



DIVISION OF
CORPORATION FINANCE

UNITED STATES
SECURITIES AND EXCHANGE COMMISSION
WASHINGTON, D.C. 20549-3010

January 14, 2008

Erik T. Hoover
Senior Counsel
E. I. du Pont de Nemours and Company
DuPont Legal, D8048-2
1007 Market Street
Wilmington, DE 19898

Re: E. I. du Pont de Nemours and Company

Dear Mr. Hoover:

This is in regard to your letter dated January 11, 2008 concerning the shareholder proposal submitted by the International Brotherhood of Dupont Workers for inclusion in DuPont's proxy materials for its upcoming annual meeting of security holders. Your letter indicates that DuPont will include the proponent's revised proposal in its proxy materials, and that DuPont therefore withdraws its December 27, 2007 request for a no-action letter from the Division. Because the matter is now moot, we will have no further comment.

Sincerely,

William A. Hines
Special Counsel

cc: Jim Flickinger
President
International Brotherhood of Dupont Workers
P.O. Box 10
Waynesboro, VA 22980



DuPont Legal

Erik T. Hoover
DuPont Legal, D8048-2
1007 Market Street
Wilmington, DE 19898
Telephone: (302) 774-0205
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RECEIVED
2007 DEC 28 AM 10:43
OFFICE OF CHIEF COUNSEL
CORPORATION FINANCE

December 27, 2007

VIA: HAND DELIVERY

U.S. Securities and Exchange Commission
Division of Corporation Finance
Office of Chief Counsel
100 F Street, N.E.
Washington, D.C. 20549

Re: E. I. DU PONT DE NEMOURS AND COMPANY
PROXY STATEMENT – 2008 ANNUAL MEETING
PROPOSAL BY INTERNATIONAL BROTHERHOOD OF DUPONT WORKERS

Ladies and Gentlemen:

This statement and the accompanying materials are submitted on behalf of E. I. du Pont de Nemours and Company ("DuPont") pursuant to the provisions of Rule 14a-8 of the Securities Exchange Act of 1934. In DuPont's view, portions of the supporting statement to the shareholder proposal submitted by the International Brotherhood of DuPont Workers ("IBDW") may be properly omitted from DuPont's proxy statement for the reasons set forth in the attached letter. I request that the staff not recommend any enforcement action if the identified portions of the supporting statement to the proposal are so omitted. By copy of this statement and the attached letter, the IBDW is being notified of DuPont's intention to omit portions of the supporting statement to its shareholder proposal from DuPont's proxy materials for the 2008 Annual Meeting.

If you have any questions or require additional information, please contact me at (302) 774-0205 or my colleague, Mary Bowler, Corporate Secretary and Corporate Counsel, at (302) 774-5303.

Very truly yours,

Erik T. Hoover
Senior Counsel

CWB/ETH/rtp
Hoover, Erik/2000 PROXY STATEMENT SHAREHOLDER PROPOSAL

cc: with attachment
Jim Flickinger, President, International Brotherhood of DuPont Workers
Kenneth Henley, General Counsel, International Brotherhood of DuPont Workers



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VIA: HAND DELIVERY

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Re: E. I. DU PONT DE NEMOURS AND COMPANY
PROXY STATEMENT – 2008 ANNUAL MEETING
PROPOSAL BY INTERNATIONAL BROTHERHOOD OF DUPONT WORKERS

I am writing on behalf of E. I. du Pont de Nemours and Company, a Delaware corporation (“DuPont”), pursuant to Rule 14a-8(j) under the Securities Exchange Act of 1934, as amended, to respectfully request that the Staff of the Division of Corporate Finance (the “Staff”) of the Securities Exchange Commission concur with DuPont’s view that, for the reasons stated below, portions of the supporting statement to the shareholder proposal (the proposal and supporting statement together, the “Proposal”) submitted by the International Brotherhood of DuPont Workers (“IBDW”) may properly be omitted from its 2008 Annual Meeting Proxy Statement (“Proxy”) to be distributed by DuPont in connection with its 2008 annual meeting of shareholders.

Pursuant to Rule 14a-8(j)(2), I am enclosing six copies of this letter and the IBDW’s letter transmitting the Proposal. A copy of this letter is also being sent to the IBDW as notice of DuPont’s intent to omit portions of the Proposal from the Proxy.

