



Combined chronic toxicity and carcinogenicity study in rats fed GM maize NK603 according to OECD Test Guideline 453 and EFSA Considerations on the applicability of OECD TG 453 to whole food/feed testing



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Combined chronic toxicity and carcinogenicity study in rats fed GM maize NK603

Multi-Site Study Plan

Study No: 632165 A/2015/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
Department of Toxicology
Slovak Medical University
Limbová 12
83303 Bratislava
Slovakia
E-mail: dagmar.zeljenkova@szu.sk



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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 11th 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 453 for Testing of Chemicals; "Combined Chronic
25 Toxicity/Carcinogenicity Studies" (adopted on the 7th of September 2009)
- 26 • The EFSA Consideration on the applicability of OECD TG 453 to whole food/feed testing
27 (EFSA Journal 2013; 11(7):3347).

28 Animal Welfare

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



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

42 GENERAL INFORMATION

43 Multi-Site Study Details

44 Test Sites:

45 Study Phase:

Histology Processing

46 Test Site 1:

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

51 Principal Investigator:

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

53 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

60 Study Phase:

Histopathology

61 Test Site 2:

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

67 Principal Investigator:

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

69 Test Site Quality Assurance:

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

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71



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72	Study Phase:	Biostatistics
73	Test Site 3:	Stichting Dienst Landbouwkundig Onderzoek (DLO)
74		Wageningen University and Research Centre
75		Droevendaalsesteeg 1
76		6708 PB Wageningen
77		The Netherlands
78	Principal Investigator:	Dr. Hilko van der Voet
79		hilko.vandervoet@wur.nl
80	Additional Responsibilities	
81	Toxicology:	Dagmar Zeljenková, VMD, PhD
82	Clinical Chemistry:	Prof. Spustova Viera, M.D., Ph.D.
83	Haematology:	Jana Tulinská, M.D., Ph.D.
84	Ophthalmology:	Prof. Andrej Černák, M.D., Dr.Sc.
85	Necropsy:	Katarina Ambrušová, VMD
86	Lead Quality Assurance:	Eva Němcová, Mgr.
87	Ethics Committee:	Ludmila Novotná, Dr.
88	Peer Reviewer:	To be added by amendment
89	Distribution List	
90	The original signed study plan will be retained in the study file, to be archived at the completion of	
91	the study. Copies of the final study plan along with any amendments will be distributed to all relevant	
92	staff via supervisors/department heads specified as follows:	
93	Sponsor:	pablo.steinberg@tiho-hannover.de
94	Study Director:	dagmar.zeljenkova@szu.sk
95	Clinical Chemistry:	viera.spustova@szu.sk
96	Haematology:	jana.tulinska@szu.sk
97	Ophthalmology:	andrej.cernak@pe.unb.sk
98	Necropsy :	katarina.amrusova@szu.sk
99	Lead Quality Assurance:	eva.nemcova@szu.sk
100	All Principal Investigators:	See multi site study details
101	All Test Site QA:	See multi site study details



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102 **Study Plan Amendments and Deviations**

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

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

109 **Quality Assurance**

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

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

119 **Reporting**

120 A GLP compliant report will be presented. This will include the reporting requirements as described
121 in OECD Test Guideline 453 and will be written in the English language. A draft report will be sent to
122 the Sponsor for review and comments before issue of the final report. The pre-QA draft report and the
123 post-QA draft report will be issued before the final report.

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

127 **Archiving**

128 The following documents will be archived under code number 632165A/2015/GLP at the
129 Registry of accredited laboratories and laboratories with GLP certificate of SZU until the year 2026:

- 130 • the study plan and any amendments
- 131 • correspondence between the SD and test sites
- 132 • QA reports of audits/inspections
- 133 • all raw data (paper and electronic)



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- 134 • all original documents/primary documentation (including chain of custody records)
 - 135 • samples of the test items
 - 136 • copy of the histology processing records (original at the Department of Pathology, University
 - 137 of Veterinary Medicine Hannover, Germany)
 - 138 • histological specimens (as long as the quality permits evaluation)
 - 139 • the original histopathology phase report
 - 140 • reports from contributing scientists
- 141 Further details of documents to be retained are included in the Appendix, Attachment 3. No data will
- 142 be discarded without the Sponsor's written consent.

