

Isopyrazam/Difenoconazole**Isopyrazam/Difenoconazole SC (A21295D) - *Salmonella Typhimurium* and *Escherichia Coli* Reverse Mutation Assay****Final Report****TEST GUIDELINE(S):**

OECD 471 (2020)

AUTHOR(S):

Dr. Steffi Chang

COMPLETION DATE:

11 March 2021

PERFORMING LABORATORY:ICCR-Roßdorf GmbH
In den Leppsteinswiesen 19
64380 Rossdorf, Germany**LABORATORY PROJECT ID:**Report Number: 2137100
Study Number: 2137100
Task Number: TK0543442**SPONSOR(S):**Syngenta Ltd.
Jealott's Hill International Research Centre
Bracknell, Berkshire RG42 6EY, United Kingdom**RESULTADOS DE TESTES E OUTROS DADOS NÃO DIVULGADOS**

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GOOD LABORATORY PRACTICE COMPLIANCE STATEMENT

This study performed in the test facility of ICCR-Roßdorf GmbH, In den Leppsteinswiesen 19, 64380 Rosdorf, Germany was conducted in compliance with Good Laboratory Practice Regulations:

Chemikaliengesetz (Chemicals Act) of the Federal Republic of Germany, "Anhang 1" (Annex 1), in its currently valid version

OECD Principles of Good Laboratory Practice, (as revised in 1997), ENV/MC/CHEM(98)17

EC Commission Directive 2004/10/EC

These procedures are compatible with Good Laboratory Practice regulations specified by regulatory authorities throughout the European Community, the United States (EPA and FDA), and Japan (MHW, MAFF, and METI), and other countries that are signatories to the OECD Mutual Acceptance of Data Agreement.

There were no circumstances that may have affected the quality or integrity of the study.

Dr. Steffi Chang
Study Director Bacterial Systems


.....
Date: 11 March 2021

Performing Laboratory:
ICCR-Roßdorf GmbH
In den Leppsteinswiesen 19
64380 Rosdorf, Germany

To be completed for USA EPA submission only:
Representative of Submitter/Sponsor:

.....
Date

Submitter/Sponsor: Syngenta Crop Protection, LLC
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QUALITY ASSURANCE STATEMENT

ICCR Study Number: 2137100
Test substance: Isopyrazam/Difenoconazole SC (A21295D)
Study director: Dr. Steffi Chang
Study Title: Isopyrazam/Difenoconazole SC (A21295D) -
Salmonella Typhimurium and
Escherichia Coli Reverse Mutation Assay

Study based activities at the Test Facility ICCR-Roßdorf GmbH were audited and inspected. The details of these audits and inspections are given below.

Type of Inspection	Date(s) of Inspection	Date Reporting to Study Director, Test Facility Management
Study Plan Verification	04 November 2020	04 November 2020
Study Plan Amendment 1 Verification	08 March 2021	08 March 2021
Process – based Test System Preparation and Application	12 November 2020	13 November 2020
Report Audit	09 December 2020	09 December 2020

General facilities and activities where this study was conducted were inspected on an annual basis and results are reported to the relevant responsible person and Management.

The statement is to confirm, that this report reflects the raw data.

11 March 2021

Date


H. Pilawa
Quality Assurance Auditor
ICCR-Roßdorf GmbH

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PROJECT STAFF SIGNATURE

Study Director

Dr. Steffi Chang

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GENERAL INFORMATION

Contributors

The following contributed to this report in the capacities indicated:

Name	Title
Dr. Steffi Chang	Study Director
Dr. Markus Schulz	Test Facility Management
Frauke Hermann	Head of Quality Assurance Unit
Merielen Pontes	Syngenta Study Manager

Study Dates

Study initiation date:	04 November 2020
Experimental start date:	11 November 2020
Experimental completion date:	25 November 2020

Deviations from the Guidelines

None

Retention of Samples

None

Performing Laboratory Test Substance Reference Number

S 2126411

Other

ICCR-Roßdorf GmbH will archive:

Records and documentation relating to this study will be maintained in the archives of ICCR-Roßdorf GmbH for a period of 4 years from the date on which the Study Director signs the final report. This will include electronic and paper raw data, and report that support the reconstruction of the study.

At termination of the aforementioned period, the records and documentation will be transferred to the GLP compliant Archive of Rhenus Archiv Services GmbH, Frankfurt am Main for further archiving up to a total archiving period of 15 years.

A sample of the test item will not be archived.

ICCR Roßdorf GmbH will retain in its archive a copy of the study plan and final report, and any amendments indefinitely.

Deviations from the study plan

There were no deviations (unplanned changes) from the study plan.

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1.0 EXECUTIVE SUMMARY

1.1 Study Design

This study was performed to investigate the potential of Isopyrazam/Difenoconazole SC (A21295D) to induce gene mutations in the plate incorporation test (Experiment I) and the pre-incubation test (Experiment II) using the *Salmonella typhimurium* (*S. typhimurium*) strains TA1535, TA1537, TA98, and TA100, and the *Escherichia coli* (*E. coli*) strains WP2 *uvrA* (pKM101) and WP2 (pKM101).

1.2 Results

The plates incubated with the test item showed normal background growth up to the maximal concentration of 5000 µg/plate with and without S9 mix in all strains used.

No cytotoxic effects, evident as a reduction in the number of revertants (below the indication factor of 0.5), occurred in all strains with and without metabolic activation.

No relevant increase in revertant colony numbers of any of the six tester strains was observed following treatment with Isopyrazam/Difenoconazole SC (A21295D) at any concentration, neither in the presence nor absence of metabolic activation (S9 mix). A minor increase not reaching the threshold of twice the number of the corresponding solvent control was observed in strain TA1537 in the absence of S9 mix in both experiments.

Appropriate reference mutagens were used as positive controls, which showed a distinct increase of induced revertant colonies consistent with the laboratory's historical control data, demonstrated the sensitivity of the test system and the efficacy of the S9 mix. Each batch of S9 was also tested with 2 pro-mutagens, benzo(a)pyrene and 2-aminoanthracene.

1.3 Conclusion

In conclusion, it can be stated that during the described mutagenicity tests and under the experimental conditions reported, Isopyrazam/Difenoconazole SC (A21295D) did not induce gene mutations by base pair changes or frameshifts in the genome of the strains used. Therefore, Isopyrazam/Difenoconazole SC (A21295D) is considered to be non-mutagenic in the *Salmonella typhimurium* and *Escherichia coli* reverse mutation assay.

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2.0 INTRODUCTION

2.1 Purpose

These experiments were performed to assess the potential of the test substance to induce gene mutations by means of the *S. typhimurium* and *E. coli* reverse mutation assay. Experiment I was performed as a plate incorporation assay. Since a negative result was obtained in this experiment, Experiment II was performed as a pre-incubation assay.

The most widely used assays for detecting gene mutations are those using bacteria (1). They are relatively simple and rapid to perform, and give reliable data on the ability of an agent to interact with DNA and produce mutations.

Reverse mutation assays determine the frequency with which an agent reverses or suppresses the effect of the forward mutation. The genetic target presented to an agent is therefore small, specific and selective. Several bacterial strains, or a single strain with multiple markers are necessary to assure reliable detection of mutagens that may be specific to one tester strain or locus. The reversion of bacteria from growth-dependence on a particular amino acid to growth in the absence of that amino acid (reversion from auxotrophy to prototrophy) is the most widely used marker.

The *S. typhimurium* histidine (his) and the *E. coli* tryptophan (trp) reversion system measures his⁻ → his⁺ and trp⁻ → trp⁺ reversions, respectively. The *S. typhimurium* and *E. coli* strains are constructed to differentiate between base pair (TA1535, TA100, WP2 *uvrA* (pKM101), and WP2 (pKM101)) and frameshift (TA1537, TA98) mutations.

According to the direct plate incorporation and pre-incubation method the bacteria are exposed to the test substance with and without metabolic activation and plated on selective medium. After a suitable period of incubation, revertant colonies are counted.

To establish a concentration response effect at least six concentrations with adequately spaced intervals were tested. The maximum concentration was 5000 µg/plate.

To validate the test, reference mutagens were tested in parallel to the test substance.

2.2 Test Guideline(s)

This study followed the procedures indicated by the following internationally accepted guideline and recommendations:

“Ninth Addendum to OECD Guidelines for Testing of Chemicals”, Section 4, No. 471: “Bacterial Reverse Mutation Test”, corrected June 26, 2020

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3.0 MATERIALS AND METHODS

3.1 Test Substance

Information as provided by the Sponsor.