The Proposal requests DuPont’s Board of Directors to “consider the following nonbinding proposal: That it create a committee, with members drawn from the employee work force of DuPont, the union leadership of DuPont, the management of DuPont, and any necessary independent consultants, to report to the Board of Directors regarding (1) the impact to communities as a result of DuPont’s action in laying off mass numbers of employees, selling its plants to other employers, and closing its plants and (2) alternatives that can be developed to help mitigate the impact of such actions in the future.”

The proposal is attached as Exhibit A. Supporting authorities cited in this letter are attached, in relevant part, as Exhibit B.

Portions of the Proposal are False and Misleading. Rule 14a-8(i)(3).

Under Rule 14a-8(i)(3), a proposal may be omitted from the registrant's proxy materials if it "is contrary to any of the Commission's proxy rules, including § 240.14a-9, which prohibits materially false or misleading statements in proxy soliciting materials." The Staff has recognized that "reliance on Rule 14a-8(i)(3) to exclude or modify a statement may be appropriate where the company demonstrates objectively that a factual statement is materially false or misleading." See *Staff Legal Bulletin No. 14B (Sept. 15, 2004)*.

Portions of the Proposal are materially false and misleading because of certain mistakes of fact. The first paragraph of the supporting statement to the Proposal states that total "U.S. employment has been cut by over 2/3 during [the last 10 years], from over 90,000 to just over 30,000." In fact, as of December 31, 1996 DuPont employed approximately 55,000 individuals in the U.S., compared to approximately 33,000 as of December 31, 2006. Moreover, the Proposal fails to reflect two major divestitures during that same time period. In 2004, DuPont sold its INVISTA business to Koch Industries, Inc. The INVISTA divestiture involved approximately 16,000 U.S. employees. In 1999, DuPont completed the sale of its interest in Conoco Inc. The Conoco divestiture involved approximately 9,300 U.S. employees. Adjusting for the INVISTA and Conoco divestitures, in which employees were subsequently employed by the buyer, total U.S. employment over the past decade was largely unchanged.

The proponent submitted a substantially similar proposal for the 2000 Annual Meeting. In the supporting statement to that proposal, the proponent made the following statement: "US employment has been cut virtually in half over the past decade, from about 100,000 to just over 50,000." The Staff, in its response to DuPont's request for no-action relief, required that such statement be omitted or revised so that it did not reflect the Conoco divestiture. See *E. I. du Pont de Nemours and Company (available March 6, 2000)*.

The second and third paragraphs of the Proposal state: "Employees who lost their jobs as a result of these actions had often been with DuPont for many years. Yet, despite their many years of loyal service to DuPont, they were almost never offered or even considered for employment at other DuPont facilities. A current example of this practice is how the employees of the Louisville DuPont facility have been treated. The Louisville business is being closed with the equipment being relocated to a DuPont plant in Louisiana, yet virtually none of the employees from Louisville has been offered employment there."

The foregoing statement is materially misleading because DuPont has a practice with every situation that involves a reduction in plant personnel or plant closure of ensuring that employees are aware of other employment opportunities within DuPont. Moreover, the Proposal fails to distinguish between two distinct operations at the Louisville site, DPE and Louisville Works. DPE was originally a joint venture with The Dow Chemical Company called DuPont Dow Elastomers, started in 1996, which made Neoprene (at the Louisville site) among other products. The joint venture ended in 2005 and the name was changed to DuPont Performance Elastomers, which became a wholly-owned subsidiary of DuPont. Louisville Works makes FREON® 22 among other products. Although DPE operations will cease, its

employees were offered the opportunity to apply for positions at DuPont's Louisiana site, to where the DPE operations were relocated. New equipment was purchased and placed into operation at the Louisiana site. Louisville Works remains in operation, producing fluoroproducts.

The seventh paragraph states that: "DuPont has concluded that it often has no option but to close or downsize a plant. And even when it simply sells the plant, rather than closing it, the new employer often comes in and does the downsizing for DuPont. This has happened at many of DuPont's former fibers facilities, including one in Waynesboro, Virginia that went from 1,000 employees to less than 500 employees in just one year."

