

**Cost Estimates of Studies Required for Pesticide Registration  
May 2026**

| Test Guideline | Guideline Section or NA* | Test Name                                                                        | Average Test Cost Adjusted for Inflation to 2025 |
|----------------|--------------------------|----------------------------------------------------------------------------------|--------------------------------------------------|
| 796.3300       |                          | Simulation Test - Aerobic Sewage Treatment: Coupled Units Tests                  | \$39,900                                         |
| 810.1000       | 0.0000                   | Overview, Definitions, and General Considerations                                | \$163,000                                        |
| 810.1550       | 0.0000                   | Product Identity and Disclosure of Ingredients (Composition) (Chemical Identity) | \$400                                            |
| 810.2100       | 0.0000                   | Products for hard surfaces - AOAC Fungicide test                                 | \$2,600                                          |
| 810.2100       | 0.0000                   | Products for hard surfaces - EPA Disinfectant test                               | \$10,800                                         |
| 810.2100       | (b)&(i)                  | Chemical Analysis                                                                | \$8,100                                          |
| 810.2100       | (f)                      | Products for hard surfaces - Fungicidal test                                     | \$2,600                                          |
| 810.2100       | (g)                      | Products for hard surfaces - AOAC Tuberculocidal test                            | \$5,300                                          |
| 810.2100       | (g)                      | Products for hard surfaces - Virucidal activity method                           | \$6,500                                          |
| 810.2100       | (j)                      | Products for hard surfaces - Sanitizer test non food                             | \$6,500                                          |
| 810.2100       | (l)                      | Products for hard surfaces - Hard inanimate surface non food                     | \$6,500                                          |
| 810.2100       | (m)(2)                   | Products for hard surfaces - AOAC Germicidal, detergent sanitizers               | \$5,700                                          |
| 810.2100       | b,c,d or i               | Products for hard surfaces - AOAC use dilution test, germicidal                  | \$9,800                                          |
| 810.2100       | c,d,e                    | Products for hard surfaces - AOAC Use dilution/germicidal spray/carrier          | \$9,800                                          |
| 810.2200       | - itemized               | Additional bacteria                                                              | \$6,200                                          |
| 810.2200       | - itemized               | Broad spectrum disinfectant                                                      | \$8,800                                          |
| 810.2200       | - itemized               | Food contact - Halide products                                                   | \$6,800                                          |
| 810.2200       | - itemized               | Food contact - Non-halide products                                               | \$9,300                                          |
| 810.2200       | - itemized               | Fungicidal disinfectant                                                          | \$6,400                                          |
| 810.2200       | - itemized               | Hospital disinfectant                                                            | \$9,100                                          |
| 810.2200       | - itemized               | Limited disinfectant                                                             | \$6,400                                          |
| 810.2200       | - itemized               | Non-food contact                                                                 | \$7,900                                          |
| 810.2200       | - itemized               | Residual self-sanitizing - wet surfaces                                          | \$7,900                                          |
| 810.2200       | - itemized               | Sanitizers for urinal and toilet bowl water and in-tank sanitizers               | \$8,600                                          |
| 810.2200       | - itemized               | Sterilants                                                                       | \$18,000                                         |
| 810.2200       | - itemized               | Tuberculocidal disinfectant                                                      | \$7,200                                          |
| 810.2200       | - itemized               | Virucidal disinfectant                                                           | \$19,900                                         |
| 810.2200       |                          | Products for hard surfaces - AVG                                                 | \$9,400                                          |
| 810.2300       | b                        | Products for fabrics/textiles - EPA Carpet Sanitizer                             | \$5,300                                          |
| 810.2400       | (b)(j)                   | Chemical Analysis                                                                | \$300                                            |
| 810.2400       | (b)(l)                   | Chemical Analysis                                                                | \$6,500                                          |
| 810.2400       |                          | Products for air sanitizers                                                      | \$8,400                                          |
| 810.2600       |                          | Products for microbial pests associated with human and animal waste              | \$8,700                                          |
| 810.2700       | (d)                      | Products for treating water systems AOAC - water disinfectants pools             | \$12,200                                         |
| 810.3000       |                          | General considerations for efficacy of invertebrate control agents               | \$1,000                                          |
| 810.3100       |                          | Soil treatments for imported fire ants                                           | \$23,500                                         |
| 810.3200       |                          | Livestock, poultry, fur, and wool bearing animal treatments                      | \$245,500                                        |
| 810.3300       |                          | Treatments to control pests of human and pets                                    | \$349,300                                        |
| 810.3400       |                          | Mosquito, blackfly, and biting midge treatments                                  | \$68,600                                         |
| 810.3500       |                          | Premises Treatments                                                              | \$22,900                                         |
| 810.3600       |                          | Structural Treatments                                                            | \$44,200                                         |
| 810.3700       | - itemized               | Cage studies with biting flies                                                   | \$33,100                                         |
| 810.3700       | - itemized               | Cage studies with mosquitoes                                                     | \$29,900                                         |
| 810.3700       | - itemized               | Field studies with biting flies                                                  | \$100,800                                        |
| 810.3700       | - itemized               | Field studies with mosquitoes                                                    | \$100,800                                        |
| 810.3700       | - itemized               | Lab studies with ticks                                                           | \$43,900                                         |

| Test Guideline | Guideline Section or NA* | Test Name                                                             | Average Test Cost Adjusted for Inflation to 2025 |
|----------------|--------------------------|-----------------------------------------------------------------------|--------------------------------------------------|
| 810.3700       |                          | Insect repellants for human skin and outdoor premises                 | \$124,300                                        |
