

Methyl Bromide Critical Use Exemption: The Review Process

A presentation to
The Methyl Bromide Alternatives
Conference

November 3, 2003

Re-thinking the Review Process

- Starting point— a ‘use’ is either in or out
- Observation— factors that justify the use of methyl bromide may only apply to portions of the crop/situation
- Decision has 2 parts:
 - Is there some need for methyl bromide?
 - If ‘yes’, how much?

Overview of the Review Process

For Individual Applications:

- OAP receives application, assigns & enters tracking info, screens, copies, forwards to OPP
- OPP/USDA staff perform technical analyses, agree on designation. OPP mgt review

For the sector:

- Similar applications are aggregated into sectors
- Research into:
 - Extent of key pests
 - Regulatory constraints
 - Inappropriate soils, climate



*Goal: Create a defensible
and robust technical
evaluation of applications
leading to a fully supported
US nomination package*

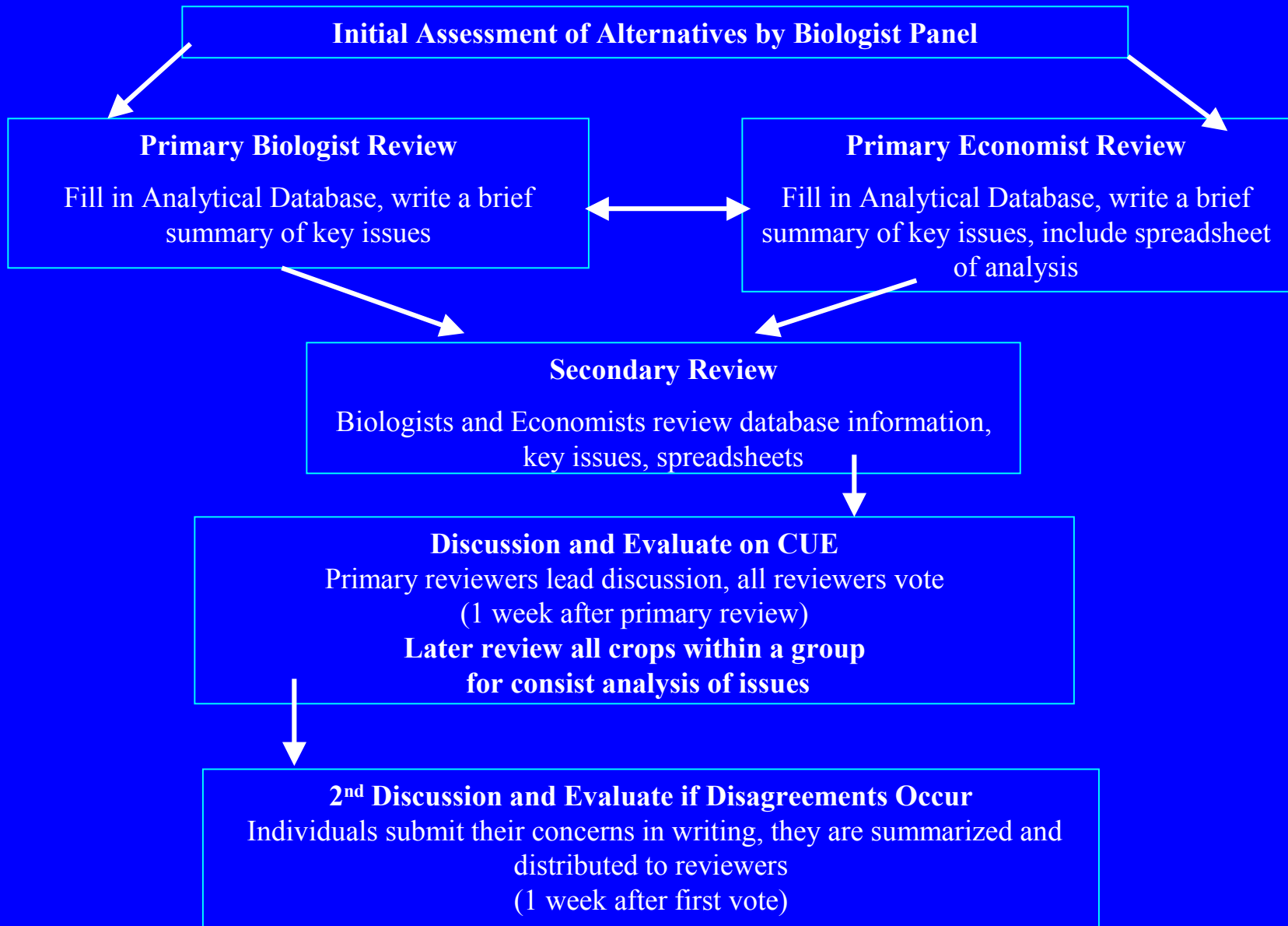
Technical Feasibility

- Meaning of ‘technical feasibility’ not spelled out
- The US has assessed by examining yield loss (compared to MeBr) when using next best alternative, and when using MBTOC alternatives, as well as looking at absolute conditions

Economic Feasibility

- Meaning of ‘economic feasibility’ not spelled out
- The US has taken a ‘portfolio’ approach
 - Assessed a variety of measures: loss per hectare, loss per Kg of MeBr, loss a % gross revenue, loss as % net cash returns, change in profit margin.
 - External benefits to the environment also considered

MeBr Critical Use Exemption Application Biological and Economic Review by OPP & USDA



Technical Review Output

- Consensus Opinion on the following factors
 - Technical feasibility
 - Economic feasibility

Overarching View

- What are the factors that require that methyl bromide be used
 - Product of the reviews of individual applications
 - What are the pests that cannot be controlled by other means?
 - What are regulatory constraints that preclude use of alternatives?
 - What are physical ‘barriers’ to the use of alternatives?

Overarching View— cont.

- For these factors which require the use of methyl bromide
 - How widely do they apply?
 - To what extent do they overlap?



The final nomination package is the combined product of the reviews of individual applications and the assessment of the overarching factors

The Applications

- Received 60 applications for 2003 round
 - Some are for 2005, some for 2006
 - New sectors include field-grown tobacco, cut flowers, custom applicators
 - Not all of the previous 2005 applicants have reapplied for 2006
- Initial MBr request is 62% of U.S. baseline
 - Greater than *current* U.S. consumption for *all uses*
 - Not strictly comparable to the baseline because some is for 2005 and some for 2006
- We are looking deeper
 - Some overlap, double counting, requests for growth, and padded baselines



*There will be an another
opportunity to apply for a
Methyl bromide CUE for 2006
next year*

Where We Are

- MBTOC/TEAP have made recommendations
- US was recommended for virtually all of our request— 1/3 straight recommendation; 2/3 recommended but ‘noted’
- Final decision will be from the Parties
- MOP is next week in Nairobi

Important Dates

- Applications for Methyl Bromide CUE due to EPA August 8, 2003
- U.S. Nomination package due to MBTOC January 31, 2004
- MBTOC recommendations due back to parties summer/fall 2004

Next Steps

- Finish technical reviews
- Develop EPA version of U.S. nomination
- Work with other entities within the U.S. Government (led by State Department) to finalize U.S. nomination package