

UNIVERSITY OF HAWAII AT MĀNOA

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

December 29, 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,

Here is our response to the question you posed to Mike Kawate in a phone conversation on Friday, December 16 regarding Hawaii's banana growers' use either of two ethoprop products (Mocap EC or Mocap 15G) if bananas were retained on the labels, but there was a closed cab restriction for both products.

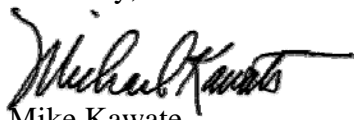
Some banana growers were queried in order to answer the question.

Two important banana growers stated that ethoprop would still be a viable pest management tool for them and they would like this use to be reregistered. While small in number, these growers may represent a significant portion of banana production. Their answers may also be representative of growers in similar situations. These growers would be able to accommodate the proposed close cab restriction on the labels. They are particularly concerned about Mocap 15G.

In addition, at least some smaller growers, for whom use of closed cab tractors is currently impractical, would need to make accommodations in order to use ethoprop in the event that pest pressures become severe.

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