| 810.3800       | 0.0000                   | Methods for efficacy testing of termite baits                         | \$91,500                                         |
| 830.1550       |                          | Product identity and composition                                      | \$400                                            |
| 830.1600       |                          | Description of materials used to produce the product                  | \$500                                            |
| 830.1620       |                          | Description of production process                                     | \$600                                            |
| 830.1650       |                          | Description of formulation process                                    | \$600                                            |
| 830.1670       |                          | Discussion of formulation of impurities                               | \$600                                            |
| 830.1700       |                          | Preliminary analysis                                                  | \$48,000                                         |
| 830.1750       |                          | Certified limits                                                      | \$400                                            |
| 830.1800       |                          | Enforcement analytical method                                         | \$25,200                                         |
| 830.1900       |                          | Submittal of samples                                                  | \$800                                            |
| 830.6302       |                          | Color                                                                 | \$1,100                                          |
| 830.6303       |                          | Physical state                                                        | \$1,100                                          |
| 830.6304       |                          | Odor                                                                  | \$1,100                                          |
| 830.6313       |                          | Stability to normal and elevated temperatures, metals, and metal ions | \$13,400                                         |
| 830.6314       |                          | Oxidation/reduction: chemical incompatibility                         | \$4,600                                          |
| 830.6315       |                          | Flammability                                                          | \$3,300                                          |
| 830.6316       |                          | Explosibility                                                         | \$6,300                                          |
| 830.6317       |                          | Storage stability                                                     | \$18,700                                         |
| 830.6319       |                          | Miscibility                                                           | \$1,800                                          |
| 830.6320       |                          | Corrosion characteristics                                             | \$4,500                                          |
| 830.6321       |                          | Dielectric breakdown voltage                                          | \$3,900                                          |
| 830.7000       |                          | pH                                                                    | \$1,200                                          |
| 830.7050       |                          | UV/visible light absorption                                           | \$3,300                                          |
| 830.7100       |                          | Viscosity                                                             | \$2,300                                          |
| 830.7200       |                          | Melting point/melting range                                           | \$2,000                                          |
| 830.7220       |                          | Boiling point/boiling range                                           | \$2,400                                          |
| 830.7300       |                          | Density/relative density/bulk density                                 | \$2,300                                          |
| 830.7370       |                          | Dissociation constants in water                                       | \$7,400                                          |
| 830.7520       |                          | Particle size, fiber length, and diameter distribution                | \$2,200                                          |
| 830.7550       |                          | Partition coefficient (n-octanol/water) - shake flask method          | \$10,200                                         |
| 830.7560       |                          | Partition coefficient (n-octanol/water) - generator column            | \$10,900                                         |
| 830.7570       |                          | Partition coefficient (n-octanol/water) - estimation chromatography   | \$7,200                                          |
| 830.7840       |                          | Water Solubility: column elution/shake flask                          | \$14,700                                         |
| 830.7860       |                          | Water solubility                                                      | \$14,700                                         |
| 830.7950       |                          | Vapor pressure                                                        | \$24,500                                         |
| 835.1110       |                          | Activated Sludge Sorption Isotherm                                    | \$28,100                                         |
| 835.1230       |                          | Sediment and soil adsorption/desorption                               | \$60,900                                         |
| 835.1240       |                          | Leaching and adsorption/desorption                                    | \$83,200                                         |
| 835.1410       |                          | Laboratory volatility                                                 | \$40,000                                         |
| 835.2120       |                          | Hydrolysis                                                            | \$59,800                                         |
| 835.2210       |                          | Direct Photolysis                                                     | \$56,000                                         |
| 835.2240       |                          | Photodegradation in water                                             | \$73,000                                         |
| 835.2370       |                          | Photodegradation in air                                               | \$195,600                                        |
| 835.2410       |                          | Soil photolysis                                                       | \$105,400                                        |
| 835.3110       |                          | Ready Biodegradability                                                | \$12,300                                         |
| 835.3180       |                          | Freshwater and marine or estuarine environmental expression testing   | \$184,000                                        |
| 835.3220       |                          | Porous Pot Test                                                       | \$47,000                                         |

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|----------------|--------------------------|------------------------------------------------------------------------------------------------------------|--------------------------------------------------|
| 835.3280       |                          | Simulation tests to assess the primary and ultimate biodegradability of chemicals discharged to wastewater | \$166,600                                        |
| 835.3300       |                          | Soil Persistence and Degradation                                                                           | \$183,000                                        |
| 835.4100       |                          | Aerobic soil metabolism                                                                                    | \$153,800                                        |
| 835.4200       |                          | Anaerobic soil metabolism                                                                                  | \$214,000                                        |
| 835.4300       |                          | Aerobic aquatic metabolism                                                                                 | \$145,600                                        |
| 835.4400       |                          | Anaerobic aquatic metabolism                                                                               | \$829,000                                        |
