

Use of Mocap EC and Mocap 15G in Bananas

Date: January 18, 2006

To: [Cathy Tarutani](#), [Mika Kawate](#), [Rick Melnicoe](#)

From: [Jacqueline Guerry](#)

Subject: Re: Ethoprop for banana growers

Mike and Cathy,

Upon further review of the Mocap 15G label, it appears that ground application (enclosed cab engineering controls) is required for all uses except for bananas, plantains, and pineapples. Application to these crops can be made with a backpack granular spreader. These crops are the only exceptions, and I apologize for the miscommunication in our earlier discussions.

In your previous response, you had indicated that the growers were most concerned with maintaining the granular registration. In the reregistration process for the EC concentration, we will be canceling all hand-held application methods, and requiring enclosed mechanical engineering controls, as well as closed coupling systems for mixing and loading. If this is not feasible for bananas, we would like to remove bananas from the Mocap EC label. Ethoprop has a high potential for worker risks, and we believe these risks are mitigated only if handled with the required engineering controls. We do not want to leave any uses on the labels that cannot be applied with these engineering controls.

Thank you again for your assistance in this matter. We would appreciate your feedback.

Jackie

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