ha using a conversion factor of 1.12 (Atkins et al., 1981; PMRA No. 1573066)

Values in bold exceed level of concern (≥1).

Value Assessment

Comments —

In response to the consultation for **REV2016-06**, comments related to the value assessment were received from individual growers, grower groups and associations, industries related to agriculture, such as packing plants, agronomy services, consultants, suppliers, distributors, and wholesalers, GOLF COURSE SUPERINTENDENTS, SUPERINTENDENT TRADE ASSOCIATIONS, TURFGRASS TRADE ASSOCIATIONS, researchers (university and research institute), and provincial ministries related to agriculture.

<http://pesticidetruths.com/wp-content/uploads/2016/02/Reference-chlorothalonil-2016-02-11-Health-Canada-Re-Ev-Note-REV2016-06-Re-Evaluation-Decision.pdf>

Resistance Management

Comment —

Chlorothalonil is important for RESISTANCE MANAGEMENT.

The proposed restriction on the use of chlorothalonil put Canadian growers at a competitive disadvantage.

Chlorothalonil is an effective, broad spectrum fungicide that has a very low risk of resistance due to its multi-site mode of action.

It is an invaluable tool for RESISTANCE MANAGEMENT and economical broad spectrum disease control.

It is used as TANK-MIX PARTNER, in pre-mixes, and as rotational product for newer fungicides that are at high risk of resistance.

The proposed additional restrictions on the use of chlorothalonil, prior to similar action by the United States Department of Agriculture (USDA), would further handicap our producers and overall industry from effectively competing with North American growers particularly processed tomato sector.

PMRA Response —

The PMRA acknowledges the importance of chlorothalonil to agriculture for disease control, RESISTANCE MANAGEMENT for higher quality and yield.

During consultation with stakeholders, the PMRA received additional information related to crop production practices and the use of chlorothalonil.

This information was used to refine the assessment of EXPOSURE RISKS for chlorothalonil and as a result, the PMRA will retain most of the uses for chlorothalonil but with a REDUCED NUMBER OF APPLICATIONS TO MITIGATE RISK CONCERNS.

Growers will have the option to rotate or tank mix chlorothalonil with other fungicides for disease control and RESISTANCE MANAGEMENT.

Integrated Pest Management (IPM)

Comment —

Chlorothalonil is the key active ingredient as part of an INTEGRATED PEST MANAGEMENT program on GOLF COURSE TURF.

Chlorothalonil plays a key role in INTEGRATED PEST MANAGEMENT Programs on GOLF COURSE TURF as it is the only fungicide with MULTI-SITE CONTROL.

Without the availability of chlorothalonil, TURF MANAGERS would be forced to ABANDON INTEGRATED PEST MANAGEMENT principles and begin focusing specifically on bi-weekly PREVENTIVE applications of less effective fungicides, ultimately requiring a significant increase in chemical applications and pesticide load in the environment. [?!?!]

NORAHG Response —

FUNGICIDES ARE MOST EFFICIENT WHEN USED PREVENTIVELY —

Disease control products that are MULTI-SITE CONTACT FUNGICIDES work best when used PREVENTIVELY.

The only available SINGLE-SITE fungicide, chlorothalonil, still requires lower rates and frequencies when used PREVENTIVELY.

In the case of late-fall pre-snow-cover applications against Snow Mold Diseases, the only solution is applying products PREVENTIVELY at the highest label rates.

Comment (continued) —

It is the key tool required to maintain the high quality playing surfaces that will continue to attract GOLFERS.

This is an extremely important active ingredient used for the prevention and control of Snow Molds, Anthracnose, *Helminthosporium* Leaf Spot, Brown Patch, *Microdochium* Patch, and Dollar Spot.

It is also important for RESISTANCE MANAGEMENT in an INTEGRATED PEST MANAGEMENT program.

PMRA Response —

The PMRA acknowledges the importance of chlorothalonil for the management of TURF diseases in GOLF COURSES.

During the consultation period for **REV2016-06**, the PMRA received information related to GOLF COURSE TURFGRASS MANAGEMENT PRACTICES and the use of chlorothalonil from different stakeholders.

<http://pesticidetruths.com/wp-content/uploads/2016/02/Reference-chlorothalonil-2016-02-11-Health-Canada-Re-Ev-Note-REV2016-06-Re-Evaluation-Decision.pdf>

This information was used to REFINE the assessed EXPOSURE RISKS associated with chlorothalonil.

As a result, TWO APPLICATIONS of chlorothalonil per year for TURFGRASS FOLIAR DISEASE MANAGEMENT, plus one application in the fall for Snow Mold control, are ACCEPTABLE.

A number of active ingredients other than chlorothalonil belong to different mode of action groups are currently registered for the control of several important GOLF COURSE TURFGRASS DISEASES — dollar spot, foliar and basal rot anthracnose, leaf spot and brown patch. Growers have the option to rotate these fungicides with chlorothalonil in a GOLF COURSE TURFGRASS DISEASE CONTROL and RESISTANCE MANAGEMENT program.

Growers also have the option for one application of a pre-mix product containing chlorothalonil, propiconazole and fludioxonil in the fall for season long control of pink and gray Snow Molds in addition to other products from different mode of action groups.



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Appendix III

Revised Label Amendments

RVD2018-11 [FULL COPY]

**Chlorothalonil And Its Associated
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May 10th, 2018

Pest Management Regulatory Agency (PMRA)

Re-Evaluation Decision By Health Canada RVD2018-11

Selected And Adapted Excerpts From FULL COPY

<http://pesticidetruths.com/wp-content/uploads/2018/06/Reference-chlorothalonil-2018-05-10-Health-Canada-Re-Evaluation-Decision-RVD2018-11-FULL-COPY-Final-Decision.pdf>

Appendix III — Revised Label Amendments For Agricultural & Turf End-Use Products Containing Chlorothalonil

The label amendments presented below do not include all label requirements for individual end-use products, such as first aid statements, disposal statements, precautionary statements and supplementary protective equipment.

