



**90-Day subchronic toxicity study in rats fed GM maize NK603 based on OECD Test Guideline 408, EFSA Guidance on conducting repeated-dose 90-day oral toxicity study in rodents on whole food/feed (2011) and EFSA explanatory statement complementing the above-mentioned EFSA Guidance (2014)**



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## **90-Day subchronic toxicity study in rats fed GM maize NK 603**

### **Multi-Site Study Plan**

Study No: 632165/2016/GLP

**Sponsor:** EU Project G-TwYST

**Sponsor's representative:** Prof. Dr. Pablo Steinberg

**Test Facility:** Slovak Medical University  
Testing Laboratories Center  
Laboratory of Toxicology  
Limbová 14,  
83303 Bratislava  
Slovakia

**Study Director:** Dagmar Zeljenková, MVD, PhD  
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Slovak Medical University  
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83303 Bratislava  
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## Signatures of Approval of the Multi-Site Study Plan:

Study Director:	Name	Date	Signature
	Dagmar Zeljenková		

Test Facility Management:	Name	Date	Signature
	Martin Gajdoš		

Sponsor's Representative:	Name	Date	Signature
	Pablo Steinberg		

**Confirmation of Study plan in accordance with GLP**  
This study plan meets the requirements for GLP compliance

Head of QAU	Name	Date	Signature
	Eva Němcová		



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## 1 NATIONAL REGULATIONS, GUIDELINES AND STANDARDS

### 2 Good Laboratory Practice

3 The study will be conducted in accordance with the OECD Principles of Good Laboratory Practice, as  
4 revised in 1997 (ENV/MC/CHEM(98)17), and the EU Commission Directive 2004/10/EC (adopted  
5 on the 11<sup>th</sup> of February 2004; Official Journal No L 50/44).

6 The test facility has received a statement of GLP compliance from the Slovak National Accreditation  
7 Service (certificate No. G-036). The National GLP Compliance Programme in the Slovak Republic is  
8 based on Act No. 67/2010 Coll. and in compliance with Government Decree No. 320/2010 Coll.

9 Each Principal Investigator at the histology processing test site and the histopathology examination  
10 test site will be responsible for compliance with their national GLP regulations, for any work  
11 performed at their test site and for data provided to the test facility for inclusion in the report. Any  
12 phase report or data provided by the principal investigator should include a statement of GLP  
13 compliance signed by them and a quality assurance statement signed by the test site quality assurance.

14 These principles are compatible with Good Laboratory Practice regulations specified by regulatory  
15 authorities throughout the European Community, the United States (EPA and FDA), and Japan  
16 (MHLW, MAFF and METI).

17 Test site 3, the biostatistics study phase, will not be claiming GLP compliance for this phase of the  
18 study. This test site does not hold a national certificate of GLP compliance, however the expertise of  
19 the Principal Investigator (Contributing Scientist) was considered by the Sponsor to be necessary for  
20 the study.

### 21 Other Guidelines

22 The study design is based on the procedures indicated by the following internationally accepted  
23 guidelines and recommendations:

- 24 • The OECD Test Guideline 408 for Testing of Chemicals; "Repeated Dose 90-Day Oral  
25 Toxicity Study in Rodents" (adopted on the 21<sup>st</sup> of September 1998)
- 26
- 27 • The EFSA Guidance on repeated-dose 90-day oral toxicity studies on whole food/feed in  
28 rodents (EFSA Scientific Opinion, 2011).

### 29 Animal Welfare

30 The study will be conducted in accordance with EU Directive 2010/63/EU of the European  
31 Parliament and the Council of 22<sup>nd</sup> September 2010 on the protection of animals used for scientific  
32 purposes. This study has been approved by the Veterinary State Administration, Slovak Republic  
33 (Statna veterinarna a potravinova sprava Slovenskej republiky; Ro-4372/12-221). Animal care will be  
34 in compliance with SOPs of the Department of Toxicology, Slovak Medical University Bratislava and  
35 with the European Convention for the Protection of Vertebrate Animals used for Experimental and  
36 other Scientific Purposes.



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37 The criteria described in the OECD Guidance Document on the recognition, assessment and use of  
38 clinical signs as humane endpoints for experimental animals used in safety evaluation  
39 (ENV/JM/MONO[2000]7) such as changes in external physical appearance and clinical signs  
40 (described in Annex 3 of the above-mentioned OECD Guidance Document) will be taken into  
41 account to determine when an animal is in a moribund condition, is expected to become moribund  
42 or experiences pain and distress, and should therefore be euthanised.

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## 43 GENERAL INFORMATION

### 44 Multi-Site Study Details

#### 45 Test Sites:

#### 46 Study Phase:

#### Histology Processing

#### 47 Test Site 1:

Department of Pathology  
University of Veterinary Medicine Hannover  
Bischofsholer Damm 15  
30173 Hannover  
Germany

#### 52 Principal Investigator:

Prof. Dr. Wolfgang Baumgärtner  
wolfgang.baumgaertner@tiho-hannover.de

#### 54 Test Site Quality Assurance:

Dr. Ilona Fleischhauer  
Fraunhofer Institut für Toxikologie und Experimentelle  
Medizin  
Leitung Qualitätssicherung  
Nikolai-Fuchs-Str. 1  
30625 Hannover, Germany  
ilona.fleischhauer@item.fraunhofer.de

#### 61 Study Phase:

#### Histopathology

#### 62 Test Site 2:

Roger Alison Ltd.,  
Caerfyrddin Fach,  
Cilcennin,  
Lampeter,  
SA48 8RN  
United Kingdom

