



May 09, 2022

Science Team Lead
Pest Management Regulatory Agency Publications Section
Pest Management Regulatory Agency (PMRA)
Health Canada
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Dear Science Team Lead,

Re: PRSD 2022-01 Special Review of Chlorothalonil and Associated End Use Products

The Canadian Association of Physicians for the Environment ([CAPE](#)) welcomes the opportunity to make this submission on **PRSD 2022-01 Special Review of Chlorothalonil and Associated End Use Products**. Please accept the following comments in response to the [summary](#) of the consultation document.

CAPE-ACME is a national physician-led organization working at the intersection of health and the environment. As an organization made up of physicians with a record of research and advocacy around evidence-based concerns relating to critical environmental health issues in Canada, CAPE agrees with and supports the Health Canada PMRA decision to cancel the use of chlorothalonil and associated end-use products and immediate revocation of MRLs. We concur that potential risks to human health and the environment are not acceptable with use according to the current conditions of registration.

Additionally, we acknowledge and direct attention to the submission from our environmental health colleagues at [Ecojustice](#) which served as an important resource for us in the development of our comment. We have studied Ecojustice's research and comment on the Health Canada PMRA review and agree with their conclusion based on the evidence presented in their document.

We wish to highlight the note of particular concern for human health associated with very high exceedances of acute and chronic non-cancer reference doses of chlorothalonil and the PMRA's review finding related to lifetime cancer risks for the general population for food alone and food plus drinking water.¹

Also of note, with regard to human health impacts, we would like to call attention to the endocrine risks established for chlorothalonil. We are concerned about the lack of data and significant uncertainty around the genotoxic potential of metabolites and genotoxicity. Without a full assessment by the PMRA of the risk of chlorothalonil, there is no reasonable certainty of a

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<https://www.canada.ca/en/health-canada/services/consumer-product-safety/pesticides-pest-management/public/consultations/proposed-special-review-decision/2022/chlorothalonil/document.html>



lack of harm to human health with these conditions. The onus is on the registrant to provide information regarding these potential hazards in the context of the re-evaluation. Without this information and the associated concern for human health, we support the immediate cancellation of the use.

In addition to cancelling all indoor uses proposed in the review decision, we request that mushroom and greenhouse uses be immediately cancelled.

It is noted by the [EPA](#) and others that occupational exposures to harmful substances are often higher than those of the general population². As such, the related health harms are also of more significant concern. With this knowledge, and considering the PMRA's failure to conduct a transparent and complete assessment of occupational risks related to chlorothalonil, we assert that greenhouse and mushroom uses should also be cancelled.

The lack of a comprehensive assessment by the PMRA of occupational risks to greenhouse and mushroom house workers leaves serious concerns about occupational risks and adverse human health. We remain concerned that the PMRA does not have reasonable certainty that no harm will occur to these workers.³ Therefore, we propose that all uses of chlorothalonil be immediately cancelled and recalled.

More than a decade of re-evaluations and special reviews has provided the groundwork for a better and more complete risk assessment information to the PMRA, including greater sources and uses of data. The onus is on the registrant to establish reasonable certainty that no harm will occur. In the case of chlorothalonil, the registrant has not met this, and therefore CAPE requests that all uses of chlorothalonil be cancelled, and an immediate recall be issued.

CAPE is pleased to answer any questions you may have about this comment and offer our continued support of the government in its actions for improved environmental and human health.

Sincerely,

Raissa Marks
Executive Director (Interim)

Jane McArthur
Toxics Campaign Director

² <https://www.epa.gov/expobox/exposure-assessment-tools-lifestyles-and-populations-occupational-workers>

³

https://www.lemonde.fr/le-monde-in-english/article/2022/02/16/poisoned-farmers-exposing-the-myth-of-pesticide-protection_6113871_5026681.html