Information on labels of currently registered products should not be removed unless it contradicts the label statements provided below.

Statements To Protect Human Health Use Precautions

The Following Statements Must Be Added To All End-Use Product Labels —

Apply only when the potential for DRIFT to non-target areas of human habitation and areas of human activity such as houses, cottages, schools, and recreational areas is minimal.

Take into consideration wind speed, wind direction, temperature inversions, application equipment, and sprayer settings.

The Following Statements Must Be Added To The Applicable Labels Of End-Use Products —

For products with GOLF COURSE uses ...

DO NOT allow the public to enter into treated GOLF COURSES following late fall application for Snow Molds

End-Use Products Formulation As Liquids —

The following Minimum Mitigation Measure Requirements are based on the risk assessment for workers mixing, loading and applying end-use products formulated as liquids will be applied to applicable product labels.

Minimum Mitigation Measure Requirements For Ground-Booms —

If handling more than 340 kg a.i. in one day, mixers and loaders must use a CLOSED SYSTEM.

Wear coveralls over a long-sleeved shirt and long pants, chemical resistant gloves, socks and shoes during mixing, loading, clean-up, and repair activities.

Wear a long sleeved-shirt, long pants, chemical resistant gloves, socks and shoes during application.

GLOVES are NOT required during application within a CLOSED CAB.

Minimum Mitigation Measure Requirements For Hand-Held Spray Equipment —

Wear a long-sleeved shirt, long pants, chemical resistant gloves, socks and shoes during mixing, loading, application, clean-up, and repair.

End-Use Products Formulations

End-use products formulated as Dry Flowable (DF) and Water Dispersible Granules (WDG) must be DISCONTINUED and re-formulated in Water-Soluble Packets (WSP).

For DF and/or WDG products that will be re-formulated as WSP, label language will need to be clarified to indicate directions for the use of Water-Soluble Packets (WSP).

Registrants will need to ensure that the sizes of the Water-Soluble Packets (WSP) are reconciled with the registered/required use-specific application rates.

The following Minimum Mitigation Measure Requirements are based on the risk assessment for workers mixing, loading, and applying end-use products formulated in Water-Soluble Packets (WSP) will be applied to applicable product labels.

Minimum Mitigation Measure Requirements For Hand-Held Spray Equipment —

Wear coveralls over a long-sleeved shirt and long pants, chemical resistant gloves, socks and shoes during mixing, loading, application, clean-up, and repair.

NIOSH-approved canister approved for pesticides.

Directions For Use

The following uses must be removed from all current labels — control of Yellow Patch Disease on TURF.

Goodbye Chlorothalonil !

Table 1 Summary of Accepted Uses

*Application of any product containing chlorothalonil cannot be made more frequently than the Retreatment Intervals stated below

Crop	Maximum Application Rate (kg a.i./ha)	Maximum Number of Applications per year for chlorothalonil	Retreatment Interval (days)	Activity	REI (days)	Additional Instructions
Turf (Snow Molds)	12.0	1	N/A	All activities	Until sprays Have dried	All other directions for use remain unchanged.
Turf - Golf Courses And Sod Farms	9.5 and 4.8	2 (total)	14 (9.5 kg a.i./ha) 7 (4.8 kg a.i./ha)	All activities	Until sprays have dried	All other directions for use remain unchanged.

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Directions For Use (continued)

- Remove all references to making subsequent applications « *as needed* », or « *as necessary* », or any other wording that implies that the user may make more applications than indicated in the use patterns noted in **Table 1 Summary of Accepted Uses**. [See previous segment.]
- The Principal display panels and RESISTANCE MANAGEMENT sections of all labels must be updated to reflect the REVISED Fungicide Resistance Action Committee (FRAC) code for chlorothalonil, « *GROUP M5 FUNGICIDE* ».
- RESISTANCE MANAGEMENT sections must be updated per the **Regulatory Directive DIR2013-04, Pesticide Resistance Management Labelling Based On Target Site / Mode Of Action**.
<http://pesticidetruths.com/wp-content/uploads/2018/06/Reference-chlorothalonil-2013-12-17-Health-Canada-Pesticide-Resistance-Management-Labelling-Based-On-Target-Site-Mode-Of-Action-DIR2013-04.pdf>
- Remove all references to application of chlorothalonil at shorter re-application intervals than indicated in **Table 1 Summary of Accepted Uses** [see previous segment], such as « *Under severe conditions, shorten spray interval* ».
- Reference to TANK-MIX PARTNERS that contain active ingredients that have been discontinued or phased-out must be removed from product labels.
- Where TANK-MIX PARTNERS are not named on the chlorothalonil product label, all tank mixing instructions must be removed.
- All disease claims must have the associated LATIN NAME (genus and species) of the causative pathogen added to the product label.

Statements To Protect The Environment (All End-Use Product Labels) —

Add To Environmental Precautions —

TOXIC to aquatic organisms.

Observe buffer zones specified under DIRECTIONS FOR USE.

To reduce run-off from treated areas into aquatic habitats avoid applications to areas with a moderate to steep slope, compacted soil, or clay.

Avoid application when heavy rain is forecast.

Add To Directions For Use —

As this product is NOT registered for the control of pests in aquatic systems, DO NOT use to control aquatic pests.

