

Exhibit 51

Myths

VS

FACTS

SETTING
THE
RECORD
STRAIGHT



GRAMOXONE SUPER is a formulated product containing 1.5 pounds active ingredient of paraquat. Statements made in this brochure are not necessarily based on GRAMOXONE SUPER per se, but they are based on research conducted with paraquat, the active ingredient in GRAMOXONE SUPER.

Myths

Myths are untrue statements that usually arise from misunderstandings or misinterpretations of facts. They can be spread for personal, political or economic gain. Or they can spring from honest and well-meaning people who happen to have unreliable information.

Myths are perceived as "facts" after they are printed in newspapers and magazines or broadcast on television and radio. Once established, a myth is difficult to dislodge from people's minds. The more they are repeated by authorities or others, the more "true" they become.

This brochure exposes some of the many misunderstandings, myths and misconceptions that surround GRAMOXONE[®] SUPER, an agricultural herbicide containing paraquat, an active ingredient that has been, and continues to be, an important tool for food production throughout the United States and around the world.

Myths about the use of GRAMOXONE SUPER

Myth

Paraquat was recently developed by the U.S. government to spray on marijuana in an effort to deter the illegal use of the plant.



FACT:

In fact, paraquat is a highly effective and versatile agricultural herbicide that has been applied annually to millions of acres of America's farmland since 1966. Although the farming community is familiar with the product, paraquat gained widespread public attention only in the last few years, following the U.S. Drug Enforcement Administration's (DEA) decision to spray patches of illegally grown marijuana in the Chattahoochee National Forest. After testing, the DEA chose paraquat because it was a fast-acting herbicide; marijuana treated in the morning would be destroyed or rendered unmarketable before dusk.

Myth

Paraquat-treated marijuana causes lung damage when smoked.



FACT:

The fear of being poisoned or developing lung injury from smoking marijuana treated with paraquat appears to be

groundless. The DEA concluded that no adverse health effects due to paraquat should occur. Likewise, no lung injury is expected from inhaling smoke from burning weeds or crop residues that have been treated with paraquat. The primary reason for this finding is that most of the herbicide either breaks down during the burning or binds innocuously to smoke particles. Particles that are inhaled or ingested will either be exhaled or eliminated in the urine.

Myth

Paraquat must be a dangerous chemical to use because it is so often in the news.



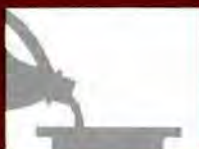
FACT:

Paraquat has come to the public's attention mainly because of its limited government use in drug enforcement.

GRAMOXONE SUPER has never caused death or injury when applied according to label directions. Like many pesticides, however, it is highly toxic if the *undiluted* product is *swallowed*. Diluted GRAMOXONE SUPER used in spray solutions according to label directions poses no undue risk to agricultural workers or neighboring individuals, livestock or wildlife. The exercise of common sense and good spray practices will reduce the chance for drift.

Myth

GRAMOXONE SUPER should not be mixed with other pesticides.



FACT:

GRAMOXONE SUPER is a versatile product that is registered for use with dozens of other herbicides in tank mixes that can be used for weed control on more than 100 crops throughout the U.S.

Tank mixing with GRAMOXONE SUPER can improve control of tough, profit-robbing weeds quickly and economically.

Myths about the chemistry of GRAMOXONE SUPER

Myth

GRAMOXONE SUPER is the same product as Agent Orange.



FACT:

GRAMOXONE SUPER is not Agent Orange, nor is it chemically related. Agent Orange is the code name given by the U.S. Army to a herbicide used as a defoliant during warfare. It is a mixture of two compounds: 2,4-D and 2,4,5-T, not paraquat. Other herbicides used by the Army were also given code names according to the color of the drums that contained the compounds. None contained paraquat.

Myths about the toxicity of GRAMOXONE SUPER

Myth

GRAMOXONE SUPER causes Parkinson's disease.



FACT:

It was recently suggested that paraquat may cause Parkinson's disease because its active ingredient has a chemical structure similar to that of a compound known as MPTP, which causes the disease. But paraquat is distinctly different from MPTP, and can't be converted to it.

