

UNIVERSITY OF HAWAII AT MĀNOA

College of Tropical Agriculture and Human Resources
Department of Plant and Environmental Protection Sciences

December 6, 2005

Jacqueline Guerry
Special Review and Reregistration Division (7508C)
Office of Pesticide Programs
USEPA Headquarters
1200 Pennsylvania Avenue, N. W.
Washington, DC 20460

Dear Ms. Guerry,

We apologize for the delay in responding to your question regarding use of Mocap EC by banana growers.

At first, the growers indicated that the loss of the use of Mocap EC would not be of a concern because they believed that they would be able to use Mocap 15G if the need arose.

However, upon examination of the Ethoprop *Fact Sheet*, it is apparent that there is the potential for a negative impact on banana growers if Mocap EC is cancelled. According the *Fact Sheet*, "Specifically for the granular formulations, the following worker risk mitigation measures are necessary: . . . both of the remaining granular formulations are to be applied to agricultural crops only with enclosed cab equipment."

There would be very few, if any, banana growers for whom use of enclosed cab equipment is feasible.

Therefore, for banana growers, the practical implication of the cancellation of Mocap EC and the implementation of the above worker mitigation measure for the granular formulations is that growers will not (be able to) use ethoprop.

Please contact us if you have further questions. We would also appreciate notification of any decisions regarding ethoprop.

Sincerely,



Mike Kawate
Pesticide Registration Specialist
Voice: 808-956-6008
mike@hpirs.stjohn.hawaii.edu



Cathy Tarutani
Educational Specialist
Voice: 808-956-2004
cathy@hpirs.stjohn.hawaii.edu