#### 68 Principal Investigator:

Roger Alison, BVSc., MRCVS, DipIECVP  
roger@rogeralison.com

#### 70 Test Site Quality Assurance:

Clare Alison, BSc., MSc., PhD., MRQA,  
Roger Alison Ltd.  
clare@clarealison.com



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73 **Study Phase:** **Biostatistics**

74 **Test Site 3:** Stichting Dienst Landbouwkundig Onderzoek (DLO)  
75 Wageningen University and Research Centre  
76 Droevendaalsesteeg 1  
77 6708 PB Wageningen  
78 The Netherlands

79 **Principal Investigator:** Dr. Hilko van der Voet  
80 hilko.vandervoet@wur.nl

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81 **Additional Responsibilities**

82	Deputy Study Director:	Jana Tulinská
83	Toxicology:	Dagmar Zeljenková, VMD, PhD
84	Clinical Chemistry:	Prof. Spustova Viera, M.D., Ph.D.
85	Haematology:	Jana Tulinská, M.D., Ph.D.
86	Ophthalmology:	Prof. Andrej Černák, M.D., Dr.Sc.
87	Necropsy:	Katarína Ambrušová, VMD
88	Lead Quality Assurance:	Eva Němcová, Mgr.
89	Ethics Committee:	Ludmila Novotná, Dr.
90	Peer Reviewer:	To be added by amendment

91 **Distribution List**

92  
93 The original signed study plan will be retained in the study file, to be archived at the completion of  
94 the study. Copies of the final study plan along with any amendments will be distributed to all relevant  
95 staff via supervisors/department heads specified as follows:

96	Sponsor:	pablo.steinberg@tiho-hannover.de
97	Study Director:	dagmar.zeljenkova@szu.sk
98	Deputy Study Director:	jana.tulinska@szu.sk
99	Clinical Chemistry:	viera.spustova@szu.sk
100	Haematology:	jana.tulinska@szu.sk
101	Ophthalmology:	andrej.cernak@pe.unb.sk
102	Necropsy :	katarina.amrusova@szu.sk
103	Lead Quality Assurance:	eva.nemcova@szu.sk
104	All Principal Investigators:	See multi-site study details
105	All Test Site QA:	See multi-site study details



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## 106 Study Plan Amendments and Deviations

107 Any intended change to the study plan will result in an amendment to study plan approved by the  
108 study director and also signed by test facility management and the Sponsor. Amendments will be  
109 distributed to all recipients of the study plan.

110 Deviations (unplanned changes) from the study plan will be documented and acknowledged by the  
111 study director. Each principal investigator will document deviations from the study plan affecting  
112 their study phase, acknowledge and report them to the study director.

## 113 Quality Assurance

114 Lead quality assurance will audit and inspect study-related procedures and will report any audit and  
115 inspection results in writing to the study director and test facility management. This includes review  
116 of the study plan and any amendments, inspection of specific critical phases of the study and audit of  
117 the final report. Details of inspections will be included within the Quality Assurance Statement issued  
118 with the final report.

119 Test site quality assurance will audit and inspect study-related work conducted at their test site  
120 according with their SOPs and will report any audit and inspection results in writing to the principal  
121 investigator, test site management, study director, test facility management and lead quality assurance.  
122 Details of inspections will be included within the test site Quality Assurance Statement.

## 123 Reporting

124 A GLP compliant report will be presented. This will include the reporting requirements as described  
125 in OECD Test Guideline 408 and will be written in the English language. A draft report will be sent to  
126 the Sponsor for review and comments before issue of the final report. The pre-QA draft report and the  
127 post-QA draft report will be issued before the final report.

128 The report will be prepared by the study director based on the raw data / phase reports received from  
129 the responsible principal investigator/contributing scientist; the phase reports received from the  
130 principal investigator/contributing scientist will be included in the appendices of the report.

## 131 Archiving

132 The following documents will be archived under code number 632165/2016/GLP at the Department  
133 of Toxicology of SZU until the year 2026:

- 134 • the study plan and any amendments
- 135 • correspondence between the SD and test sites
- 136 • QA reports of audits/inspections
- 137 • all raw data (paper and electronic)



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- 138 • all original documents/primary documentation (including chain of custody records)
- 139 • samples of the test items
- 140 • copy of the histology processing records (original at the Department of Pathology, University
- 141 of Veterinary Medicine Hannover, Germany)
- 142 • histological specimens (as long as the quality permits evaluation)
- 143 • the original histopathology phase report
- 144 • reports from contributing scientists

145 Further details of documents to be retained are included in the Appendix, Attachment 3. No data will  
146 be discarded without the Sponsor's written consent.

#### 147 **Proposed Time Schedule**

148	Test feeds arrive:	March 2016
149	Arrival of animals:	March - April 2016
150	Starting of the treatment:	
151	- males	April - Day 1
152	- females	April - Day 3
153	Last necropsy of the animals:	Day 95
154	Histological processing:	1 month after Day 95
155	Histopathology evaluation:	2 months after Day 95
156	Draft Report to Sponsor:	3 months after Day 95

157 See Appendix, Attachment 1 for a more detailed proposed time frame.



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## 158 **OBJECTIVE**

159 The purpose of this oral toxicity study is to assess the effects of GM maize NK 603 when fed to rats  
160 for a period of 90 days. This 90-day study is being conducted in association with two long-term  
161 feeding studies designed according to OECD test guidelines 451 and 453 as part of a bigger project.  
162 These studies will provide a comparative assessment of the results of subchronic toxicity studies  
163 versus extended chronic toxicity and carcinogenicity studies.