Identification:	Isopyrazam/Difenoconazole SC (A21295D)
Batch:	SG40038
Content of difenoconazole (CGA169374):	11.93% w/w corresponding to 130 g/L
Content of isopyrazam (SYN520453):	12.105% w/w corresponding to 132 g/L
Appearance:	Off-white, liquid
Recertification Date:	29 August 2023
Storage Conditions:	At room temperature
Stability in Solvent:	Not indicated by the Sponsor

The test substance concentrations were not adjusted for the content of isopyrazam or difenoconazole.

On the day of the experiment (immediately before use), the test substance was suspended in deionised water. The solvent was chosen as the most suitable solvent compared to water and ethanol, according to its solubilisation properties and its relative non-toxicity to the bacteria (2).

All formulations were prepared freshly before treatment and used within two hours of preparation. The formulation was assumed to be stable for this period unless specified otherwise by the Sponsor.

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3.2 Controls

3.2.1 Negative controls

Concurrent untreated and solvent controls were performed.

3.2.2 Positive control substances

Without metabolic activation

Strains: TA1535, TA100
Name: Sodium azide, (NaN₃)
Supplier: SERVA, 69042 Heidelberg, Germany
Batch No.: 150564
Purity: ≥ 99%
Dissolved in: Deionised water
Concentration: 10 µg/plate

Strains: TA1537, TA98
Name: 4-nitro-o-phenylene-diamine, (4-NOPD)
Supplier: Sigma-Aldrich, 82024 Taufkirchen, Germany
Batch No.: MKBM 5257V
Purity: ≥ 98%
Dissolved in: DMSO (purity >99 %, Fisher Leics LE11 5RG, United Kingdom)
Concentration: 10 µg/plate in strain TA 98, 50 µg/plate in strain TA 1537

Strains: WP2 *uvrA* (pKM101), WP2 (pKM101)
Name: Methyl methane sulfonate, (MMS)
Supplier: Sigma-Aldrich, 82024 Taufkirchen, Germany
Batch No.: MKCG 1346
Purity: ≥ 99%
Dissolved in: Deionised water
Concentration: 2.0 µL/plate

With metabolic activation

Strains: TA1535, TA1537, TA98, TA100, WP2 *uvrA* (pKM101), WP2 (pKM 101)
Name: 2-aminoanthracene, (2-AA)
Supplier: Sigma-Aldrich, 82024 Taufkirchen, Germany
Batch No.: STBG 0630V
Purity: ≥ 96%
Dissolved in: DMSO (purity > 99 %, Fisher Leics LE11 5RG, United Kingdom)
Concentration: 2.5 µg/plate (TA1535, TA1537, TA98, TA100),
10 µg/plate (WP2 *uvrA* (pKM101), WP2 (pKM101))

The stability of the positive control substances in solution is unknown but a mutagenic response in the expected range is sufficient evidence of biological activity.

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3.3 Experimental Design

3.3.1 Characterisation of the *Salmonella typhimurium* and *E. coli* strains

The histidine dependent strains are derived from *S. typhimurium* strain LT2 through mutations in the histidine locus. Additionally, due to the "deep rough" (*rfa*⁻) mutation they possess a faulty lipopolysaccharide envelope which enables substances to penetrate the cell wall more easily. A further mutation causes a reduction in the activity of an excision repair system. The last alteration includes mutational processes in the nitrate reductase and biotin genes produced in a UV-sensitive area of the gene named *uvrB*⁻. In the strains TA98 and TA100 the R-factor plasmid pKM101 carries the ampicillin resistance marker (3).

Strain WP2 (4) and its derivatives all carry the same defect in one of the genes for tryptophan biosynthesis. Tryptophan-independent (*Trp*⁺) mutants (revertants) can arise either by a base change at the site of the original alteration or by a base change elsewhere in the chromosome so that the original defect is suppressed. This second possibility can occur in several different ways so that the system seems capable of detecting all types of mutagen which substitute one base for another. Additionally, the *uvrA* derivative is deficient in the DNA repair process (excisable repair damage). Such a repair-deficient strain may be more readily mutated by agents. The *E. coli* strains WP2 *uvrA* (pKM101) and WP2 (pKM101) are constructed by introduction of the R-factor plasmid pKM101.

When summarized, the mutations of the *S. typhimurium* and *E. coli* strains used in this study can be described as follows:

Strains	Genotype	Type of mutations indicated
<i>Salmonella typhimurium</i>		
TA1537	<i>his C</i> 3076; <i>rfa</i> ⁻ ; <i>uvrB</i> ⁻	frame shift mutations
TA98	<i>his D</i> 3052; <i>rfa</i> ⁻ ; <i>uvrB</i> ⁻ ; R-factor	" "
TA1535	<i>his G</i> 46; <i>rfa</i> ⁻ ; <i>uvrB</i> ⁻	base-pair substitutions
TA100	<i>his G</i> 46; <i>rfa</i> ⁻ ; <i>uvrB</i> ⁻ ; R-factor	" "
<i>Escherichia coli</i>		
WP2 <i>uvrA</i> (pKM101)	<i>trp E</i> 56 <i>uvrA</i> ⁻ ; R-factor	base-pair substitutions and others
WP2 (pKM101)	<i>trp E</i> 56; R-factor	" "

Regular checking of the properties of the *S. typhimurium* and *E. coli* strains regarding the membrane permeability and ampicillin resistance; UV sensitivity, and amino acid requirement as well as normal spontaneous mutation rates is performed by ICCR-Roßdorf GmbH according to Ames *et al.* (5), Maron and Ames (3), and Mortelmans and Riccio (7). In this way it is ensured that the experimental conditions set down by Ames are fulfilled.

The bacterial strains TA1535, TA1537, TA98, TA100, WP2 *uvrA* (pKM101), and WP2 (pKM101) were obtained from Trinova Biochem GmbH (35394 Gießen, Germany).

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3.3.2 Storage

The strain cultures were stored as stock cultures in ampoules with nutrient broth + 5 % DMSO (Fisher Leics, LE11 5RG, United Kingdom) in liquid nitrogen.

3.3.3 Precultures

The thawed bacterial suspension was transferred into 250 mL Erlenmeyer flasks containing nutrient medium (50 mL). A solution of ampicillin (50 µL, 25 µg/mL) was added to the strains TA98, TA100, WP2 *uvrA* (pKM101), and WP2 (pKM101). This nutrient medium contains per liter:

8 g Nutrient Broth (MERCK, 64293 Darmstadt, Germany)

5 g NaCl (MERCK, 64293 Darmstadt, Germany)

The bacterial cultures were incubated in a shaking water bath for 4 hours at 37 °C. The optical density of the bacteria was determined by absorption measurement and the obtained values indicated that the bacteria were harvested at the late exponential or early stationary phase (10⁸-10⁹ cells/mL).

3.3.4 Selective agar

Plates with selective agar (without Histidine/Tryptophan) were used.

3.3.5 Overlay agar

The overlay agar contained per litre:

for *Salmonella* strains:

7.0 g Agar Agar*

6.0 g NaCl*

10.5 mg L-Histidine×HCl×H₂O*

12.2 mg Biotin*

* (MERCK, 64293 Darmstadt, Germany)

for *Escherichia coli* strains:

7.0 g Agar Agar*

6.0 g NaCl*

10.2 mg Tryptophan*

Sterilisations were performed at 121 °C in an autoclave.

3.4 Mammalian Microsomal Fraction S9 Mix

The bacteria used in this assay do not possess the enzyme systems which, in mammals, are known to convert promutagens into active DNA damaging metabolites. In order to overcome this major drawback an exogenous metabolic system is added in the form of mammalian microsome enzyme activation mixture.

3.4.1 S9 (Preparation by ICCR-Roßdorf GmbH)

Phenobarbital/β-naphthoflavone induced rat liver S9 was used as the metabolic activation system. The S9 was prepared from male Wistar rats (RjHan:WI; weight approx. 220 – 320 g,

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Janvier Labs, 53941 Saint-Berthevin Cedex, France) induced by peroral administration of 80 mg/kg b.w. phenobarbital (Sigma-Aldrich Chemie GmbH, 82024 Taufkirchen, Germany) and by peroral administrations of β -naphthoflavone (Acros Organics, 2440 Geel, Belgium) each, on three consecutive days. The livers were prepared 24 hours after the last treatment. The S9 fractions were produced by dilution of the liver homogenate with a KCl solution (1+3 parts) followed by centrifugation at 9000 g. Aliquots of the supernatant were frozen and stored in ampoules at -80°C . Small numbers of the ampoules can be kept at -20°C for up to one week. Each batch of S9 mix is routinely tested with 2-aminoanthracene as well as benzo[a]pyrene (Appendix 3).

The protein concentration in the S9 preparation was 33.0 mg/mL (lot no. 030920K) in the pre-experiment / Experiment I and 34.8 mg/mL (lot no. 030920D) in Experiment II.