There is absolutely no scientific evidence that GRAMOXONE SUPER can cause Parkinson's disease.

Myth

Breathing spray mists of GRAMOXONE SUPER will cause lung damage.



FACT:

In fact, there have been no substantiated cases of systemic poisoning or death from inhaling spray mists containing paraquat.

In order for a particle to enter air spaces in the lungs, its size must be 10 microns or less (a micron is one millionth of a meter). Smoke particles are in the 10 micron range. The majority of droplets emitted from spray equipment typically used in applying agrichemicals are 100 to 200 microns in diameter. These large-size droplets generally are not inhaled. Instead, they are deposited in the nasal passages and throat or pharyngeal portion of the respiratory tract.

Very few sprayers produce uniformly sized droplets, so some smaller droplets can be produced. Occasionally, a few of these small droplets may, under atypical conditions, enter the lungs.

Since GRAMOXONE SUPER can be irritating to the mucosa of the respiratory tract, inhalation overexposure to these small spray droplets can cause sore throats or nosebleeds. These signs and symptoms will disappear once exposure is either discontinued or respiratory protection equipment is worn.

hazard from exposure to vapor or "fumes" of paraquat. In fact, the odor or stench you smell has been intentionally added as a safety precaution to help prevent accidental ingestion.

If GRAMOXONE SUPER is spilled and allowed to dry, a crystalline substance will remain. If this residue becomes airborne and is inhaled, at most, an irritation of the respiratory tract could result, leading to a headache, sore throat or nosebleed. Again, no systemic poisoning is likely from inhalation overexposure to residues of GRAMOXONE SUPER. Spills should be cleaned up promptly with absorbent material.

Myth

GRAMOXONE SUPER has caused numerous deaths.



FACT:

Drinking concentrated paraquat has caused nearly all the worldwide poisonings and deaths attributed to paraquat.

In the U.S., an average of five to eight deaths result from paraquat poisoning each year. It is important to note that approximately 90 percent of these deaths were suicides and the remainder involved accidental poisoning resulting primarily from unsuspecting adults or children drinking paraquat that had been transferred from the original container to a beverage container. No deaths or poisonings have occurred when the

Myth

Breathing the vapors from GRAMOXONE SUPER can be fatal.



FACT:

Breathing the air near an opened container of GRAMOXONE SUPER poses no harm, because it has no measurable vapor pressure. Therefore, there can be no health

product has been used according to label instructions.

GRAMOXONE SUPER is highly toxic and a prolonged and painful death can result when the concentrated chemical is swallowed. Death may occur in two to three weeks when a mouthful (estimated minimum human adult lethal dose is $\frac{1}{3}$ to $\frac{1}{2}$ oz. of concentrate) is swallowed and the recommended treatment for paraquat is not administered. In cases involving the swallowing of two to three ounces or more of concentrated GRAMOXONE SUPER, death may occur within 24 to 48 hours.

Myth

GRAMOXONE SUPER is readily absorbed through the skin.



FACT:

Intact skin is an effective barrier to paraquat. The product is highly ionized and therefore water soluble. Chemicals with these properties do not readily penetrate biological membranes such as skin and the mucosa of the respiratory tract. Results of human skin penetration studies indicate that only about 0.3% of the amount of GRAMOXONE SUPER applied to the skin will be absorbed in 24 hours.

Continuous or repeated skin contact can cause skin irritation, and contact with irritated or broken skin may result in poisoning. The hazards of skin absorption are reduced even more when GRAMOXONE SUPER is used in spray solutions.

Myth

GRAMOXONE SUPER always requires special clothing to protect workers from exposure.



FACT:

When handling the *concentrated* product, workers should wear rubber gloves, apron, face shield and waterproof footwear. After mixing, however, diluted GRAMOXONE SUPER poses no serious risk to spray operators as a result of absorption through skin, although prolonged contact with skin can lead to irritation. Once mixed, only waterproof footwear and work clothing need be worn. However, it is a good idea to keep rubber gloves handy in the event that nozzle or equipment adjustments are necessary.

Myth

Paraquat accumulates in the body.



FACT:

Paraquat is a water-soluble chemical, so it is not stored or accumulated in body fat.