143 **Proposed Time Schedule**

- | | | |
|-----|------------------------------------|--|
| 144 | Test feeds arrive: | February 2015 |
| 145 | Arrival of animals: | February 2015 |
| 146 | Starting of the treatment: | |
| 147 | - males | March-April 2015 - Day 1-5 and 8-12 (in groups) |
| 148 | - females | March - April 2015 - Day 15-19 and 22-26 (in groups) |
| 149 | Necropsy of the animals (1 year): | Day 366 of each group |
| 150 | Histological processing: | 1 month after Day 389 |
| 151 | Histopathology evaluation: | 2 months after Day 389 |
| 152 | Draft Report to Sponsor: | 3 months after Day 389 |
| 153 | Necropsy of the animals (2 years): | Day 731 of each group |
| 154 | Histological processing: | 1 month after Day 760 |
| 155 | Histopathology evaluation: | 4 months after Day 760 |
| 156 | Draft Report to Sponsor: | 6 months after Day 760 |
- 157 See Appendix, Attachment 1 for a more detailed proposed time frame.

158 **OBJECTIVE**

- 159 The purpose of this oral toxicity study is to assess the effects of GM maize NK603 when fed to rats
- 160 for a period of 1 year and 2 years. This study is being conducted in association with 90 day feeding
- 161 studies (designed according to OECD test guideline 408) as part of a wider project. These studies will



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162 provide a comparative assessment of the results of shorter term subchronic toxicity studies versus
163 extended chronic toxicity and carcinogenicity studies.

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.

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).



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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 Rec Han) is recognized by
191 international guidelines as a recommended test system for chronic toxicity/carcinogenicity studies.
192 Females will be nulliparous and non-pregnant. The number of animals used in this study is planned to
193 be 20 males and 20 females for 1 year; 50 males and 50 females for 2 years in each of the five dose
194 groups, a total of 700 animals, as recommended by the OECD Test Guideline 453 (2013). A
195 prospective power analysis will be performed to critically assess proposed sample sizes and
196 meaningful effect sizes, and, if needed and practically possible, the number of animals will be
197 adapted. Ten male and ten female rats more than those determined through the power analysis will be
198 ordered and those animals not assigned to the study will be used as sentinels. Two animals of the
199 same gender will be placed in one cage, and cages will be considered as experimental units.

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 „Chronic toxicity/carcinogenicity feeding trail -
210 Supplementary 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



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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 B2-308, 309, 310, 311 and 312 of the Specific Pathogen Free
223 (SPF) experimental animal house equipped with a pressurized climatic of the Specific Pathogen Free
224 (SPF) experimental animal house equipped with a pressurized climatic system at the Department of
225 Toxicology of the Slovak Medical University. The temperature and relative humidity in the animal
226 room will be recorded every 20 minutes and every week the computer readout for the past week will
227 be evaluated. Mean temperature will be maintained at $22 \pm 2^{\circ}\text{C}$ and relative humidity at 40-70%. The
228 animals will be subjected to a 12-hour light/12-hour dark cycle.

229 Rats will be housed in Tecniplast cages Type 2145 F from Tecniplast Italy. The cages have a high-
230 density polypropylene body, measuring 480 x 265 x 210 mm - floor area 940 cm².

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



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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 4 separate rooms (2 for males, 2
 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).

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 001 to 360 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 361 to 720.
 271 Ten male and ten female rats will be used as sentinels. Sentinel animals, which will be held in the
 272 same rooms as the rest of the animals in this study, are not included in the experimental design
 273 described below.

274 Fourteen racks contain 5 rows of 5 cages. Four racks (numbered Ch1-Ch4) are used for the chronic
 275 toxicity study and 10 racks (numbered Ca1-Ca10) for the carcinogenicity study. Each cage houses two
 276 rats. Dose groups are randomized within rows. This implies that the design is a randomised complete
 277 block design in which rows constitute the blocks. The experiment starts in week 1 with 1 block for the
 278 chronic study and 3 blocks for the carcinogenicity study on Monday (total 4 blocks, 20 cages, 40 male
 279 animals). This is repeated on the other days in week 1. Racks are filled from top to bottom, for the
 280 chronic and the carcinogenicity study separately. In week 2 the scheme is continued with on each day
 281 1 block for the chronic study and 2 blocks for the carcinogenicity study (total 3 blocks, 15 cages, 30
 282 male animals per day). The scheme of weeks 1-2 is repeated in weeks 3-4 with female rats.