DO NOT contaminate irrigation or drinking water supplies or aquatic habitats by cleaning of equipment or disposal of wastes.

DO NOT allow effluent or runoff from greenhouses and mushroom houses containing this product to enter lakes, streams, ponds, or other bodies of water.

Vegetative Filter Strips —

A Vegetative Filter Strip (VFS) of at least 10 METRES wide must be constructed and maintained.

More information can be found in the **Buffer Zone Table**. [See next segment.]

The VFS is required between the field edge and adjacent, downhill aquatic habitats to reduce risk to aquatic organisms from run-off.

Aquatic habitats include, but are not limited to, lakes, reservoirs, rivers, permanent streams, marshes or natural ponds, and estuaries.

The VFS is to be composed of grasses and may also include shrubs, trees, or other vegetation.

Additional guidance can be found on the PMRA Environmental Risk Mitigation web-pages.

Both VFS and spray drift buffer zones must be observed.

Spray Drift Buffer Zones —

Spray drift buffer zones are to protect terrestrial and aquatic habitats from spray drift.

Spray drift buffer zones are a separate requirement from VFS which are required to mitigate risks from runoff.

Field sprayer application — DO NOT apply during periods of dead calm.

Avoid application of this product when winds are gusty.

DO NOT apply with spray droplets smaller than the **American Society of Agricultural Engineers (ASAE S572.1) — Medium Spray Quality**.

<http://pesticidetruths.com/wp-content/uploads/2018/06/Reference-chlorothalonil-Droplet-Size-Classification-ASAE-S572.1-American-Society-of-Agricultural-Engineers.pdf>

More information can be found in the **ASAE S572.1 Droplet Size Classification**. [See next segment.]

Boom height must be 60 CENTIMETRES or less above the crop or ground.

Spot treatments using HAND-HELD equipment DO NOT require a buffer zone.

The spray drift buffer zones specified in the **Buffer Zone Table** [see next segment] are required between the point of direct application and the closest down-wind edge of sensitive freshwater habitats (such as lakes, rivers, sloughs, ponds, prairie potholes, creeks, marshes, streams, reservoirs and wetlands) and estuarine / marine habitats.

Goodbye Chlorothalonil !

Buffer Zone Table

	Crop	Buffer Zones (metres) Required for the Protection of —			
		Freshwater Habitat of Depths —		Estuarine/Marine Habitats of Depths —	
		Less than 1 m	Greater than 1 m	Less than 1 m	Greater than 1 m
Field Sprayer	Turf	15	2	15	5

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Goodbye Chlorothalonil !

ASABE S572.1 Droplet Size Classification

The American Society of Agricultural and Biological Engineers (ASABE) developed the ASABE S572.1 standard to measure and interpret spray quality from tips.

Spray Quality*	Size of Droplets	VMD Range (Microns**)	Color Code	Retention on Difficult to Wet Leaves	Used for	Drift Potential
Extremely Fine	Small	<60	Purple	Excellent	Exceptions	High
Very Fine		61-105	Red	Excellent	Exceptions	
Fine		106-235	Orange	Very Good	Good Cover	
Medium		236-340	Yellow	Good	Most Products	
Coarse		341-403	Blue	Moderate	Systemic Herbicides	
Very Coarse		404-502	Green	Poor	Soil Herbicides	
Extremely Coarse		503-665	White	Very Poor	Liquid Fertilizer	
Ultra Coarse	Large	>665	Black	Very Poor	Liquid Fertilizer	Low

*Always read the pesticide label to determine which spray quality is required.

**Estimated from sample reference graph in ASABE/ANSI/ASAE Standard S572.1

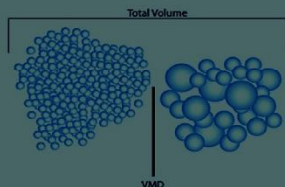
ASABE S572.1 standard uses eight droplet classification categories, six of which are common for agriculture and horticulture:

Very Fine Fine Medium Coarse Very Coarse Extremely Coarse

Most agrochemical applications recommend a fine, medium, or coarse spray:

Fine	sprays provide enhanced retention for directed spraying on the target including: • Foliar-acting weed control • Contact-acting fungicides and insecticides	Medium	sprays are the most widely used spray type. • Used by default by most applicators when spray quality is not defined by the label • Systemic-acting fungicides, insecticides and herbicides.	Coarse	sprays are used with systemic, residual, and soil-applied herbicides.
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A. Understanding Droplet VMD



VMD is the droplet size at which 50% of the spray volume is in droplets larger than the VMD and 50% of the volume is in droplets smaller than the VMD (adapted from Matthews 1992).

Degree of Atomization	Droplet Size (Microns)	Relative Size Related to Common Objects
Fog	Up to 25	Point of a Needle (25 Microns)
Fine Mist	20-100	Human Hair (100 Microns)
Fine Drizzle	100-250	Sewing Thread (150 Microns)
Heavy Drizzle	250-500	Toothbrush Bristle (300 Microns)
Light Rain	500-800	Staple (550 Microns)
Heavy Rain	800-1000	Paper Clip (850 Microns)
Thunderstorm Rain	1000-4000	#2 Pencil Lead (2000 Microns)

Droplet sizes are usually expressed in microns (micrometers). One micron equals one thousandth of a millimeter. Other than the effects of the specific material being sprayed, the four major factors affecting droplet size are: tip style, capacity, spraying pressure and spray pattern type. Lower spraying pressures provide larger droplet sizes, while higher spraying pressures yield smaller droplet sizes. The smallest droplet sizes are achieved by air atomizing tips. Generally speaking, the largest spray droplets are produced by wide-angle, flat hydraulic spray tips. In the hydraulic spray tip series, the smallest droplet sizes are produced by hollow-cone spray tips.