Paraquat that may have been absorbed into the blood is rapidly and effectively eliminated in the urine by the kidneys.

Myth

Paraquat is dangerous because it has no antidote.



FACT:

Not all pesticides in use today have antidotes. However, there is an effective, two-phase treatment for poisoning with paraquat. The first phase consists of taking advantage of the herbicide's property of tightly binding to clay particles by having the patient drink a water suspension of bentonite clay or Fullers Earth along with a cathartic. This procedure results in quick binding and inactivation of paraquat in the stomach and intestines. The second phase of the treatment is designed to lower the blood level of paraquat through the use of a kidney machine.

If two ounces or less of concentrated GRAMOXONE SUPER are swallowed, and the recommended treatment is administered during the first 24 hours after ingestion, the survival rate from the poisoning is between 75 and 85 percent.

A person who has swallowed, or is suspected of swallowing GRAMOXONE SUPER should be taken immediately to an emergency treatment center and have the physician telephone the ICI Medical Emergency Information Center 1-800-327-8633 (1-800-FAST-MED).

Myths about GRAMOXONE SUPER in Soil and Water

Myth

Paraquat remains toxic in the soil.



FACT:

When GRAMOXONE SUPER is applied, some spray material inevitably falls on the soil between the target weeds. Here it becomes adsorbed rapidly to the mineral and organic components, especially to clay particles. Once adsorbed, it is biologically unavailable; it cannot be taken up by plant roots, earthworms or other organisms. It does not sterilize the soil, nor can it be released and reactivated by water or application of other agricultural chemicals.

In fact, soils, and especially those with high clay content, have a tremendous capacity to adsorb paraquat, so much so that normal agricultural applications could take place yearly for more than a hundred years without using up the adsorption capacity within the top inch or two of soil. The greater the clay content, the greater the ability to adsorb the product.

Myth

GRAMOXONE SUPER destroys soil structure when used over extended lengths of time.



FACT:

When GRAMOXONE SUPER is used in no-till or reduced tillage farming programs, erosion and the subsequent pollution problems caused by the runoff of soils containing fertilizer and other agricultural chemicals are greatly reduced. This is because of the vegetative cover left on the land when tillage is not used. In addition, the cover contributes to increased organic matter in the soil, which ultimately results in overall improvement in soil tilth and fertility.

Myth

Paraquat in the soil can eventually contaminate groundwater, streams and lakes.



FACT:

Because of its strong adsorption to minerals, organic matter and clay particles in the soil, paraquat cannot be released from soil particles to contaminate groundwater. Even when soil particles containing paraquat do find their way into groundwater, the chemical is irreversibly bound to the particles, thus rendering it biologically inactive. GRAMOXONE SUPER is so tightly bound that to release it for analysis, the clay particles have to be destroyed by boiling in concentrated acid for several hours.

In open waterways, concentrations of paraquat fall rapidly because of adsorption to plant and suspended soil particles and exposure to sunlight. Although not registered for this use in the U.S.,

paraquat is used in some parts of the world for water weed control. When applied according to label directions, it causes no unreasonable adverse effects to fish and other forms of aquatic life.

Myths about GRAMOXONE SUPER in the Environment

Myth

GRAMOXONE SUPER is highly susceptible to drift.



FACT:

When applied according to label directions and with properly calibrated equipment in good working order, there is no more hazard from drift of GRAMOXONE SUPER than from any other contact material. As with other contact herbicides, drift onto nontarget species will cause leaf burning. Because paraquat is nonvolatile, it cannot escape from leaf surfaces once contact has been made.

Myth

GRAMOXONE SUPER is not effective if it is applied during cool, cloudy weather.



FACT:

All chemical reactions are speeded up by heat and slowed down by cold. GRAMOXONE SUPER is no less effective when applications are made under cool, cloudy conditions, but its activity is slowed down. Likewise, it acts faster when the weather is warm and sunny.

In fact, paraquat's fast activity will cause its molecules to penetrate plant tissue soon after contact is made. Therefore, GRAMOXONE SUPER is usually rainfast in as little as 30 minutes.