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## 164 **TEST AND CONTROL ITEMS**

### 165 **Test Item**

166 GM maize crop: Variety containing the NK603 event expressing the glyphosate tolerant  
167 5-enoylpyruvylshikimate-3-phosphate synthase from *Agrobacterium* sp. strain  
168 CP4 (CP4 EPSPS). Variety to be chosen after the analyses of the harvests.

169 This is referred to as NK603 maize hereafter. Untreated NK603 maize as well as NK603 maize  
170 treated with the herbicide Roundup will be used

171 Records including test item and reference item characterisation, batch number, purity,  
172 composition/concentrations, date of receipt, expiry date, storage conditions, quantities received and  
173 used will be maintained within the study file.

### 174 **Control Item**

175 Near-isogenic non-GM crop: Variety to be chosen after the analyses of the harvests.



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## 176 TEST SYSTEM

### 177 Species and strain

178 Rat Wistar Rcc Han/Specific Pathogen Free (SPF)

### 179 Source

180 Harlan Italy, reg. No 2-2914 - 15-06-1994

### 181 Approximate weight and age

182 Upon arrival, the animals will weigh between 100-120 g and will be 5 weeks old. The animals will be  
183 6-weeks old at the start of the study and will weigh between 110-140 g. Ideally, they should be born  
184 within 1-5 days of each other and be of uniform weight ( $\pm 20\%$  of the mean).

### 185 Identification

186 Each rat will be marked by a code (tattoo) on the tail base or marked with a chip on the neck in  
187 accordance with SOP ŠPP/TOX/V002 to identify the animals individually. Each cage will be marked  
188 with a colored cage card.

### 189 Justification for the selection and number of animals

190 The animal species (*Rattus norvegicus* ssp. *alba*) and strain (Wistar Rcc Han) is recognized by  
191 international guidelines as a recommended test system for subchronic toxicity studies. Females will be  
192 nulliparous and non-pregnant. The number of animals used in this study is planned to be 16 males and  
193 16 females in each of the five dose groups, a total of 160 animals, as recommended by the OECD Test  
194 Guideline 408 (1998). A prospective power analysis will be performed to critically assess proposed  
195 sample sizes and meaningful effect sizes, and, if needed and practically possible, the number of  
196 animals will be adapted. Six male and six female rats more than those determined through the power  
197 analysis will be ordered and those animals not assigned to the study will be used as sentinels, which  
198 will be held in the same rooms as the rest of the animals in this study. Two animals of the same  
199 gender will be placed in one cage, and cages will be considered as experimental units.



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## 200 MATERIALS AND METHODS

### 201 General Remark

202 Details of the materials and methods that are not specified in the subsequent sections of this study  
203 plan are contained in the appropriate standard operating procedures.

### 204 Test item preparation - Diet formulation

205 The test item will be supplied to the test facility as a pre-prepared complete pelleted diet. The diet  
206 formulation will be done so as to produce separate diet compositions according to the dose group  
207 requirements. The test diets will be provided as single batches (containing portions of diets packed in  
208 separate vacuum, gamma-irradiated packs). Specific details of this process and the analyses  
209 performed will be included in the accompanying „90-day feeding trial Study plan - Supplementary  
210 Information“ and records/data will be retained at JKI.

### 211 Storage conditions

212 The pelleted test diets will be stored in a closed storage room (cool and dry, controlled temperature  
213 and humidity) by the test facility. The temperature and humidity of the room will be recorded and the  
214 records will be kept.

### 215 Water

216 The rats will be supplied water *ad libitum* during the acclimatisation and study periods. Tap water  
217 with a special filter to eliminate microorganisms will be used. The bottles containing this water will  
218 be autoclaved before use. The microbiological and chemical quality of the water from the local mains  
219 will be monitored quarterly by the Waterworks Bratislava. The test facility will receive a  
220 corresponding quality certificate.

### 221 Animal housing

222 All animals will be housed in rooms N° B 2/317 and 318 of the Specific Pathogen Free (SPF)  
223 experimental animal house equipped with a pressurized climatic system at the Department of  
224 Toxicology of the Slovak Medical University. The temperature and relative humidity in the animal  
225 room will be recorded every 20 minutes and every week the computer readout for the past week will  
226 be evaluated. Mean temperature will be maintained at  $22 \pm 2^{\circ}\text{C}$  and relative humidity at 40-70%. The  
227 animals will be subjected to a 12-hour light/12-hour dark cycle.

228 Rats will be housed in Tecniplast cages Type 2145 F with an H-Temp™ (PSU) from Tecniplast Italy.  
229 The cages have a high-density polypropylene body, measuring 480 x 265 x 210 mm - floor area 940  
230 cm<sup>2</sup>.



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231 The animals will be provided with environmental enrichment items: wooden chew blocks and  
232 a plastic tunnel or suitable alternatives. Certificates of analysis for the environmental enrichment items  
233 will be provided by the supplier. These enrichment items are considered not to contain any  
234 contaminants that could be expected to affect the study in any way.

235 We will use sterilized animal bedding (sawdust, JRS Lignocel®) from Charles River in Germany. It  
236 will be stored in the clean, dry and cold store room on the second floor in the animal facility. One lot  
237 of sawdust bedding will be purchased and used for the entire study.