Golf Industry

Explore the following links ...

The Critical Issues That Must Be Addressed By The Golf Industry

<http://pesticidetruths.com/2018/06/21/the-golf-industry-is-on-a-collision-course-the-critical-issues-that-must-be-addressed-by-the-golf-industry-now-2018-06-21/>

Golf Industry's Looming Shipwreck

<http://pesticidetruths.com/2015/12/21/golf-industrys-looming-shipwreck-predictions-concerning-the-loss-of-its-pesticide-exception-status-2009-encore-report/>

Liberal Party Of Canada

Decisions By Health Canada To Impose National Prohibitions Instigated By Liberals

<http://pesticidetruths.com/2016/04/23/the-end-of-the-golf-industrys-pesticide-ban-exception-status-goodbye-iprodione/>

Liberal Party Of Canada

Get Ready For The Liberal Pain

<http://pesticidetruths.com/2015/11/03/growers-across-canada-had-better-get-ready-for-the-pain-of-catastrophic-carnage-justin-trudeau-liberal-party-of-canada-2015-11-02/>

Liberal Party Of Canada

Prohibitions Instigated By Liberals & Other Issues

<http://pesticidetruths.com/2016/04/23/the-end-of-the-golf-industrys-pesticide-ban-exception-status-goodbye-iprodione/>

Liberal Party Of Canada

Imbeciles Planning To Vote For Liberals

<http://pesticidetruths.com/2015/10/16/norahg-responds-to-those-imbeciles-planning-to-vote-for-liberal-party-of-canada-a-k-a-world-wildlife-federation-2015-10-16/>

Canadian Golf Superintendents Trade Association

The Failed CGSA Trade Association

<http://pesticidetruths.com/2018/02/02/the-failed-cgsa-take-over-by-golf-course-owners-why-are-cgsa-leaders-allowing-the-golf-industrys-greatest-train-wreck-crisis-2018-01-26/>

Canadian Golf Superintendents Trade Association

The Media History Of Failed CGSA

<http://pesticidetruths.com/toc/canadian-golf-superintendents-association/>

Western Canada Turfgrass Trade Association

The Media History Of Failed WCTA

<http://pesticidetruths.com/toc/wcta-reports-blogs-references-cards/>

Prohibitions

Explore the following links ...

Chlorothalonil Prohibition

The Story & Sad End Of Chlorothalonil

<http://pesticidetruths.com/2016/02/23/chlorothalonil/>

Chlorothalonil Prohibition

Ontario Trade Association Responses Regarding Chlorothalonil

<http://pesticidetruths.com/2016/04/01/chlorothalonil-near-total-prohibition-for-the-golf-industry-trade-associations-respond-to-health-canada-2016-03-30/>

Iprodione Prohibition

Decisions By Health Canada To Impose National Prohibitions

<http://pesticidetruths.com/2016/04/23/the-end-of-the-golf-industrys-pesticide-ban-exception-status-goodbye-iprodione/>