| 835.6100       |                          | Terrestrial field dissipation                                                                              | \$518,000                                        |
| 835.6200       |                          | Aquatic field dissipation                                                                                  | \$435,600                                        |
| 835.6300       |                          | Forestry dissipation                                                                                       | \$449,100                                        |
| 835.6400       |                          | Combination and tank mixes                                                                                 | \$701,600                                        |
| 835.7100       |                          | Groundwater Monitoring                                                                                     | \$2,178,000                                      |
| 835.8100       |                          | Field volatility                                                                                           | \$739,000                                        |
| 840.1100       |                          | Spray droplet size spectrum                                                                                | \$394,600                                        |
| 840.1200       |                          | Spray drift field deposition                                                                               | \$24,800                                         |
| 850.1000       |                          | Use Profile                                                                                                | \$400                                            |
| 850.1010       |                          | Aquatic invertebrate acute toxicity, freshwater daphnids                                                   | \$27,700                                         |
| 850.1020       |                          | Gammarid acute toxicity test                                                                               | NA                                               |
| 850.1025       |                          | Oyster acute toxicity test                                                                                 | \$32,800                                         |
| 850.1035       |                          | Mysid acute toxicity test                                                                                  | \$32,800                                         |
| 850.1045       |                          | Penaeid acute toxicity test                                                                                | \$32,800                                         |
| 850.1055       |                          | Bivalve acute tox larval (embryo/larval)                                                                   | \$32,800                                         |
| 850.1075       |                          | Fish acute toxicity (freshwater)                                                                           | \$18,200                                         |
| 850.1075       |                          | Fish acute toxicity test (estaurine/marine)                                                                | \$17,700                                         |
| 850.1300       |                          | Daphnid chronic toxicity test                                                                              | \$192,500                                        |
| 850.1350       |                          | Mysid chronic tox - aquatic invertebrate life-cycle (saltwater)                                            | \$59,200                                         |
| 850.1400       |                          | Fish early-life stage toxicity test (freshwater)                                                           | \$60,800                                         |
| 850.1450       |                          | Fish early-life stage toxicity test (saltwater)                                                            | NA                                               |
| 850.1500       |                          | Fish life-cycle toxicity                                                                                   | \$835,400                                        |
| 850.1710       |                          | Aquatic Bioavailability/Biomagnification: Oyster BCF                                                       | \$189,000                                        |
| 850.1730       |                          | Aquatic Bioavailability/Biomagnification: Fish BCF                                                         | \$214,200                                        |
| 850.1735       |                          | Whole sediment acute toxicity invertebrates (freshwater)                                                   | \$36,200                                         |
| 850.1740       |                          | Whole sediment acute toxicity invertebrates (marine)                                                       | \$53,300                                         |
| 850.1790       |                          | Chironomid sediment toxicity test                                                                          | \$131,600                                        |
| 850.1800       |                          | Tadpole/sediment subchronic toxicity test                                                                  | \$310,600                                        |
| 850.1850       |                          | Aquatic food chain transfer - Bioavailability                                                              | \$495,700                                        |
| 850.1900       |                          | Generic freshwater microcosm test (laboratory)                                                             | \$467,800                                        |
| 850.1925       |                          | Site-specific aquatic microcosm test (laboratory)                                                          | \$396,400                                        |
| 850.1950       |                          | Simulated or actual field testing - aquatic                                                                | \$978,100                                        |
| 850.1950       |                          | Simulated or actual field testing - field animal                                                           | \$835,400                                        |
| 850.1950       |                          | Simulated or actual field testing - insect predators                                                       | \$142,600                                        |
| 850.1950       |                          | Simulated or actual field testing - plants                                                                 | \$101,900                                        |
| 850.2100       |                          | Avian acute oral toxicity test                                                                             | \$16,500                                         |
| 850.2200       |                          | Avian dietary toxicity test                                                                                | \$10,600                                         |
| 850.2300       |                          | Avian reproduction test                                                                                    | \$274,300                                        |
| 850.2400       |                          | Wild mammal acute toxicity                                                                                 | \$68,600                                         |
| 850.2500       |                          | Simulated or actual field testing - birds                                                                  | \$978,100                                        |
| 850.2500       |                          | Simulated or actual field testing terrestrial wildlife                                                     | \$859,100                                        |
| 850.3020       |                          | Honey bee acute contact toxicity                                                                           | \$10,200                                         |

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|----------------|--------------------------|--------------------------------------------------------------------------------------------|--------------------------------------------------|
| 850.3030       |                          | Honey bee toxicity of residues on foliage                                                  | \$23,800                                         |
| 850.3040       |                          | Field testing for pollinators                                                              | \$341,600                                        |
