

Dear All,

Thank you for your interest in MSMA and for your participation in our conference call on Monday, October 8, 2012. We appreciate your commitment to MSMA and we welcome the opportunity to update you on important developments pertinent to our products.

During and after the call, questions were raised that we believe are of interest to all of you, as well as to those who were unable to join the call. We are going to respond to these questions, and place these questions and answers to them on the Organic Arsenical Products Task Force (OAPTF) website, <http://www.oaptf.com>, for your convenience.

Q: The timetable for Group II uses¹, according to the agreement with EPA has been changed. Does the change affect the removal of MSMA from Florida?

A: According to the agreement between the registrants and EPA, Group II uses were scheduled to be off label by the end of 2012, with use permitted until the end of 2013. A review of the science was going to take place in 2012, following which an application for reregistration of MSMA for these uses would be possible. Florida is listed with Group III uses². Florida is different from the other states because the cancellation of MSMA in Florida is state-specific, and has no bearing on Federal restrictions or any other state restrictions. The state of Florida requires studies that the Task Force cannot justify, and, therefore, MSMA products were withdrawn from Florida. (Please note: MSMA use on cotton is permitted on Florida cotton-producing counties).

Q: According to the agreement with EPA, Group III uses² were cancelled in 2009, with use permitted until end of 2010. However, users heard that the use is allowed until product depletion. Is this correct?

A: According to the agreement with EPA the use of Group III uses was allowed only until end of 2010. The cancellation order that EPA issued later clearly specified that these uses are

¹ Group II uses are Golf courses, sod farms and Highway Right of Ways

² Group III uses:

Residential turf

Forestry

Non-bearing fruit and nuts

Citrus, bearing and non-bearing

Bluegrass, fescue and ryegrass grown for seed

All uses of MSMA in Florida except use on cotton grown in Calhoun, Columbia, Escambia,

Hamilton, Holmes, Jackson, Jefferson, Okaloosa, Santa Rosa, Suwannee, Walton, and

Washington counties.

Drainage ditch banks, railroad, pipeline, and utility rights of way, fence rows, storage yards and similar non-crop areas.

allowed until product depletion, provided that the product label allows such uses. Based on recent communications with EPA, we can confirm that the Task Force and EPA are in agreement that MSMA products labeled for Group III uses in the channels of trade can be used through depletion. To the extent the cancellation order and Agreement may be read otherwise, EPA and the Task Force are working on a new cancellation order that EPA intends to issue soon that will, in addition to clarifying other issues, clearly state that use of MSMA products labeled for Group III uses is allowed through depletion.

Q: The states are not aware of the change in the timetables, thus certain states refuse to register MSMA after 2012. What does the Task Force plan to do?

A: The Task Force is actively discussing the issue with EPA and will make sure that the states are aware of the change in timetables.

Q: Is there a basis for optimism with regard to the future of MSMA following the science review?

A: The Task Force is very optimistic about the outcome of the science review process. EPA's decision to ban MSMA was based on EPA's cancer risk assessment for inorganic arsenic. Recently, the mechanism of action of inorganic arsenic has been shown to be such that it has a threshold, and it has been clearly demonstrated that the risk of cancer due to exposure to inorganic arsenic is only relevant to situations where the exposures are very high. Such exposures do not occur in the US and certainly are not due to the use of MSMA. EPA also is currently reviewing effects of inorganic arsenic that are not related to cancer. While this is a new area of inquiry, the Task Force is optimistic that this review will reflect the new science revealing a threshold mode of action.

We hope this information is helpful.