Chlorothalonil Prohibition

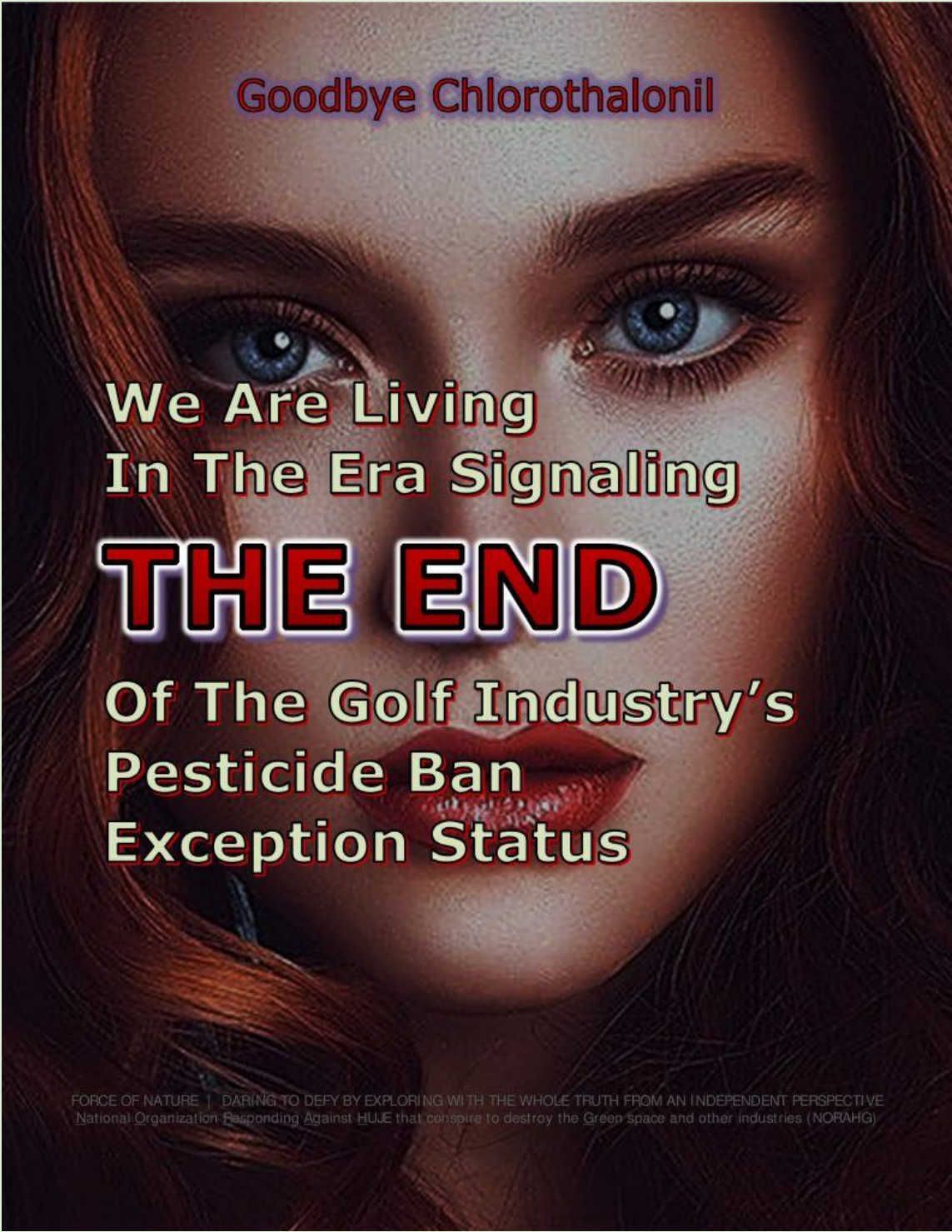
The Complete Media Library

<http://pesticidetruths.com/toc/chlorothalonil/>

National Prohibition

The Media History Of The National Annihilation Of The Modern Green Space Industry

<http://pesticidetruths.com/toc/national-prohibition-reports-blogs-references/>



Goodbye Chlorothalonil

We Are Living
In The Era Signaling
THE END
Of The Golf Industry's
Pesticide Ban
Exception Status

FORCE OF NATURE | DARING TO DEFY BY EXPLORING WITH THE WHOLE TRUTH FROM AN INDEPENDENT PERSPECTIVE
National Organization Responding Against HUJE that conspire to destroy the Green space and other industries (NORAHG)

Background Information

Health Canada

FORCE OF NATURE | DARING TO DEFY BY EXPLORING THE WHOLE TRUTH FROM AN INDEPENDENT PERSPECTIVE
National Organization Responding Against BURE that conspire to destroy the Green space and other industries (NORAHQ)

✓ **FACT** — Within The Government Of Canada, Health Canada's Pest Management Regulatory Agency (PMRA) Is Responsible For Administering The Pest Control Products Act On Behalf Of The Minister Of Health

✓ **FACT** — Before A Pest Control Product Is Allowed To Be Used Or Sold In Canada, It Must Undergo A Rigorous Scientific Assessment Process Which Provides Reasonable Certainty That No Harm Will Occur, Including Chronic Effects Such As Cancer, When Used According To Label Directions

✓ **FACT** — When Used Properly, Health-Canada-Approved Pest Control Products Are Scientifically-Safe, & Will Not Cause Harm To People, Animals, Or The Environment

✓ **FACT** — Health-Canada-Approved Pest Control Products Will Not Harm Children

✓ **FACT** — The Assessment Of Pest Control Products By Health Canada Takes Into Consideration Sensitive Groups, Such As Children, As Well As Infants & Pregnant Women

✓ **FACT** — Children's Physiology, Behaviours, & Habits While Playing On Treated Grass Are Considered By Health Canada When Determining The Safety Of Pest Control Products

✓ **FACT** — Extra Safety Factors Are Applied By Health Canada To Protect Children, As Well As Infants & Pregnant Women

✓ **FACT** — Health Canada Looks At The Worst Case Scenario When Approving Pest Control Products & Pays Special Attention To Pregnant Women

✓ **FACT** — Under Federal Law, Health Canada Has Special Provisions For The Protection Of Pregnant Women & Children, Which Are Taken Into Account During The Risk Assessment Of Pest Control Products

✓ **FACT** — Canadians Have No Need To Worry With Health-Canada-Approved Pest Control Products

✓ **FACT** — The Issues Concerning The Safety Of Pest Control Products Have Been Successfully Resolved By Health Canada Since There Has Never Been Any Real Correlation Between The Users Of Pest Control Products & Negative Health Outcomes

Explore the following links ...

HEALTH CANADA — LINK TO WEB-SITE — PESTICIDES & PEST MANAGEMENT ([Link](#))

<http://www.hc-sc.gc.ca/cps-spc/pest/index-eng.php>

HEALTH CANADA — THE WISDOM OF REAL EXPERTS WHO SPEAK OUT AGAINST THE CONSPIRACY TO IMPOSE RECKLESS AND ARBITRARY PROHIBITION AGAINST CONVENTIONAL PEST CONTROL PRODUCTS ([Blog](#))

<http://pesticidetruths.com/2014/11/14/the-wisdom-of-real-experts-who-speak-out-against-the-conspiracy-to-impose-reckless-and-arbitrary-prohibition-against-conventional-pest-control-products-2014-11-14/>

HEALTH CANADA — RE-EVALUATION SUMMARY TABLE — PRODUCTS ACCEPTABLE FOR CONTINUED REGISTRATION ([Blog](#))

<http://pesticidetruths.com/2013/06/25/pesticides-evaluated-as-acceptable-for-continued-registration-by-health-canada-2013-03-31/>

HEALTH CANADA — RE-EVALUATION SUMMARY TABLE — PRODUCTS REMOVED ([Blog](#))

<http://pesticidetruths.com/2013/06/12/pesticides-removed-or-proposed-for-removal-by-health-canada-2013-03-31/>

HEALTH CANADA — RE-ENTRY INTERVALS — LABEL DIRECTIONS FOR APPLICATIONS ON TURFGRASSES ([Blog](#))

<http://pesticidetruths.com/2017/10/23/update-re-entry-intervals-label-statements-for-applications-on-turfgrasses-2017-10-23/>