238 The cages will be cleaned twice a week outside of the animal room. Animals will first be transferred  
239 to a clean cage. The cages will then be emptied and cleaned with water and detergent. After cleaning  
240 they will be dried and thereafter immersed in disinfectant. The cages will then be brought into the  
241 animal house and placed in an additional Tecniplast disinfectant solution. Then the cages will be  
242 placed in the SPF unit on a drying rack before use.

243 The cage racks will be cleaned in the SPF rooms every week manually with water and detergent.

244 Feed containers and any other containers or equipment being used in the SPF rooms will be cleaned in  
245 the same way as the cages are cleaned.

246 Bottles will be exchanged and cleaned daily according to SOP ŠPP/SPF/V005. They will be cleaned  
247 in a special automatic washing machine set aside for the bottles in this study. The cleaning solution  
248 will include detergent followed by a disinfectant.

## 249 **Experimental Design**

### 250 **Animal receipt and acclimatisation**

251 All animals will be purchased from Harlan and will only be a few days apart in age. Therefore, we  
252 will have the required number of test animals of uniform weight and age, and house them all under  
253 identical conditions.

254 Upon arrival, the animals will be placed in cages, 4 per cage. 48 hours after arrival, the animals will  
255 be weighed and kept in cages for the next 4 - 6 days prior to the start of the study to allow for  
256 acclimatisation to the laboratory conditions. These are identical to those defined for the feeding trial.  
257 During this period of time the health status of the animals will be monitored twice a day (see the  
258 section Periodical Health Status Observations below for a full description of the health status  
259 evaluation) according to SOP ŠPP/TOX/V006.

260 One day before the start of treatment, all animals will be housed in 2 separate rooms (1 for males, 1  
261 for females) under standard SPF conditions. To verify the health condition of the rats, a detailed  
262 examination of all animals will be carried out on study day 1, prior to the start of the treatment (see  
263 the section Periodical Health Status Observations for a full description).





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264 **Randomization**

265 Tables with cage numbers and the random diet assignment (as specified in the table below) will be  
266 prepared by the local statisticians. We will use the Random Number Generators (RNG) of SPSS  
267 software to allocate rats to cages, for male and female animals separately. All male animals will be  
268 numbered from 1 to 85. We will assign 2 animals into 1 cage, using RNG. These animals will be  
269 excluded from next option and random choice will be repeated until all animals are randomly assigned  
270 to cages. The same procedure will be done with female animals - they will be numbered 101 to 185.

271 Four racks contain 4 rows of 5 cages. Each cage houses two rats. Dose groups are randomized within  
272 rows. This implies that the design is a randomised complete block design, in which rows constitute  
273 the blocks. The experiment starts in week 1 with two blocks on Monday (10 cages, 20 male animals),  
274 two blocks on Tuesday, two blocks on Wednesday and finally two blocks on Thursday. This is  
275 repeated in week 3 with female rats. At the end of the 90-days feeding trial experiment the cages are  
276 handled block by block in the same order as at the start of the experiment. This design ensures that  
277 possible differences between starting and ending days, and also possible differences between the  
278 vertical position of cages, are confounded with blocks, implying that the analysis accounts for such  
279 differences. Table 1 gives the random order of the 5 dose groups for each row.

280 **Table 1.** Randomised order of the 5 dose groups for each row in the 90-day toxicity testing phase. The dose  
281 group codes 1-5 are randomised by the feed supplier over the five dose groups in the study.

StartWeek	Sex	BlockNr	Row	StartDay	Rack 1 Male				
Week 1	Male	Block 1	Row 1	Monday	3	2	4	5	1
Week 1	Male	Block 2	Row 2	Monday	1	5	3	4	2
Week 1	Male	Block 3	Row 3	Tuesday	1	3	2	5	4
Week 1	Male	Block 4	Row 4	Tuesday	5	3	2	1	4

StartWeek	Sex	BlockNr	Row	StartDay	Rack 2 Male				
Week 1	Male	Block 5	Row 1	Wednesday	1	2	5	4	3
Week 1	Male	Block 6	Row 2	Wednesday	5	3	1	2	4
Week 1	Male	Block 7	Row 3	Thursday	4	3	1	5	2
Week 1	Male	Block 8	Row 4	Thursday	2	3	5	1	4

StartWeek	Sex	BlockNr	Row	StartDay	Rack 3 Female				
Week 3	Female	Block 9	Row 1	Monday	2	1	3	4	5
Week 3	Female	Block 10	Row 2	Monday	3	5	4	2	1
Week 3	Female	Block 11	Row 3	Tuesday	1	3	4	2	5
Week 3	Female	Block 12	Row 4	Tuesday	5	4	1	3	2



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StartWeek	Sex	BlockNr	Row	StartDay	Rack 4 Female				
Week 3	Female	Block 13	Row 1	Wednesday	3	1	4	2	5
Week 3	Female	Block 14	Row 2	Wednesday	5	2	3	1	4
Week 3	Female	Block 15	Row 3	Thursday	3	1	4	2	5
Week 3	Female	Block 16	Row 4	Thursday	4	3	5	1	2

282 On a regular basis (once per week) cages within each row of cages will be rotated from left to right.  
283 Racks will be rotated clockwise every two weeks within the original room configuration.

284 A skeleton analysis of variances with the appropriate degrees of freedom is given below, both for an  
285 analysis with all 80 cages including both sexes as well for an analysis for a single sex.