3.4.2 S9 mix

Before the experiment an appropriate quantity of S9 supernatant was thawed and mixed with S9 cofactor solution. The amount of S9 supernatant was 10% v/v in the S9 mix. Cofactors were added to the S9 mix to reach the following concentrations in the S9 mix:

8 mM MgCl₂
 33 mM KCl
 5 mM Glucose-6-phosphate
 4 mM NADP

in 100 mM sodium-ortho-phosphate-buffer, pH 7.4.

During the experiment the S9 mix was stored in an ice bath. The S9 mix preparation was performed according to Ames *et al.*(5).

3.5 Pre-Experiment for Cytotoxicity

To evaluate the cytotoxicity of the test substance a pre-experiment was performed with all strains. Eight concentrations were tested for cytotoxicity and mutation induction each with three replicate plates. The experimental conditions in this pre-experiment are described in section 3.7 (plate incorporation test).

Cytotoxicity of the test substance results in a reduction in the number of spontaneous revertants (below a factor of 0.5) or a clearing of the bacterial background lawn.

The pre-experiment is reported as the Main Experiment I since the criteria mentioned in Section 3.8.2 Acceptability of the Assay were met.

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3.6 Concentration Selection

In the pre-experiment the concentration range of the test substance was 3 - 5000 µg/plate. The pre-experiment is reported as Experiment I. Since no cytotoxic effects were observed in Experiment I, 5000 µg/plate was chosen as the maximal concentration in Experiment II.

The concentration range included two logarithmic decades. The following concentrations were tested in Experiment II:

33; 100; 333; 1000; 2500; and 5000 µg/plate

3.7 Experimental Performance

For each strain and concentration including the controls, three plates were used.

The following materials were mixed in a test tube and poured onto the selective agar plates:

- 100 µL Test solution at each concentration, solvent (negative control) or reference mutagen solution (positive control),
- 500 µL S9 mix (for test with metabolic activation) or S9 mix substitution buffer* (for test without metabolic activation),
- 100 µL Bacteria suspension (cf. test system, pre-culture of the strains; OD = 0.9 - 1.2; wavelength = 500 nm; approx. 8×10^8 cells/mL),
- 2000 µL Overlay agar

For the pre-incubation method test solution (100 µL) (solvent or reference mutagen solution (positive control)), S9 mix / S9 mix substitution buffer* (500 µL) and bacteria suspension (100 µL) were mixed in a test tube and incubated at $37\text{ C} \pm 1.5^\circ\text{ C}$ for 60 minutes. After pre-incubation overlay agar (2.0 mL, $45\text{ }^\circ\text{C}$) was added to each tube. The mixture was poured on selective agar plates.

After solidification the plates were incubated upside down for 72 hours at $37\text{ C} \pm 1.5^\circ\text{ C}$ in the dark, plates were then stored at $4\text{ }^\circ\text{C}$ until counted (6).

In parallel to each test a sterile control of the test substance was performed and documented in the raw data. Therefore, stock solution (100 µL) and S9 mix / S9 mix substitution buffer* (500 µL) were mixed with overlay agar (2.0 mL) and poured on minimal agar plates.

* Substitution buffer: 7 parts of the 100 mM sodium-ortho-phosphate-buffer pH 7.4 with 3 parts of KCl solution 0.15 M

3.8 Data Evaluation

3.8.1 Data recording

The colonies were counted using a Petri Viewer with the software program Ames Study Manager (see section 3.9, Major computerized systems). The evaluation unit was connected

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to a PC with printer to print out the individual values, the means from the plates for each concentration together with standard deviations and enhancement factors as compared to the spontaneous reversion rates (see tables of results). The print outs are kept with the raw data. Due to precipitation of the test item some test groups were scored manually (as indicated on data tables).

3.8.2 Acceptability of the assay

The *Salmonella typhimurium* and *Escherichia coli* reverse mutation assay is considered acceptable if it meets the following criteria:

- regular background growth in the negative and solvent control
- the spontaneous reversion rates in the negative and solvent control are in the range of the historical data
- the positive control substances should produce an increase in mutant colony frequencies of at least twofold the revertant colony count of the concurrent control
- a minimum of five analysable concentrations should be present with at least four concentrations showing no signs of toxic effects, evident as a reduction in the number of revertants below the indication factor of 0.5.

3.8.3 Evaluation of results

A test substance is considered as a mutagen if a biologically relevant increase in the number of revertants of twice or above the spontaneous mutation rate of the corresponding solvent control is observed (1).

A concentration dependent increase is considered biologically relevant if the threshold is reached or exceeded at more than one concentration (6).

An increase of revertant colonies equal or above the threshold at only one concentration is judged as biologically relevant if reproduced in an independent second experiment.

A concentration dependent increase in the number of revertant colonies below the threshold is regarded as an indication of a mutagenic potential if reproduced in an independent second experiment. However, whenever the colony counts remain within the historical range of negative and solvent controls, such an increase is not considered biologically relevant.

3.8.4 Biometry

According to the OECD guideline 471, a statistical analysis of the data is not mandatory.

3.9 Major Computerized System

Petri Viewer Sorcerer Colony Counter 3.0 (Instem, Suffolk IP33 3TA, UK) with the software program Ames Study Manager (v1.24) and Ames Archive Manager (v1.01).

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4.0 RESULTS AND DISCUSSION

The test substance, Isopyrazam/Difenoconazole SC (A21295D), was assessed for its potential to induce gene mutations in the plate incorporation test (Experiment I) and the pre-incubation test (Experiment II) using *S. typhimurium* strains TA1535, TA1537, TA98, and TA100, and the *E. coli* strains WP2 (pKM101) and WP2 *uvrA* (pKM101).

In the pre-experiment the concentration range of the test substance was 3 - 5000 µg/plate. The pre-experiment is reported as Experiment I. Since no cytotoxic effects were observed in Experiment I, 5000 µg/plate was chosen as the maximal concentration in Experiment II.

The assay was performed with and without liver microsomal activation. Each concentration, including the controls, was tested in triplicate. The concentration range included two logarithmic decades. The test substance was tested at the following concentrations:

Pre-Experiment/Experiment I: 3; 10; 33; 100; 333; 1000; 2500; and 5000 µg/plate
Experiment II: 33; 100; 333; 1000; 2500; and 5000 µg/plate

The test item precipitated in the overlay agar in the test tubes from 2500 to 5000 µg/plate in Experiment I and from 1000 to 5000 µg/plate in Experiment II. Precipitation of the test item in the overlay agar on the incubated agar plates was observed at 5000 µg/plate in both experiments. The undissolved particles had no influence on the data recording, a manual count was performed where required.

The plates incubated with the test item showed normal background growth up to the maximal dose of 5000 µg/plate with and without S9 mix in all strains used.

No cytotoxic effects, evident as a reduction in the number of revertants (below the indication factor of 0.5), occurred in the test groups with and without metabolic activation.

No relevant increase in revertant colony numbers of any of the six tester strains was observed following treatment with Isopyrazam/Difenoconazole SC (A21295D) at any concentration, neither in the presence nor absence of metabolic activation (S9 mix). A minor increase was observed in strain TA1537 in the absence of S9 mix in both experiments. The threshold of twice the number of the corresponding solvent control was neither reached nor exceeded.

The highest increase in revertant colony count was observed at 2500 µg/plate in both experiments. In Experiment I the upper limit of the historical control data of negative and solvent control was exceeded from 1000 to 5000 µg/plate, in Experiment II the upper limit of the negative control was reached at 2500 µg/plate, the upper limit of the solvent control was slightly increased (22 versus 20 colonies) at 2500 µg/plate. It can be stated therefore, that the increase observed in Experiment I was not completely reproduced and did, therefore, not fulfill the criteria of a biological relevant increase.

Appropriate reference mutagens were used as positive controls. They showed a distinct increase in induced revertant colonies consistent with the laboratory's historical control data

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and demonstrated the sensitivity of the test system and the efficacy of the S9 mix. Each batch of S9 was also tested with 2 pro-mutagens, benzo(a)pyrene and 2-aminoanthracene.

In experiment II, the data in the untreated and solvent control of strain WP2 (pKM101) in the presence of S9 mix were slightly above the laboratory historical control range. Since this deviation is rather small, this effect is considered to be based upon biologically irrelevant fluctuations in the number of colonies and had no detrimental impact on the outcome of the study.

5.0 CONCLUSIONS

In conclusion, it can be stated that during the described mutagenicity tests and under the experimental conditions reported, Isopyrazam/Difenoconazole SC (A21295D) did not induce gene mutations by base pair changes or frameshifts in the genome of the strains used. Therefore, Isopyrazam/Difenoconazole SC (A21295D) is considered to be non-mutagenic in the *Salmonella typhimurium* and *Escherichia coli* reverse mutation assay.