283 At the end of the feeding trial experiment the cages are handled block by block in the same order as
 284 at the start of the experiment. This design ensures that possible differences between starting and
 285 ending days, and also possible differences between the vertical position of cages, are confounded with
 286 blocks implying that the analysis accounts for such differences.

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

Start Week	Sex	Block No.	Row	Start Day	Rack Ch1 Male				
					5	4	2	3	1
Week 1	Male	Block 1	Row 1	Monday	5	4	2	3	1
Week 1	Male	Block 2	Row 2	Tuesday	3	5	4	2	1
Week 1	Male	Block 3	Row 3	Wednesday	2	4	5	3	1
Week 1	Male	Block 4	Row 4	Thursday	1	4	5	3	2



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Week 1	Male	Block 5	Row 5	Friday	2	1	3	5	4
Start Week	Sex	Block No.	Row	Start Day	Rack Ch2 Male				
Week 2	Male	Block 6	Row 1	Monday	2	3	1	4	5
Week 2	Male	Block 7	Row 2	Tuesday	4	2	1	3	5
Week 2	Male	Block 8	Row 3	Wednesday	3	1	2	4	5
Week 2	Male	Block 9	Row 4	Thursday	5	1	2	3	4
Week 2	Male	Block 10	Row 5	Friday	2	5	1	4	3

Draft



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Start Week	Sex	Block No.	Row	Start Day	Rack Ch3 Female				
Week 3	Female	Block 11	Row 1	Monday	4	5	3	2	1
Week 3	Female	Block 12	Row 2	Tuesday	2	4	5	3	1
Week 3	Female	Block 13	Row 3	Wednesday	4	3	1	5	2
Week 3	Female	Block 14	Row 4	Thursday	5	1	4	2	3
Week 3	Female	Block 15	Row 5	Friday	1	4	5	2	3
Start Week	Sex	Block No.	Row	Start Day	Rack Ch4 Female				
Week 4	Female	Block 16	Row 1	Monday	5	3	2	4	1
Week 4	Female	Block 17	Row 2	Tuesday	3	2	4	5	1
Week 4	Female	Block 18	Row 3	Wednesday	1	3	2	4	5
Week 4	Female	Block 19	Row 4	Thursday	5	2	3	1	4
Week 4	Female	Block 20	Row 5	Friday	5	2	3	1	4

289 **Table 2.** Randomised order of the 5 dose groups for each row in the carcinogenicity testing phase. The dose
290 group codes 1-5 are randomised by the feed supplier over the five dose groups in the study.

Start Week	Sex	Block No.	Row	Start Day	Rack Ca1 Male				
Week 1	Male	Block 1	Row 1	Monday	4	5	1	2	3
Week 1	Male	Block 2	Row 2	Monday	2	3	5	4	1
Week 1	Male	Block 3	Row 3	Monday	3	5	2	4	1
Week 1	Male	Block 4	Row 4	Tuesday	4	2	3	1	5
Week 1	Male	Block 5	Row 5	Tuesday	1	5	4	3	2
Start Week	Sex	Block No.	Row	Start Day	Rack Ca2 Male				
Week 1	Male	Block 6	Row 1	Tuesday	5	1	4	3	2
Week 1	Male	Block 7	Row 2	Wednesday	3	5	4	2	1
Week 1	Male	Block 8	Row 3	Wednesday	4	1	5	3	2
Week 1	Male	Block 9	Row 4	Wednesday	4	3	1	2	5
Week 1	Male	Block 10	Row 5	Thursday	5	3	4	1	2
Start Week	Sex	Block No.	Row	Start Day	Rack Ca3 Male				
Week 1	Male	Block 11	Row 1	Thursday	1	3	2	4	5
Week 1	Male	Block 12	Row 2	Thursday	4	2	3	1	5
Week 1	Male	Block 13	Row 3	Friday	2	4	5	1	3
Week 1	Male	Block 14	Row 4	Friday	4	1	3	2	5
Week 1	Male	Block 15	Row 5	Friday	5	3	4	2	1