The Proposal is materially misleading because it implies that when DuPont sells a facility and a reduction in force is implemented by the buyer after the sale, the buyer is acting on behalf of DuPont. In reducing the workforce after the closing of a transaction, the buyer is not acting on behalf of DuPont. To illustrate using the example set forth in the Proposal, the Waynesboro, VA facility was sold as part of the INVISTA divestiture. Employees at that site were offered employment with the buyer. The cited reduction in force at the Waynesboro facility occurred after the closing of the INVISTA sale and resulted from independent business decisions made by the buyer.

For the foregoing reasons, the above-cited portions of the Proposal are false and misleading and may be omitted from DuPont's 2008 Annual Meeting Proxy Statement pursuant to Rule 14a-8(i)(3).

If you have any questions or require additional information, please contact me at (302) 774-0205 or my colleague, Mary Bowler, Corporate Secretary and Corporate Counsel, at (302) 774-5303.

Very truly yours,



Erik T. Hoover
Senior Counsel

CWB/ETH/rtp
Hoover, Erik/2000 PROXY STATEMENT SHAREHOLDER PROPOSAL

cc: with attachment

Jim Flickinger, President, International Brotherhood of DuPont Workers
Kenneth Henley, General Counsel, International Brotherhood of DuPont Workers

EXHIBIT A

INTERNATIONAL BROTHERHOOD OF DUPONT WORKERS

"Workers Representing DuPont, DuPont Performance Elastomers, Bemis And INVISTA Workers"

James D. Flickinger
International President
(Waynesboro, VA)
(540) 487-7000
Fax: (540) 337-5442
E-mail: ibdw.jim@comcast.net

www.dupontworkers.com



Tony Davis
International Vice-President
of Organizing
(Clinton, IA)
(563) 503-9515
E-mail: tonyheather@mchsi.com

Dave Gibson
Secretary-Treasurer
(215) 539-6261
(Philadelphia, PA)
E-mail: dj.gibson@verizon.net

P.O. Box 10
Waynesboro, VA 22980

Donny Irvin
International Vice-President
of Communications
(Richmond, VA)
(804) 216-8976
E-mail: donnyirvin@aol.com

Kenneth Henley
General Counsel
(610) 664-6130
E-mail: khenleyesq@aol.com

October 26, 2007

RECEIVED
OCT 31 2007

Mary Bowler, Corporate Secretary
E.I. Dupont De Nemours & Co.
1007 Market Street
Wilmington, DE 19898

BY:

Re: Proxy Proposal

Dear Ms. Bowler:

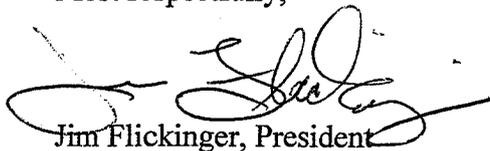
The International Brotherhood of Dupont Workers (IBDW) is the owner of sixty (60) shares of Dupont Common Stock that it has owned for more than three years. Evidence of such ownership is attached. The IBDW intends to continue ownership of these shares through the date of the upcoming stockholders' meeting in 2008.

I serve as the President of the IBDW.

Pursuant to 17 CFR Section 240.14a-8, I hereby request that the enclosed stockholder proposal of the IBDW, including the resolution and statement in support thereof, be included in the upcoming Dupont proxy statement.

I also request that if there are any legal or technical problems with this letter or the proposal, I be contacted in a timely manner so I will be able to make any necessary changes.

Most respectfully,



Jim Flickinger, President

cc: Kenneth Henley, IBDW General Counsel

Attachment

Member Union Locations:
Clinton, IA * Louisville, KY * Old Hickory, TN * Martinsville, VA
Philadelphia, PA * Richmond, VA * Waynesboro, VA

STOCKHOLDER PROPOSAL ON MASS LAYOFFS, PLANT CLOSURES AND OUTRIGHT PLANT SALES

The International Brotherhood of Dupont Workers, P.O. Box 10, Waynesboro, VA, 22980, owner of 60 shares of Dupont Common Stock, has given notice that it will introduce the following resolution and statement in support thereof.