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TABLES SECTION

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TABLE 1 Summary of Results Pre-Experiment/Experiment I

Study Name: 2137100
 Experiment: 2137100 VV Plate
 Assay Conditions:

Study Code: ICCR 2137100
 Date Plated: 11.11.2020
 Date Counted: 16.11.2020

Metabolic Activation	Test Group	Dose Level (per plate)	Revertant Colony Counts (Mean ±SD)					
			TA 1535	TA 1537	TA 98	TA 100	WP2 pKM101	WP2 uvrA pKM101
Without Activation	Deionised water		13 ± 4	16 ± 3	28 ± 6	138 ± 7	293 ± 30	384 ± 19
	Untreated		12 ± 3	9 ± 2	32 ± 4	134 ± 24	283 ± 22	364 ± 32
	3 µg		11 ± 3	12 ± 4	30 ± 5	136 ± 15	292 ± 12	354 ± 22
	Isopyrazam/ Difenconazole SC (A21295D)	10 µg	13 ± 3	15 ± 3	27 ± 1	136 ± 4	271 ± 9	356 ± 24
	33 µg	33 µg	10 ± 3	14 ± 1	33 ± 12	131 ± 1	286 ± 23	356 ± 11
	100 µg	100 µg	10 ± 1	15 ± 3	34 ± 3	138 ± 17	254 ± 6	323 ± 41
	333 µg	333 µg	9 ± 3	13 ± 2	36 ± 4	148 ± 7	262 ± 13	361 ± 12
	1000 µg	1000 µg	13 ± 3	23 ± 4	27 ± 7	151 ± 9	283 ± 16	343 ± 14
	2500 µg	2500 µg	13 ± 3	29 ± 5	24 ± 6	148 ± 10	249 ± 33	341 ± 8
	5000 µg	5000 µg	9 ± 3 ^P	27 ± 4 ^{P,M}	29 ± 9 ^P	142 ± 6 ^P	219 ± 13 ^P	324 ± 37 ^P
	NaN3	10 µg	10 ± 1	1371 ± 97		1731 ± 65		
	4-NOPD	10 µg			637 ± 63			
	4-NOPD	50 µg			87 ± 8			
	MMS	2.0 µL					3053 ± 135	3092 ± 186
With Activation	Deionised water		12 ± 1	16 ± 5	39 ± 10	148 ± 9	270 ± 27	414 ± 30
	Untreated		10 ± 1	14 ± 1	45 ± 11	145 ± 23	301 ± 15	396 ± 24
	3 µg		10 ± 3	20 ± 2	38 ± 10	140 ± 19	296 ± 22	386 ± 32
	Isopyrazam/ Difenconazole SC (A21295D)	10 µg	10 ± 1	15 ± 4	38 ± 12	132 ± 6	292 ± 6	388 ± 7
	33 µg	33 µg	9 ± 2	17 ± 5	32 ± 6	141 ± 14	264 ± 15	389 ± 23
	100 µg	100 µg	10 ± 4	19 ± 5	34 ± 5	153 ± 23	229 ± 20	378 ± 12
	333 µg	333 µg	10 ± 3	17 ± 6	35 ± 9	156 ± 4	272 ± 31	403 ± 49
	1000 µg	1000 µg	10 ± 3	19 ± 2	36 ± 4	152 ± 19	292 ± 15	373 ± 21
	2500 µg	2500 µg	12 ± 3	14 ± 2	41 ± 10	152 ± 9	268 ± 17	352 ± 6
	5000 µg	5000 µg	14 ± 3 ^P	20 ± 3 ^P	37 ± 10 ^P	147 ± 13 ^P	262 ± 23 ^P	351 ± 28 ^P
	2-AA	2.5 µg	322 ± 37	391 ± 24	3336 ± 266	4431 ± 215		
	2-AA	10.0 µg					944 ± 23	1643 ± 56

Key to Positive Controls

NaN3 sodium azide
 2-AA 2-aminoanthracene
 4-NOPD 4-nitro-o-phenylene-diamine
 MMS methyl methane sulfonate

Key to Plate Postfix Codes

P Precipitate
 M Manual count

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TABLE 2 Summary of Results Experiment II

Study Name: 2137100
 Experiment: 2137100 HV2 Pre
 Assay Conditions:

Study Code: ICCR 2137100
 Date Plated: 19.11.2020
 Date Counted: 25.11.2020

Metabolic Activation	Test Group	Dose Level (per plate)	Revertant Colony Counts (Mean ±SD)					
			TA 1535	TA 1537	TA 98	TA 100	WP2 pKM101	WP2 uvrA pKM101
Without Activation	Deionised water		12 ± 2	13 ± 2	26 ± 3	148 ± 23	296 ± 14	377 ± 32
	Untreated		9 ± 3	13 ± 3	30 ± 8	152 ± 17	304 ± 14	350 ± 24
	33 µg		13 ± 3	13 ± 1	26 ± 8	154 ± 21	307 ± 8	407 ± 24
	Isopyrazam/ Difenoconazole	100 µg	10 ± 1	15 ± 1	21 ± 5	148 ± 21	315 ± 21	396 ± 9
	SC (A21295D)	333 µg	14 ± 3	15 ± 3	28 ± 6	147 ± 7	298 ± 40	369 ± 32
	1000 µg	1000 µg	11 ± 3	19 ± 3	25 ± 5	172 ± 6	301 ± 22	318 ± 26
	2500 µg	2500 µg	13 ± 2	22 ± 6	27 ± 10	152 ± 9	288 ± 3	313 ± 20
	5000 µg	5000 µg	8 ± 2 ^{PM}	17 ± 2 ^{PM}	27 ± 6 ^P	143 ± 3 ^P	255 ± 27 ^P	307 ± 21 ^P
	NaN3	10 µg	1228 ± 146			1500 ± 79		
	4-NOPD	10 µg			449 ± 21			
	4-NOPD	50 µg		95 ± 18				
	MMS	2.0 µL					3599 ± 284	3338 ± 202
With Activation	Deionised water		12 ± 3	12 ± 3	39 ± 9	142 ± 22	350 ± 12	350 ± 17
	Untreated		13 ± 4	11 ± 2	43 ± 1	139 ± 15	361 ± 25	373 ± 14
	33 µg		12 ± 3	16 ± 1	41 ± 11	143 ± 3	305 ± 15	415 ± 38
	Isopyrazam/ Difenoconazole	100 µg	11 ± 1	15 ± 5	41 ± 11	161 ± 9	281 ± 40	376 ± 27
	SC (A21295D)	333 µg	15 ± 4	17 ± 5	35 ± 3	163 ± 5	276 ± 15	379 ± 41
	1000 µg	1000 µg	15 ± 4	16 ± 1	38 ± 4	167 ± 9	315 ± 21	401 ± 17
	2500 µg	2500 µg	9 ± 3	13 ± 4	39 ± 4	151 ± 15	304 ± 21	385 ± 21
	5000 µg	5000 µg	7 ± 2 ^{PM}	11 ± 3 ^{PM}	31 ± 5 ^P	152 ± 16 ^P	272 ± 60 ^P	382 ± 27 ^P
	2-AA	2.5 µg	194 ± 46	263 ± 14	1881 ± 343	2812 ± 173		
	2-AA	10.0 µg					1081 ± 139	1498 ± 182

Key to Positive Controls

NaN3 sodium azide
 2-AA 2-aminoanthracene
 4-NOPD 4-nitro-o-phenylene-diamine
 MMS methyl methane sulfonate

Key to Plate Postfix Codes

P Precipitate
 M Manual count

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TABLE 3**Pre-Experiment and Experiment I: 2137100 VV Plate Incorporation Without Metabolic Activation**

Study Name: 2137100
 Experiment: 2137100 VV Plate
 Assay Conditions:

Study Code: ICCR 2137100
 Date Plated: 11.11.2020
 Date Counted: 16.11.2020

Without metabolic activation						
Strain	Compound	Concentration per plate	Mean revertants per plate	Standard Deviation	Ratio treated / solvent	Individual revertant colony counts
TA 1535		3 µg	11.0	2.6	0.8	9, 10, 14
	Isopyrazam/	10 µg	12.7	3.2	0.9	15, 9, 14
	Difenoconazole	33 µg	9.7	2.5	0.7	7, 10, 12
	SC (A21295D)	100 µg	10.3	0.6	0.8	11, 10, 10
		333 µg	9.0	2.6	0.7	6, 11, 10
		1000 µg	13.0	2.6	1.0	15, 14, 10
		2500 µg	12.7	3.2	0.9	14, 15, 9
		5000 µg	9.3	2.9	0.7	11 P, 6 P, 11 P
	Deionised water		13.3	3.8		9, 15, 16
	Untreated		12.3	3.2		16, 11, 10
TA 1537		3 µg	11.7	4.0	0.7	7, 14, 14
	Isopyrazam/	10 µg	14.7	3.2	0.9	16, 17, 11
	Difenoconazole	33 µg	14.3	0.6	0.9	15, 14, 14
	SC (A21295D)	100 µg	14.7	2.5	0.9	15, 17, 12
		333 µg	13.3	2.3	0.8	12, 12, 16
		1000 µg	23.0	3.6	1.4	22, 20, 27
		2500 µg	28.7	5.1	1.8	33, 23, 30
		5000 µg	26.7	3.5	1.6	30 P M, 23 P M, 27 P M
	Deionised water		16.3	2.5		16, 19, 14
	Untreated		8.7	2.3		6, 10, 10
TA 98		3 µg	30.3	4.9	1.1	36, 27, 28
	Isopyrazam/	10 µg	26.7	0.6	1.0	27, 26, 27
	Difenoconazole	33 µg	33.3	11.8	1.2	27, 47, 26
	SC (A21295D)	100 µg	34.3	3.1	1.2	31, 37, 35
		333 µg	36.3	3.5	1.3	40, 36, 33
		1000 µg	27.3	7.1	1.0	26, 21, 35
		2500 µg	23.7	5.7	0.9	22, 19, 30
		5000 µg	29.3	9.3	1.1	19 P, 37 P, 32 P
	Deionised water		27.7	5.9		30, 21, 32
	Untreated		32.0	4.0		36, 28, 32

Key to Plate Postfix Codes

P	Precipitate
M	Manual count

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Study Name: 2137100
 Experiment: 2137100 VV Plate
 Assay Conditions:

Study Code: ICCR 2137100
 Date Plated: 11.11.2020
 Date Counted: 16.11.2020

Without metabolic activation

Strain	Compound	Concen- tration per plate	Mean revertants per plate	Standard Deviation	Ratio treated / solvent	Individual revertant colony counts
TA 100	Isopyrazam/	3 µg	136.0	15.4	1.0	149, 119, 140
	Difenoconazole	10 µg	135.7	4.0	1.0	135, 140, 132
	SC (A21295D)	33 µg	131.0	1.0	0.9	132, 131, 130
		100 µg	137.7	16.6	1.0	120, 140, 153
		333 µg	147.7	7.1	1.1	149, 154, 140
		1000 µg	151.0	8.7	1.1	156, 141, 156
		2500 µg	148.0	9.5	1.1	153, 154, 137
		5000 µg	142.0	6.0	1.0	136 P, 148 P, 142 P
	Deionised water		138.3	7.4		144, 130, 141
	Untreated		133.7	23.7		112, 159, 130
WP2 pKM101	Isopyrazam/	3 µg	291.7	11.6	1.0	305, 284, 286
	Difenoconazole	10 µg	271.3	9.5	0.9	264, 268, 282
	SC (A21295D)	33 µg	286.0	22.6	1.0	267, 280, 311
		100 µg	254.0	6.1	0.9	257, 258, 247
		333 µg	262.3	13.3	0.9	277, 251, 259
		1000 µg	283.0	16.1	1.0	288, 265, 296
		2500 µg	249.3	32.6	0.9	285, 221, 242
		5000 µg	219.3	13.3	0.7	226 P, 228 P, 204 P
	Deionised water		293.0	30.4		278, 328, 273
	Untreated		283.3	22.3		272, 309, 269
WP2 pKM101	Isopyrazam/	3 µg	354.3	21.5	0.9	349, 378, 336
	Difenoconazole	10 µg	355.7	24.0	0.9	331, 357, 379
	SC (A21295D)	33 µg	356.0	11.1	0.9	368, 346, 354
		100 µg	322.7	41.5	0.8	358, 277, 333
		333 µg	361.3	11.6	0.9	363, 372, 349
		1000 µg	342.7	13.6	0.9	341, 357, 330
		2500 µg	340.7	8.4	0.9	331, 345, 346
		5000 µg	324.0	37.2	0.8	328 P, 359 P, 285 P
	Deionised water		384.0	18.7		399, 363, 390
	Untreated		364.0	32.4		328, 373, 391
TA 1535 TA 1537 TA 98 TA 100 WP2 pKM101 WP2 uvrA pKM101	NaN3	10 µg	1370.7	97.4	102.8	1483, 1320, 1309
	4-NOPD	50 µg	87.3	8.1	5.3	86, 80, 96
	4-NOPD	10 µg	636.7	63.3	23.0	688, 656, 566
	NaN3	10 µg	1730.7	64.7	12.5	1661, 1742, 1789
	MMS	2.0 µL	3053.0	134.7	10.4	3044, 2923, 3192
	MMS	2.0 µL	3092.3	185.6	8.1	2935, 3045, 3297

Key to Positive Controls

NaN3 sodium azide
 4-NOPD 4-nitro-o-phenylene-diamine
 MMS methyl methane sulfonate

Key to Plate Postfix Codes

P Precipitate
 M Manual count

TABLE 4 Pre-Experiment and Experiment I: 2137100 VV Plate Incorporation With Metabolic Activation

Study Name: 2137100
 Experiment: 2137100 VV Plate
 Assay Conditions:

Study Code: ICCR 2137100
 Date Plated: 11.11.2020
 Date Counted: 16.11.2020

With metabolic activation						
Strain	Compound	Concentration per plate	Mean revertants per plate	Standard Deviation	Ratio treated / solvent	Individual revertant colony counts
TA 1535		3 µg	10.3	2.9	0.9	7, 12, 12
	Isopyrazam/	10 µg	10.3	0.6	0.9	11, 10, 10
	Difenoconazole	33 µg	8.7	1.5	0.7	7, 9, 10
	SC (A21295D)	100 µg	10.3	3.5	0.9	14, 10, 7
		333 µg	10.0	2.6	0.9	12, 7, 11
		1000 µg	9.7	3.2	0.8	6, 11, 12
		2500 µg	12.3	2.9	1.1	14, 9, 14
		5000 µg	13.7	2.5	1.2	16 P, 14 P, 11 P
	Deionised water		11.7	0.6		12, 12, 11
	Untreated		9.7	0.6		9, 10, 10
TA 1537		3 µg	19.7	2.3	1.2	17, 21, 21
	Isopyrazam/	10 µg	15.0	4.0	0.9	19, 11, 15
	Difenoconazole	33 µg	16.7	4.5	1.0	21, 12, 17
	SC (A21295D)	100 µg	19.3	4.7	1.2	14, 21, 23
		333 µg	17.3	5.5	1.1	17, 23, 12
		1000 µg	18.7	2.3	1.2	16, 20, 20
		2500 µg	13.7	1.5	0.9	12, 15, 14
		5000 µg	19.7	3.2	1.2	22 P, 21 P, 16 P
	Deionised water		16.0	5.0		21, 11, 16
	Untreated		14.3	0.6		14, 15, 14
TA 98		3 µg	38.0	9.8	1.0	27, 41, 46
	Isopyrazam/	10 µg	38.3	11.6	1.0	40, 26, 49
	Difenoconazole	33 µg	32.3	6.0	0.8	26, 33, 38
	SC (A21295D)	100 µg	34.0	5.2	0.9	40, 31, 31
		333 µg	35.0	8.5	0.9	36, 43, 26
		1000 µg	36.3	4.2	0.9	33, 41, 35
		2500 µg	40.7	9.7	1.0	49, 30, 43
		5000 µg	37.3	10.0	1.0	27 P, 38 P, 47 P
	Deionised water		39.0	10.1		41, 28, 48
	Untreated		45.3	10.7		33, 52, 51

Key to Plate Postfix Codes

P Precipitate

RESULTADOS DE TESTES E OUTROS DADOS NÃO DIVULGADOS

Estas informações, resultados de testes e outros dados não divulgados são confidenciais e de propriedade da SYNCTA DIFERENTES CULTIVOS LTDA., protegidos na forma da Lei 10.603/02 e do artigo 195, IV da Lei 9.279/96.

