

Petitioner AMVAC

Exhibit 12

Plan for completion of DCPA developmental thyroid studies:

1) DCPA (Chlorthal Dimethyl): Dose Range Finding Pre and Post Natal Developmental Thyroid Study in Sprague Dawley Rats by Oral Administration (Envigo Study: BDG0204).

We needed to rerun Phase I of this study because the rat Luminex immunofluorescence assay which was used at the time the study was performed was not able to detect quantifiable levels of T4 and T3 in plasma from rat fetuses: and these are critical endpoints on the study. The assays were validated to the lowest possible limits of detection taking into account the limited available scientific literature on this subject.

As Phases II and III of the study were scheduled to start after Phase I, we acted quickly and those phases were not performed and will be performed once the rerun of Phase I has been completed. Detection of T4 and T3 and TSH in the dams and TSH in the fetuses was successful using the Luminex assay.

In order to overcome this challenge Envigo has now developed an LC-MS MS assay with much lower detection limits (pg/ml) which has been proven to detect T4 and T3 in Control fetuses. The assay, which detects T4 and T3 simultaneously, has been satisfactorily validated for accuracy and precision and we also have 1 month frozen stability data and are currently investigating stability for longer periods of storage. The Luminex assay is also currently being validated for detection of TSH in serum so that all 3 hormones are assayed in the same medium, serum.

The rerun of Phase I was authorised by UK Home Office and the in life phase and thyroid hormone assays have been successfully completed as follows:

Animal arrival 22 February 2017.

Start of dosing on Day 6 after mating: 6 March 2017

Completion of in life phase: 26 March 2017

Thyroid hormone assay results issued: 19 May 2017

The results from Phase I have been reviewed by US EPA.

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As per the results/discussion/conclusions of the US EPA HED Review dated November 16, 2017 of the comparative thyroid assay range-finding study and thyroid hormone methods data, a few points for clarification are being submitted next week for EPA's attention. Since 13 January 2018 Envigo has been experiencing IT disruption (which is now being resolved) and this has led to an additional delay in the issue of this update. The plan moving forwards is as follows:

Submission to EPA of the outline of the proposed design of the new range-finding pre- and post-natal developmental thyroid study (Envigo Study No. JV36WK) which will incorporate all aspects (data originally planned to be provided on Phases II and III of BDG0204) as requested by the HED review – February 2018

Clarify an acceptable method for analysis of TSH in rat serum with EPA – February 2018

Development and validation of bioassays for detection of DCPA in rat milk and plasma – to start in mid-March 2018 and to be completed by early July 2018.

Submission of validation data for the DCPA assays in rat milk and plasma and TSH assay in rat serum and, and the full draft study plan for the range-finding pre- and post-natal developmental thyroid study (Envigo Study No. JV36WK) to EPA – August 2018***

*** This draft date is dependent on two assumptions: 1) that the current immunoassay is an acceptable method of analysis for TSH in rat serum and 2) that the outstanding validation of the luminex immunoassay can be completed by this date. If it is determined that TSH in rat serum has to be measured by LC-MS-MS, then additional time will be needed for the method development and validation and this date extended accordingly.

Testing on the new range-finding pre- and post-natal developmental thyroid study (Envigo Study No. JV36WK) study will proceed as soon as possible following authorisation to proceed is received from US EPA.

The results will determine the doses for the definitive main pre and post natal developmental thyroid study (BDG0202) and the precise design and size of the study (i.e. if direct dosing of pups required) and if it is how many groups of pups will need to be dosed.

2) DCPA (Chlorthal Dimethyl): Definitive Main Pre and Post Natal Developmental Thyroid Study in CD Rats by Oral Administration (Envigo Study:BDG0202)

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Testing will proceed as soon as possible once the range-finding pre- and post-natal developmental thyroid study (Envigo Study No. JV36WK) has been completed and all of the results from that study have been reviewed by US EPA and authorisation to proceed is received.

Signed: David P Myers, BSc, PhD, IDT, Senior Toxicologist, Department of Toxicology
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