Ontario Processing Vegetable Growers

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Pest Management Regulatory Agency
2720 Riverside Dr.
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To Whom it May Concern:

The OPVG represents the interests of growers of several vegetable crops for processing, including tomatoes, cucumbers, carrots, onions, pumpkin and squash. In each of these crops, chlorothalonil is a crucial tool to manage disease and ensure that there is a crop to harvest and process. It is not an overstatement to say that reducing the number of chlorothalonil applications as proposed threatens the viability of vegetable production and processing in Ontario. The farm gate value of these crops is in excess of 65 million dollars annually. When one takes into account the value of finished product derived from these vegetables and sold by Ontario processors, that value is multiplied many times over.

Chlorothalonil is the backbone of growers disease prevention and crop protection programs. The primary reason for this is effectiveness. Chlorothalonil works to provide effective multi-mode suppression of a broad spectrum of plant diseases ranging from late blight in tomatoes to phytophthora in cucumbers. It is also added to site-specific products to make them more effective and prevent development of resistance. To attempt to replace chlorothalonil to deal with the multitude of disease issues that arise every year would, almost certainly, result in growers spraying more products, more often, with no guarantee that present levels of quality and quantity could be maintained.

Effective crop protection is one of the most challenging aspects facing growers in modern day agriculture. Knowledge of how particular products work and how to use them safely is necessary. In order to apply crop protection products, growers undergo certification procedures that include mandatory safety training. Recognizing the potential danger associated with the products they are handling, growers wear personal protective equipment, including rubber glovers, appropriate clothing, eye protection and breathing apparatuses.

.....2

Pesticides are applied only when necessary, utilizing IPM techniques to avoid excess usage. Pesticides are a significant component of a growers total cost of production and this alone provides a strong incentive for limiting applications to when they are absolutely necessary. Growers also employ other means to reduce the need for pesticides, including crop rotation and planting resistant varieties whenever possible. Nevertheless, in our humid Southwestern Ontario microclimate, disease pressure is often very high and growers need access to tools that work.

In processing crops such as tomatoes, carrots, onions, pumpkins and cucumbers, which are harvested by machine, there is often little, if any, physical contact between the crop and humans at any point in the production process. As such, the reductions being proposed have no basis in science when actual production practices are taken into account.

Hand harvest cucumbers and squash are the exception. Cucumber harvest typically begins in mid-July. Pickers cover the field in 2 to 4 day cycles until harvest is complete, generally around the middle of August. Typically, a pickers maximum yearly exposure could be calculated as follows:

6 days harvest/week
x 5 hours/day
x 5 weeks harvest
= 150 hours/year

In processing squash, harvest is conducted over a period of several days, resulting in minimal total exposure.

Virtually every picker wears gloves. If necessary we are prepared to require and document that pickers are wearing gloves in the field. It is our understanding that glove use alone is known to reduce skin contact by 90%. In addition it has been noted in the literature that chlorothalonil "sticks" to plant surfaces. That stickiness is one of its strengths, further reducing the amount of transfer from the treated surface.

Presently the pre-harvest interval for chlorothalonil on cucumbers is 2 days. Moving it to anything more than 2 days will effectively remove it from use. If this were to happen, growers will have lost their most effective disease prevention treatment, placing a crop, with a farm gate value of 11 million dollars annually, almost all of which is exported, in jeopardy. This, in spite of the fact that there is no evidence of harm caused to pickers by chlorothalonil since its initial registration in 1971.

Finally, access to crop protection products continues to be a key component of competitiveness. Processing vegetables are effectively a North American marketplace. In the absence of corresponding use restrictions in the United States, restrictions placed on the use of chlorothalonil here will seriously impair the competitive position of Ontario producers and processors.

.....3

It is our request that the current use pattern for chlorothalonil be maintained.

Given the importance of chlorothalonil to growers and processors of these crops, members of the processing vegetable industry are prepared to meet with you, at your convenience, should you require further information.

Please do not hesitate to contact us.

Sincerely,

Francis Dobbelaar
Chairman

cc: Jim Chaput, Provincial Minor Use Co-ordinator, OMAFRA
Craig Hunter, Research and Crop Protection, Ontario Fruit and Vegetable Growers Association
Bev Shipley, MP for Lambton-Kent-Middlesex
Dave Van Kesteren, MP for Chatham-Kent-Leamington
Rick Nicholls, MPP for Chatham-Kent -Essex
Toby Barrett, MPP for Haldimand-Norfolk
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Rob Anderson, Bonduelle Ontario Inc.
Dan Hartung, President, Hartung Brothers Inc.
John Iacobelli, CEO, Sun-Brite Foods Inc.
Roger Sterling, Harvest-Pac Products Inc.
Dale Nash, Cavendish Appetizers Inc.
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Sam Diab, Highbury Canco Corporation
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