ANOVA for both sexes		ANOVA for a single sex	
Source of variation	d.f.	Source of variation	d.f.
startweek stratum		block stratum	7
sex	1	block.cage stratum	
startweek.block stratum	14	dosegroup	4
startweek.block.cage stratum		Residual	28
dosegroup	4	Total	39
sex.dosegroup	4		
Residual	56		
Total	79		

286 **Route of administration**

287 The route of administration will be the oral route as this route is the most appropriate for the safety  
288 assessment of foods. The test item will be incorporated into the diet, since this is the way humans  
289 could be exposed to the test item. Attention will be paid that there will be no nutritional imbalances as  
290 a result of dietary incorporation of the test item.

291 Food will be supplied *ad libitum*. Measurement of feed consumption and food efficiency will be made  
292 once weekly for 90 days. At the beginning of each food consumption measurement, full feeders with  
293 stainless steel lids will be weighed and placed in each cage. The feeders will be weighed again on the  
294 day of the feeder change-out (once weekly), the difference in weight being an estimate of the total  
295 amount consumed by two rats in one cage. Food spillage will be documented and the amount will be  
296 noted and subtracted. Feed consumption will be determined once weekly and reported as the total  
297 amount of feed consumed by two animals in one cage per week.



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298 **General experimental design with NK603 maize, start April 2016**

Group	Isogenic maize (% of diet)	NK603 only (% of diet)	NK603 + Roundup (% of diet)	No. of Males	No. of Females
1	33	0	0	16	16
2	22	11	0	16	16
3	0	33	0	16	16
4	22	0	11	16	16
5	0	0	33	16	16
Sentinels <sup>1</sup>				5	5
Total animals				85	85

299 <sup>1</sup> Sentinels will be fed the standard rat diet Teklad Global Diet®.

300 The different diets will be randomized and labelled I-V by the supply company. The code will only be  
301 given to Ralf Wilhelm and Josefine Engel (JKI). Feed containers and scoops will be colour-coded.  
302 However, animal house staff will be “blind” with respect to the identity of the diets.

303 The dose groups will be unblinded at the time of necropsy.

304 Blood and urine collection, haematology, clinical chemistry and urine analyses as well as body  
305 weight, feed consumption and organ weight measurements will be performed block by block, from  
306 cages in the order of the randomisation scheme. This minimises sampling variation between dose  
307 groups within blocks.



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## 308 **Periodical Health Status Observations**

### 309 **Morbidity, mortality**

310 Normally observations are done twice a day. However, in case of moribund animals, we will isolate  
311 them in the quarantine area to prevent cannibalism and will carefully observe them at least 4 times  
312 daily. Selection criteria are made explicit in SOP ŠPP/TOX/V004. If a study animal dies, we will  
313 subject it to necropsy as soon as possible after death. The criteria described in the OECD Guidance  
314 Document on the recognition, assessment and use of clinical signs as humane endpoints for  
315 experimental animals used in safety evaluation (ENV/JM/MONO[2000]7) such as changes in  
316 external physical appearance and clinical signs (described in Annex 3 of the above-mentioned  
317 OECD Guidance Document) will be taken into account to determine when an animal is in a  
318 moribund condition, is expected to become moribund or experiences pain and distress, and should  
319 therefore be euthanized. In such a case animals will be anaesthetized with ketamine/xylazine (SOP  
320 ŠPP/TOX/V005) and thereafter immediately necropsied.

### 321 **Clinical signs**

#### 322 ***Cage side observations / uncovered cage***

323 Rats will be inspected twice daily for evidence of reaction to treatment or illness, which includes the  
324 following signs: changes in skin, fur, eyes, mucous membranes, occurrence of secretions and  
325 excretions as well as activity level and change in behavior in accordance with SOP ŠPP/TOX/V003.

#### 326 ***Detailed physical examination and functional assessment***

327 Rats will be examined out of the cage once weekly. Any deviations from normal will be recorded in  
328 terms of nature and severity, date and time of onset, duration and progress of the observed response.  
329 Signs noted will include changes in skin, fur, eyes, mucous membranes, occurrence of secretions and  
330 excretions and autonomic activity such as lacrimation, piloerection, pupil size, and unusual respiratory  
331 patterns as well as activity level and change in behavior.

332 Changes in gait, posture and response to handling as well as the occurrence of clonic or tonic  
333 movements or bizarre behavior (self-mutilation, walking backwards) will also be recorded. The  
334 outcome of this examination will be recorded for each animal in accordance with the SOP  
335 ŠPP/TOX/V003 (Origin of score system: Ország A. et al. [1985] Veterinárna ortopédia a  
336 rontgenológia, Bratislava: Príroda, 243 p.). The animals will also be assessed for gait disturbances  
337 using the *Accuplacer* treadmill equipment.

#### 338 ***Ophthalmologic examination***

339 The eyes of all animals will be examined in line with OECD TG 408 prior to the administration of the  
340 test feeds and at the end of the study. Pupillar dilation and ophthalmologic examination of both eyes  
341 will be performed by an experienced ophthalmologist in the conscious rat during gentle manual  
342 restraint by a technician. In a first step, the eyes and the peribulbar structures will be macroscopically  
343 examined. Thereafter, direct ophthalmoscopy will be performed using an ophthalmoscope.  
344 Ophthalmoscopic findings will be recorded on data sheets and transcribed into the computer system  
345 for compilation and analysis.



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346 ***Body weight***

347 Each animal will be weighed at the following times: 1) 48 hours after arrival, 2) on the first day of  
348 feeding, 3) weekly during the study period, 4) at the end of the study, 5) in the event of an early death  
349 or sacrifice *in extremis*. The General Linear Model (GLM) for Repeated Measures will be used for the  
350 analysis of the body weight.

