Column E Explanation FY 2019

1. Registration Number: 93-R-0189
2. Number and species (common name): A total of 72 guinea pigs were used.
3. Procedure: Dermal sensitization (68), General Safety Test (4)
4. Explanation:

   Dermal sensitization studies in guinea pigs were performed per ISO 10993-10 to assess the potential for skin sensitization or delayed contact hypersensitivity of the test article. ISO International Standards ensure that products are safe, reliable and of good quality and are performed to meet FDA requirements. Guinea pigs are placed in Column E if, during the course of the study, they develop a skin reaction that warrants treatment, which is presumably associated with the use of Complete Freund's adjuvant. Lesions are treated topically with antibiotics and cleaning with a disinfectant such as dilute chlorhexidine solution. Analgesics are not administered as they may interfere with the specific outcome of the test which requires an immune system response, and would invalidate the results. This explanation accounts for Sixty-eight (68) of the guinea pigs listed under Column E.

   Four (4) guinea pigs were assigned to a safety test per 21CFR Part 610.11 (biologics) to assess for toxic substances within a drug product under development. Animals did not demonstrate any adverse clinical signs or mortality, but were allocated to Category E, per the IACUC approved animal care and use protocol, as the components being tested contained botulinum toxin and anti-toxin.

5. Federal regulations that require this procedure:
   a. FDA
   b. ISO 10993-10:2010
   c. EPA:OPPTS 870.2600
   d. OECD: 406
   e. 21CFR Part 610.11