Methyl Bromide Critical Use Exemption Process

2007 Methyl Bromide Usage Numerical Index (BUNI)

Date: 1/27/2005 **Sector:** TOMATOES

Average Hectares in the US: 48,603

% of Average Hectares Requested: 60%

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	% of 2001 & 2002 Avg	% of Request	
Michigan	30,391	253	120	31,848	265	120	0%	769	34%	33%	5501
California	40,823	364	112	76,648	653	117	0%	13,355	5%	3%	
Southeastern US	4,651,126	28,638	162	4,493,128	29,170	154	0%	26,703	109%	107%	
TOTAL OR AVERAGE	4,722,340	29,255	161	4,601,624	30,088	153	0%	40,827	74%	72%	

2007 Nomination Options	Subtractions from Requested Amounts (kgs)					Combined Impacts Adjustment (kgs)		Adoption / Transition Adjustment (kgs)		MOST LIKELY IMPACT VALUE		
REGION	2007 Request	(-) Double Counting	(-) Growth	(-) Use Rate Adjustment	(-) QPS	HIGH	LOW	HIGH	LOW	Kilograms (kgs)	Hectares (ha)	Use Rate (kg/ha)
Michigan	30,391	-	-	-	-	10,333	10,333	10,333	10,333	10,333	86	120
California	40,823	-	-	-	-	40,823	40,823	40,823	40,823	40,823	364	112
Southeastern US	4,651,126	-	186,665	-	-	2,968,200	2,401,858	2,665,180	2,158,264	2,277,389	14,785	154
TOTAL	4,722,340	4,722,340	4,535,675	4,535,675	4,535,675	3,019,356	2,453,015	2,716,336	2,209,420	2,328,546	15,235	153
% Reduction from Initial Request	0%	0%	4%	4%	4%	36%	48%	42%	53%	51%	48%	5%

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 (%)		Adoption / Transition****	
REGION	Low	EPA	High	Low	High	Low	High	Low	High	Low	High	Low	High	Low	HIGH	LOW	% Adopt	% per Year
Michigan ***	120	120	0%	0%	0%	0%	34%	34%	0%	0%	0%	0%	34%	34%	34%	34%	0%	0%
California	112	112	0%	0%	0%	0%	0%	0%	9%	1%	100%	100%	0%	0%	100%	100%	0%	0%
Southeastern US	154	154	32%	32%	0%	0%	50%	29%	0%	0%	0%	0%	0%	0%	66%	53%	83%	10%

Other Considerations	Dichotomous Variables (Y/N)					Other Issues			Economic Analysis				Quality/ Time/ Market Window/ Yield Loss (%)	Marginal Strategy
REGION	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		
Michigan	Yes	Yes	Yes	Tarp	No	-	Yes	1/year	$ 1,937	$ 16	5%	42%	22%, 6% Yield Loss + 16% delay	1,3-D + Pic
California	Yes	Yes	Yes	Tarp	No	-	Yes	1/year	$ 5,391	$ 22	7%	21%	15% Yield Loss, Range 15 to 20%	Metam-Sodium
Southeastern US	Yes	Yes	Yes	Tarp	No	-	Yes	1/year	$ 6,113	$ 36	13%	30%	21%, 6.2%Yield Loss+14.8% delay	1,3-D+Pic+herbicide

Pest Distribution GA used Stanley Culpepper, UGA survey. GA figures were used for FL and SE US

High estimate adds moderate and severe, Low estimate add 1/2 of moderate and all severe

Conversion Units: 1 Pound = 0.453592 Kilograms; 1 Acre = 0.404686 Hectares

Most Likely Impact Value: High 24% Low 77%

*Georgia rotates crops with solanaceous crops therefore we had to balance the distribution with the other sectors in Georgia's application.

**Georgia Acreage estimates verified at http://www.caed.uga.edu/2003gafgveg.pdf

***Michigan rates are higher for 2007 based on more current information.

**** Adoption / Transition in the Southeastern US is the weighted average based on the weight of their request and the estimate that can be transitioned.