

Water Quality Best Management Practices for Chlorothalonil – Comments Received

On September 22, 2025, the Minnesota Department of Agriculture (MDA) published a request for public comments on draft water quality best management practices (BMPs) for the use of the fungicide chlorothalonil ([50 SR 307](#)) and opened a 30-day public comment period. The MDA received a total of two comments on the proposed BMPs.



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October 21, 2025

Pesticide and Fertilizer Management Division Minnesota Department of Agriculture
625 Robert Street North, Saint Paul, MN, 55155

Attention: Eric Burkness

Subject: Chlorothalonil BMPs Comment

Dear Mr. Burkness,

The Minnesota Golf Course Superintendents applauds the efforts to better educate all users on Chlorothalonil and its appropriate use. As an industry, we are proud to support our industries turf management BMP's, and our professionals strive to implement and develop improved practices and efficiencies. Chlorothalonil is a broad-spectrum fungicide with multiple modes of action and is still a valuable tool related to turf IPM.

Minnesota's proposed Draft Best Management Practices (BMP) for Chlorothalonil includes many practices already recommended or required on existing labels. When amended labels are approved, additional practices outlined in the Draft BMP proposal will be reflected in those labels. Given the impending label changes with new mandatory requirements, presenting these BMPs prior to those label change could cause confusion amongst users. The introduction of these BMPs may be better suited to align with the label changes. As the issue does not expand beyond a specific region yet, the timeline could be adjusted to better leverage the EPA label changes, for greater impact and penetration to the ag community.

The MGCSA is always a willing partner to improve management of the lands entrusted to us. We hope these efforts provide clarity and insights to the greater ag industry, and all users engage in these efforts to preserve Minnesota's water quality.

Best regards,

Chris Aumock
Executive Director
Minnesota Golf Course Superintendents Association
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October 21, 2025

Pesticide and Fertilizer Management Division
Minnesota Department of Agriculture
625 Robert Street North, Saint Paul, MN, 55155

Attention: Eric Burkness

Subject: Minnesota Chlorothalonil BMPs Comment

Dear Mr. Burkness,

Syngenta appreciates the opportunity to comment on the Minnesota Draft Best Management Practices for Chlorothalonil published on September 22, 2025.

Chlorothalonil is a broad spectrum fungicide with multiple modes of action. It is an important management tool for both agricultural crops and turf & ornamental production. The Environmental Protection Agency (EPA) recently issued the Interim Registration Review Decision (ID) for Chlorothalonil (EPA 2024). The ID included rate reductions and mitigation measures deemed necessary based on ecological considerations as well as an updated dietary risk assessment which included an acute dietary endpoint for the chlorothalonil degradate, 4-hydroxychlorothalonil (EPA 2023). Reducing the movement of chlorothalonil and its degradates into groundwater was a key driver for the ID measures, which included:

- Reduced annual maximum application rates across many use sites in both agricultural and non-agricultural scenarios.
- Additional rate reductions for use on vulnerable soils.
- Updated spray drift and erosion/runoff mitigation measures.
- Aquatic buffers for aerial / airblast (150 ft) and ground (25 ft) applications.
- Wind-speed restrictions and wind-directional buffers.
- Saturated soil restrictions.

The ID established a 60-day timeline for registrants to submit amended product labels, which was later extended for an additional 30 days. In April 2025, Syngenta submitted amended labels to the EPA reflecting the mitigation measures listed above.

Minnesota's proposed Draft Best Management Practices (BMP) for Chlorothalonil includes many practices already recommended or required on existing labels. When amended labels are approved, additional practices outlined in the Draft BMP proposal will be reflected on those labels. Given the impending label changes with new mandatory requirements, aligning the finalization of the MN BMPs for Chlorothalonil with the federal timeline will reduce grower confusion regarding mitigations and actions. Additionally, this would allow a strategic opportunity to align communication and enhance grower education during the transition to new label language and mitigations. The EPA vulnerable soils rate reduction requirements will be particularly relevant for the Central Sands region of MN where 4-hydroxychlorothalonil has been found in groundwater.



Syngenta agrees with the recommendation that chlorothalonil products be used as part of Integrated Pest Management and Resistance Management program. The Biological and Economic Analysis Division (BEAD) of the Office of Pesticide Programs found that the use of Chlorothalonil in both agricultural and non-ag production offers resistance management benefits not found in potential chemical alternatives (BEAD 2023a, BEAD 2023b). For applications to turfgrass, BEAD noted that chlorothalonil is used to control fungal pathogens that recur on an annual basis. As such, limiting chlorothalonil use in successive seasons would undermine effective resistance management programs.

If you have any questions or comments regarding this response, please contact me at 336-632-3913 or by e-mail at jovana.bradaric@syngenta.com.

Sincerely,

A handwritten signature in black ink that reads "Jovana Bradaric". The signature is written in a cursive, flowing style.

Jovana Bradaric,
Regulatory Manager
Syngenta Regulator Affairs
Syngenta Crop Protection, LLC

References:

EPA, 2023. Chlorothalonil Revised Acute and Chronic Aggregate Dietary (Food and Drinking Water) Exposure and Risk Assessments for the Registration Review Risk Assessment. Environmental Protection Agency, Health Effects Division. September 2023. EPA-HQ-OPP-2011-0840-0141

EPA, 2024. Chlorothalonil Interim Registration Review Decision Case Number 0097. Environmental Protection Agency, Pesticide Re-Evaluation Division. December 2024. EPA-HQ-OPP-2011-0840-0363

BEAD, 2023a. Chlorothalonil (PC Code 081901) Usage, Pest Management Benefits, and Impacts of Potential Mitigation for Turfgrass and Ornamentals. Biological and Economic Analysis Division (BEAD). September 2023. EPA-HQ-OPP-2011-0840-0147

BEAD, 2023b. Chlorothalonil (PC Code 081901) Use, Usage, Pest Management Benefits, and Impacts of Potential Mitigation for Agricultural Use Sites. Biological and Economic Analysis Division (BEAD). September 2023. EPA-HQ-OPP-2011-0840-0148