| 850.4000       |                          | Background - Nontarget plant testing                                                       | NA                                               |
| 850.4025       |                          | Target area phytotoxicity                                                                  | NA                                               |
| 850.4100       |                          | Terrestrial plant toxicity (seedling emergence, Tier I)                                    | \$26,000                                         |
| 850.4150       |                          | Terrestrial plant toxicity (vegetative vigor, Tier I)                                      | \$26,400                                         |
| 850.4200       |                          | Seed germination                                                                           | \$45,500                                         |
| 850.4200       |                          | Seed germination/root elongation toxicity test                                             | \$18,300                                         |
| 850.4225       |                          | Seedling emergence, Tier II                                                                | \$33,200                                         |
| 850.4230       |                          | Early seed growth toxicity test                                                            | NA                                               |
| 850.4250       |                          | Vegetative vigor, Tier II                                                                  | \$52,700                                         |
| 850.4300       |                          | Terrestrial plants field study, Tier III                                                   | \$62,700                                         |
| 850.4400       |                          | Aquatic plant toxicology test using Lemna spp., Tier I                                     | \$51,800                                         |
| 850.4400       |                          | Aquatic plant toxicology test using Lemna spp., Tier II                                    | \$53,600                                         |
| 850.4450       |                          | Aquatic plants field study, Tier III                                                       | \$40,600                                         |
| 850.4500       |                          | Algal Toxicity Tier I and Tier II                                                          | \$20,600                                         |
| 850.5100       |                          | Soil microbial community toxicity test                                                     | \$20,300                                         |
| 850.6100       |                          | Environmental chemistry methods and associated independent laboratory validations for soil | \$80,000                                         |
| 850.6800       |                          | Modified activated sludge, respiration inhibition test                                     | \$6,100                                          |
| 860.1100       |                          | Chemical identity                                                                          | \$2,000                                          |
| 860.1200       |                          | Directions for use                                                                         | \$6,500                                          |
| 860.1300       |                          | Nature of the residue in livestock                                                         | \$172,500                                        |
| 860.1300       |                          | Nature of the residue in plants                                                            | \$163,000                                        |
| 860.1340       |                          | Residue analytical method - livestock                                                      | \$106,800                                        |
| 860.1340       |                          | Residue analytical method - plants                                                         | \$20,700                                         |
| 860.1360       |                          | Multiresidue method                                                                        | \$39,100                                         |
| 860.1380       |                          | Storage stability data                                                                     | \$28,200                                         |
| 860.1400       |                          | Fish                                                                                       | \$169,500                                        |
| 860.1400       |                          | Irrigated crops (one-crop)                                                                 | \$124,700                                        |
| 860.1400       |                          | Water                                                                                      | \$87,600                                         |
| 860.1460       |                          | Food handling                                                                              | \$334,200                                        |
| 860.1480       |                          | Meat/milk/poultry/eggs                                                                     | \$242,900                                        |
| 860.1500       |                          | Crop field trials                                                                          | \$119,200                                        |
| 860.1520       |                          | Processed food/feed                                                                        | \$128,100                                        |
| 860.1540       |                          | Reduction of Residues                                                                      | \$24,500                                         |
| 860.1550       |                          | Proposed tolerance                                                                         | \$8,700                                          |
| 860.1560       |                          | Reasonable grounds in support of the petition                                              | \$16,300                                         |
| 860.1650       |                          | Submittal of analytical reference standards                                                | \$500                                            |
| 860.1850       |                          | Confined accumulation in rotational crops                                                  | \$381,100                                        |
| 860.1900       |                          | Field accumulation in rotational crops                                                     | \$244,500                                        |
| 870.1100       |                          | Acute oral toxicity (rat)                                                                  | \$5,700                                          |
| 870.1200       |                          | Acute dermal toxicity                                                                      | \$8,300                                          |
| 870.1300       |                          | Acute inhalation tox (microbials)                                                          | \$19,600                                         |
| 870.1300       |                          | Acute inhalation toxicity (rat)                                                            | \$40,100                                         |
| 870.2400       |                          | Acute eye irritation (rabbit)                                                              | \$3,300                                          |
| 870.2500       |                          | Acute dermal irritation                                                                    | \$3,300                                          |
| 870.2600       |                          | Skin (dermal) sensitization                                                                | \$11,600                                         |
| 870.3100       |                          | 90-day oral toxicity in rodents                                                            | \$225,100                                        |

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|----------------|--------------------------|------------------------------------------------------------------------------------------------------|--------------------------------------------------|
| 870.3150       |                          | 90-day oral toxicity in non-rodents                                                                  | \$337,100                                        |
