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ODA Pesticide Advisory

EPA Publishes Chlorothalonil Interim Registration Review Decision: What Label Changes Can I Expect?

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ATTN: Oregon State University Extension agents, pesticide consultants and applicators, and growers who rely on chlorothalonil

The Oregon Department of Agriculture (ODA) has received several questions about the status of chlorothalonil. EPA published their Interim Registration Review Decision (ID) for chlorothalonil in January 2025. Chlorothalonil registrants are in the process of updating their labels with EPA. While it will take time for updated container labeling to enter the Oregon marketplace, the label changes required by the ID are significant, and include changes in application rates for many crops. It is a good idea to start thinking ahead and learn how chlorothalonil use will change for the crops you grow or work with. If you have questions about this advisory, EPA's chlorothalonil ID, or alternative fungicides (including potential FIFRA Section 24(c) Special Local Need registrations), please contact Matthew Bucy at matthew.bucy@oda.oregon.gov or 971-388-8212.

What is Chlorothalonil?

Chlorothalonil has been registered in the United States for use as a fungicide since 1966. Chlorothalonil is also used as an antimicrobial pesticide (e.g., wood preservative). However, this article focuses on its conventional fungicidal uses. There are at least 87 chlorothalonil products registered for use and distribution in Oregon (e.g., "Bravo"), and over 30 chlorothalonil registrants. There are active SLNs in Oregon for use of specific chlorothalonil products on sugar beets grown for seed, spinach grown for seed, and Swiss chard grown for seed.

What is Registration Review?

Under the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA), the U.S. Environmental Protection Agency (EPA) is required to review the registrations for each active ingredient every 15 years to ensure that each pesticide performs its intended function without unreasonable adverse effects on human health or the environment. EPA fulfills this mandate through a program called Registration Review.

Two major milestones in the Registration Review process are the Proposed Interim Registration Review Decision (PID) and the Interim Registration Review Decision (ID). The PID explains the label

changes that EPA is *proposing* in order to mitigate the risks posed by an active ingredient. EPA publishes a PID with a public comment period. After reviewing public comments, EPA will then publish an ID, which explains the label changes EPA is *requiring*. Once an ID is published, registrants must begin the process of updating their labels as required by the ID.

EPA published their PID for chlorothalonil on October 18, 2023, with a 90-day public comment period. EPA published their ID for chlorothalonil on January 6, 2025. Chlorothalonil registrants are now in the process of updating their labels.

When will these label changes affect me?

It will take time for update container labels to enter the marketplace.

Registrants must submit EPA labels that have been updated per an ID to EPA no later than 60 days after an ID is published. However, it takes time (typically 2-3 years) for EPA to review and approve these labels, and then registrants typically have 12 months to submit update marketplace labels to ODA for review. It is reasonable to expect that you will see updated chlorothalonil labels enter the marketplace over the next 3-4 years.

When applying any pesticide product, you must follow the label affixed to the container in your possession. If the label of the chlorothalonil product you've purchased has not yet been updated per the chlorothalonil ID, then these changes do not yet affect you.

What changes is EPA requiring?

For non-antimicrobial uses of chlorothalonil, EPA found that human health dietary (food + drinking water) risks exceeded EPA's levels of concern. The primary contributor to dietary exposure was drinking water exposure via groundwater. EPA is requiring many label changes to mitigate these human health risks and to address acute and chronic risks of concern for birds, mammals, fish, amphibians, aquatic invertebrates, and aquatic non-vascular plants. This article focuses on the most unique and significant label changes, including reductions in annual application rates, buffers to aquatic areas and conservation areas, measures to protect endangered species, and changes to conifer use sites. This article does not discuss the label changes required for antimicrobial chlorothalonil products.

The full ID is available at https://www.regulations.gov/document/EPA-HQ-OPP-2011-0840-0363. Appendix B summarizes all the required label changes, and Appendix C summarizes the risk mitigation measures that will be required on future Endangered Species Protection Bulletins.

Application rate reductions

EPA has required that the maximum annual application rate of chlorothalonil be reduced for several sites. This is not an uncommon risk mitigation measure. What is unique for chlorothalonil is that, for certain sites, the maximum amount of chlorothalonil you will be allowed to apply per year will depend on whether your soil is a "vulnerable soil" and whether there are residential users who obtain drinking water from an on-site well.
To be considered a vulnerable soil ALL three criteria must be met:

1. The soil texture of the application area is over 50% sand, loamy sand, or sandy loam soil (as defined by USDA's soil classification system) and there is not a restrictive layer that impedes the movement of water through the soil.
2. The soil has less than 2% organic matter.
3. The water table occurs at a depth of 30 feet or less from the surface.