291



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Start Week	Sex	Block No.	Row	Start Day	Rack Ca4 Male				
Week 2	Male	Block 16	Row 1	Monday	4	2	3	1	5
Week 2	Male	Block 17	Row 2	Monday	3	2	4	1	5
Week 2	Male	Block 18	Row 3	Tuesday	3	5	2	1	4
Week 2	Male	Block 19	Row 4	Tuesday	5	3	1	2	4
Week 2	Male	Block 20	Row 5	Wednesday	2	1	4	3	5
Start Week	Sex	Block No.	Row	Start Day	Rack Ca5 Male				
Week 2	Male	Block 21	Row 1	Wednesday	4	1	2	5	3
Week 2	Male	Block 22	Row 2	Thursday	3	4	2	5	1
Week 2	Male	Block 23	Row 3	Thursday	1	4	3	5	2
Week 2	Male	Block 24	Row 4	Friday	5	3	1	2	4
Week 2	Male	Block 25	Row 5	Friday	3	4	5	1	2
Start Week	Sex	Block No.	Row	Start Day	Rack Ca6 Female				
Week 3	Female	Block 26	Row 1	Monday	4	3	2	1	5
Week 3	Female	Block 27	Row 2	Monday	2	5	3	4	1
Week 3	Female	Block 28	Row 3	Monday	4	5	2	1	3
Week 3	Female	Block 29	Row 4	Tuesday	3	4	5	1	2
Week 3	Female	Block 30	Row 5	Tuesday	3	5	4	2	1
Start Week	Sex	Block No.	Row	Start Day	Rack Ca7 Female				
Week 3	Female	Block 31	Row 1	Tuesday	5	2	4	3	1
Week 3	Female	Block 32	Row 2	Wednesday	1	2	3	5	4
Week 3	Female	Block 33	Row 3	Wednesday	3	2	4	5	1
Week 3	Female	Block 34	Row 4	Wednesday	3	2	1	4	5
Week 3	Female	Block 35	Row 5	Thursday	4	5	1	3	2
Start Week	Sex	Block No.	Row	Start Day	Rack Ca8 Female				
Week 3	Female	Block 36	Row 1	Thursday	5	3	4	1	2
Week 3	Female	Block 37	Row 2	Thursday	3	1	4	2	5
Week 3	Female	Block 38	Row 3	Friday	3	4	1	5	2
Week 3	Female	Block 39	Row 4	Friday	5	3	4	2	1
Week 3	Female	Block 40	Row 5	Friday	3	4	5	2	1



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Start Week	Sex	Block No.	Row	Start Day	Rack Ca9 Female				
Week 4	Female	Block 41	Row 1	Monday	1	3	2	5	4
Week 4	Female	Block 42	Row 2	Monday	2	4	3	5	1
Week 4	Female	Block 43	Row 3	Tuesday	4	2	1	5	3
Week 4	Female	Block 44	Row 4	Tuesday	4	5	1	3	2
Week 4	Female	Block 45	Row 5	Wednesday	4	5	1	3	2
Start Week	Sex	Block No.	Row	Start Day	Rack Ca10 Female				
Week 4	Female	Block 46	Row 1	Wednesday	5	3	2	1	4
Week 4	Female	Block 47	Row 2	Thursday	3	2	4	1	5
Week 4	Female	Block 48	Row 3	Thursday	5	2	3	1	4
Week 4	Female	Block 49	Row 4	Friday	5	1	2	4	3
Week 4	Female	Block 50	Row 5	Friday	1	4	3	2	5

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

295 Skeleton analyses of variances with the appropriate degrees of freedom are given below, both for
296 analyses with all cages including both sexes as well for an analysis for a single sex.