Resolved: That the stockholders of E.I. Dupont DeNemours & Company, assembled in annual meeting and by proxy, hereby request that the Board of Directors consider the following nonbinding proposal: That it create a committee, with members drawn from the employee work force of Dupont, the union leadership of Dupont, the management of Dupont, and any necessary independent consultants, to report to the Board of Directors regarding (1) the impact to communities as a result of Dupont's action in laying off mass numbers of employees, selling its plants to other employers, and closing its plants and (2) alternatives that can be developed to help mitigate the impact of such actions in the future.

Stockholders' Statement

In just the last 10 years, Dupont has closed, sold or sharply reduced the size of a great number of plants across the United States. As a result of these reductions, total U.S. employment has been cut by over 2/3 during this period, from over 90,000 to just over 30,000. Almost without exception, these plants had been in operation for upward of 50 years and were located in rural areas where they were a primary employer for the community.

Employees who lost their jobs as a result of these actions had often been with Dupont for many years.

Yet, despite their many years of loyal service to Dupont, they were almost never offered or even considered for employment at other Dupont facilities. A current example of this practice is how the employees of the Louisville Dupont facility have been treated. The Louisville business is being closed with the equipment being relocated to a Dupont plant in Louisiana, yet virtually none of the employees from Louisville has been offered employment there.

As for any pension the laid off employees were entitled to, that amount was dramatically reduced by 5% for each year they were under 58 years of age with less than 27 years of service.

This combination of job loss and pension reduction can be devastating for the community in which the plant was located. Just as an example, at a Dupont plant in Martinsville, Virginia the work force was reduced from over 600 employees to a skeleton staff of about 60 employees. The overall loss to this rural community has been estimated at over \$20 million each and every year.

There are other, equally substantial costs to the community. Where Dupont has closed its plants, there often are environmental issues that have made it difficult for the site to be put to any real productive use. The buildings simply remain (with the Dupont logo removed, of course), undergoing gradual deterioration. Think about it - would you like to live or run a business near a vacated Dupont factory? Would anyone?

Dupont has concluded that it often has no option but to close or downsize a plant. And even when it simply sells the plant, rather than closing it, the new employer often comes in and does the downsizing for Dupont. This has happened at many of Dupont's former fibers facilities, including one in Waynesboro, Virginia that went from 1,000 employees to less than 500 employees in just one year.

For this reason, it is important that attention be paid to the impact of these actions on the communities in which the plants are located and how best to mitigate their impact. This is particularly true given the close relationship between Dupont and the communities where it has been operating for so many years.

If you AGREE, please mark your proxy FOR this resolution.

EXHIBIT A

The International Brotherhood of DuPont Workers, P.O. Box 16333, Louisville, Kentucky, owner of 60 shares of DuPont Common Stock, has given notice that it will introduce the following resolution and statement thereof.

Resolved: That the stockholders of E. I. DuPont DeNemours & Company, assembled in annual meeting and by proxy, hereby request that the Board of Directors consider the following nonbinding proposal: That it create a committee, with members drawn from the employee work force of DuPont, the union leadership of DuPont, the management of DuPont, and any necessary independent consultants, to report to the Board of Directors regarding the impact to communities as a result of the closure of DuPont plants and alternatives that can be developed to help mitigate the impact of such closures in the future.

Stockholders' Statement

Over the past decade DuPont has closed or sharply reduced the size of a great number of plants across the United States. In part as a result of these reductions, total U.S. employment has been cut virtually in half over the past decade, from about 100,000 to just over 50,000. Almost without exception, these plants had been in operation for upward of 50 years and were located in rural areas where they were a primary employer for the community.

Employees who lost their jobs as a result of these plant closures had often been with DuPont for many years. Once terminated, these employees could look forward to receiving a pension reduced 5% for every year they were under the age of 58 and 5% for every year of service less than 27.

This combination of job loss and pension reduction can be devastating for the community in which the plant was located. For example, at the Martinsville, Virginia plant that was closed just two years ago, the overall loss to the community has been estimated at over \$20 million per year. Many of the terminated employees, which were over 500 in number, were not able to gain comparable employment. They had to take minimum wage level jobs or move to another town in the hope of a better opportunity. For a small, sleepy southern town located in the foothills of the Shenandoah Mountains, this was a blow of monumental import.

These are other, equally substantial costs to the community. In a number of locations where DuPont has closed its plants, including Martinsville, there have been environmental issues that have made it difficult for the site to be put to full productive use. The community is left with not only an eyesore, but one that cannot be of any substantial economic benefit. The buildings simply remain, undergoing gradual deterioration.

