Competent Authority Report

Programme for Inclusion of Active Substances in Annex I to Council Directive 98/8/EC



Cyphenothrin (PT 18)

CAS-No. 39515-40-7 Sumitomo Chemical (U.K.) PLC

DOCUMENT III-A

Study summaries

Section A6.5

Toxicology section

Rapporteur: Hellas

November 2017

| Cyphenothrin Sumitomo Chemical UK PLC | November 2017 |
|---|---------------|
| Doc.IIIA – Study summaries – Active substance | RMS: EL |

6.5 Chronic toxicity

| | | 1. REFERENCE | Official use only |
|---------|--------------------------------------|--|-------------------------|
| 1.1 | Reference | Reference : A6.5/01 Authors : Title: Combined oncogenicity and toxicity study in rats Laboratory : Life Sciences Research Ltd , UK Unpublished Report no : Date: September 28 1988 | |
| 1.2 | Data protection | Yes | |
| 1.2.1 | Data owner | Sumitomo | |
| 1.2.2 | Companies with letter of access | None | |
| 1.2.3 | Criteria for data protection | Data submitted to the MS after 13 May 2000 on an existing a.s. for the purpose of its entry into Annex I | |
| | | 2. GUIDELINES AND QUALITY ASSURANCE | |
| 2.1 | Guideline study | No | Х |
| 2.2 | GLP | Yes | |
| 2.3 | Deviations | Not applicable | Х |
| | | 3. MATERIALS AND METHODS | |
| 3.1 | Test material | As given in Section 2 | |
| 3.1.1 | Lot/Batch number | | |
| 3.1.2 | Specification | As given in Section 2 | |
| .1.2.1 | Description | Amber viscous liquid | |
| .1.2.2 | Purity | | |
| .1.2.3 | Stability | Stable | |
| 3.2 | Test Animals | | |
| 3.2.1 | Species | Rat | |
| 3.2.2 | Strain | F-344 | |
| 3.2.3 | Source | | |
| 3.2.4 | Sex | Male and Female | |
| 3.2.5 | Age/weight at study initiation | 4 – 6 weeks 84 – 120 g (males) and 73 – 102g (females) | |
| 3.2.6 | Number of animals per group | 160 (80 male and 80 female) | |
| 3.2.6.1 | at interim sacrifice (54 weeks) | 20 (10 male and 10 female) for toxicity study | |
| 3.2.6.2 | at terminal sacrifice (104 weeks) | 40 (20 male and 20 female) for toxicity study 100 (50 male and 50 female) for oncogenicity study | |
| 3.2.7 | Control a nimals | Yes | |
| 3.3 | Administration/ Exposure | | |

Х

| 2.2.1 | | 104 1 |
|---------|-------------------------------|---|
| 3.3.1 | Duration of treatment | |
| 3.3.2 | Frequency of exposure | Daily in feed |
| 3.3.3 | Postexposure period | None |
| 3.3.4 | Oral | |
| 3.3.4.1 | Туре | Dietary |
| 3.3.4.2 | Concentration | 0, 100, 300 and 1000 ppm |
| 3.3.4.3 | Vehicle | None |
| 3.3.4.4 | Concentration in vehicle | Not applicable |
| 3.3.4.5 | Total volume applied | Not applicable |
| 3.3.4.6 | Controls | Pla in diet |
| 3.4 | Examinations | |
| 3.4.1 | Observations | |
| 3.4.1.1 | Clinical signs | Yes – twice daily |
| 3.4.1.2 | Mortality | Yes – twice daily |
| 3.4.2 | Body weight | Yes - weekly intervals for the first 14 weeks, and subsequently at two- weekly intervals |
| 3.4.3 | Food consumption | Yes - the weight of food consumed by each cage of rats was calculated weekly from measurements of the amount of food offered and food remaining including that scattered; this was expressed as g/rat/week. |
| | | Group mean food conversion ratios, that is, the a mount of food consumed per unit gain in bodyweight, were calculated at weekly intervals for the first 14 weeks of treatment |
| 3.4.4 | Water consumption | Yes Water intake was assessed by daily visual inspection of the water bottles. Accurate measurements were performed, over 24-hour periods, in Weeks 1, 4, 8, 13, 26, 52, 78 and 104. |
| 3.4.5 | Opthalmoscopic examination | Yes - Before commencement of treatment, both eyes of all rats assigned to the study were examined using a Fisons binocular indirect ophthalmoscope after the instillation of 0.5% tropicamide |
| | | During Weeks 26, 51, 78 and 103 the eyes of all surviving rats from Groups 1 and 4 of each replicate of the Oncogenicity Study were examined; the examination was extended to Groups 2 and 3 of the Oncogenicity Study for Week 103 only |
| 3.4.6 | Haematology | Yes Before commencement of treatment blood samples were withdrawn from the retro-orbital sinus of ten male and ten female rats taken from the same batch as those on study. These rats were then killed by inhalation of carbon dioxide and discarded without necropsy. |
| | | During Weeks 26.51,79, and 103 of treatment, blood samples were withdrawn from the retro-orbital sinus of five males and five females from each group of each replicate of the Toxicity Study. The following parameters were examined: |
| | | Packed cell volume (PCV), Haemoglobin concentration (Hb), Erythrocyte count (RBC), Leucocyte count (WBC), Platelet count, Reticulocyte, Mean cell volume (MCV), Mean cell haemoglobin (MCH), Mean cell haemoglobin concentration (MCHC) |