297 **NK603 Chronic toxicity testing phase (5 dose groups, 100 cages, 200 rats)**

ANOVA for both sexes		ANOVA for a single sex	
Source of variation	d.f.	Source of variation	d.f.
startweeks stratum		block stratum	9
sex	1	block.cage stratum	
startweeks.block stratum	18	dosegroup	4
startweeks.block.cage stratum		Residual	36
dosegroup	4	Total	49
sex.dosegroup	4		
Residual	72		
Total	99		



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298 **NK603 Carcinogenicity testing phase (5 dose groups, 250 cages, 500 rats)**

ANOVA for both sexes		ANOVA for a single sex	
Source of variation	d.f.	Source of variation	d.f.
startweeks stratum		block stratum	24
sex	1	block.cage stratum	
startweeks.block stratum	48	dosegroup	4
startweeks.block.cage stratum		Residual	96
dosegroup	4	Total	124
sex.dosegroup	4		
Residual	192		
Total	249		

299 **Route of administration**

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

304 Food will be supplied *ad libitum*. Measurement of feed consumption and food efficiency will be made
 305 once weekly for the first 13 weeks and monthly thereafter. At the beginning of each food consumption
 306 measurement, full feeders with stainless steel lids will be weighed and placed in each cage. The
 307 feeders will be weighed again on the day of the feeder change-out, the difference in weight being an
 308 estimate of the total amount consumed by two rats in one cage. Food spillage will be documented and
 309 the amount will be noted and subtracted. Feed consumption will be determined and reported as the
 310 total amount of feed consumed by two animals in one cage per week.

311 **General experimental design with NK603 maize, start March-April 2015**

Group	Isogenic maize (% of diet)	NK603 only (% of diet)	NK603 + Roundup (% of diet)	No of animals			
				Chronic toxicity		Carcinogenicity	
				No. of Males	No. of Females	No. of Males	No. of Females
1	33	0	0	20	20	50	50
2	22	11	0	20	20	50	50
3	0	33	0	20	20	50	50



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4	22	0	11	20	20	50	50
5	0	0	33	20	20	50	50
Sentinels ¹						10	10
Total animals				100	100	260	260

312 ¹ Sentinels will be fed the standard rat diet Teklad Global Diet[®].

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

316 The codes will be unblinded for the histopathological evaluation of the tissues after necropsy and
317 weighing of the organs.

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

322 **Periodical Health Status Observations**

323 **Morbidity, mortality**

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

335 **Clinical signs**

336 ***Cage side observations / uncovered cage***

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

340 ***Detailed physical examination and functional assessment***

341 Rats will be examined out of the cage once weekly. Any deviations from normal will be recorded in
342 terms of nature and severity, date and time of onset, duration and progress of the observed response.



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343 Signs noted will include changes in skin, fur, eyes, mucous membranes, occurrence of secretions and
344 excretions and autonomic activity such as lacrimation, piloerection, pupil size, and unusual respiratory
345 patterns as well as activity level and change in behavior.

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

352 ***Ophthalmologic examination***

353 The eyes of all animals will be examined in line with OECD TG 453 prior to the administration of the
354 test feeds and at the end of the study. Pupillar dilation and ophthalmologic examination of both eyes
355 will be performed by an experienced ophthalmologist in the conscious rat during gentle manual
356 restraint by a technician. In a first step, the eyes and the peribulbar structures will be macroscopically
357 examined. Thereafter, direct ophthalmoscopy will be performed using an ophthalmoscope.
358 Ophthalmoscopic findings will be recorded on data sheets and transcribed into the computer system
359 for compilation and analysis.

360 ***Body weight***

361 Each animal will be weighed at the following times: 1) 48 hours after arrival, 2) on the first day of
362 feeding, 3) weekly during the first 13 weeks, 4) monthly thereafter, 5) at the end of the study, 6) in the
363 event of an early death or sacrifice *in extremis*. The General Linear Model (GLM) for Repeated
364 Measures will be used for the analysis of the body weight.

365 **Procedures For Sample Collection**

366 Samples will be collected for the following analyses: haematology, blood chemistry, urinalysis and
367 histopathology. Samples collected will include blood, urine and tissues/organs. Blood samples will be
368 divided for the haematology and clinical chemistry analyses. Tissues/organs will be removed and
369 evaluated histopathologically.

370 At the end of the first and second year 500 µl plasma/rat and 2-3 ml urine/rat from 16 rats per
371 experimental group and at the end of the second year liver and kidney samples from 16 rats per
372 experimental group will be sent by SZU to the French consortium GMO90+, which will analyze the
373 expression of a number of biomarkers of effects in the above-mentioned samples.