DuPont has concluded that it often has no option but to close a plant, particularly those in its old line industries such as fibers and chemicals. For this reason, it is imperative that attention be paid to the impact of these closures on the communities in which the plants are located. This is particularly true given the close relationship between DuPont and the communities where it has been operating for many years. Establishing the proposed committee will be a first step toward understanding and dealing with future plant closings.



DuPont Legal

Erik T. Hoover
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1007 Market Street
Wilmington, DE 19898
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RECEIVED
2008 JAN 14 AM 11:25
OFFICE OF CHIEF COUNSEL
CORPORATION FINANCE

January 11, 2008

VIA: FEDERAL EXPRESS

U.S. Securities and Exchange Commission
Division of Corporation Finance
Office of Chief Counsel
100 F Street, N.E.
Washington, D.C. 20549

Re: E. I. DU PONT DE NEMOURS AND COMPANY
PROXY STATEMENT – 2008 ANNUAL MEETING
PROPOSAL BY INTERNATIONAL BROTHERHOOD OF DUPONT WORKERS

Ladies and Gentlemen:

I am writing on behalf of E. I. du Pont de Nemours and Company, a Delaware corporation (“DuPont”), to respectfully withdraw our request for no action relief with respect to the above-referenced shareholder proposal, which was filed with your office on December 27, 2007, pursuant to Rule 14a-8(j) under the Securities Exchange Act of 1934, as amended. A copy of that request is enclosed for your convenience.

DuPont has agreed to include a revised proposal and supporting statement in its 2008 Annual Meeting Proxy Statement (“Proxy”) to be distributed by DuPont in connection with its 2008 annual meeting of shareholders. I have enclosed a statement from the shareholder that he accepts such revisions.

If you have any questions or require additional information, please contact me at (302) 774-0205.

Respectfully submitted,

Erik T. Hoover
Senior Counsel

Hoover, Erik/IBDWNActionWithdrawalLetterFINAL.doc
Enclosures

cc: Jim Flickinger, President, International Brotherhood of DuPont Workers (w/ encl)
Kenneth Henley, General Counsel, International Brotherhood of DuPont Workers (w/encl)



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Ladies and Gentlemen:

This statement and the accompanying materials are submitted on behalf of E. I. du Pont de Nemours and Company ("DuPont") pursuant to the provisions of Rule 14a-8 of the Securities Exchange Act of 1934. In DuPont's view, portions of the supporting statement to the shareholder proposal submitted by the International Brotherhood of DuPont Workers ("IBDW") may be properly omitted from DuPont's proxy statement for the reasons set forth in the attached letter. I request that the staff not recommend any enforcement action if the identified portions of the supporting statement to the proposal are so omitted. By copy of this statement and the attached letter, the IBDW is being notified of DuPont's intention to omit portions of the supporting statement to its shareholder proposal from DuPont's proxy materials for the 2008 Annual Meeting.

If you have any questions or require additional information, please contact me at (302) 774-0205 or my colleague, Mary Bowler, Corporate Secretary and Corporate Counsel, at (302) 774-5303.

Very truly yours,

Erik T. Hoover
Senior Counsel

CWB/ETH/rtp
Hoover, Erik/2000 PROXY STATEMENT SHAREHOLDER PROPOSAL

cc: with attachment
Jim Flickinger, President, International Brotherhood of DuPont Workers
Kenneth Henley, General Counsel, International Brotherhood of DuPont Workers



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Pursuant to Rule 14a-8(j)(2), I am enclosing six copies of this letter and the IBDW’s letter transmitting the Proposal. A copy of this letter is also being sent to the IBDW as notice of DuPont’s intent to omit portions of the Proposal from the Proxy.

The Proposal requests DuPont’s Board of Directors to “consider the following nonbinding proposal: That it create a committee, with members drawn from the employee work force of DuPont, the union leadership of DuPont, the management of DuPont, and any necessary independent consultants, to report to the Board of Directors regarding (1) the impact to communities as a result of DuPont’s action in laying off mass numbers of employees, selling its plants to other employers, and closing its plants and (2) alternatives that can be developed to help mitigate the impact of such actions in the future.”

