

Methyl Bromide Critical Use Exemption Process

2007 Methyl Bromide Usage Numerical Index (BUNI)

Date: **4/8/2005**
Sector: **CORRECTED FRUIT, NUT, & FLOWER NURSERY**

Average Hectares in the US:
% of Average Hectares Requested:

not available

2007 Amount of Request				2001 & 2002 Average Use*			Quarantine and Pre-Shipment	Regional Hectares**		Research Amount (kgs)
REGION	Kilograms (kgs)	Hectares (ha)	Use Rate (kg/ha)	Kilograms (kgs)	Hectares (ha)	Use Rate (kg/ha)		2001 & 2002 Average	Requested %	
Western Raspberry Nursery Consortium	53,416	212	252	27,379	117	235	90%	Not Available	1,506	
CA Rose Growers	22,680	81	280	208,217	616	338	99%			
CA Assoc. - Fruit & Nut Tree Growers	43,998	134	329	201,678	642	314	92%			
TOTAL OR AVERAGE	120,094	426	282	437,274	1,374	318				

2007 Nomination Options	Subtractions from Requested Amounts (kgs)					Combined Impacts Adjustment (kgs)		MOST LIKELY IMPACT VALUE		
	2007 Request	(-) Double Counting	(-) Growth	(-) Use Rate Adjustment	(-) QPS	HIGH	LOW	Kilograms (kgs)	Hectares (ha)	Use Rate (kg/ha)
Western Raspberry Nursery Consortium	53,416	-	26,037	-	24,641	2,738	2,738	2,738	12	235
CA Rose Growers	22,680	-	-	-	22,453	227	227	227	1	280
CA Assoc. - Fruit & Nut Tree Growers	43,998	-	-	-	40,479	3,520	3,520	3,520	11	314
Nomination Amount	120,094	120,094	94,057	94,057	6,485	6,485	6,485	6,485	24	274
% Reduction from Initial Request	0%	0%	22%	22%	95%	95%	95%	95%	94%	3%

Adjustments to Requested Amounts	Use Rate (kg/ha)		(% Karst (Telone))		(%) 100 ft Buffer Zones		(%) Key Pest Distribution		Regulatory Issues (%)		Unsuitable Terrain (%)		Cold Soil Temp (%)		Combined Impacts (%)	
	Low	EPA	High	Low	High	Low	High	Low	High	Low	High	Low	High	Low	HIGH	LOW
Western Raspberry Nursery Consortium	235	235	0	0	0	0	100	100	0	0	0	0	0	0	100%	100%
CA Rose Growers	280	280	0	0	0	0	100	100	44	31	0	0	0	0	100%	100%
CA Assoc. - Fruit & Nut Tree Growers	314	314	0	0	0	0	100	100	0	0	0	0	0	0	100%	100%

Other Considerations	Dichotomous Variables (Y/N)					Other Issues			Economic Analysis				Quality/ Time/ Market Window/ Yield Loss (%)	Marginal Strategy
	Strip Bed Treatment	Currently Use Alternatives?	Research / Transition Plans	Tarps / Deep Injection Used	Pest-free Cert. Requirement	Change from Prior CUE Request (+/-)	Verified Historic MeBr Use / State	Frequency of Treatment	Loss per Hectare (US\$/ha)	Loss per Kilogram of MeBr (US\$/kg)	Loss as a % of Gross Revenue	Loss as a % of Net Revenue		
Western Raspberry Nursery Consortium	No	No	Yes	Tarp	Yes	+	Yes	2-3x/1yr	Not included as there is no technically feasible alternative.					
CA Rose Growers	No	Yes	Yes	Tarp	Yes	-	Yes	3-5x/1yr						
CA Assoc. - Fruit & Nut Tree Growers	No	No	Yes	Tarp	Yes	0	Yes	3-5x/1yr						

Conversion Units: 1 Pound = 0.453592 Kilograms 1 Acre = 0.404686 Hectare

Most Likely Impact Value: High 24% Low 77%

*USEPA has recently been informed that a larger proportion of methyl bromide use falls under QPS therefore EPA has reduced the request to adjust for this new information.

* CA Deciduous Fruit & Nut Tree Growers have a new QPS % of 92% instead of their previous 100%.

* Raspberry was miscalculated using QPS% of 60% instead of 90%.