

# Symposium on Preplant Research Gaps in Research and Issues for CUE Applicants

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# Fumigant Review by EPA

- All soil fumigants are being reviewed to create a “level playing field”
  - methyl bromide (soil and post harvest uses), Telone™, chloropicrin, metam & potassium sodium, Basamid™
- Potential for label changes.

# Suggestions for CUE Applicants

- Economic information ranges from excellent to “vague”.
- Amount of methyl bromide nominated is estimated based on areas where alternatives are not both technically and economically feasible.
- Improved information on regulatory constraints, problem soils, pest yield and quality losses, etc.
- Extent of pest pressure is difficult to find (Georgia conducted a survey).

# Research Plans Considerations

## Feedback from TEAP/MBTOC

- Research plan is a living plan and will require implementation.
- Multiple component system (fumigant plus herbicide or fungicide) or alternating fumigants.
- VIF systems to reduce rates.
- Economics of “substrate” systems.

# Research Plans Considerations

## Feedback from TEAP/MBTOC

- Incremental strategy (e.g. small change in use rate can lead to a large aggregate change).

# New Critical Use Exemption Form for 2005

- New information was requested by MBTOC.
- As part of the Paperwork Reduction Act the Office of Management of the Budget (OMB) reviews and must approve of all information collections.
- In general all information collections are for 3 years.
- New review by OMB prior to collecting additional information

# Registration of Pesticides

- Concern among groups that it takes too long and is very expensive to register pesticides.
- Expensive and discourages applications from smaller companies.
- Efficacy, chemistry, toxicology, regulatory testing costs millions.
- Registration fees are a further burden.