

Methyl Bromide Usage on Golf Courses Denied

Methyl bromide is an important soil fumigant for fields planted with food and non-food crops (such as turf, ornamental plants and forestry seedlings). The supply of methyl bromide is tightly controlled by the U.S. Environmental Protection Agency (EPA) under the Clean Air Act. Over the last five years, supplies have been decreasing dramatically as EPA continues to reduce the amount of product that manufacturers can make and sell.

EPA's recently decided that methyl bromide may only continue to be applied for a certain narrow set of uses. Under its authority to regulate pesticides, EPA determined earlier this summer that only certain "critical" uses of methyl bromide can continue to go forward. EPA incorrectly concluded that seven (7) extremely minor, but important uses must be cancelled because they do not have "critical use" designation including **turf and sod (for replanting on golf courses and athletic fields)**. Registrants, growers and applicators asked EPA to reconsider its conclusion on these uses because it was apparent that EPA's assessment of the benefits and viability of alternatives to using methyl bromide was incomplete and inaccurate.

EPA Rejects Proposal for a Transition Period

EPA continues to insist that these uses must be cancelled, and is now demanding a cancellation timetable that does not allow sufficient time for affected growers/users to adjust their operations or implement alternatives. After EPA considered information provided by registrants and users, it determined that the caneberry, tomato, pepper, ginger and vidalia onion uses have "high benefits," but must be cancelled by the end of 2010. EPA continues to incorrectly assert that the use of methyl bromide on golf courses/athletic fields and tobacco seedling trays has no benefit, and that **these uses must be cancelled immediately**.

The 2010 cut-off demanded by EPA is completely arbitrary, and no explanation or support for it has been provided. EPA's demand for immediate cancellation for golf courses/athletic fields and tobacco

trays is similarly unsupported and appears to be driven by incorrect assumptions about the availability of alternatives.< br> Cancellation of the uses without adequate transition periods will create an extreme hardship for affected users and result in substantial economic impacts.

~ EPA's cancellation decision reverses a long-standing policy without providing adequate time for growers to adjust. EPA repeatedly told the regulated community that it could continue to utilize methyl bromide for uses that did not have a "critical use" designation. The application process to obtain a designation has proven to be overly burdensome for minor crop growers with limited resources. Thus, growers in small niche markets relied on EPA's assurances that their uses would continue and did not apply. EPA's new demand for cancellation of "non-critical" uses reverses its prior position and does not provide time frames that would permit affected growers to file a "critical use" application for the next round of designations, which would take at least three to four years to complete.

~ Currently, there are no viable alternatives for growers to turn to for these uses. Alternatives that EPA asserts are available do not control key pests; have significant limitations because of how they must be applied; are not registered; or are prohibitively expensive. EPA analysis of the alternatives is incomplete and inaccurate in many aspects. More detail on the specific problems with potential alternatives is provided below for each use.

~ Economic impacts from cancellation without adequate transition periods will be significant. The loss of methyl bromide use in resurfacing/replanting turf for golf courses is estimated to result in additional costs of \$241,000,000 or \$402,000 per acre. The methyl bromide registrants continue to dispute EPA's decision that these important uses cannot continue, but have tried to work with EPA on establishing a reasonable time table for an orderly cancellation process. The methyl bromide registrants submitted a proposal to EPA on September 21, 2009 that would provide for reasonable timetables; prevent the abrupt interruption of business operations; and minimize the hardship to growers and applicators from EPA's reversal in policy. Unlike the time frames demanded by EPA, the registrants' schedule for orderly cancellation is based on input from applicators, growers and other impacted groups regarding the amount of time they need to transition to alternative

pest control methods or apply for "critical use" designation. The registrants' proposed timetables/transition periods for Golf Courses/Athletic Fields were suggested for cancellation by December 2014

EPA has rejected this proposal in its entirety without providing any specific feedback as to why it was unacceptable. The methyl bromide registrants met with EPA's career staff on September 24, 2009 to review the proposal and answer questions about it. The next day the registrants were informed that EPA's political staff rejected the proposal in its entirety. The registrants have requested a meeting with the EPA's senior management and are waiting to hear if that meeting will occur.

Your help is needed - contact your Congressional Representative

The registrants will continue to press these issues with EPA, but need growers and users to contact their Congressional representatives to encourage EPA to accept the registrants' proposal for orderly cancellation.

Be sure to mention the specific difficulties and impacts associated with the loss of methyl bromide for turf/sod resurfacing for golf courses and athletic facilities which include:

- ~ Methyl bromide is currently the only fumigant available for "no-till" resurfacing of courses and recreational fields.
 - ~ The "no-till" method enables users to avoid bulldozing and reconstructing areas where new turf grasses are being installed.
 - ~ Resurfacing is done for maintenance and to upgrade surfaces with improved turf grasses that result in lower impacts on the environment.
 - ~ The improved turf grasses require less water, fertilizer and pesticides. Other fumigant alternatives such as methyl iodide and dazomet cannot be used for the "no-till" resurfacing method. In addition, methyl iodide is not currently registered in key use areas and dazomet is not viable at the rates permitted by EPA or the maximum rate of application supported by the manufacturer. Dazomet has a higher potential for off-target movement in water and soil, and thus, would create environmental impacts that golf

courses, athletic facilities and schools would rather avoid.

Need a Sample Letter for Your Congressman?

[Contact Rob Taylor today!](#)

229-402-3750