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Todos os infratores poderão ser processados civil e criminalmente

Study Name: 2137100
 Experiment: 2137100 VV Plate
 Assay Conditions:

Study Code: ICCR 2137100
 Date Plated: 11.11.2020
 Date Counted: 16.11.2020

With metabolic activation

Strain	Compound	Concen- tration per plate	Mean revertants per plate	Standard Deviation	Ratio treated / solvent	Individual revertant colony counts
TA 100		3 µg	139.7	18.5	0.9	128, 161, 130
	Isopyrazam/	10 µg	131.7	6.1	0.9	137, 133, 125
	Difenoconazole	33 µg	141.3	14.0	1.0	156, 140, 128
	SC (A21295D)	100 µg	153.3	23.0	1.0	128, 159, 173
		333 µg	156.0	4.4	1.1	153, 161, 154
		1000 µg	152.3	18.5	1.0	162, 131, 164
		2500 µg	151.7	9.3	1.0	156, 141, 158
		5000 µg	147.0	12.8	1.0	144 P, 136 P, 161 P
	Deionised water		147.7	9.3		154, 137, 152
	Untreated		145.3	22.5		153, 163, 120
WP2 pKM101		3 µg	295.7	21.5	1.1	320, 279, 288
	Isopyrazam/	10 µg	291.7	5.9	1.1	296, 294, 285
	Difenoconazole	33 µg	264.3	14.8	1.0	277, 268, 248
	SC (A21295D)	100 µg	229.0	19.5	0.8	228, 210, 249
		333 µg	272.0	31.5	1.0	263, 246, 307
		1000 µg	292.0	14.9	1.1	275, 298, 303
		2500 µg	268.0	16.5	1.0	251, 284, 269
		5000 µg	262.3	23.3	1.0	246 P, 252 P, 289 P
	Deionised water		270.3	27.5		301, 262, 248
	Untreated		300.7	14.7		312, 306, 284
WP2 uvrA pKM101		3 µg	386.3	31.5	0.9	393, 352, 414
	Isopyrazam/	10 µg	388.0	7.0	0.9	393, 380, 391
	Difenoconazole	33 µg	389.3	22.9	0.9	363, 405, 400
	SC (A21295D)	100 µg	377.7	12.1	0.9	387, 364, 382
		333 µg	402.7	48.8	1.0	448, 409, 351
		1000 µg	373.0	20.7	0.9	396, 367, 356
		2500 µg	352.0	5.6	0.8	347, 358, 351
		5000 µg	351.0	28.1	0.8	380 P, 349 P, 324 P
	Deionised water		414.3	30.0		408, 447, 388
	Untreated		396.3	23.7		403, 416, 370
TA 1535	2-AA	2.5 µg	322.0	37.3	27.6	279, 342, 345
TA 1537	2-AA	2.5 µg	390.7	24.4	24.4	364, 412, 396
TA 98	2-AA	2.5 µg	3336.0	266.0	85.5	3080, 3317, 3611
TA 100	2-AA	2.5 µg	4431.0	215.3	30.0	4512, 4187, 4594
WP2	2-AA	10.0 µg	944.3	23.0	3.5	964, 919, 950
pKM101	2-AA	10.0 µg	1643.3	56.3	4.0	1623, 1600, 1707

Key to Positive Controls

2-AA 2-aminoanthracene

Key to Plate Postfix Codes

P Precipitate

RESULTADOS DE TESTES E OUTROS DADOS NÃO DIVULGADOS

Estas informações, resultados de testes e outros dados não divulgados são confidenciais e de propriedade da SYNCHROBIO TECNOLOGIAS MULTIVOS LTDA., protegidos na forma da Lei 10.603/02 e do artigo 195, IV da Lei 9.279/96.

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Todos os infratores poderão ser processados civil e criminalmente

TABLE 5

Experiment II: 2137100 HV2 Pre Incubation Without Metabolic Activation

Study Name: 2137100
Experiment: 2137100 HV2 Pre
Assay Conditions:

Study Code: ICCR 2137100
Date Plated: 19.11.2020
Date Counted: 25.11.2020

Without metabolic activation						
Strain	Compound	Concentration per plate	Mean revertants per plate	Standard Deviation	Ratio treated / solvent	Individual revertant colony counts
TA 1535		33 µg	12.7	3.2	1.1	14, 15, 9
	Isopyrazam/	100 µg	9.7	0.6	0.8	10, 9, 10
	Difenoconazole	333 µg	13.7	2.5	1.1	14, 16, 11
	SC (A21295D)	1000 µg	11.3	3.2	0.9	10, 9, 15
		2500 µg	13.3	2.1	1.1	14, 11, 15
		5000 µg	7.7	1.5	0.6	6 P M, 8 P M, 9 P M
	Deionised water		12.0	1.7		14, 11, 11
	Untreated		9.0	3.0		9, 6, 12
TA 1537		33 µg	13.3	1.2	1.0	14, 12, 14
	Isopyrazam/	100 µg	15.3	0.6	1.1	16, 15, 15
	Difenoconazole	333 µg	14.7	3.2	1.1	16, 17, 11
	SC (A21295D)	1000 µg	18.7	3.2	1.4	15, 20, 21
		2500 µg	22.0	5.6	1.6	21, 28, 17
		5000 µg	17.3	1.5	1.3	16 P M, 19 P M, 17 P M
	Deionised water		13.3	2.1		15, 14, 11
	Untreated		12.7	2.9		16, 11, 11
TA 98		33 µg	26.0	7.9	1.0	20, 35, 23
	Isopyrazam/	100 µg	21.0	5.3	0.8	19, 17, 27
	Difenoconazole	333 µg	27.7	5.5	1.1	33, 28, 22
	SC (A21295D)	1000 µg	25.0	5.3	1.0	31, 23, 21
		2500 µg	26.7	9.8	1.0	38, 21, 21
		5000 µg	27.3	5.5	1.1	33 P, 27 P, 22 P
	Deionised water		26.0	2.6		23, 27, 28
	Untreated		30.3	8.1		35, 21, 35
TA 100		33 µg	154.0	21.0	1.0	172, 159, 131
	Isopyrazam/	100 µg	147.7	21.2	1.0	138, 133, 172
	Difenoconazole	333 µg	147.0	6.6	1.0	146, 141, 154
	SC (A21295D)	1000 µg	172.3	6.4	1.2	165, 177, 175
		2500 µg	151.7	9.0	1.0	151, 161, 143
		5000 µg	143.3	3.1	1.0	144 P, 140 P, 146 P
	Deionised water		147.7	22.9		132, 137, 174
	Untreated		152.0	17.3		132, 162, 162

Key to Plate Postfix Codes

P Precipitate
M Manual count

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Study Name: 2137100
 Experiment: 2137100 HV2 Pre
 Assay Conditions:

Study Code: ICCR 2137100
 Date Plated: 19.11.2020
 Date Counted: 25.11.2020

Without metabolic activation

Strain	Compound	Concen- tration per plate	Mean revertants per plate	Standard Deviation	Ratio treated / solvent	Individual revertant colony counts
WP2 pKM101	Isopyrazam/ Difenoconazole SC (A21295D)	33 µg	306.7	8.1	1.0	301, 316, 303
		100 µg	314.7	21.0	1.1	336, 314, 294
		333 µg	298.3	39.8	1.0	256, 335, 304
		1000 µg	300.7	22.2	1.0	321, 304, 277
		2500 µg	287.7	2.5	1.0	285, 290, 288
		5000 µg	254.7	27.4	0.9	243 P, 235 P, 286 P
	Deionised water		296.0	13.7		311, 293, 284
	Untreated		303.7	13.8		288, 309, 314
WP2 uvrA pKM101	Isopyrazam/ Difenoconazole SC (A21295D)	33 µg	406.7	23.6	1.1	380, 415, 425
		100 µg	396.0	8.9	1.1	389, 393, 406
		333 µg	369.0	32.1	1.0	352, 349, 406
		1000 µg	318.3	26.2	0.8	346, 294, 315
		2500 µg	312.7	20.2	0.8	301, 301, 336
		5000 µg	306.7	20.5	0.8	286 P, 307 P, 327 P
	Deionised water		377.0	32.1		384, 342, 405
	Untreated		349.7	23.7		346, 375, 328
TA 1535	NaN3	10 µg	1228.3	146.3	102.4	1246, 1074, 1365
TA 1537	4-NOPD	50 µg	94.7	18.3	7.1	74, 101, 109
TA 98	4-NOPD	10 µg	448.7	21.5	17.3	424, 459, 463
TA 100	NaN3	10 µg	1500.0	78.5	10.2	1420, 1503, 1577
WP2 pKM101	MMS	2.0 µL	3599.3	284.2	12.2	3495, 3382, 3921
WP2 uvrA pKM101	MMS	2.0 µL	3338.3	202.1	8.9	3139, 3333, 3543

Key to Positive Controls

NaN3 sodium azide
 4-NOPD 4-nitro-o-phenylene-diamine
 MMS methyl methane sulfonate

Key to Plate Postfix Codes

P Precipitate
 M Manual count

RESULTADOS DE TESTES E OUTROS DADOS NÃO DIVULGADOS

Estas informações, resultados de testes e outros dados não divulgados são confidenciais e de propriedade da
 SYNCHROBIO TECNOLOGIAS MULTIVOS LTDA., protegidos na forma da Lei 10.603/02 e do artigo 195, IV da
 Lei 9.279/96

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 autorizados.