Myth

GRAMOXONE SUPER kills wildlife.



FACT:

Although the label contains a warning that GRAMOXONE SUPER is toxic to wildlife, application experience on millions of acres of farmland for nearly two decades shows that it has no unreasonable adverse effect on wildlife when applications are made according to label directions.

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Myth

Livestock feeding on treated foliage will be poisoned by paraquat.



FACT:

There are no known deaths or adverse effects on livestock as a result of using GRAMOXONE SUPER according to label directions.

Paraquat is tightly bound to plant tissue and therefore becomes inactive as a poison when it contacts foliage.

The label for GRAMOXONE SUPER carries grazing restrictions to avoid exceeding the tolerance established by EPA for residues of GRAMOXONE SUPER in meat and milk products. This restriction varies according to crop and use because residues that remain on plant tissues that animals consume vary under different application methods, conditions and use rates.

This is also why there are harvest restrictions following application of GRAMOXONE SUPER as a harvest aid—to avoid exceeding allowable residues of the material on the harvested food or feed crop.

Myth

Residues of GRAMOXONE SUPER on food and fiber products pose a serious health threat to humans.



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FACT:

Because GRAMOXONE SUPER binds so firmly to soil, it cannot be taken up by plant roots to contaminate crops under normal agricultural practices. Even where GRAMOXONE SUPER is sprayed directly on crops, residue levels in the harvested produce are well below the levels set by enforcement officials throughout the world.

Myth

The long-term health hazards from GRAMOXONE SUPER are not fully understood.



FACT:

Paraquat, developed in 1954, is one of the most extensively studied of all agricultural chemicals used in the world today. It has withstood the most intensive scrutiny by scientists, the Environmental Protection Agency and critics since its commercial introduction in the U.S. more than 20 years ago.



ICI Americas Inc.

Agricultural Products

Wilmington, Delaware 19897

For additional information, call the ICI Americas Information Service toll free at 1-800-441-7757, extension 3192. In Delaware, call collect at 575-3192.

GRAMOXONE SUPER - it's paraquat at its best.

GRAMOXONE SUPER is a restricted use pesticide.

ACD 571-038

Printed in USA

Case ID: 220300429
Control No.: 26064959
SYNG-PQ-01832805

different

GET THE FIRST ROUND PICK YOU DESERVE

GRAMOXONE® SUPER herbicide
HARVEST AID FOR COTTON



GRAMOXONE® SUPER herbicide—a proven performer that burns back green weeds and crop foliage for a cleaner, faster harvest. GRAMOXONE SUPER speeds up cotton defoliation and desiccation, cracks open mature cotton bolls, and improves first-pick yields.

Beat bad weather. When you're ready to harvest cotton, nothing should get in the way—especially unopened bolls or wet or cold weather. GRAMOXONE SUPER aids in *cracking bolls* and can get your cotton ready to pick on schedule. So you harvest more cotton and can complete your harvest before bad weather sets in.

For maximum yields. GRAMOXONE SUPER cracks mature but unopened bolls so you're ready to harvest in 5 to 7 days after application. On *irrigated* cotton GRAMOXONE SUPER helps you harvest more pounds of lint on the first pick. When used on *stripper* cotton you get more pounds of cotton without damaging the lint. On *picker* cotton you speed up your harvest so you can save bolls that would ordinarily be lost to rainy weather. It all adds up to more cotton and better profits at the end of the season.

Higher quality and faster harvesting.

GRAMOXONE SUPER aids defoliation and desiccates green cotton leaves and burns back weeds and grasses. You harvest less trash and minimize staining. There's also less clogging of equipment and machinery downtime. That's especially important at harvest time when you need every hour the day has in it.

Works in cool weather. GRAMOXONE SUPER penetrates green plant tissue quickly. It desiccates well even at cooler temperatures. In addition, it enhances the performance of phosphate or chlorate defoliant during cool weather. And, GRAMOXONE SUPER isn't readily washed off by rain; it's rainfast in 30 minutes.

When to apply. Timing is very important. GRAMOXONE SUPER opens mature bolls; however, development of immature bolls will be inhibited. Follow timing directions on the product label to avoid spraying too early.

