

Petitioner AMVAC

Exhibit 15

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 need 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.

Envigo

Woolley Road, Alconbury, Huntingdon, Cambridgeshire, PE28 4HS, UK

T +44 (0) 1480 892 000 F +44 (0) 1480 892 693

Envigo CRS Ltd. Registered in England No. 1815730

envigo.com

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, 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. JW36WK) which will incorporate all aspects (data originally planned to be provided on Phases I and II of BDG0204) as requested by the HED review – May 2018

Submission to EPA of a summary table of validated thyroid hormone analysis methods and measured levels using these methods at different developmental stages – July 2018.

Submission to EPA of the QA audited final report for validation of method of analysis and stability of TSH in rat serum – July 2018.

Submission to EPA of the QA audited final report for validation of methods of analysis and stability of T4 and T3 in rat serum – July 2018.

Development and validation of bioassays for detection of DCPA in rat milk and plasma. Work started in mid-March 2018, is ongoing and is expected to be completed by January 2019.

Submission of the full draft study plan for the range-finding pre- and post-natal developmental thyroid study (Envigo Study No. JW36WK) to EPA – November 2018. A copy is attached for EPA's review. AMVAC will await EPA's approval of the study design before commencing.

Submission of validation report for the DCPA assay in rat plasma (Envigo Study No. DC87NT) to EPA – January 2019

Submission of validation data for the DCPA assay in rat milk (Envigo Study No. CH09GN) to EPA – March 2019

Testing on the new range-finding pre- and post-natal developmental thyroid study (Envigo Study No. JW36WK) 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.

Envigo
Woolley Road, Alconbury, Huntingdon, Cambridgeshire, PE28 4HS, UK
T +44 (0) 1480 892 000 F +44 (0) 1480 892 693

Envigo CRS Ltd. Registered in England No. 1815730

envigo.com

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

Testing will proceed as soon as possible once the range-finding pre- and post-natal developmental thyroid study (Envigo Study No. JW36WK) has been completed and all of the results from that study have been reviewed by US EPA and authorisation to proceed is received.

+  12 November
2018

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

Test Facility:
ENVIGO CRS Limited
Eye
Suffolk
IP23 7PX
UK