| 3.4.7 | Clinical chemistry | Yes At the same intervals as for haematology further blood samples were taken using lithium heparin as anticoagulant. Samples were obtained from the same animals used for haematological analysis, under the same conditions. |
|-------|-----------------------------|---|
| | | After centrifugation the plasma was examined in respect of: Glucose concentration, Alkaline phosphatase activity (AP), Alanine amino- transferase activity (ALT), Aspartate amino-transferase activity (AST), Total protein concentration, albumin (A) concentration, globulin (G) concentration, A/G ratio, Sodium (Na) and Potassium (K) concentrations, Calcium concentration (Ca), Phosphorus (inorganic) concentration (P), Urea concentration, Total bilirubin concentration, Total cholesterol concentration, Creatinine concentration, Creatinine phosphokinase activity (LDH) |
| 3.4.8 | Urinalysis | Yes During Weeks 26, 51, 79 and 103, of treatment urine samples were collected from, as far as possible, the animals used to provide samples for haematology and blood chemistry investigations. |
| | | Water was removed from cages at 12.30 hours; the rats were placed individually into metabolism cages at 17.00 hours, with water and food removed. Urine was collected until 09 hours the following morning and examined in respect of the following: |
| | | Appearance, Volume, pH, Specific gravity (SG), Glucose, Protein, Ketones, Blood, Bilirubin, Urobilin, Total reducing substances, Nitrite Micropsy of the sediments |
| 3.5 | Sacrifice and pathology | |
| 3.5.1 | Organ weights | Yes Adrenal glands, Pituitary gland, Brain, Spleen, Heart, Testes, Kidneys, Thyroid glands (with parathyroids), Liver, Ovaries, Uterus with cervix |
| 3.5.2 | Gross and histopathology | Yes Prior to commencement of the necropsy the clinical history of each a nimal was studied. The gross necropsy included examination of the external surfaces including all na tural orifices, the cranial, thoracic and abdominal cavities and an examination of the residual carcase. In the course of the necropsy the external and cut surfaces of the tissues and organs were examined. All details of abnormalities were recorded. |
| | | Oesophagus, Adrenals, Ovaries, Aorta (thoracic arch), Pancreas, Brain, Pituitary, Caecum, Presumptive tumours, Carcase, Prostate, Colon, Rectum, Duodenum, Salivary glands (submandibular), Epididymides, Sciatic nerves, Seminal vesicles, Femoral Bone and marrow (with joint), Skeletal muscle, Skin, Spinal cord, Heart, Spleen, Hardarian Glands, Sternum (with marrow), Eye and optic nerve, Ileum, Jejunum, Stomach, Kidneys, Liver, Testes, Thymus, Lungs (with main stem bronchi), Thyroid (with parathyroids), Lymph nodes, Trachea, Urinary bladder, Mammary glands and Uterus with cervix |
| 3.5.3 | Otherexaminations | |
| 3.5.4 | Statistics | Tests for the significance of difference between each treatment group and the corresponding controls were conducted as follows: |
| | | For body weight gain and haematology data (where applicable), a series of Student's t-tests was performed using a pooled within- treatment error variance. A least significant difference was calculated |

at the 0.1%, 1% and 5% levels of significance.

Inter-group differences in mean absolute or bodyweight-relative organ weights were assessed using Dunnett's test at the 1% and 5% levels of significance.