Harvest-aid uses.

HARVEST AID—To Aid in Opening of Mature Bolls and to Desiccate Green Leaves.

Apply 11 fl. oz. of GRAMOXONE SUPER Herbicide in combination with 1 pt. of phosphate or 1 gal. of chlorate defoliant per acre. Apply when 80% or more of the bolls are open and the remaining bolls to be harvested are mature. Development of immature bolls will be inhibited.

To Aid in Opening of Mature Bolls and to Desiccate Green Weeds—Post Defoliation Application in Picked Cotton (For use in all cotton-producing areas except Arizona and California).

Apply 1½ to 2½ pints of GRAMOXONE SUPER per acre. Use the higher rate if weed infestation is dense or heavy. Apply when 75% or more of the bolls are open and remaining bolls to be harvested are mature. Development of immature bolls will be inhibited.

To Desiccate Regrowth in Cotton.

Apply 11 to 21 fl. oz. of GRAMOXONE SUPER per acre to desiccate regrowth occurring after defoliation or desiccation. Use the higher rate if regrowth is excessive.

To Aid in Defoliation and Opening of Mature Bolls of Western Cotton (Arizona, California).

First Application—7 to 11 fl. oz. GRAMOXONE SUPER Herbicide plus 1 to 3 pts. of phosphate defoliant or 1 to 2 gals. of chlorate defoliant per acre. Use higher dosages on rank cotton. (Caution—Do not use more than 11 fl. oz. GRAMOXONE SUPER Herbicide in initial application, as excessive desiccation may occur.) Apply when 60% or more of the bolls are open and remaining bolls to be harvested are mature. Development of immature bolls will be inhibited. Do not use more than 4.0 lbs. of actual sodium chlorate per acre or more than 2.28 lbs. of actual phosphate type defoliants per acre.

Second Application—To Aid in Opening of Mature Bolls at Second or Later Harvest Aid Treatment and to Desiccate Green Leaves—Apply 11 to 21 fl. oz. GRAMOXONE SUPER Herbicide per acre (in desert cotton areas or on rank vigorous cotton, use the 21 fl. oz. rate only) or 11 to 21 fl. oz. GRAMOXONE SUPER Herbicide plus 1½ to 2 pts. of phosphate defoliant or 1½ to 2 gals. of chlorate defoliant. Apply when 75% or more of the bolls are open and the remaining bolls to be harvested are mature. Development of immature bolls will be inhibited.

To Desiccate Stripper Cotton.

Apply 1½ to 2½ pts. GRAMOXONE SUPER Herbicide per acre. When foliage is dense, use 2 applications of 1½ pts. if necessary. Apply when 85% or more of the bolls are open and the remaining bolls to be harvested are mature. Development of immature bolls will be inhibited.

Aerial Application—Apply 3 to 10 gals. spray mix per acre. Use Spreader (non-ionic) at 8 to 32 fl. oz. per 100 gals. spray mix. Do not apply during periods of thermal inversion to avoid drift.

Ground Application—Apply 10 to 30 gals. spray mix per acre. Arrange nozzles to provide thorough coverage of the foliage. Use Spreader (non-ionic) at 8 to 32 fl. oz. per 100 gals. spray mix.

May apply as split application. Do not pasture lactating dairy animals. Do not pasture livestock in treated fields within 15 days after treatment. Remove livestock from treated area 30 days before slaughter. Do not feed gin trash to livestock. Do not apply to cotton within 3 days before harvest. Repeat application if necessary. Do not make more than 2 applications or exceed a total of 2½ pts. per acre. When combined with phosphate defoliants, observe livestock cautions listed on the phosphate label. When combined with chlorate defoliants, do not pasture livestock on treated areas or feed treated foliage or gin trash. Do not apply within 7 days when used with phosphate or chlorate defoliant.

Always read and follow complete label directions.

HARVEST EARLY. HARVEST MORE COTTON.

Get the First-Round Pick that you
deserve with GRAMOXONE SUPER.



For additional information, call the ICI Americas
Information Service toll free at 1-800-441-7757,
extension 3192.

GRAMOXONE SUPER is a restricted use pesticide.



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