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DuPont Haskell Global Centers
for Health & Environmental Sciences
Elkton Road, P.O. Box 50
Newark, DE 19714-0050

November 20, 2009

Elizabeth Goldentyer, DVM
USDA, APHIS, REAC
Eastern Regional Office
920 Main Campus Drive
Raleigh, NC 27606

RE: ANNUAL REPORT, CUSTOMER NO: 41, CERTIFICATE NO: 50-R-0001

Dear Dr. Goldentyer:

In accordance with the Animal Welfare Act (AWA) regulations, DuPont Haskell Global Centers for Health and Environmental Sciences is filing its Annual Research Facility Report (APHIS Form 7023) documenting animal usage for the Federal Fiscal Year 2009 (October 1, 2008 through September 30, 2009).

Acute Dermal Irritation Study

Two (2) rabbits used in Acute Dermal Irritation studies met the criteria described on APHIS Form 7023 Column "E". All procedures and methodology on these tests followed test guidelines OPPTS 870.2500 (1998) and OECD 404 (1992), with the only exception that fewer animals were used. The guidelines require 3 animals per test substance. We (keeping in mind the three R's) used 2 animals which is predictive of previous test substance responses, safety assessment information, as well as for registration of the product. The IACUC approved this work which is predictive of the results of the guideline-compliant studies.

Acute Eye Irritation Study

Three (3) rabbits used in Acute Eye Irritation studies met the criteria described on the APHIS Form 7023 Column "E". These studies comply with test guidelines OPPTS 870.2400 (1998) and OECD 405 (1987).

Acute Eye Irritation Study – the purpose is to provide DuPont with a safety assessment and/or information for registration of the product.

Animals experiencing extreme pain are euthanized immediately. Most tested substances are novel materials. Any exceptions must be approved by the IACUC. Acute irritation studies are not conducted for test substances if it is expected they will produce corrosion or severe irritation, based on measured pH or the results of an *in vitro* assay (i.e., Corrositex). Haskell follows the principles of the three R's in all of our work.

Developmental Toxicity Study

Eight (8) rabbits used in Developmental Toxicity Studies met the criteria described on APHIS Form 7023 Column "E".

Developmental Toxicity Main Study – the purpose of this study is to evaluate the potential developmental toxicity of a test substance when administered orally to pregnant rabbits during gestation. These are safety assessment studies that are often required by regulatory agencies in support of product registration.

Regulatory agency guidelines related to this type of testing include:

U.S. EPA, OPPTS 870.3700 Prenatal Developmental Toxicity Study, Health Effects Test Guidelines (1998).

OECD, Section 4 (Part 414): Prenatal Developmental Toxicity Study, Guideline for the Testing of Chemicals (2001).

Official Journal of the European Communities, 87/302/EEC, Part B: Methods for the Determination of Toxicity.

MAFF Japan, Notification 12 Nousan Number 8147, The Guidelines Related to the Study Reports for the Registration Application of Pesticides, 24 November 2000.

The IACUC approved the studies listed above without the use of anesthetics, analgesics or tranquilizing drugs. These studies are designed to evaluate the safety of test substances: co-administration of drugs intended to manage pain and distress in surviving animals could potentially interfere with the objective of the test and invalidate the results of the study.

Haskell's IACUC has not approved any exceptions to the AWA standards during the previous year for any USDA covered species.

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