Time-to-event analysis of mortality (Main Study animals only) was by Cox's test applied both as an overall test for homogeneity of survival curves and for pairwise comparison against control. Tarone's extension of Cox's test (Biometrika, 62, 679-684, 1975) was used to examine linear trend on dose and to assess deviation from linearity.

Fisher's Exact Probability test was applied as a two-tailed test, where appropriate, to the distribution of macroscopic pathological entities. The probability levels quoted are 0.1% 1% and 5%. Bonferroni's correction which allows for simultaneous statistical inference (Gart, Chu and Tarone, 3 Natl, Cancer Inst. 62 957, 1979) was also applied to assist interpretation.

The Fisher's Exact Probability Test was used to analyse nonneoplastic and neoplastic histopathological findings using the two- and one-tailed tests respectively. This test was only applied when inspection of the data suggested that the difference between control and treated groups might be statistically significant (P < 0.05). In the case of neoplastic findings, only increases in incidences were examined (one-tailed test). Bonferroni's correction was applied as above.

3.6 Further remarks

4.

| Observations | | |
|--|--|---|
| Clinical signs | Unaffected by treatment | |
| Mortality | Unaffected by treatment | |
| Body weight gain | Female rats receiving 1000 ppm of cyphenothrin gained less weight than their controls over the first 78 weeks of treatment. | |
| | All other groups were unaffected by treatment See table A.6.5-1 | Х |
| Food consumption and compound intake | Fem a le rats receiving 1000 ppm of cyphenothrin gained less weight than their controls over the first 78 weeks of treatment. All other groups were unaffected by treatment | |
| Ophthalmoscopic examination | Unaffected by treatment | |
| Blood analysis | | |
| Haematology | Unaffected by treatment | |
| Clinical chemistry | Unaffected by treatment | |
| Urinalysis | Unaffected by treatment | |
| Sacrifice and pathology | | |
| Organ weights | Unaffected by treatment | |
| Gross and histopathology | Unaffected by treatment | |
| Other | | |
| | Clinical signs Mortality Body weight gain Body weight gain Food consumption and compound intake Ophthalmoscopic examination Blood analysis Haematology Clinical chemistry Urinalysis Sacrifice and pathology Organ weights Gross and histopathology | Clinical signsUna ffected by treatmentMortalityUna ffected by treatmentBody weight gainFemale rats receiving 1000 ppm of cyphenothrin gained less weight than their controls over the first 78 weeks of treatment. All other groups were unaffected by treatment See table A.6.5-1Food consumption and compound intakeFemale rats receiving 1000 ppm of cyphenothrin gained less weight than their controls over the first 78 weeks of treatment. All other groups were unaffected by treatment groups were unaffected by treatmentDophthalmoscopic examinationFemale rats receiving 1000 ppm of cyphenothrin gained less weight than their controls over the first 78 weeks of treatment. All other groups were unaffected by treatmentBlood analysisImage: See table descriptionHaematologyUna ffected by treatmentClinical chemistryUna ffected by treatmentUnaffected by treatmentImage: See table descriptionSacrifice and pathologyUna ffected by treatmentOrgan weightsUna ffected by treatmentGross and histopathologyUna ffected by treatment |

