

MBTOC Structures and Commodities - Views, Research Needs and Myths

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In 2010, MBTOC received four CUNs pertaining to food processing structures and four CUNs which included commodities (although one of these is incorporated in a structural CUN).

The CUNs received in 2010 included one for 2011. In that CUN, Canada nominated 3.529 tonnes for pasta facilities, but MBTOC recommended 2.085 tonnes. Australia, Canada, Japan and the US nominated 180.958 tonnes for 2012, and MBTOC recommended 99.021 tonnes. In this paper I will review some of the highlights of those CUNs, our views on them, research needs and some myths about MBTOC.

This year something different occurred with the Australia rice CUN. Australia provided a new phase-out plan including a 25% decrease in 2012 over the Party's earlier nomination, plus significant step downs for 2013 and 2014. The Party said it would ensure these decreases took place even in times of low harvest. The Party indicated that it would not nominate for rice in 2015. A multi-year CUN is not really allowed under the Montreal Protocol. But, this approach has been used with Japan's soils CUNs for several years. MBTOC SC will assess Australia rice each year that it is submitted. We expect that the decreases in MB use will occur, at a minimum, each year. So, it is a myth that MBTOC is rigid and unable to work with the individual circumstances of Parties. However detailed information and data must be submitted by parties to enable this to happen.

Canada nominated 11.020 tonnes for flour mills in 2012. This was a reduction of 22% over the amount of MB granted by the Parties for 2011 and 50% of 2010. SF still not registered for food contact in Canada. MBTOC recommended the nominated amount. MBTOC SC understands the need for swift, but orderly, transition to alternatives.

This CUN is a good illustration of MBTOC's views when evaluating CUNs. If a Party's annual reductions show a transition, and demonstrates the ongoing critical need for MB under their local circumstances and if MBTOC is given enough evidence, we usually agree to the CUN. If the Party reduces the nomination before sending it to MBTOC, it has a better chance of success.

Japan nominated 4.984 tonnes for chestnuts in 2012. MBTOC determined that methyl iodide was registered and farmer training and adoption can begin in 2011. MBTOC recommended 3.489 t, a 30% reduction.

US nominated 3.73 tonnes for cured pork in 2012. There is no alternative registered for this use. There is a multi-state, multi-university research program ongoing which is increasing knowledge of pest and dose response to potential alternatives. MBTOC recommended the full nomination.

US nominated 135.299 tonnes for mills and processors 2012; no reduction over the MB use granted by the Parties for 2011. The substantiation for this CUN is very thin. MBTOC thinks this sector has extensively adopted alternatives, and that more facilities would use alternatives if MB was not available, as has happened in other countries. If this is incorrect, then the sector should provide substantiation!

MBTOC would like to know about the successes and problems seen in commercial trials. It is not ok to say that results of commercial trials and adoption attempts will not be submitted to MBTOC in a CUN request. If the applicant disagrees with the analysis or results or impact of research, don't ignore the research; explain it. MBTOC reduced this CUN to 74.510 t

US nominated 4.907 tonnes for dried fruit (dried plums, figs and raisins), walnuts and dates for 2012. MBTOC recommended 2.419 tonnes (a 49% reduction). Dried fruit and walnut sectors use

MB from stocks. USG said the dried fruit industry has reached the maximum adoption of alternatives. But MBTOC has identified several registered alternatives. MBTOC believes that logistical improvements would resolve the need for MB in dried fruit. The applicant has not substantiated why this might not be true by providing pest efficacy or cost data. We know about the USDA research on dates and walnuts and SF efficacy. We would like to know if supplemental heat could be used with SF to result in improved pest efficacy for dates. The dried fruit sectors in other countries have switched to alternatives.

Comments from dried fruit and nut sector members illustrate some myths about MBTOC. For example, in spite of what you might have heard, MBTOC can not recommend more MB than requested by the Party. MBTOC is not responsible for any of the differences between what the applicant asks for and what the Party requests. Applicants can review the USEPA website to see the CUN submitted by the Party and compare differences between what was submitted by the applicant and what was submitted by the Party to MBTOC.

US nominated 17.365 tonnes for food processing (NPMA) for 2012. There was some evidence of infestation problems for cheese in storage, but no registered alternative. There was no actual use data, so MBTOC recommended 200 kg for cheese infested while in storage only. The rest of the CUN was inadequately substantiated and not recommended. MBTOC needs to know how much MB is used for infested cheese in cheese stores.

MBTOC congratulates the NPMA on their recent negotiations and clarifications which resulted in the new regulatory interpretation from EPA regarding incidental fumigation with SF. We recognize that this must have been a lot of work! The NPMA work shows the impact that regulatory improvements – even just interpretation – can have on adoption of alternatives. NPMA has notified US EPA that it will not seek a CUN in 2011 for 2013.

In its May Progress Report, MBTOC published a special report on use of alternatives in UK mills which we think also pertains to US and Canada mills. We also published a special report on pest control in dates. MBTOC and USDA scientists investigated US date pest control situation; research not successful thus far, but ongoing.

MBTOC is currently preparing its Assessment Report due Dec 2010. MBTOC has asked the US if its flour milling, food processing or commodities industry sectors have any views, news, concerns or other information for the Assessment Report.

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