| 870.3200       |                          | 21/28-day dermal toxicity                                                                            | \$148,000                                        |
| 870.3250       |                          | 90-day dermal toxicity                                                                               | \$188,300                                        |
| 870.3355       |                          | Combined Chronic Toxicity/Carcinogenicity Testing of Respirable Fibrous Particles (inhalation route) | \$5,281,100                                      |
| 870.3465       |                          | 90-day inhalation toxicity (rat)                                                                     | \$747,100                                        |
| 870.3700       |                          | Prenatal developmental toxicity study (rabbit)                                                       | \$237,400                                        |
| 870.3700       |                          | Prenatal developmental toxicity study (rat)                                                          | \$166,800                                        |
| 870.3800       |                          | Reproduction and fertility effects (multigeneration) - rat                                           | \$560,400                                        |
| 870.4100       |                          | Chronic oral toxicity - dog                                                                          | \$1,079,900                                      |
| 870.4200       |                          | Carcinogenicity (microbials)                                                                         | \$1,642,900                                      |
| 870.4200       |                          | Carcinogenicity (rat and mouse, preferred)                                                           | \$2,300,400                                      |
| 870.5100       |                          | Bacterial reverse mutation assay                                                                     | \$7,600                                          |
| 870.5300       |                          | In vitro mammalian cell gene mutation test                                                           | \$34,200                                         |
| 870.5375       |                          | In vitro mammalian chromosomal aberration test                                                       | \$41,000                                         |
| 870.5380       |                          | Mammalian spermatogonial chromosomal aberration test                                                 | \$31,600                                         |
| 870.5385       |                          | Mammalian bone marrow chromosomal aberration test                                                    | \$48,900                                         |
| 870.5395       |                          | Mammalian erythrocyte micronucleus test                                                              | \$33,500                                         |
| 870.5450       |                          | Rodent dominant lethal assay                                                                         | NA                                               |
| 870.5500       |                          | Bacterial DNA damage or repair tests                                                                 | NA                                               |
| 870.5550       |                          | Unscheduled DNA synthesis in mammalian cells in culture                                              | \$36,700                                         |
| 870.6100       |                          | Acute and 28 day delayed neurotoxicity organophosphorus substances (hen)                             | \$141,100                                        |
| 870.6200       |                          | 90-day Neurotoxicity (rat)                                                                           | \$327,200                                        |
| 870.6200       |                          | Acute neurotoxicity (rat)                                                                            | \$221,700                                        |
| 870.6300       |                          | Developmental neurotoxicity study                                                                    | \$1,000,900                                      |
| 870.6500       |                          | Schedule-controlled operant behavior                                                                 | \$291,600                                        |
| 870.6850       |                          | Peripheral nerve function                                                                            | \$195,600                                        |
| 870.6855       |                          | Neurophysiology: sensory evoked potentials                                                           | \$195,600                                        |
| 870.7200       |                          | Companion animal safety                                                                              | \$277,400                                        |
| 870.7485       |                          | Metabolism and pharmacokinetics                                                                      | \$278,700                                        |
| 870.7600       |                          | Dermal penetration                                                                                   | \$225,000                                        |
| 870.7800       |                          | Immunotoxicity                                                                                       | \$92,300                                         |
| 875.1100       |                          | Dermal outdoor exposure                                                                              | \$273,600                                        |
| 875.1200       |                          | Dermal indoor exposure                                                                               | \$206,100                                        |
| 875.1300       |                          | Inhalation outdoor exposure (HRSB costs not included)                                                | \$641,200                                        |
| 875.1400       |                          | Inhalation indoor exposure                                                                           | \$206,100                                        |
| 875.1500       |                          | Biological monitoring                                                                                | \$307,100                                        |
| 875.1600       |                          | Application exposure data reporting and calculations                                                 | \$13,300                                         |
| 875.1700       |                          | Product use information                                                                              | \$4,900                                          |
| 875.2100       |                          | Dislodgeable foliar residue dissipation and turf transferable residues                               | \$98,000                                         |
| 875.2200       |                          | Soil residue dissipation                                                                             | \$361,500                                        |
| 875.2300       |                          | Indoor surface residue dissipation                                                                   | \$107,500                                        |
| 875.2400       |                          | Dermal exposure                                                                                      | \$223,100                                        |
| 875.2500       |                          | Inhalation exposure                                                                                  | \$129,800                                        |
| 875.2600       |                          | Biological monitoring (HRSB costs not included)                                                      | \$534,300                                        |
| 875.2700       |                          | Product use information                                                                              | \$5,300                                          |
| 875.2800       |                          | Description of human activity                                                                        | \$5,300                                          |
| 875.2900       |                          | Data reporting and calculations                                                                      | \$5,300                                          |
| 875.3000       |                          | Nondietary ingestion exposure                                                                        | \$133,300                                        |