RESULTS AND DISCUSSION

| | | 5. APPLICANT'S SUMMARY AND CONCLUSION |
|-------|-------------------------|---|
| 5.1 | Materialsand methods | Groups of eighty male and eighty female F-344 rats received cyphenothrin (95.1%) continuously, via the diet provided <i>ad libitum</i> at concentrations of 100, 300 or 1000 ppm. A similarly constituted group received diet containing no cyphenothrin and served to generate contemporaneous control data. |
| | | Ten of the above 80 animals in each group and sex were sacrificed for interim study after 54 weeks of treatment. |
| | | Surviving animals were sacrificed after 104 weeks had been completed. |
| 5.2 | Results and | Survival was unaffected by treatment with cyphenothrin |
| | discussion | Fem a le rats receiving 1000 ppm of cyphenothrin gained less weight than their controls over the first 78 weeks of treatment. |
| | | Fem a le rats receiving 1000 ppm consumed slightly less food than their controls. |
| | | Food conversion ratios over the first 14 weeks was unaffected by treatment. |
| | | The dosages a chieved during the first week of treatment ranged from 13 to 129 mg/kg/day approximately. Dosages fell as the study progressed such that by Week 104 the range of dosages a chieved was approximately 4 to 45 mg/kg/day. |
| | | Water consumption was unaffected by treatment. |
| | | No toxicologically-significant ophthalm ic changes were observed for a nimals receiving cyphenothrin |
| | | The chemical and cellular composition of the blood and urine were unaffected by treatment. |
| | | Organ weight analysis did not reveal any inter-group differences that were considered to be related to treatment with cyphenothrin. |
| | | There were no macroscopic changes which were attributed to treatment with cyphenothrin |
| | | None of the histopathological changes seen was considered to be related to treatment. |
| | | On the basis of the evidence generated in this study, it is concluded that the continuous administration of cyphenothrin to F-344 rats for 2 years, at dietary levels of up to 1000 ppm, did not influence the incidence of any tumour. Some evidence of an effect of treatment was observed for female rats which had received 1000 ppm. |
| | | The no-effect level was 1000 ppm (providing 48 mg/kg/day*) for males and 300 ppm (providing 18 mg/kg/day*) for females. |
| | | * These are the overall dosages calculated for a nimals of the Oncogenicity Study. |
| 5.3 | Conclusion | |
| 5.3.1 | LO(A)EL | |
| 5.3.2 | NO(A)EL | NOEL was 300 ppm (8 mg/kg/day) based on reduced bodyweight and X food consumption at 1000 ppm |
| 5.3.3 | Other | |

5. APPLICANT'S SUMMARY AND CONCLUSION

5.3.4 Reliability 2

5.3.5 Deficiencies This study was not conducted to a recognized OECD guideline.

| | Controls | 100ppm | 300ppm | 1000 ppm |
|------------------|----------------|-----------------------|--------|--------------------|
| Males – Oncoge | nicity Study | | | |
| weeks | | | | |
| 0 - 70 | 380 | 388 | 380 | 375 |
| 70 - 104 | -49 | -53 | -70 | -58 |
| 0 - 104 | 327 | 327 | 307 | 316 |
| Females - Onco | genicity Study | | • | • |
| weeks | | | | |
| 0 - 78 | 233 | 231 | 227 | 221* |
| 78 - 104 | 8 | 12 | 14 | 12 |
| 0 - 104 | 241 | 244 | 238 | 232 |
| Males – Toxicity | y Study | | | |
| weeks | | | | |
| 0 - 70 | 387 | 394 | 382 | 377 |
| 70 - 104 | -66 | -57 | -72 | -66 |
| 0 - 104 | 321 | 335 | 303 | 310 |
| Females – Toxic | ity Study | | | |
| weeks | | | | |
| 0 - 78 | 232 | 227 | 226 | 227 |
| 78 - 104 | 14 | 19 17 18 8 | | <mark>18-</mark> 8 |
| 0 - 104 | 241 | 246 | 240 | 236 |

Table A6.5-1Bodyweight changes – group mean values (grammes)