Draft



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351 **Procedures For Sample Collection**

352 Samples will be collected for the following analyses: haematology, blood chemistry, urinalysis and  
353 histopathology. Samples collected will include blood, urine and tissues/organs. Blood samples will be  
354 divided for the haematology and clinical chemistry analyses. Tissues/organs will be removed and  
355 evaluated histopathologically.

356 **Urine and blood collection and processing**

357 Sufficient personal will be available:

358 Urine will be collected by person No. 1

359 Urine processing and transport to the Laboratory of Clinical and Experimental Biochemistry  
360 (urinalysis) - person No. 2

361 Blood taking from the tail vein - person No. 3

362 Blood processing, dividing of samples - person No. 4

363 Blood transport to the Laboratory of Immunotoxicology (haematology) - person No. 5

364 Blood transport to the Laboratory of Clinical and Experimental Biochemistry (clinical chemistry) -  
365 person No. 6

366 **Tissue collection and processing at the end of the study**

367 This will be done in accordance with SOP ŠPP/TOX/V006. Sufficient personal will be available:

368 Animals will be anaesthetized by person No. 1

369 Animal transport to the autopsy room on the same floor - person No. 2

370 Necropsy of the thorax part of the body - person No. 3

371 Necropsy of the abdominal part of the body - person No. 4

372 Necropsy of the genital organs - person No. 5

373 Removal and weighing of tissues and organs in line with OECD guideline 408 - person No. 6

374 Decapitation and necropsy of the head including brain - person No. 7

375 All organs will be stored in formalin or Bouin's solutions for the histological examination - person  
376 No. 8

377 Details will be documented by subsequent amendment.

378 **Haematology**

379 At the end of the study and before sacrifice, blood samples from the tail vein will be taken from all  
380 animals for haematological examination after 12 hours fasting. EDTA will be used as anticoagulant.  
381 Blood samples will be stored at room temperature (17-25°C), maximally up to 4 hours, until  
382 measurement. Haematological analysis will be performed in accordance with SOP ŠPP/IMU/M002 by  
383 using a Sysmex K-4500 automated haematology analyzer (Sysmex, Kobe, Japan).

384 Parameters scheduled for examination are:

- 385 • erythrocyte count (RBC)
- 386 • haematocrit (HT)
- 387 • haemoglobin (Hb) -
- 388 • leukocyte count (WBC)
- 389 • differential leukocyte count



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- 390
- platelet count (PLT)

391 Differential leukocyte counts will be performed by using a light microscope. Blood smears will be  
392 subjected to panoptic staining by using May-Grunwald and Giemsa-Romanowski dyes. The  
393 percentage of lymphocytes, neutrophils, eosinophils, basophils and monocytes will be determined by  
394 examining 200 cells.

395 **Clinical chemistry**

396 At the end of the study and before sacrifice, blood samples from the tail vein will be taken from all  
397 anaesthetized animals for blood chemistry examination after 12 hours fasting. Samples will be  
398 analysed using an Ortho Clinical Vitros<sup>®</sup> 250 Chemistry System (Ortho-Clinical Diagnostics, Raritan,  
399 NJ, USA). Methodologies include colorimetric, potentiometric and rate tests using multi-layered  
400 Vitros Slides in accordance with SOP ŠPP/LEKB/M001. Blood samples will be stored at room  
401 temperature (17-25°C) for a maximum of 4 hours until measurement. Parameters will include:

- 402
- total protein
  - 403 • albumin
  - 404 • aspartate aminotransferase
  - 405 • alanine aminotransferase
  - 406 • alkaline phosphatase
  - 407 • creatinine
  - 408 • urea
  - 409 • glucose
  - 410 • total cholesterol
  - 411 • Na
  - 412 • K
  - 413 • Cl

414 In addition:

- 415
- Ca
  - 416 • P
  - 417 • triglycerides
  - 418 • 17β-estradiol, testosterone, T3 and T4

419 **Urinalysis**

420 During the last week of the study urine analyses will be performed. Urine will be collected from each  
421 individual rat in metabolic cages under the same conditions in groups of 8 animals during 5  
422 consecutive days. For every collected group of animals, every test diet will be balanced for the  
423 number of animals submitted to urine collection. Sixteen animals will be kept in metabolic cages for  
424 16 hours each day of urine collection. The total volume of urine excreted during the 16-hour period  
425 will be measured at the end of every 16-hour collection period, and the animals will be brought back  
426 from the metabolic cages to their respective conventional cages. Every sample collected at different  
427 time points will be identified by a unique code. Data concerning the volumes of urine collected at  
428 different time points will be recorded.



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429 Parameters will include:

- 430 • appearance
- 431 • volume
- 432 • osmolality
- 433 • pH
- 434 • total trotein
- 435 • glucose
- 436 • occult blood

Draft





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## 437 **Necropsy and Histopathology**

### 438 **Gross necropsy**

439 A complete necropsy will be performed on all animals at the end of the study. The weight of organs  
440 will be recorded in line with OECD guideline 408 and organs/tissues will be examined  
441 macroscopically for any deviations from normal (in accordance with ŠPP/TOX/V005). A supervising  
442 toxicopathologist will be present at terminal necropsy. The results will be manually recorded and  
443 subsequently transferred and saved in the computer system.

444 The wet weight of the following organs will be recorded:

- 445 • adrenal glands
- 446 • brain
- 447 • heart
- 448 • kidneys
- 449 • liver
- 450 • ovaries
- 451 • spleen
- 452 • sternum with bone marrow
- 453 • testes
- 454 • thymus
- 455 • thyroid and parathyroid

456 Organs and tissues for histopathological examination will be formalin-fixed (neutrally buffered 10%  
457 formalin). Details will be added later by amendment.