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|----------------|--------------------------|------------------------------------------------------------------|--------------------------------------------------|
| 880.1100       |                          | Product identity                                                 | \$400                                            |
| 880.1200       |                          | Description materials, production, formulation                   | \$1,500                                          |
| 880.1400       |                          | Discussion of formation of impurities                            | \$500                                            |
| 880.3800       |                          | Immune Response                                                  | \$138,600                                        |
| 880.4350       |                          | Non-target insect testing                                        | \$24,500                                         |
| 880.4425       |                          | Dispenser - water leaching                                       | \$40,800                                         |
| 885.1100       |                          | Product Identity                                                 | \$8,200                                          |
| 885.1200       | a                        | Manufacturing process                                            | \$5,700                                          |
| 885.1200       | b                        | Deposition of samples                                            | \$5,700                                          |
| 885.1300       |                          | Discussion of formulation of unintentional ingredients           | \$5,700                                          |
| 885.1400       |                          | Analysis of samples                                              | \$121,400                                        |
| 885.1500       |                          | Certification of limits                                          | \$600                                            |
| 885.2000       |                          | Background for residue analysis of microbial pest control agents | NA                                               |
| 885.2100       |                          | Chemical identity                                                | \$1,100                                          |
| 885.2200       |                          | Nature of the residue in plants                                  | \$176,600                                        |
| 885.2250       |                          | Nature of the residue in animals                                 | \$191,000                                        |
| 885.2300       |                          | Analytical method - plants                                       | \$43,300                                         |
| 885.2350       |                          | Analytical method - animals                                      | \$71,600                                         |
| 885.2400       |                          | Storage stability, plants                                        | \$50,600                                         |
| 885.2500       |                          | Magnitude of residue in plants                                   | \$223,600                                        |
| 885.2550       |                          | Magnitude of residue in meat/milk/poultry                        | \$257,000                                        |
| 885.2600       |                          | Magnitude of residue in potable water, fish, and irrigated crops | \$361,000                                        |
| 885.3000       |                          | Background Mammalian Infectivity/pathogenicity analysis          | \$407,500                                        |
| 885.3050       |                          | Acute oral toxicity/pathogenicity                                | \$53,800                                         |
| 885.3150       |                          | Acute pulmonary toxicity/pathogenicity                           | \$61,100                                         |
| 885.3200       |                          | Acute injection toxicity/pathogenicity (intraperitoneal)         | \$20,400                                         |
| 885.3200       |                          | Acute injection toxicity/pathogenicity (intravenous)             | \$61,100                                         |
| 885.3400       |                          | Hypersensitivity incidents                                       | \$1,300                                          |
| 885.3500       |                          | Cell Culture                                                     | \$48,900                                         |
| 885.3550       |                          | Acute toxicity, TI                                               | \$35,000                                         |
| 885.3600       |                          | Subchronic toxicity/pathogenicity                                | \$244,500                                        |
| 885.3650       |                          | Reproductive/fertility effects                                   | \$118,200                                        |
| 885.4050       |                          | Avian Oral, TI                                                   | \$24,500                                         |
| 885.4100       |                          | Avian Inhalation toxicity/pathogenicity, TI                      | \$26,100                                         |
| 885.4150       |                          | Wild mammal toxicity/pathogenicity,TI                            | \$106,000                                        |
| 885.4200       |                          | Freshwater fish toxicity/pathogenicity,TI                        | \$61,100                                         |
| 885.4240       |                          | Freshwater invertebrate toxicity/pathogenicity,TI                | \$61,100                                         |
| 885.4280       |                          | Estuarine/marine animal testing, TI                              | \$65,200                                         |
| 885.4280       |                          | Estuarine/marine invertebrate testing,TI                         | \$65,200                                         |
| 885.4300       |                          | Nontarget plant studies, TI                                      | \$54,500                                         |
| 885.4340       |                          | Nontarget insect testing, Tier I                                 | \$17,100                                         |
| 885.4340       |                          | Non-target Lepidoptera                                           | \$54,900                                         |
| 885.4350       |                          | Beneficial soil invertebrate testing - Collembola                | \$18,700                                         |
| 885.4380       |                          | Honey bee testing                                                | \$17,700                                         |
| 885.4600       |                          | Avian chronic pathogenicity and reproduction, TIII               | \$285,300                                        |
| 885.4650       |                          | Aquatic invertebrate range testing,TIII                          | \$41,600                                         |
| 885.4700       |                          | Fish life cycle studies,TIII                                     | \$407,500                                        |
| 885.4750       |                          | Aquatic ecosystem test                                           | \$570,500                                        |

| Test Guideline | Guideline Section or NA* | Test Name                                                                                                                                                                                                                                                                       | Average Test Cost Adjusted for Inflation to 2025 |
|----------------|--------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------|
| 885.5200       |                          | Terrestrial environmental expression tests                                                                                                                                                                                                                                      | \$154,900                                        |
| 885.5300       |                          | Freshwater environmental expression test                                                                                                                                                                                                                                        | NA                                               |