Special case – cranberry: Peat bottom cranberry beds or upland marsh cranberry beds with a confining layer for flooding that completely isolates the cranberry bed from groundwater are not considered vulnerable soils. The maximum annual application rate for such cranberry beds will be higher than the maximum rate allowed for cranberries grown in vulnerable soil.

Special case – golf course greens: Turf putting greens constructed to U.S. Golf Association or California green specifications or constructed as push up greens are not considered vulnerable soils. The maximum annual application rate that will be allowed on such greens will be higher than the rate allowed in vulnerable soils.

Chlorothalonil labels will also require a maximum annual application rate if there are residential users who obtain their drinking water from an on-site well, with the specific rate depending on the site. Putting this altogether, chlorothalonil applicators will need to be mindful of whether the soil in the intended application area is considered a vulnerable soil and whether there are any drinking water wells on site.

Buffers – aquatic habitats

EPA is requiring a buffer to water bodies (estuarine/marine and freshwater). You will not be able to apply chlorothalonil products by aerial or airblast application within 150 feet of water bodies, or by ground application within 25 feet of water bodies.

Special case - turf: If applying to turf, in lieu of the ground application buffer, you will have the option of constructing and maintaining a 10-foot vegetative filter strip of grass or other permanent vegetation between the field or application area edge and the down-gradient water body.

Buffers – conservation areas

To reduce exposure to non-target organisms, including species listed under the Endangered Species Act, EPA is requiring a buffer to conservation areas in addition to the buffers to aquatic habitats. Conservation areas include public lands and parks, national and state wilderness areas and wildlife refuges, national and state forests, and national and state grasslands. The buffer will be in effect when wind is blowing towards the conservation area.

The buffer distance will be up to 100 feet for aerial or airblast application and up to 25 feet for ground applications. The label will provide options for reducing this buffer distance, and those options will vary depending on the application method. For example, labels will include an option to reduce buffer distance by a certain percentage if there is a windbreak or shelterbelt between the application site and conservation area that meets labeled criteria.

When calculating buffer distance, any land – including Conservation Reserve Program (CRP) and Agricultural Conservation Easement Program (ACEP) areas – may be included. Applications made to agricultural fields located within a conservation area will be acceptable when made in accordance with an approved pesticide management plan for the conservation area and the restrictions on this label.

Endangered species

As part of this ID, EPA is implementing the National Marine Fisheries Service's (NMFS) 2011 Salmonid Biological Opinion for chlorothalonil. A statement referring users to Bulletins Live! Two (BLT) will be added to chlorothalonil labels. Endangered Species Protection Bulletins have ***NOT yet*** been established for chlorothalonil, but they will be in the future. If the product in your possession directs you to check BLT, you must check for a Bulletin in the area in which you intend to apply the product. When implemented, the Bulletins for chlorothalonil products will prohibit application if the soil is saturated and if a certain amount of rainfall is predicted within a certain period of time. The Bulletins will require these mitigation measures within 985 feet of aquatic habitat within the listed salmonid and steelhead ranges and designated critical habitat.

Conifers

Chlorothalonil will no longer be labeled for use on forest stands of conifers. Use on conifers will be limited to nursery beds, Christmas tree and bough production plantations, tree seed orchards, and landscaping.

Other changes

In addition to the changes described above, future chlorothalonil labels will prohibit application to saturated soil for products delivered by liquid spray to crops that do not require production in flooded fields or streams. Future labels must also include information on reporting ecological incidents and advisory best management practices for pollinator protection. This ID also requires label "cleanup" typically seen in IDs for other active ingredients, including updates to the resistance management information, glove and respirator language, Environmental Hazards, and mandatory and advisory spray drift management information.

Summary

You must apply any pesticide product in a manner consistent with the label affixed to the main container in your possession. It will take some time before chlorothalonil product labels are updated per this ID. However, it is always good to start thinking ahead. If you currently rely on chlorothalonil in your disease management program, it's a good idea to start considering the following:

1. Is my soil considered a vulnerable soil? Do any of the crops I grow require a potentially lower maximum annual rate when applied to vulnerable soil?
2. In the areas I typically apply chlorothalonil, are there residential users who obtain drinking water from an on-site well?
3. Is my field near any aquatic habitats?
4. Is my field near any conservation areas? If so, are any of the options to reduce the buffer distance feasible (e.g., would it be feasible to construct a shelterbelt)?

If you have questions about this article or EPA's registration review of chlorothalonil, please contact Matthew Bucy at matthew.bucy@oda.oregon.gov or 971-388-8212.