HEALTH CANADA — ONTARIO'S ANTI-NEONICOTINOID REGULATIONS PUTS FARMERS AT A COMPETITIVE DISADVANTAGE — PMRA & EPA SAY THERE IS NO POTENTIAL RISK TO BEES AS A RESULT OF ON-LABEL USE OF NEONICOTINOID SEED TREATMENTS ([Report](#))

<http://pesticidetruths.com/2016/01/30/the-problem-of-forming-agricultural-polices-on-internet-trends/>

HEALTH CANADA — REGULATORY REVIEWS SHOW SLIM RISK TO BEES FROM NEONICOTINOID INSECTICIDES ([Blog](#))

<http://pesticidetruths.com/2016/01/14/there-is-no-bee-crisis-regulatory-reviews-show-that-there-is-a-slim-risk-to-bees-from-neonicotinoid-insecticides-2016-01-06/>

HEALTH CANADA — UNCOUPLING OF WEED N WEED (Report)

<http://pesticidetruths.com/wp-content/uploads/2012/05/Force-Of-Nature-Fertilizer-TERROR-Health-Canada-2010-02-02-Terror-NEVER-Ends-Uncoupling-of-Weed-N-Weed-pdf.pdf>

HEALTH CANADA — PEST CONTROL PRODUCTS (Web-Page With References, Official Documents)

<http://pesticidetruths.com/toc/pest-control-products-health-canada-epa/>

HEALTH CANADA — INCIDENT REPORTS (Web-Page With Reports, Official Documents)

<http://pesticidetruths.com/toc/incident-reports/>

HEALTH CANADA — ONTARIO COSMETIC PESTICIDES BAN ACT — MR LINDSAY HANSON (Report With Official Document)

<http://pesticidetruths.com/2010/08/14/gide-on-forman-janet-kasperski-mrep-communications-pmra-alex-cullen-committee-transcripts-standing-committee-on-social-policy-june-09-2008-bill-64-cosmetic-pesticides-ban-act-2008/>

HEALTH CANADA — STANDING COMMITTEE ON SOCIAL POLICY — LEGISLATIVE ASSEMBLY OF ONTARIO— MR LINDSAY HANSON (Slide Show)

<http://pesticidetruths.com/wp-content/uploads/2011/12/Slide-Show-Health-Canada-Pest-Management-Regulatory-Agency-Hanson-2008-06-09.pdf>

HEALTH CANADA — BRITISH COLUMBIA DOESN'T NEED PESTICIDE BAN — EXPERTS ARE TOXICOLOGISTS, DOCTORS, & SCIENTIST WHOSE EXPERTISE IS IN THE FIELD OF PESTICIDES — HEALTH CANADA WOULD BE A GOOD START — MS JACQUIE DOHERTY — BRITISH COLUMBIA (Report)

<http://pesticidetruths.com/2011/03/21/hero-b-c-doesn%E2%80%99t-need-pesticide-ban-letters-kamloops-daily-news/>

HEALTH CANADA — 2,4-D HERBICIDE — RE-EVALUATION WAS ONE OF THE MOST COMPREHENSIVE SCIENCE REVIEWS IN CANADIAN HISTORY — THE LAWN IS SAFE (Report)

<http://uncleadolph.blogspot.com/2010/03/lawn-is-safe-national-post-2008-article.html>

HEALTH CANADA — 2,4-D HERBICIDE — HEALTH CANADA RELEASES RE-EVALUATION DECISION ON 2,4-D (Reference)

<http://pesticidetruths.com/wp-content/uploads/2011/11/Reference-24-D-2008-05-16-Re-Evaluation-Decision-Health-Canada.pdf>

HEALTH CANADA — IS ROUNDUP (GLYPHOSATE) SAFE ?!?! (Report)

<http://uncleadolph.blogspot.com/2010/03/glyphosate-roundup-reevaluation-plan.html>

HEALTH CANADA — PESTICIDE SPRAY DRIFT IN RESIDENTIAL AREAS (Report With **Official Document**)

<http://uncleadolph.wordpress.com/2010/10/21/health-canada-faq-pesticide-spray-drift-in-residential-areas/>

HEALTH CANADA — RESPONDING TO LUNATKCS AT ONTARIO COLLEGE OF FAMILY PHYSICIANS PESTICIDE LITERATURE REVIEW (Report)

<http://uncleadolph.blogspot.com/2010/03/questions-and-answers-ontario-college.html>

HEALTH CANADA — RESPONDING TO LUNATKC J K COTTAM (Report)

<http://uncleadolph.blogspot.com/2010/03/kj-cottam-questions-and-answers-from-24.html>

HEALTH CANADA — RESPONDING TO LUNATKC ALLAN TAYLOR (Report)

<http://uncleadolph.blogspot.com/2010/03/allan-taylor-questions-and-answers-from.html>

Background Information

Pest Control Products

FORCE OF NATURE | DARING TO DEFY BY EXPLORING THE WHOLE TRUTH FROM AN INDEPENDENT PERSPECTIVE
National Organization Responding Against BLM that conspire to destroy the Green space and other industries (NORAHQ)

Explore the following links ...