| 885.5400       |                          | Marine or estuarine environmental expression tests                                                                                                                                                                                                                              | \$154,900                                        |
| OECD 121       |                          | Estimation for the Sorption Coefficient (Koc) on Soil and Sewage Sludge using High Performance Liquid Chromatography                                                                                                                                                            | \$6,800                                          |
| OECD 303A      |                          | Simulation Test - Aerobic Sewage Treatment, with measurement of loss of the parent                                                                                                                                                                                              | \$65,200                                         |
|                | NA                       | 90-day oral toxicity                                                                                                                                                                                                                                                            | \$199,000                                        |
|                | NA                       | Acute oral toxicity                                                                                                                                                                                                                                                             | \$64,800                                         |
|                | NA                       | Additive effects - synergy study                                                                                                                                                                                                                                                | \$35,100                                         |
|                | NA                       | Allergenicity Info: in vitro digestibility in SGF                                                                                                                                                                                                                               | \$50,400                                         |
|                | NA                       | Allergenicity analysis (combination of in vitro digestibility in SGF, Assessment of heat stability/lability, Bioinformatic amino acid sequence analysis (comparison to allergens), and in vitro digestibility in SIF)                                                           | \$145,600                                        |
|                | NA                       | Allergenicity Info: Bioinformatic amino acid sequence analysis (comparison to allergens)                                                                                                                                                                                        | \$5,100                                          |
|                | NA                       | Allergenicity Info: Assessment of heat stability/lability                                                                                                                                                                                                                       | \$39,600                                         |
|                | NA                       | Allergenicity Information: specific serum-binding study                                                                                                                                                                                                                         | \$167,800                                        |
|                | NA                       | Amphibian Metamorphosis (Frog)                                                                                                                                                                                                                                                  | \$118,200                                        |
|                | NA                       | Analytical detection method                                                                                                                                                                                                                                                     | \$94,400                                         |
|                | NA                       | Androgen Receptor Binding (Rat Prostrate)                                                                                                                                                                                                                                       | \$34,300                                         |
|                | NA                       | Annual reporting                                                                                                                                                                                                                                                                | \$95,700                                         |
|                | NA                       | Appropriate identifier for active and inert ingredient(s) (e.g., name or designation )                                                                                                                                                                                          | \$400                                            |
|                | NA                       | Aromatase (Human Recombinant)                                                                                                                                                                                                                                                   | \$42,900                                         |
|                | NA                       | Arthropod - toxicity (combination of all nontarget insect testing tests)                                                                                                                                                                                                        | \$64,500                                         |
|                | NA                       | Assessment of heat stability/lability.                                                                                                                                                                                                                                          | \$43,600                                         |
|                | NA                       | Avian dietary toxicity                                                                                                                                                                                                                                                          | \$9,300                                          |
|                | NA                       | Avian oral toxicity                                                                                                                                                                                                                                                             | \$29,100                                         |
|                | NA                       | Avian single-dose oral LD50                                                                                                                                                                                                                                                     | \$14,600                                         |
|                | NA                       | Beneficial soil invertebrate testing - Collembola                                                                                                                                                                                                                               | \$17,700                                         |
|                | NA                       | Beneficial soil invertebrate testing - Earthworm                                                                                                                                                                                                                                | \$17,700                                         |
|                | NA                       | Bioinformatic amino acid sequence analysis (comparison to toxins) (also called a global amino acid sequence comparison)                                                                                                                                                         | \$5,100                                          |