The proposal is attached as Exhibit A. Supporting authorities cited in this letter are attached, in relevant part, as Exhibit B.

Portions of the Proposal are False and Misleading. Rule 14a-8(i)(3).

Under Rule 14a-8(i)(3), a proposal may be omitted from the registrant's proxy materials if it "is contrary to any of the Commission's proxy rules, including § 240.14a-9, which prohibits materially false or misleading statements in proxy soliciting materials." The Staff has recognized that "reliance on Rule 14a-8(i)(3) to exclude or modify a statement may be appropriate where the company demonstrates objectively that a factual statement is materially false or misleading." See *Staff Legal Bulletin No. 14B (Sept. 15, 2004)*.

Portions of the Proposal are materially false and misleading because of certain mistakes of fact. The first paragraph of the supporting statement to the Proposal states that total "U.S. employment has been cut by over 2/3 during [the last 10 years], from over 90,000 to just over 30,000." In fact, as of December 31, 1996 DuPont employed approximately 55,000 individuals in the U.S., compared to approximately 33,000 as of December 31, 2006. Moreover, the Proposal fails to reflect two major divestitures during that same time period. In 2004, DuPont sold its INVISTA business to Koch Industries, Inc. The INVISTA divestiture involved approximately 16,000 U.S. employees. In 1999, DuPont completed the sale of its interest in Conoco Inc. The Conoco divestiture involved approximately 9,300 U.S. employees. Adjusting for the INVISTA and Conoco divestitures, in which employees were subsequently employed by the buyer, total U.S. employment over the past decade was largely unchanged.

The proponent submitted a substantially similar proposal for the 2000 Annual Meeting. In the supporting statement to that proposal, the proponent made the following statement: "US employment has been cut virtually in half over the past decade, from about 100,000 to just over 50,000." The Staff, in its response to DuPont's request for no-action relief, required that such statement be omitted or revised so that it did not reflect the Conoco divestiture. See *E. I. du Pont de Nemours and Company (available March 6, 2000)*.

The second and third paragraphs of the Proposal state: "Employees who lost their jobs as a result of these actions had often been with DuPont for many years. Yet, despite their many years of loyal service to DuPont, they were almost never offered or even considered for employment at other DuPont facilities. A current example of this practice is how the employees of the Louisville DuPont facility have been treated. The Louisville business is being closed with the equipment being relocated to a DuPont plant in Louisiana, yet virtually none of the employees from Louisville has been offered employment there."

The foregoing statement is materially misleading because DuPont has a practice with every situation that involves a reduction in plant personnel or plant closure of ensuring that employees are aware of other employment opportunities within DuPont. Moreover, the Proposal fails to distinguish between two distinct operations at the Louisville site, DPE and Louisville Works. DPE was originally a joint venture with The Dow Chemical Company called DuPont Dow Elastomers, started in 1996, which made Neoprene (at the Louisville site) among other products. The joint venture ended in 2005 and the name was changed to DuPont Performance Elastomers, which became a wholly-owned subsidiary of DuPont. Louisville Works makes FREON® 22 among other products. Although DPE operations will cease, its

employees were offered the opportunity to apply for positions at DuPont's Louisiana site, to where the DPE operations were relocated. New equipment was purchased and placed into operation at the Louisiana site. Louisville Works remains in operation, producing fluoroproducts.

The seventh paragraph states that: "DuPont has concluded that it often has no option but to close or downsize a plant. And even when it simply sells the plant, rather than closing it, the new employer often comes in and does the downsizing for DuPont. This has happened at many of DuPont's former fibers facilities, including one in Waynesboro, Virginia that went from 1,000 employees to less than 500 employees in just one year."

The Proposal is materially misleading because it implies that when DuPont sells a facility and a reduction in force is implemented by the buyer after the sale, the buyer is acting on behalf of DuPont. In reducing the workforce after the closing of a transaction, the buyer is not acting on behalf of DuPont. To illustrate using the example set forth in the Proposal, the Waynesboro, VA facility was sold as part of the INVISTA divestiture. Employees at that site were offered employment with the buyer. The cited reduction in force at the Waynesboro facility occurred after the closing of the INVISTA sale and resulted from independent business decisions made by the buyer.