Todos os infratores poderão ser processados civil e criminalmente

TABLE 6 Experiment II: 2137100 HV2 Pre Incubation With Metabolic Activation

Study Name: 2137100
 Experiment: 2137100 HV2 Pre
 Assay Conditions:

Study Code: ICCR 2137100
 Date Plated: 19.11.2020
 Date Counted: 25.11.2020

With metabolic activation						
Strain	Compound	Concen-tration per plate	Mean revertants per plate	Standard Deviation	Ratio treated / solvent	Individual revertant colony counts
TA 1535	33 µg	11.7	3.1	1.0	11, 15, 9	
	100 µg	10.7	0.6	0.9	10, 11, 11	
	333 µg	14.7	4.0	1.3	17, 10, 17	
	SC (A21295D)	1000 µg	15.3	4.0	1.3	19, 16, 11
		2500 µg	9.3	2.9	0.8	11, 6, 11
		5000 µg	7.0	1.7	0.6	6 P M, 6 P M, 9 P M
	Deionised water		11.7	3.1		15, 9, 11
TA 1537	Untreated		13.0	3.6		12, 10, 17
	33 µg	16.0	1.0	1.3	17, 16, 15	
	100 µg	15.3	5.1	1.2	21, 14, 11	
	333 µg	16.7	4.9	1.4	20, 11, 19	
	SC (A21295D)	1000 µg	15.7	1.2	1.3	15, 17, 15
		2500 µg	12.7	4.0	1.0	9, 17, 12
		5000 µg	10.7	3.2	0.9	7 P M, 12 P M, 13 P M
TA 98	Deionised water		12.3	2.5		12, 15, 10
	Untreated		11.0	1.7		12, 12, 9
	33 µg	41.0	11.4	1.1	33, 36, 54	
	100 µg	41.0	10.8	1.1	38, 32, 53	
	333 µg	35.3	2.9	0.9	32, 37, 37	
	SC (A21295D)	1000 µg	38.0	4.4	1.0	41, 40, 33
		2500 µg	39.3	4.0	1.0	35, 40, 43
TA 100		5000 µg	30.7	4.5	0.8	35 P, 26 P, 31 P
	Deionised water		39.0	8.7		49, 35, 33
	Untreated		43.3	0.6		44, 43, 43
	33 µg	143.0	3.5	1.0	141, 147, 141	
	100 µg	161.3	9.1	1.1	168, 151, 165	
	333 µg	163.3	5.1	1.1	159, 169, 162	
	SC (A21295D)	1000 µg	167.0	9.2	1.2	159, 165, 177
Deionised water		2500 µg	150.7	15.4	1.1	158, 161, 133
		5000 µg	152.3	15.5	1.1	165 P, 157 P, 135 P
	Untreated		142.3	22.3		151, 117, 159
			139.0	14.7		131, 130, 156

Key to Plate Postfix Codes

P Precipitate
 M Manual count

RESULTADOS DE TESTES E OUTROS DADOS NÃO DIVULGADOS

Estas informações, resultados de testes e outros dados não divulgados são confidenciais e de propriedade da SYNCTA DROGAS MULTIVOS LTDA., protegidos na forma da Lei 10.603/02 e do artigo 195, IV da Lei 9.279/96.

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Todos os infratores poderão ser processados civil e criminalmente

Study Name: 2137100
Experiment: 2137100 HV2 Pre
Assay Conditions:

Study Code: ICCR 2137100
Date Plated: 19.11.2020
Date Counted: 25.11.2020

With metabolic activation

Strain	Compound	Concen- tration per plate	Mean revertants per plate	Standard Deviation	Ratio treated / solvent	Individual revertant colony counts
pKM101	WP2	33 µg	305.3	14.6	0.9	322, 295, 299
	Isopyrazam/	100 µg	280.7	39.5	0.8	288, 316, 238
	Difenoconazole	333 µg	276.0	14.9	0.8	265, 293, 270
	SC (A21295D)	1000 µg	314.7	21.4	0.9	326, 290, 328
		2500 µg	303.7	21.4	0.9	279, 315, 317
		5000 µg	272.3	60.0	0.8	203 P, 307 P, 307 P
	Deionised water		350.0	12.3		345, 341, 364
pKM101	Untreated		361.0	25.2		354, 389, 340
	WP2	33 µg	414.7	38.4	1.2	456, 380, 408
	uvrA	Isopyrazam/	375.7	26.6	1.1	389, 345, 393
	uvrA	Difenoconazole	379.0	41.3	1.1	367, 425, 345
	uvrA	SC (A21295D)	401.0	16.7	1.1	404, 416, 383
		2500 µg	385.3	20.5	1.1	409, 374, 373
		5000 µg	381.7	26.8	1.1	361 P, 372 P, 412 P
pKM101	Deionised water		350.0	17.4		362, 330, 358
	Untreated		373.3	14.0		374, 387, 359
TA 1535	2-AA	2.5 µg	193.7	45.7	16.6	198, 146, 237
TA 1537	2-AA	2.5 µg	263.3	14.0	21.4	249, 264, 277
TA 98	2-AA	2.5 µg	1881.0	343.1	48.2	1555, 1849, 2239
TA 100	2-AA	2.5 µg	2812.3	173.3	19.8	2645, 2801, 2991
WP2	2-AA	10.0 µg	1081.0	138.8	3.1	1240, 1019, 984
pKM101	2-AA	10.0 µg	1498.0	182.1	4.3	1436, 1355, 1703

Key to Positive Controls

2-AA 2-aminoanthracene

Key to Plate Postfix Codes

P Precipitate
M Manual count

RESULTADOS DE TESTES E OUTROS DADOS NÃO DIVULGADOS

Estas informações, resultados de testes e outros dados não divulgados são confidenciais e de propriedade da
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autorizados.

Todos os infratores poderão ser processados civil e criminalmente

APPENDICES SECTION

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RESULTADOS DE TESTES E OUTROS DADOS NÃO DIVULGADOS

Estas informações, resultados de testes e outros dados não divulgados são confidenciais e de propriedade da SYNGENTA PROTETORES MULTIVOS LTDA., protegidos na forma da Lei 10.603/02 e do artigo 195, IV da Lei 9.279/96.

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APPENDIX 1 Historical Control Data

These data represent the laboratory's historical control data from July 2018 until July 2020 representing approx. 600 experiments (WP2 pKM101, WP2 uvrA pKM101 the historical data are based on approx. 80 experiments).

The positive controls that used to compile the historical positive control data correspond to the positive control substances described in Methods; section 3.2.2 (Positive control substances).

Strain		without S9 mix				with S9 mix			
		Mean	SD	Min	Max	Mean	SD	Min	Max
TA 1535	Solvent control	12	2.6	7	22	13	2.5	7	24
	Untreated control	12	2.9	6	26	13	2.8	7	23
	Positive control	1116	141.3	340	1612	346	72.1	170	736
TA1537	Solvent control	11	2.4	6	20	14	2.8	7	28
	Untreated control	11	2.8	5	22	14	3.2	7	30
	Positive control	83	22.1	48	400	286	98.7	82	630
TA 98	Solvent control	28	4.9	13	46	38	6.4	12	62
	Untreated control	29	5.0	14	48	41	6.8	14	64
	Positive control	421	91.2	216	1218	3275	774.9	322	5699
TA 100	Solvent control	127	30.7	63	214	131	30.0	72	214
	Untreated control	135	35.7	64	233	140	34.4	68	217
	Positive control	1759	273.4	511	2588	3566	837.6	553	5444
WP2 pKM 101	Solvent control	248	31.7	171	299	266	33.0	205	315
	Untreated control	269	26.6	212	346	299	28.2	233	345
	Positive control	3343	428.4	2332	4653	1092	257.8	933	2781
WP2uvrA pKM 101	Solvent control	322	31.6	248	388	375	38.5	287	466
	Untreated control	346	28.2	279	403	393	32.6	313	480
	Positive control	3176	468.5	2021	4717	1897	183.2	1270	2464

Mean = mean value of revertants/plate

SD = standard deviation

Min = minimal value

Max = maximal value

RESULTADOS DE TESTES E OUTROS DADOS NÃO DIVULGADOS

Estas informações, resultados de testes e outros dados não divulgados são confidenciais e de propriedade da SYNCTA DROTOIDES MULTIVOS LTDA., protegidos na forma da Lei 10.603/02 e do artigo 195, IV da Lei 9.279/96

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APPENDIX 2 Copy of GLP Certificate



Gute Laborpraxis/Good Laboratory Practice



GLP-Bescheinigung/Statement of GLP Compliance (gemäß/according to § 19b Abs. 1 Chemikaliengesetz)