458 As described in the OECD Test Guideline 408, the following tissues will be subjected to a  
459 histopathological examination after fixation:

- 460 • all gross lesions
- 461 • adrenal glands
- 462 • aorta
- 463 • brain (representative regions including cerebrum, cerebellum, medulla/pons and pituitary)
- 464 • caecum
- 465 • epididymides
- 466 • eyes
- 467 • femur (femoro-tibial joint)
- 468 • gonads (testes, left and right; ovaries, left and right)
- 469 • heart
- 470 • kidneys (left and right)
- 471 • large intestine
- 472 • liver
- 473 • lymph nodes: submandibular and mesenteric
- 474 • oesophagus
- 475 • ovaries
- 476 • pancreas
- 477 • parathyroid



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- 478 • peripheral nerve (sciatic) preferably in close proximity to the muscle
- 479 • prostate
- 480 • rectum
- 481 • salivary glands
- 482 • section of bone marrow and/or a fresh bone marrow aspirate
- 483 • seminal vesicles
- 484 • skeletal muscle
- 485 • skin with mammary gland area
- 486 • small intestine (including the Gut-Associated Lymphoid Tissue, GALT)
- 487 • spinal cord (cervical, mid-thoracic and lumbar regions)
- 488 • spleen
- 489 • sternum with bone marrow
- 490 • stomach
- 491 • testes
- 492 • thymus
- 493 • thyroid
- 494 • tongue
- 495 • trachea and lungs inflated with fixative and then immersed in formalin
- 496 • urinary bladder
- 497 • uterus
- 498 • vagina
- 499 • additional tissues may need to be investigated based on clinical or any other findings

500 Trimming will be done by the Department of Toxicology at SZU, who will ship the tissue samples to  
501 the histology processing test site at the Institute of Pathology at the University of Veterinary  
502 Medicine Hannover immediately after the tissue samples have been formalin-fixed. Tissue samples of  
503 animals that have to be prematurely necropsied (because of their moribund condition) will also be  
504 shipped immediately after having fixed the samples.

#### 505 **Histology processing**

506 The trimmed tissue specimens will be transported in labelled cassettes in 10% buffered formalin at  
507 ambient temperature to the histology processing test site at the Department of Pathology, University  
508 of Veterinary Medicine, Hannover, Germany. They will be stored in neutral buffered 10% formalin at  
509 room temperature until they are further processed. The whole processing will take place under GLP  
510 conditions in room B2-317 of the Department of Pathology, and all procedures will be performed by  
511 trained technicians.

512 Briefly, trimmed tissue samples within the cassettes will be checked and recorded and a confirmatory  
513 dispatch note will be sent back to SZU. Then, specimens will automatically be embedded in paraffin  
514 wax according to a standardized protocol. Paraffin blocks will be made manually. Each block will be  
515 cut until the whole tissue specimen is visible on its surface. Then, a 3-5µm thick section will be taken,  
516 straightened on a warm water bath and mounted on a glass slide. The glass slides will be labelled  
517 according to the labelling on the respective cassette. Slides will be stained with haematoxylin and  
518 eosin according to a standardized protocol. The slides will then be covered with a cover glass, dried,  
519 and stored at room temperature until shipped. The slides will then be packed in a shatter-proof manner



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520 and shipped to the histopathology examination test site Roger Alison Ltd. by DHL or a comparable  
521 courier.

522 The paraffin blocks will be stored at the Department of Pathology, University of Veterinary Medicine,  
523 Hannover, Germany, temporarily. Final archiving will take place at SZU.

524 **Histopathology**

525 The above-mentioned tissue specimens of all animals in the control group (dose group 1) and the two  
526 high dose groups (groups 3 and 5) will be examined. If test item-related morphologic changes are  
527 detected in organs of any high-dose animal, then the tissues of all animals in the low-dose groups will  
528 also be analyzed. Furthermore, all tissue specimens from animals having died or having had to be  
529 sacrificed before the actual end of the feeding trial as well as all tissues showing macroscopic  
530 abnormalities will be examined microscopically.

531 A histopathology phase report will be provided by the principal investigator for inclusion in the main  
532 report as an appendix. A peer review of findings will be performed and the peer review statement will  
533 be attached as a separate appendix within the final report.

534 All histological slide samples will be returned to the test facility for archiving.



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## 535 DATA EVALUATION AND STATISTICAL ANALYSIS

536 Evaluation of the data and screening for any obvious errors and outliers will be performed by the local  
537 statistical team at the test facility, SZU. Outliers will be checked against the original paper records.  
538 Outliers which are not due to transcription or other obvious types of error will be retained, but noted.  
539 The statistical analysis will be performed by the Biostatistics test site, the Biometris group of partner  
540 DLO. Analyses will be performed with and without the outliers. If the conclusion depends on the  
541 presence of one or more outliers, then this will require further investigation on a case-by-case basis. If  
542 an outlier makes no difference to the conclusions, it will be retained.

543 The statistical analysis will be performed according to a pre-established protocol. Cages will be the  
544 experimental units. Summary statistics will be tabulated. Weight and food consumption data will be  
545 plotted over time. Data of males and females will be analysed together unless there is a prior  
546 biological argument to analyse males and females separately. Conclusions for males and females will  
547 also be reported separately if a significant interaction between treatment and sex is found in the joint  
548 analysis.

