...ill in an order to cease and desist and to be subject to penalties ... section 2159

UNITED STATES DEPARTMENT OF AGR[ICULT]URE
ANIMAL AND PLANT HEALTH INSPECTI[ON SE]RVICE

FORM APPROVED
OMB NO 0579-0036

1. REGISTRATION NO
34-R-0008

2. HEADQUARTERS RESEARCH FACILITY (Name and Address as registered with USDA, include Zip Code)
The Dow Chemical Company
Toxicology & Environmental Research & Consulting
1803 Building
Midland, MI 48674

CONTINUATION SHEET FOR ANNUAL REPORT OF RESEARCH FACILITY
(TYPE OR PRINT)

REPORT OF ANIMALS USED BY OR UNDER CONTROL OF RESEARCH FACILITY *(Attach additional sheets if necessary or use this form.)*

A. Animals Covered By The Animal Welfare Regulations 12 &/OR 13 Other *(List by species)*	B. Number of animals being bred, conditioned, or held for use in teaching, testing, experiments, research, or surgery but not yet used for such purposes	C. Number of animals upon which teaching, research, experiments, or tests were conducted involving no pain, distress, or use of pain-relieving drugs	D. Number of animals upon which experiments, teaching, research, surgery, or tests were conducted involving accompanying pain or distress to the animals and for which appropriate anesthetic, analgesic, or tranquilizing drugs were used	E. Number of animals upon which teaching, experiments, research, surgery or tests were conducted involving accompanying pain or distress to the animals and for which the use of appropriate anesthetic, analgesic, or tranquilizing drugs would have adversely affected the procedures, results, or interpretation of the teaching, research, experiments, surgery, or tests. *(An explanation of the procedures producing pain or distress in these animals and the reasons such drugs were not used must be attached to this report)*	F. TOTAL NO OF ANIMALS (Cols. C + D + E)
None	None	None	None	None	None

ASSURANCE STATEMENTS

1) Professionally acceptable standards governing the care, treatment, and use of animals, including appropriate use of anesthetic, analgesic, and tranquilizing drugs, prior to, during and following actual research, teaching, testing, surgery, or experimentation were followed by this research facility.

2) Each principal investigator has considered alternatives to painful procedures.

3) This facility is adhering to the standards and regulations under the Act, and it has required that exceptions to the standards and regulations be specified and explained by the principal investigator and approved by the Institutional Animal Care and Use Committee (IACUC). A summary of all such exceptions is attached to this annual report. In addition to identifying the IACUC-approved exceptions, this summary includes a brief explanation of the exceptions, as well as the species and number of animals affected.

4) The attending veterinarian for this research facility has appropriate authority to ensure the provision of adequate veterinary care and to oversee the adequacy of other aspects of animal care and use.

CERTIFICATION BY HEADQUARTERS RESEARCH FACILITY OFFICIAL
(Chief Executive Officer or Legally Responsible Institutional Official)
I certify that the above is true, correct, and complete (7 U.S.C. Section 2143)

[redacted]

NAME & TITLE OF C.E.O. OR INSTITUTIONAL OFFICIAL *(Type or Print)*
[redacted]

DATE SIGNED
11/22/99

APHIS FORM 7023A (AUG 91)

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PART I HEADQUARTERS

34 R 0008

Optional Column E Explanation Form

This form is intended as an aid to completing the Column E explanation. It is not an official form and its use is voluntary. Names, addresses, protocols, veterinary care programs, and the like, are not required as part of an explanation. A Column E explanation must be written so as to be understood by lay persons as well as scientists.

1. Registration Number: 34-R-0008

2. Number 40 of animals used in this study.

3. Species (common name) Rabbit of animals used in this study.

4. **Explain the procedure producing pain and/or distress.**

The rabbits were used on studies to assess potential for dermal absorption of a test material. The studies were conducted in support of product registration according to federally mandated guidelines. As per those guidelines, the endpoint of this type of study is death.

5. **Provide scientific justification why pain and/or distress could not be relieved. State methods or means used to determine that pain and/or distress relief would interfere with test results.** (For Federally mandated testing, see question 6 below)

Studies conducted for federally mandated testing in support of product registration.

6. **What, if any, federal regulations require this procedure? Cite the agency, the Code of Federal Regulations (CFR) title number and the specific section number (e.g., APHIS, 9 CFR 113.102):**

Agency	CFR
U.S. EPA	40 CFR Subpart B 798.1100 OPPTS 870.1200, 1998
Japan MAFF	Japan MAFF Acute Dermal Toxicity, 1985
OECD	Guideline No. 402, 1987
EEC	EEC Methods Number B.3, 1992