✓ **FACT** — Overwhelming Scientific Evidence Clearly Demonstrates That Pest Control Products Are Scientifically-Safe, & Will Not Cause Harm To Children, Adults, Animals, Or The Environment

✓ **FACT** — Pesticides Are Less Lethal To Humans Than Caffeine — **LINK**

<http://pesticidetruths.com/2014/03/01/pesticides-are-scientifically-safe-safe-to-use-less-lethal-to-humans-than-caffeine-2014-02-27/>

✓ **FACT** — Yes, You Are Definitely Ingesting Pesticides, But Here's Why It's Not A Problem — **LINK**

<http://pesticidetruths.com/2017/08/18/pesticides-are-scientifically-safe-if-food-is-sprayed-a-lot-is-that-bad-for-your-digestive-health-2017-08-18/>

✓ **FACT** — Children Are Not At Risk From Pesticides — Dangerous Playing Surfaces Are Created By #@!!% Pesticide Bans — **LINK**

<http://pesticidetruths.com/too/children-are-not-at-risk/>

✓ **FACT** — Pest Control Products Are Safe For Kids — Slide Show — **LINK**

<http://pesticidetruths.com/2016/08/30/a-look-at-safety-environment-facts-pest-control-products-are-safe-for-kids-slide-show-2016-08-31/>

✓ **FACT** — Chemicals Are Evaluated For Carcinogenic Potential By Environmental Protection Agency (EPA)— **LINKS**

<http://pesticidetruths.com/wp-content/uploads/2011/12/Force-Of-Nature-Myth-BUSTING-Cancer-2012-11-00-Chemicals-Evaluated-for-Carcinogenic-Potential-EPA-pdf-300-dpi.pdf>

<http://pesticidetruths.com/2013/04/17/chemicals-evaluated-for-carcinogenic-potential-environmental-protection-agency-epa-2012-11-00/>

✓ **FACT** — Pesticides Are Evaluated As Acceptable For Continued Registration By Health Canada — **LINK**

<http://pesticidetruths.com/2013/06/25/pesticides-evaluated-as-acceptable-for-continued-registration-by-health-canada-2013-03-31/>

✓ **FACT** — Our Children Are Safe When Pesticide Bans Are Stopped — There Are Real Trends AGAINST Pesticide Bans — **LINK**

<http://pesticidetruths.com/2012/10/11/posters-there-is-a-real-trend-against-pesticide-bans-victories-against-terrorists-our-children-are-safe-when-pesticide-bans-are-stopped-2012-10-11/>

✓ **FACT** — Pest Control Products Have Been Tested In More Ways Than Virtually Any Other Set Of Substances — The Industry Task Force II On 2,4-D Research Data — **LINKS**

<http://pesticidetruths.com/wp-content/uploads/2011/12/Force-Of-Nature-UPDATE-24-D-2013-05-30-The-Industry-Task-Force-II-On-24-D-Research-Data-Gray-Burns-Mahlburg-pdf.pdf>

<http://pesticidetruths.com/2013/06/06/the-industry-task-force-ii-on-24-d-research-data-update-on-24-d-herbicide-gray-burns-mahlburg-2013-05-30/>

✓ **FACT** — Pesticides Are Safe — **LINKS**

<http://pesticidetruths.com/2014/03/01/pesticides-are-scientifically-safe-safe-to-use-less-lethal-to-humans-than-caffeine-2014-02-27/>

<http://pesticidetruths.com/toc/children-are-not-at-risk/>

<http://pesticidetruths.com/2013/06/25/pesticides-evaluated-as-acceptable-for-continued-registration-by-health-canada-2013-03-31/>

<http://pesticidetruths.com/2012/10/11/posters-there-is-a-real-trend-against-pesticide-bans-victories-against-terrorists-our-children-are-safe-when-pesticide-bans-are-stopped-2012-10-11/>

✓ **FACT** — Pesticides Are Health Canada Approved — Listen To Mr Lindsay Hanson From The Pest Management Regulatory Agency — **LINK**

<http://pesticidetruths.com/wp-content/uploads/2011/dirtybit/LHansonPMRAottawaPesticideSafety.mp3>

✓ **FACT** — There Is No Direct Proof Pesticides Cause Cancer — Canadian Cancer Society — **LINK**

<http://pesticidetruths.com/toc/canadian-cancer-society-no-conclusive-link-between-pesticides-and-cancer/>

<http://pesticidetruths.com/2012/07/01/pesticides-cancer-no-definite-cause-effect-canadian-cancer-society-patti-moore-2012-06-09/>

✓ **FACT** — REAL Experts Speak Out Against The Conspiracy To Impose Reckless & Arbitrary Prohibition Against Conventional Pest Control Products — **LINK**

<http://pesticidetruths.com/2014/11/14/the-wisdom-of-real-experts-who-speak-out-against-the-conspiracy-to-impose-reckless-and-arbitrary-prohibition-against-conventional-pest-control-products-2014-11-14/>

Norah GFON

The golf industry's pesticide ban
exception status has come to an end

FORCE OF NATURE | DARING TO DEFY BY EXPLORING WITH THE WHOLE TRUTH FROM AN INDEPENDENT PERSPECTIVE
National Organization Responding Against HUIE that conspire to destroy the Green space and other industries (NORAHG)

We Speak The Whole Truth About Health Canada From An Independent Perspective

We are the National Organization Responding Against HUJE that conspire to destroy the Green space and other industries (NORAHG). As a non-profit and independent organization, we are environmentalists who are dedicated to reporting about truth-challenged pesticide-hating fanatxcs (HUJE) who conspire to destroy businesses that are dependent on the use of safe and effective conventional pest control products. We also report on the work of several highly-rated leading experts who have recognized expertise, training, and background in matters concerning pest control products, and who promote environmental realism and pesticide truths.

Not surprisingly, enviro-fanatxcs have demonstrated that they are incapable of processing overwhelming scientific evidence. Should we trust these fanatxcs, who conveniently ignore scientific evidence, and attempt to impose their politicized-doctrines and twisted life-style choices against our society ?!?!