549 The statistical analysis will present the results as differences between the treated group and the control  
550 group on an appropriate scale with a 95% confidence interval, and compare these results with a zero  
551 difference (difference test) and pre-specified limits of concern (equivalence test). The precise  
552 statistical methods may vary depending on the nature of the data. For many quantitative endpoints an  
553 ANOVA type analysis with fixed factors group and sex will be appropriate. The results of the  
554 statistical analyses will be presented in tabular and graphical form.

555 The data used within the statistical analyses will be made publically available on the G-TwYST web  
556 site.

557 For histopathology data, statistical analyses may be performed at the discretion of the Study  
558 Pathologist if required and full details of statistical tests employed will be included in the  
559 histopathology phase report.



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Page No.: 30/32590 **APPENDIX**591 **Attachment 1**

592

**Proposed Time schedule**

				Month 1	Month 2	Month 3	Month 4	Month 5	Month 6	Month 7	Every 7 days
	Day -7	Day 0	Day 1			Day 90					
Quarantine	7 days										
Randomization		Males, day 0; females, day +1									
Ophthalmology	day -5/6				week 11						
Application males			day 1 start			day 90 end					
Application females			day 1+14 start			day 90 + 14 end					
Weighing of the feed		every 7 days	every 7 days	every 7 days	every 7 days	XX					
Weighing of animals		every 7 days	every 7 days	every 7 days	every 7 days	XX					
General clinical observations		every day	every day twice	every day twice	every day twice	XX					
Detailed clinical observations		every 7 days	every 7 days	every 7 days	every 7 days	XX					
Sensory reactivity		every 7 days	every 7 days	every 7 days	every 7 days	XX					
Hematology, males+females						days 83-87					
Clinical chemistry, males+females						days 83-87					
Urinalysis, males+females						days 83-87					
Gross necropsy, males						days 91 & 92					
Gross necropsy, females						days 91,92 +2					
Tissue processing							X				
Histopathology								X			
Draft report									X		



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593 **Attachment 2**

594 **List of Materials and Equipment**

595 ***Laboratory of Toxicology, SZU***

- 596 • Electronic balance Kern ABJ 220-4M, No. WB 0850106, range: 0.01-220g, precision: 0.0000g,  
597 Kern &Sohn GmbH, Germany, room No. B2-326  
598 • Personal computers, office

599 **Experimental animal rooms:**

- 600 • Temperature and humidity detector, PMICRO-LCD-THSYS, Dallas Semiconductor, rooms No.  
601 B 2/317 and 318  
602 • Personal computers, office  
603 • Data backup system - 2 external hard drives and the eXplorer system established by JKI  
604 • Electronic balance Sartorius BP 1200, No. 6080646, range: 0-1000 g, Sartorius AG, Germany, the  
605 operating room of experimental animal rooms  
606 • Pressure air conditioning system VENTO, No. RMK 01.2, REMAK LTD., Czech Republic,  
607 experimental animal rooms on the 3<sup>th</sup> floor at SZU  
608 • Personal computers, office  
609 • Type of animal cages in TECNIPLAST Filter top cages Type 2145 F with an H-Temp™ (PSU)  
610 durable filter cover from the Tecniplast Company, Italy. The cages have a high density  
611 polypropylene body, measuring 480 x 265 x 210 mm - floor area 940 cm<sup>2</sup>  
612 • Ophthalmoscope Welch Allyn  
613 • Apparatus for neurobehavioural testing: Accupacer treadmill

614 ***Laboratory of Immunotoxicology, SZU***

- 615 • Haematological analyzer Sysmex K-4500, SYSMEX TOA Medical Electronics Co. LTD, Japan,  
616 No. VČ F-1466, room B2-212.  
617 • Personal computers, office

618 ***Laboratory of Clinical and Experimental Biochemistry, SZU***

- 619 • Analyzer Vitros 250, Ortho-Clinical Diagnostics, No. 219037234, USA, room B-048  
620 • Personal computers, office, software for processing of the data  
621 • Windows XP, program Office 2003  
622 • Windows 2007, program Office 2010  
623 • Software SPPS version 16.0.

624 **Materials:**

- 625 • Syringes, needles, tubes, tubes microvette, tips, gloves, gauze, racks, paper, cartridge

626 ***Department of Pathology, University of Veterinary Medicine Hannover***

- 627 • Embedding apparatus, embedding solutions, paraffin wax, microtome blades, glass slides, cover  
628 glasses, staining solutions, packing materials, paraffin block storage cabinets

629 ***Equipment for Histopathology, Roger Alison Ltd.***

- 630 • PathData software, Olympus microscope, personal computers, slide storage cabinets

631



**90-Day subchronic toxicity study in rats fed GM maize NK603 based on OECD Test Guideline 408, EFSA Guidance on conducting repeated-dose 90-day oral toxicity study in rodents on whole food/feed (2011) and EFSA explanatory statement complementing the above-mentioned EFSA Guidance (2014)**



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632 **Attachment 3**

633 List of records to be maintained for this study includes:

- 634 • animal receipt records and quarantine records
- 635 • randomization records
- 636 • serology reports
- 637 • feed log and analysis reports
- 638 • water analysis reports
- 639 • moribundity/mortality checks
- 640 • rack/cage rotation records
- 641 • Temperature/relative humidity/light intensity and cycle checks
- 642 • dose analysis data
- 643 • dose preparation and accountability records
- 644 • dose administration records
- 645 • necropsy and histopathological findings
- 646 • pathology specimens as specified
- 647 • copy of the histology processing records (original at the Department of Pathology, University of
- 648 Veterinary Medicine Hannover, Germany)