For the foregoing reasons, the above-cited portions of the Proposal are false and misleading and may be omitted from DuPont's 2008 Annual Meeting Proxy Statement pursuant to Rule 14a-8(i)(3).

If you have any questions or require additional information, please contact me at (302) 774-0205 or my colleague, Mary Bowler, Corporate Secretary and Corporate Counsel, at (302) 774-5303.

Very truly yours,



Erik T. Hoover
Senior Counsel

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Kenneth Henley, General Counsel, International Brotherhood of DuPont Workers

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This combination of job loss and pension reduction can be devastating for the community in which the plant was located. Just as an example, at a Dupont plant in Martinsville, Virginia the work force was reduced from over 600 employees to a skeleton staff of about 60 employees. The overall loss to this rural community has been estimated at over \$20 million each and every year.

There are other, equally substantial costs to the community. Where Dupont has closed its plants, there often are environmental issues that have made it difficult for the site to be put to any real productive use. The buildings simply remain (with the Dupont logo removed, of course), undergoing gradual deterioration. Think about it – would you like to live or run a business near a vacated Dupont factory? Would anyone?

Dupont has concluded that it often has no option but to close or downsize a plant. And even when it simply sells the plant, rather than closing it, the new employer often comes in and downsizes the workforce. This has happened at many of Dupont's former fibers facilities, including one in Waynesboro, Virginia that went from 1,000 to less than 500 employees in just one year.

For this reason, it is important that attention be paid to the impact of these actions on the communities in which the plants are located and how best to mitigate their impact. This is particularly true given the close relationship between Dupont and the communities where it has been operating for so many years.

If you AGREE, please mark your proxy FOR this resolution.

More new features than ever. Check out the new [AOL Mail!](#)



khenleyesq@aol.com
01/11/2008 11:39 AM

To Erik T Hoover/AE/DuPont@DuPont
cc
bcc
Subject Re: stockholder proposal of ibdw

RECEIVED
2008 JAN 14 AM 11:26
OFFICE OF CHIEF COUNSEL
CORPORATION FINANCE

Eric: Per our agreement, set forth below is the revised proposal of the IBDW that you have agreed, on behalf of Dupont, to include in the 2008 proxy statement of Dupont. Also, per our agreement, should employees at Louisville Dupont Performance Elastomers receive offers of employment from Dupont or any of its subsidiaries prior to the time this proposal goes to print, the IBDW agrees to revise the language of the proposal to generally reflect those offers. You have represented to me that you will notify the SEC of this agreement on the revised language and, accordingly, will withdraw your request of the SEC. Please copy me on your correspondence to the SEC. I appreciate very much your efforts in working out this resolution.
Ken

STOCKHOLDER PROPOSAL ON MASS LAYOFFS, PLANT CLOSURES AND OUTRIGHT PLANT SALES

The International Brotherhood of Dupont Workers, P.O. Box 10, Waynesboro, VA, 22980, owner of 60 shares of Dupont Common Stock, has given notice that it will introduce the following resolution and statement in support thereof.

Resolved: That the stockholders of E.I. Dupont DeNemours & Company, assembled in annual meeting and by proxy, hereby request that the Board of Directors consider the following nonbinding proposal: That it create a committee, with members drawn from the employee work force of Dupont, the union leadership of Dupont, the management of Dupont, and any necessary independent consultants, to report to the Board of Directors regarding (1) the impact to communities as a result of Dupont's action in laying off mass numbers of employees, selling its plants to other employers, and closing its plants and (2) alternatives that can be developed to help mitigate the impact of such actions in the future.

Stockholders' Statement

In just the last 10 years, Dupont has closed, sold or sharply reduced the size of a great number of plants across the United States. As a result of these reductions, total U.S. employment has been cut by ½ during this period, from just over 60,000 to just over 30,000. Almost without exception, these plants had been in operation for upward of 50 years and were located in rural areas where they were a primary employer for the community.

Employees who lost their jobs as a result of these actions had often been with Dupont for many years.

Yet, despite their many years of loyal service to Dupont, they were almost never offered employment at other Dupont facilities. A current example of this practice is how the employees of the Louisville Dupont Performance Elastomers facility have been treated; this business is being closed with the equipment being relocated a Dupont plant in Louisiana, yet virtually none of the employees from Louisville has been offered employment there.