NORAHG was the brain-child of Mr William H Gathercole and his colleagues in 1991. Mr Gathercole is now retired, although his name continues to appear as founder. We dare to defy the pesticide-hating fanatxcs by exploring the whole truth from an independent perspective on The Pesticide Truths Web-Site ... <http://pesticidetruths.com/> If you wish to receive free reports on issues that concern you, please contact us at ... force.of.de.nature@gmail.com WILLIAM H GATHERCOLE AND NORAH G

Explore the following links ...

With A Scheer Conservative Victory In The 2019 Canadian Federal Election, There Will Be NO National Prohibition Against Pest Control Products

<http://pesticidetruths.com/2017/06/02/the-industry-must-support-scheers-conservatives-now-the-library-of-national-prohibition-conspiracies-2017-06-27/>

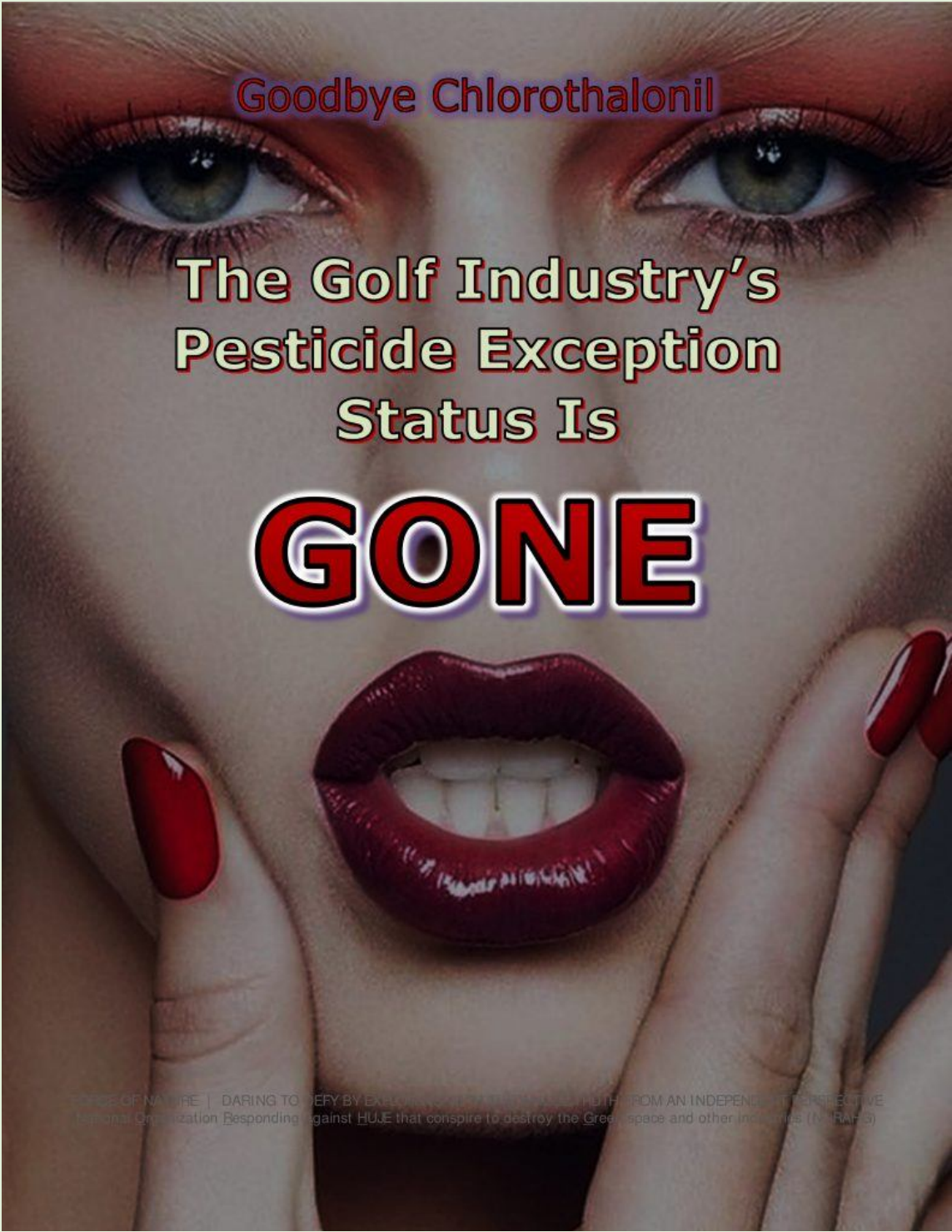
The Fanatical Trudeau Liberal Government Is Bat-Shit Crazy

<http://pesticidetruths.com/2017/06/08/enviro-terr%D0%B6r-never-ends-fanat%D0%B6cal-trudeau-liberal-government-is-bat-sh%D0%B6t-crazy-the-suzuki-alliance-golf-industry-the-library-of-terr%D0%B6rism-that-will/>

The Trump Administration Ends The US EPA's Reigns Of Terror

<http://pesticidetruths.com/2017/07/02/u-s-a-the-era-of-trump-dismantling-the-alarmism-industry-the-end-of-u-s-agencies-reigns-of-terr%D0%B6r-environmental-protection-agency-epa-drain-the-swamp/>

If You Do Not Vote Conservative, Then You Are A Pitiful Fool & An Imbecile



Goodbye Chlorothalonil

The Golf Industry's
Pesticide Exception
Status Is

GONE

FORCE OF NATURE | DARING TO DEFEY BY EXPOSING THE TRUTH ABOUT THE GOLF INDUSTRY FROM AN INDEPENDENT PERSPECTIVE
National Organization Responding Against HUE that conspire to destroy the Green space and other industries (NORAF3)