Eine GLP-Inspektion zur Überwachung der Einhaltung der GLP-Grundsätze gemäß Chemikaliengesetz bzw. Richtlinie 2004/9/EG wurde durchgeführt in:

Assessment of conformity with GLP according to Chemikaliengesetz and Directive 2004/9/EC at:

Prüfeinrichtung/Test facility

Prüfstandort/Test site



ICCR-Roßdorf GmbH
Institute for Competent Contract Research
In den Leppsteinwiesen 19
64380 Roßdorf



(Unverwechselbare Bezeichnung und Adresse/Unequivocal name and address)



Prüfungen nach Kategorien/Areas of Expertise (gemäß/according ChemVwV-GLP Nr. 5.3/OECD guidance)

- 2 Prüfungen zur Bestimmung der toxikologischen Eigenschaften
- 3 Prüfungen zur Bestimmung der erbgutverändernden Eigenschaften (in vitro und in vivo)
- 8 Analytische Prüfungen an biologischen Materialien

- 2 Toxicity studies

- 3 Mutagenicity studies

- 8 Analytical and clinical chemistry testing

22.11.2018, 21.02.2019, 12. bis 14.03.2019
Datum der Inspektion/Date of Inspection
(Tag Monat Jahr/day month year)

Die genannte Prüfeinrichtung befindet sich im nationalen GLP-Überwachungsverfahren und wird regelmäßig auf Einhaltung der GLP-Grundsätze überwacht.

The above mentioned test facility is included in the national GLP Compliance Programme and is inspected on a regular basis.

Auf der Grundlage des Inspektionsberichtes wird hiermit bestätigt, dass in dieser Prüfeinrichtung die oben genannten Prüfungen unter Einhaltung der GLP-Grundsätze durchgeführt werden können.

Based on the inspection report it can be confirmed, that this test facility is able to conduct the aforementioned studies in compliance with the Principles of GLP.

Im Auftrag

Dr. Astrid Brandt, Referentin, Wiesbaden, den 23. Oktober 2019
(Name und Funktion der verantwortlichen Person/
Name and function of responsible person)



Hessisches Ministerium für Umwelt, Klimaschutz, Landwirtschaft und Verbraucherschutz,
Mainzer Straße 80, D 65189 Wiesbaden
(Name und Adresse der GLP-Überwachungsbehörde/Name and address of the GLP Monitoring Authority)

English name and address of the GLP Monitoring Authority: Hessian Ministry for Environment, Climate Protection, Agriculture and Consumer Protection; Department II 10; P.O. Box 31 09; 65189 Wiesbaden

Translation of seal inscription: Hessian Ministry for Environment, Climate Protection, Agriculture and Consumer Protection

RESULTADOS DE TESTES E OUTROS DADOS NÃO DIVULGADOS

Estas informações, resultados de testes e outros dados não divulgados são confidenciais e de propriedade da SYNTETICAPROTEIN MULTIVOS LTDA., protegidos na forma da Lei 10.603/02 e do artigo 195, IV da

Report Number: 2137100
Lei 9.279/96

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É proibida a revelação ou divulgação, e vedado o uso, ainda que parcial ou por vias indiretas, a terceiros não autorizados.

Todos os infratores poderão ser processados civil e criminalmente

APPENDIX 3 Certificate of S9



CERTIFICATE

ICCR-Roßdorf S9 Preparation Lot No. 030920K

Date of preparation: September 03, 2020

Release date: September 14, 2020

Protein assay: 33 mg protein / ml S9

Sterility: 0 colonies / ml S9 on glucose-minimal-agar

Salmonella typhimurium assay (AMES-test)

Treatment	µl S9 / plate	number of revertants in TA 98
negative	0	28
control	100	33
10 µg/plate	0	69
2-Aminoanthracene	100	2608
10 µg/plate	0	30
Benzo(a)pyrene	100	99

The S9 was obtained from the livers of male Wistar rats which received triple treatments of 80 mg / kg body weight Phenobarbital and β -Naphthoflavone orally on consecutive days. The livers were prepared 24 hours after the last treatment.

 30. SEP. 2020

Quality Assurance Auditor
ICCR-Roßdorf GmbH

 Date

30. SEP. 2020

 Dr. Steffen Naumann
Study Director
ICCR-Roßdorf GmbH

 Date

ICCR-Roßdorf GmbH
In den Leppsteinwiesen 19, 64380 Roßdorf, Deutschland
T +49 6154 8070 F +49 6154 83399
Registergericht Darmstadt, HRB 6837, Ust-ID DE812333696
Geschäftsführer: Dr. Markus Schulz

SOP Origin TS-SOP S9_21

RESULTADOS DE TESTES E OUTROS DADOS NÃO DIVULGADOS

Estas informações, resultados de testes e outros dados não divulgados são confidenciais e de propriedade da SYNTETICAPROTEINOS MULTIVOS LTDA., protegidos na forma da Lei 10.603/02 e do artigo 195, IV da Lei 9.279/96.

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Todos os infratores poderão ser processados civil e criminalmente

CERTIFICATE

ICCR-Roßdorf S9 Preparation Lot No. 030920D

Date of preparation: September 03, 2020

Release date: November 11, 2020

Protein assay: 34.8 mg protein / ml S9

Sterility: 0 colonies / ml S9 on glucose-minimal-agar

Salmonella typhimurium assay (AMES-test)

Treatment	µl S9 / plate	number of revertants in TA 98
negative	0	27
control	100	34
10 µg/plate	0	87
2-Aminoanthracene	50	1732
10 µg/plate	0	29
Benzo(a)pyrene	100	97

The S9 was obtained from the livers of male Wistar rats which received triple treatments of 80 mg / kg body weight Phenobarbital and β-Naphthoflavone orally on consecutive days. The livers were prepared 24 hours after the last treatment.


Quality Assurance Auditor
ICCR-Roßdorf GmbH


H. Pilawa

17. NOV. 2020

Date


Dr. Steffen Naumann
Study Director
ICCR-Roßdorf GmbH

18. NOV. 2020

Date

ICCR-Roßdorf GmbH
In den Leppsteinswiesen 19, 64380 Roßdorf, Deutschland
T +49 6154 8070 F +49 6154 83399
Registergericht Darmstadt, HRB 6837, USt-ID DE812333696
Geschäftsführer: Dr. Markus Schulz

SOP Origin TS-SOP S9_23

Report Number: 2137100
Lei 9.279/96

RESULTADOS DE TESTES E OUTROS DADOS NÃO DIVULGADOS

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APPENDIX 4 Certificate of Analysis



GLP Testing Facility GOA
Analytical & Product Chemistry

Syngenta Biosciences Pvt. Ltd.
Santa Monica Works,
Corlim, Ilhas Goa 403 110
India

Certificate of Analysis

A21295D
isopyrazam/difenoconazole SC (125/125)
SG40038

Batch Identification

Other Batch ID

SG40038

Product Code

1156078

Other Product Code(s)

A21295D

CGA169374/SYN520453 SC (125/125)

Chemical Analysis

(Active Ingredient content)

- Identity of the Active Ingredients*
- Content of difenoconazole (CGA169374)*
- Content of isopyrazam (SYN520453) *

Confirmed
11.93 % w/w corresponding to 130 g/l
12.105 % w/w corresponding to 132 g/l

The Active Ingredient(s) content is within the FAO limits.

Methodology used for Characterization

HPLC, oscillating density meter

Physical Analysis

- Appearance
- Density*

Off-white liquid

1093 kg/m³

Stability:

- Storage Temperature
- Recertification Date

< 30 °C

End of August 2023

If stored under the conditions given above, this test substance can be considered stable until the recertification date is reached.

This Certificate of Analysis is summarizing data which originate either from a single study or from several individual studies. Tests marked with an asterisk (*) have been conducted in compliance with GLP. Raw data, documentation, study plans, any amendments to study plans and reports pertaining to this study(ies) are stored under the study number(s) referenced below within the archives of the GLP Testing Facility Goa at Syngenta Biosciences Pvt. Ltd., Santa Monica Works, Corlim, Ilhas, Goa 403110.

Study number of batch characterization:

SMG16520

Study number(s) of batch recertification:


Sunil B. Khot

Analytical and Product Chemistry, Goa

Authorization: 16-Sep-2020

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RESULTADOS DE TESTES E OUTROS DADOS NÃO DIVULGADOS

Estas informações, resultados de testes e outros dados não divulgados são confidenciais e de propriedade da SYNGENTA AGROBIOLOGICOS MULTIVOS LTDA., protegidos na forma da Lei 10.603/02 e do artigo 195, IV da Lei 9.279/96.

Report Number: 2137100

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Todos os infratores poderão ser processados civil e criminalmente