374 **Urine and blood collection and processing**

375 Sufficient personnel will be available:

376 Urine will be collected by person No. 1

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

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

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

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



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

384 **Blood and tissue collection and processing at the end of the study**

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

386 Animals will be anaesthetized by person No. 1

387 Blood taking from the abdominal aorta (for GMO90+) - person No. 2

388 Blood processing and transport to the Laboratory of Clinical and Experimental Biochemistry (for
389 GMO90+) - person No. 3

390 Animal transport to the autopsy room on the same floor - person No. 4

391 Necropsy of the thorax part of the body - person No. 5

392 Necropsy of the abdominal part of the body - person No. 6

393 Necropsy of the genital organs - person No. 7

394 Removal and weighing of tissues and organs in line with OECD guideline 453 - person No. 8

395 Decapitation and necropsy of the head including brain - person No. 9

396 All organs will be stored in formalin or Bouin's solutions for the histological examination - person
397 No. 10

398 Details will be documented by subsequent amendment.

399 **Haematology**

400 At 3, 6 and 12 months and at the end of the study and before sacrifice, blood samples from the tail
401 vein will be taken from all animals for haematological examination after 12 hours fasting. EDTA will
402 be used as anticoagulant. Blood samples will be stored at room temperature (17-25°C), maximally up
403 to 4 hours, until measurement. Haematological analysis will be performed in accordance with SOP
404 ŠPP/IMU/M002 by using a Sysmex K-4500 automated haematology analyzer (Sysmex, Kobe, Japan).

405 Parameters scheduled for examination are:

- 406 • erythrocyte count (RBC)
- 407 • haematocrit (HT)
- 408 • haemoglobin (Hb) -
- 409 • leukocyte count (WBC)
- 410 • differential leukocyte count
- 411 • platelet count (PLT)
- 412 • mean corpuscular volume (MCV)
- 413 • mean corpuscular haemoglobin (MCH)
- 414 • mean corpuscular haemoglobin concentration (MCHC)

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



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419 **Clinical chemistry**

420 At month 3, 6, and 12 and at the end of the study and before sacrifice, blood samples from the tail
421 vein will be taken from all anaesthetized animals for blood chemistry examination after 12 hours
422 fasting. Samples will be analysed using an Ortho Clinical Vitros® 250 Chemistry System (Ortho-
423 Clinical Diagnostics, Raritan, NJ, USA). Methodologies include colorimetric, potentiometric and rate
424 tests using multi-layered Vitros Slides in accordance with SOP ŠPP/LEKB/M001. Blood samples will
425 be stored at room temperature (17-25°C) for a maximum of 4 hours until measurement. Parameters
426 will include:

- 427 • total protein
- 428 • albumin
- 429 • aspartate aminotransferase
- 430 • alanine aminotransferase
- 431 • alkaline phosphatase
- 432 • creatinine
- 433 • glucose
- 434 • urea
- 435 • total cholesterol
- 436 • gamma-glutamyl transpeptidase
- 437 • Na
- 438 • K
- 439 • Cl
- 440 • Ca
- 441 • P

442



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443 In addition:

- 444 • triglycerides
- 445 • 17 β -estradiol, testosterone, T3 and T4

446 **Urinalysis**

447 At month 3, 6, and 12 of the study and during the last week of the study urine analyses will be
448 performed. Urine will be collected from each individual rat in metabolic cages under the same
449 conditions in groups of 8 animals during 5 consecutive days. For every collected group of animals,
450 every test diet will be balanced for the number of animals submitted to urine collection. Sixteen
451 animals will be kept in metabolic cages for 16 hours each day of urine collection. The total volume of
452 urine excreted during the 16-hour period will be measured at the end of every 16-hour collection
453 period, and the animals will be brought back from the metabolic cages to their respective conventional
454 cages. Every sample collected at different time points will be identified by a unique code. Data
455 concerning the volumes of urine collected at different time points will be recorded.