* Significantly different from controls p < 0.01

| | EVALUATIO | NBY | COMPETE | NTAUTHO | ORITIES | | | | |
|------------------------|---|---------------------------|--|----------------------------------|--------------------------------|-------------------------------|--------------------------------|--|--|
| | | | | | | | | | |
| | EVALUATIO | NBY | RAPPORTI | EURMEM | BERSTATI | E | | | |
| Date | November, 20 | 17 | | | | | | | |
| Materials and methods | <u>Point 3.3.4.2</u> : The RMS considers that the average amount of compound ingested at each dose group, as determined based on food consumption data, should be presented in the report. The following table should be added: | | | | | | | | |
| | Table A.6.5-2: | | eeks in the O | ncogenicity | Study. | or | | | |
| | Dose level (pp | m) – | <u>Compound i</u> Males | ngested (mg/ | Kg bw/day) Females | _ | | | |
| | 0 100 300 1000 | | 0 4.84 14.49 48.16 | | 0 5.89 17.77 58.52 | | | | |
| | Point 4.2: Rega | rdingly | Table A.6.1- | | ypographica | | | | |
| | Point 5.3.5: Th according to a 453 (combined testing method comment to po | recogn Ichron B.33, | ized OECD g ic toxicity/ca with the exce | guideline, it i ircinogenicit | s generally i y studies) wh | n compliance tich correspo | e to the OECD nds to the EU | | |
| Results and Discussion | The applicant's following poin | | on is generall | y a cceptable | . However, t | he RMS cons | siders the | | |
| | <u>Point 4.6.1</u> : Th values should l | | | | | regard to or | gan weight | | |
| | a) Toxicity study (54 weeks – n=10): Increased absolute and relative kidney weight in males of 1000ppm; higher relative liver weight in males and females of 1000ppm. The statistically significant increase in relative-to-body liver weight at 54 weeks although not remarkable (< 10%) was considered as related to treatment since after prolonged exposure to cyphenothrin (104 weeks) relevant histopathology was evident (increased incidence of liver/bile duct hyperplasia in females – see comment in Point 4.6.2). | | | | | | | | |
| | There was no a | ssocia | ted histopath | ologicalcha | nge however | | | | |
| | Table A.6.5-3: | | | | | | | | |
| | Organ | Sex A | 0 Absolute organ | 100 ppm 1 weight valu | 300 ppm es (g) | 1000 ppm | | | |
| | Kidneys | М | 3.32 | 3.27 | 3.34 | 3.53* | | | |
| | Thyroid+ | F M | 2.05 0.017 | 2.09 0.016 | 2.05 0.016 | 2.05 0.014* | | | |
| | parathyroid | F | 0.014 2.02 | 0.010 ** 2.01 | 0.012 2.01 | 0.013 1.99 | | | |
| | Brain | M F | 1.82 | 1.81 | 1.84 | 1.81 | | | |
| | Pituitary | M F | 0.008 | 0.009 0.010 | 0.008 | 0.008 | | | |
| | | Relati | ive-to-body o | rgan weight w | alues(%) | | | | |
| | Kidneys | M F | 0.729 0.805 | 0.736 0.822 | 0.745 0.803 | 0.812** 0.829 | | | |
| | Liver | M F | 3.56 | 3.77 | 3.74 | <u>3.83*</u> 3.74* | | | |
| | *=0.05 level | Г | 3.53 | 3.61 | 3.59 | 3.74* | | | |
| I | **= 0.01 level | | | | | | | | |

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b) Toxicity study (104 weeks - n=20): absolute and relative kidney weight in females of 1000ppm was lower than control. Relative kidney weight females 300ppm was lower than control. Absolute and relative thyroid/parathyroid gland weight in females of 100 or 300 ppm was lower than control.

0 100 ppm 300 ppm 1000 ppm Organ Sex Absolute organ weight values (g) Μ 4.37 4.37 4.21 4.02 Kidneys F 3.07 2.93 2.82 2.79 * М 0.029 0.027 0.024 0.023 Thyroid+ parathyroid F 0.022 0.018* 0.016** 0.019 Relative-to-body organ weight values (%) 1.080 1.069 1.0741.023 Μ Kidneys F 0.978 0.892 0.882* 0.878* М 0.0071 0.0067 0.0061 0.0060 Thyroid+ parathyroid 0.0059 F 0.0069 0.0054 ** 0.0049** Μ 5.27 4.68 4.84 4.77 Liver 4.07 F 4.66 4.20 4.19

Table A.6.5-4: Organ weight values (Toxicity study, 104 weeks)

*=0.05 level

**= 0.01 level

c) Oncogenicity study (104 weeks -n=50): absolute and relative pituitary gland weight in females in all treatment groups was lower than the control with no dosage-relationsip. Absolute and relative thyroid/parathyroid gland weight in females of 300 and 1000 ppm was lower than control. Absolute kidney weight was lower in females of 1000ppm. No associated histopathological changes were found.

| Organ | Sex | 0 | 100 ppm | 300 ppm | 1000 ppm | | | | |
|----------------------------------|-------|---------------|----------------|------------|----------|--|--|--|--|
| Absolute organ weight values (g) | | | | | | | | | |
| D'. '. | М | 0.015 | 0.014 | 0.014 | 0.015 | | | | |
| Pituitary | F | 0.014 | 0.010* | 0.009** | 0.010* | | | | |
| Kidneys | М | 4.30 | 4.21 | 4.24 | 4.19 | | | | |
| Kiulleys | F | 2.93 | 2.87 | 2.80 | 2.76* | | | | |
| Thyroid+ | М | 0.031 | 0.029 | 0.027 | 0.027 | | | | |
| parathyroid | F | 0.023 | 0.022 | 0.017** | 0.017** | | | | |
| | Relat | ive-to-body o | organ weight v | values (%) | | | | | |
| D:4 :4 | М | 0.0037 | 0.0035 | 0.0036 | 0.0037 | | | | |
| Pituitary | F | 0.0043 | 0.0031** | 0.0027** | 0.0033** | | | | |
| W: 4., | М | 1.038 | 1.014 | 1.111 | 1.069 | | | | |
| Kidneys | F | 0.925 | 0.896 | 0.880 | 0.892 | | | | |
| Thyroid+ | М | 0.0074 | 0.0069 | 0.0071 | 0.0069 | | | | |
| parathyroid | F | 0.0073 | 0.0072 | 0.0053** | 0.0055** | | | | |
| Liven | М | 4.66 | 4.53 | 4.93 | 5.02 | | | | |
| Liver | F | 4.31 | 4.22 | 4.06 | 4.23 | | | | |
| *=0.05 level **= 0.01 level | | | | | | | | | |

