

Exhibit 24

From: Cook Andy GBJH
Sent: Thursday, March 12, 2009 1:36 PM
To: Dieterle Roland Mario CHBS
Subject: RE: FYI only: Key events of PQ in Sweden

Hi Roland,

This is what I discovered in my trawl through the old microfiche records using the microfiche reader I found in a part of the site 'officially' known as 'the dungeon'....

The records are quite good although in some cases the scans of the original documents are difficult to read.

'Gramoxone' (200 g paraquat ion/litre) was first registered in Sweden in 1964.

On 18th November 1982 communication was received which indicated that the Swedish registration board/bureau did not want 'Gramoxone' on the market in 1984, the concerns identified were:

- High toxicity
- (Non-fatal) accidents
- Lack of an antidote
- Use of IBT (Industrial Bio-test) toxicity studies on paraquat (you may recall that IBT was charged with falsification of results and one consequence of the 'fall-out' was the introduction of GLP)
- Availability of alternatives

The Swedish registration board also stated that ICI should withdraw 'Gramoxone' before the end of December 1982 or the Swedish board would do so themselves during 1983.

A meeting took place on 3rd December 1982 between ICI - Bernie Hart (Martin Wilks equivalent) and Geoff Willis – and representatives from the Swedish registration board. ICI subsequently decided to cancel registration of the original 20% liquid 'Gramoxone' effective December 1982.

An application was made for registration of a reduced strength solid (granular) formulation - 'Gramoxone 80' (containing 8% w/w paraquat ion) for use on couch grass in potatoes. The application was received by the board on 20th July 1983 and the Swedish board made a decision on this application on 3rd November 1983. There is an English translation of the board's decision. The registration application was rejected on the grounds of 'Gramoxone 80' being considered under the Swedish legislation as 'products dangerous to health and environment' and the availability of alternative products. In this case the specific reasoning cited was the 'risk of serious poisoning in case of an accident'. ICI were granted a right of Appeal (within three weeks) however the decision was not appealed in view of the known position of the registration Board who were already committed to excluding paraquat (and were therefore unlikely even to accept an application for registration of 'Weedol (a lower strength granular formulation containing 2.5% paraquat + 2.5% w/w diquat).

Let me know if you need to discuss this further.

I simply took notes from my reading of the microfiche. If it were absolutely necessary to have a copy of the English translation of the board's decision I would have to further investigate the feasibility of doing this (there is a print facility on the machine but I doubt it has been used in recent times and replacement ink, etc. may not be available).

Regards.

Andy

From: Dieterle Roland Mario CHBS
Sent: 12 March 2009 08:29
To: Cook Andy GBJH
Subject: RE: FYI only: Key events of PQ in Sweden

Wow, thank you very much! I'll pay you a beer – or do you prefer a spare driller?...
Roland

From: Cook Andy GBJH
Sent: Mittwoch, 11. März 2009 17:42
To: Dieterle Roland Mario CHBS
Subject: RE: FYI only: Key events of PQ in Sweden

Hi Roland,

This has proved more challenging than I first thought (searching rat-infested archives at Guildford and no key to open the critical metal filing cabinet – we had to drill out the lock!). However the good news is that I now have the relevant correspondence files in my hands and will be looking through this on the only remaining microfiche reader tomorrow morning. I should be in a position to update you sometime later tomorrow (Thursday).

Regards.

Andy

From: Dieterle Roland Mario CHBS
Sent: 10 March 2009 17:12
To: Cook Andy GBJH
Subject: RE: FYI only: Key events of PQ in Sweden

Andy

Have you received anything from the UK archivists?

Can we try to get some info from Geoff Willis – the last option mentioned in my mail below...

Best regards,

Roland

From: Dieterle Roland Mario CHBS
Sent: Mittwoch, 18. Februar 2009 15:36
To: Cook Andy GBJH
Subject: FYI only: Key events of PQ in Sweden

Andy

Just as a follow up on yesterday's phone call to help you in the microfiche search...

I could not find any original documentation on the Swedish paraquat decision of 1983 in the files I got from Ian two years ago.

Some memos of early of the 1990s state that ICI has withdrawn the Gramoxone from the market in 1983 with the intention to introduce a new PQ product. Sweden decided not to register any paraquat products anymore due to the inherent toxicity of paraquat (LD50) and the lack of need of the product in Sweden. The commercial opportunities were always very small.

I talked to Bernhard Johnen, Ian Wheals, Martin Wilks, Freddy Pedersen and Lewis Smith, with some valuable input from Lewis and Freddy only. Sweden had a very negative attitude towards paraquat and wanted to ban it. ICI discussed the withdrawal of Weedol for H&G use (Lewis) and alternative products like a diluted 100 g/L (Freddy). There was a meeting with ICI reps and the Swedish regulators in 1983 which was very tough and destroyed the good relationship for some years. ICI decided to withdraw paraquat from the market to prevent a ban. Lewis thinks that no ban decision has ever been received and also Freddy cannot remember to have seen such a document.

Only in 1998, Sweden refers to the paraquat ban of 1983 in the "The Swedish Chemicals Agency's Chemical Products and Biotechnical Organisms Regulations (1998:8 Annex 5)":

Paraquat (CAS No: 4685-14-7). Banned. High acute toxicity. Risk of irreversible effects, high risk of accidents when handled. Year: 1983

This is also the reference Sweden mentioned in their notification of the 1983 ban to the Rotterdam Convention secretariat (Jan. 2006).

Some points of interest we may look for in the archives:

- Any letter or other doc from the Swedish regulators mentioning a ban decision for paraquat (possibly not existing).
- Any documentation around 1982/83 showing the grounds why Sweden had banned paraquat or wanted to get rid of paraquat (in the notification to the R.Convention, they mention 2 literature reviews of 1982, but no risk evaluation seems to exist).
- Did we submit an alternative paraquat product in Sweden in 1983 or did we only discuss possible options?
- Any minutes or memos on the 1983 meeting with the Swedish regulators?

Geoff Willis may remember more details – has anybody still some contacts with him?...

Regards,

Roland