456 Parameters will include:

- 457 • appearance
- 458 • volume
- 459 • osmolality
- 460 • pH
- 461 • total trotein
- 462 • glucose
- 463 • occult blood
- 464 • ketone
- 465 • urobilinogen

466 **Necropsy and Histopathology**

467 **Gross necropsy**

468 A complete necropsy will be performed on all animals at the end of the study (after 1 year for the
469 chronic phase and after 2 years for the carcinogenicity phase). Organs/tissues will be examined
470 macroscopically for any deviations from normal (in accordance with ŠPP/TOX/V005). A supervising
471 toxicopathologist will be present at terminal necropsy. The results will be manually recorded and
472 subsequently transferred and saved in the computer system.

473 The wet weight of the following organs of animals sacrificed after 1 year will be recorded:

- 474 • adrenal glands
- 475 • brain
- 476 • epididimydes
- 477 • heart
- 478 • kidneys
- 479 • liver
- 480 • ovaries
- 481 • spleen



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- 482 • sternum with bone marrow
- 483 • testes
- 484 • thymus
- 485 • thyroid and parathyroid
- 486 • uterus

487 As described in the OECD Test Guideline 453, organ weights of animals sacrificed after 2 years will
488 not be recorded, since geriatric changes and the development of tumours will confound the usefulness
489 of organ weight data.

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

492 As described in the OECD Test Guideline 453, the following tissues of animals sacrificed after 1 year
493 and of animals sacrificed after 2 years will be subjected to a histopathological examination after
494 fixation:

- 495 • all gross lesions
- 496 • adrenal glands
- 497 • aorta
- 498 • brain (representative regions including cerebrum, cerebellum, medulla/pons and pituitary)
- 499 • caecum
- 500 • cervix
- 501 • coagulating gland
- 502 • epididymides
- 503 • eyes
- 504 • femur (femoro-tibial joint)
- 505 • gonads (testes, left and right; ovaries, left and right)
- 506 • Harderian gland
- 507 • heart
- 508 • kidneys (left and right)
- 509 • lacrimal gland
- 510 • large intestine
- 511 • liver
- 512 • lymph nodes: submandibular and mesenteric
- 513 • oesophagus
- 514 • ovaries
- 515 • pancreas
- 516 • parathyroid
- 517 • peripheral nerve (sciatic) preferably in close proximity to the muscle
- 518 • prostate
- 519 • rectum
- 520 • salivary glands
- 521 • section of bone marrow and/or a fresh bone marrow aspirate
- 522 • seminal vesicles
- 523 • skeletal muscle



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- 524 • skin with mammary gland area
- 525 • small intestine (including the Gut-Associated Lymphoid Tissue, GALT)
- 526 • spinal cord (cervical, mid-thoracic and lumbar regions)
- 527 • spleen
- 528 • sternum with bone marrow
- 529 • stomach
- 530 • testes
- 531 • thymus
- 532 • thyroid
- 533 • tongue
- 534 • trachea and lungs inflated with fixative and then immersed in formalin
- 535 • urinary bladder
- 536 • uterus
- 537 • vagina
- 538 • additional tissues may need to be investigated based on clinical or any other findings

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

544 **Histology processing**

545 The trimmed tissue specimens will be transported in labelled cassettes in 10% buffered formalin to the
546 histology processing test site at the Department of Pathology, University of Veterinary Medicine,
547 Hannover, Germany. They will be stored in neutral buffered 10% formalin at room temperature until
548 they are further processed. The whole processing will take place under GLP conditions in room B2-
549 317 of the Department of Pathology, and all procedures will be performed by trained technicians.

550 Briefly, trimmed tissue samples within the cassettes will be checked and recorded and a confirmatory
551 dispatch note will be sent back to SZU. Then, specimens will automatically be embedded in paraffin
552 wax according to a standardized protocol. Paraffin blocks will be made manually. Each block will be
553 cut until the whole tissue specimen is visible on its surface. Then, a 3-5µm thick section will be taken,
554 straightened on a warm water bath and mounted on a glass slide. The glass slides will be labelled
555 according to the labelling on the respective cassette and paraffin block. Slides will be stained with
556 haematoxylin and eosin according to a standardized protocol. The slides will then be covered with a
557 cover glass, dried, and stored at room temperature until shipped. The slides will then be packed in a
558 shatter-proof manner and shipped to the histopathology examination test site Roger Alison Ltd. by
559 DHL or a comparable courier.