Table A.6.5-5: Organ weight values (Oncogenicity study, 104 weeks)

| Cyphenothrin Sumitomo Chemical UK PLC | November 2017 |
|---|---------------|
| Doc.IIIA – Study summaries – Active substance | RMS: EL |

<u>Point 4.6.2</u>: A slight increase in the incidence of liver / bile duct hyperplasia in female rats treated with 1000 ppm cyphenothrin for 104 weeks (Oncogenicity study) was noted (Table A.6.5-6). Although this finding did not follow a dose-related pattern, it was only observed in females and did not reach statistical difference compared to the control, the RMS considers that a relation to cyphenothrin administration cannot be excluded.

| Τ | able A.6.5-6: | Liverhist | opathol | ogy (On | cogenicit | y Stud | y, 104 weel | (s) |
|---|---------------|-----------|---------|---------|-----------|--------|-------------|-----|
| | | | | | | | | |

| | Sex | 0 | 100 ppm | 300 ppm | 1000 ppm |
|------------------|-----|---------------|---------------|---------------|---------------|
| Liver (bile duct | М | 33(30) | 30(30) | 33(31) | 34(32) |
| hyperplasia) | F | 37(16) 43% | 41(15) 37% | 34(13) 38% | 35(23) 66% |

Number of animals tested (number of animals affected)

During the commenting period of the draft CAR, the applicant noted that bile duct hyperplasia is often observed as one of aging findings and thus did not consider that the slight difference without toxicological significance is treatment related. The eCA responded that although bile duct hyperplasia may be noted in aging rats (control incidence: 43%), the incidence of the effect at 1000 ppm was substantially increased (66%). Taking also into consideration the increased relative-to-body liver weight after 54 weeks of exposure, the eCA considered that relation to cyphenothrin administration could not be excluded. Point 4.5.1: Relative to the values for the controls, the following changes were evident in animals receiving 1000 ppm after 25 weeks of treatment; lower PCV in males, lower haemoglobin concentrations in males and females and lower RBC in females. Generally, these were considered to be small differences and not of toxicological significance. Conclusion LOAEL = 1000 ppm (equivalent to 48.16 mg/Kg bw/day in males and 58.52 mg/Kgbw/day in females) based on body weight and food consumption reduction in females, as well as the increase in relative-to-body liver weight in both sexes at 54 weeks, followed by increased liver/bile ducthyperplasia in females at 104 weeks. $\underline{NOAEL} = 300 \text{ ppm}$ (equivalent to 14.49 mg/Kg bw/day in males and 17.77 mg/Kg bw/day in females) The applicant has considered that the daily consumption of 300 ppm corresponds to a 8 mg/kgb.w./day dose. Nevertheless, the RMS considers that the a verage amount of compound ingested at each dose group, as determined based on food consumption data, should be used. Other conclusions: In general, it seems that females are more sensitive to cyphenothrin administration than males. Target organ: liver. Reliability 2 Acceptability Acceptable Remarks Point 2.1: Although the study was not conducted according to a recognized OECD guideline, it is generally in compliance to the OECD 453 (combined chronic toxicity/carcinogenicity studies) which corresponds to the EU testing method B.33, with the exception of some limitations (see comment to point 2.3). Point 2.3: 1. In addition to the time points of blood sampling, an additional blood sampling should have been performed at 13 weeks. 2. Regarding Haematology, there was no measurement of the blood clotting potential.

Moreover, no differential blood count was performed on samples of animals in the highest dose and control group.

3. Regarding Clinical Chemistry, there was no measurement of the ODC (ornithine decarboxylase) activity and blood urea nitrogen.