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

562 **Histopathology**

563 The above-mentioned tissue specimens of all animals in the control group (dose group 1) and the two
564 high dose groups (groups 3 and 5) will be examined. If test item-related morphologic changes are
565 detected in organs of any high-dose animal, then the tissues of all animals in the low-dose groups will
566 also be analyzed. Furthermore, all tissue specimens from animals having died or having had to be



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567 sacrificed before the actual end of the feeding trial as well as all tissues showing macroscopic
568 abnormalities will be examined microscopically.

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

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

573 **DATA EVALUATION AND STATISTICAL ANALYSIS**

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

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

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

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

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



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627 **APPENDIX**

628 **Attachment 1**

629

Proposed time schedule

				Month number																								
				1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	
	Day - 7	Day 0	Day 1												Chron Tox													Carc.
Quarantine	7 days																											
Randomization		males, day 0; females, day +14																										
Ophtalmology	day - 5/6														days 350- 355													days 710- 715
Application males			start: days 1-5												day 365 end													end day 730
Application females			start: days 1-5 (14 days after start males)												day 365 end													end day 730
Weighing of the feed			every 7 days	every 7 days	every 7 days	every 7 days	Monthly																					



Combined chronic toxicity and carcinogenicity study in rats fed GM maize NK603 according to OECD Test Guideline 453 and EFSA Considerations on the applicability of OECD TG 453 to whole food/feed testing



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630 **Attachment 2**

631 **List of Materials and Equipment**

632 **Laboratory of Toxicology, SZU**

- 633 • Electronic balance Kern ABJ 220-4M, No. WB 0850106, range: 0.01-220g, precision: 0.0000g, Kern & Sohn GmbH, Germany, room No. B2-326
- 634
- 635 • Personal computers, office

636 Experimental animal rooms:

- 637 • Temperature and humidity detector, PMICRO-LCD-THSYS, Dallas Semiconductor, rooms No. B2-308, 309, 310, 311 and 312
- 638
- 639 • Personal computers, office
- 640 • Data backup system - 2 external hard drives and the eXplorer system established by JKI
- 641 • Electronic balance Sartorius BP 1200, No. 6080646, range: 0-1000 g, Sartorius AG, Germany, the operating room of experimental animal rooms
- 642
- 643 • Pressure air conditioning system VENTO, No. RMK 01.2, REMAK LTD., Czech Republic, experimental animal rooms on the 3th floor at SZU
- 644
- 645 • Personal computers, office
- 646 • Type of animal cages in TECNIPLAST Filter top cages Type 2145 F with an H-Temp™ (PSU) durable filter cover from the Tecniplast Company, Italy. The cages have a high density polypropylene body, measuring 480 x 265 x 210 mm - floor area 940 cm².
- 647
- 648
- 649 • Ophthalmoscope Welch Allyn
- 650 • Apparatus for neurobehavioural testing: Accupacer treadmill

651 **Laboratory of Immunotoxicology, SZU**

- 652 • Haematological analyzer Sysmex K-4500, SYSMEX TOA Medical Electronics Co. LTD, Japan, No. VČ F-1466, room B2-212.
- 653
- 654 • Personal computers, office

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

- 656 • Analyzer Vitros 250, Ortho-Clinical Diagnostics, No. 219037234, USA, room B-048
- 657 • Personal computers, office, software for processing of the data
- 658 • Windows XP, program Office 2003
- 659 • Windows 2007, program Office 2010
- 660 • Software SPPS version 16.0.

661 Materials:

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

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

- 664 • Embedding apparatus, embedding solutions, paraffin wax, microtome blades, glass slides, cover glasses, staining solutions, packing materials, paraffin block storage cabinets
- 665

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

- 667 • PathData software, Olympus microscope, personal computers, slide storage cabinet
- 668



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669 **Attachment 3**

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

- 671 • animal receipt records and quarantine records
- 672 • randomization records
- 673 • serology reports
- 674 • feed log and analysis reports
- 675 • water analysis reports
- 676 • moribundity/mortality checks
- 677 • rack/cage rotation records
- 678 • Temperature/relative humidity/light intensity and cycle checks
- 679 • dose analysis data
- 680 • dose preparation and accountability records
- 681 • dose administration records
- 682 • necropsy and histopathological findings
- 683 • pathology specimens as specified
- 684 • histology processing records