|                | NA                       | Bioinformatic amino acid sequence comparison of short contiguous amino acid segments using an allergen database to identify any allergens containing identical short sequences                                                                                                  | \$11,900                                         |
|                | NA                       | Bioinformatic amino acid sequence search for overall similarity with known toxins and allergens                                                                                                                                                                                 | \$9,500                                          |
|                | NA                       | Biology of the plant (high)                                                                                                                                                                                                                                                     | \$24,000                                         |
|                | NA                       | Biology of the plant (low)                                                                                                                                                                                                                                                      | \$4,600                                          |
|                | NA                       | Certification of limits                                                                                                                                                                                                                                                         | \$400                                            |
|                | NA                       | Characterization of inserted DNA                                                                                                                                                                                                                                                | \$2,700                                          |
|                | NA                       | Characterization of inserted DNA and Inheritance and stability                                                                                                                                                                                                                  | \$3,100                                          |
|                | NA                       | Characterization of protein (active/inert)                                                                                                                                                                                                                                      | \$114,500                                        |
|                | NA                       | Degradation rate in the environment                                                                                                                                                                                                                                             | \$489,800                                        |
|                | NA                       | Description of propensity of the crop plant to naturalize, including extent of existing feral populations (In most cases, sufficient information can be obtained from literature searches and/or consultations with breeders. Field surveys may be required in some instances.) | \$23,800                                         |
|                | NA                       | Description of the intended trait                                                                                                                                                                                                                                               | \$400                                            |
|                | NA                       | Development and implementation of a resistance monitoring plan to detect potential resistance to the PIP in the field - TOTAL                                                                                                                                                   | \$1,451,900                                      |

| Test Guideline | Guideline Section or NA* | Test Name                                                                                                                                                                                                                                                                                                    | Average Test Cost Adjusted for Inflation to 2025 |
|----------------|--------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------|
|                | NA                       | Development and implementation of a resistance monitoring plan to detect potential resistance to the PIP in the field                                                                                                                                                                                        | \$110,400                                        |
|                | NA                       | Development and implementation of a resistance monitoring plan to detect potential resistance to the PIP in the field - Annual Reporting                                                                                                                                                                     | \$82,800                                         |
|                | NA                       | Development and implementation of a resistance monitoring plan to detect potential resistance to the PIP in the field - Bioassays                                                                                                                                                                            | \$467,900                                        |
|                | NA                       | Development and implementation of a resistance monitoring plan to detect potential resistance to the PIP in the field - Implementation Monitoring, Reporting                                                                                                                                                 | \$112,200                                        |
|                | NA                       | Development and implementation of a resistance monitoring plan to detect potential resistance to the PIP in the field - Plan Development Cost                                                                                                                                                                | \$816,600                                        |
|                | NA                       | Development of a grower education program                                                                                                                                                                                                                                                                    | \$610,100                                        |
|                | NA                       | Development of a refuge compliance plan                                                                                                                                                                                                                                                                      | \$5,900                                          |
|                | NA                       | Development of a remedial action plan to mitigate potential resistance to the PIP in the field                                                                                                                                                                                                               | \$14,700                                         |
|                | NA                       | Dose expression for the target pests                                                                                                                                                                                                                                                                         | \$541,800                                        |
|                | NA                       | Endangered species exposure determination                                                                                                                                                                                                                                                                    | \$94,700                                         |
|                | NA                       | Environmental Fate – Field Persistence                                                                                                                                                                                                                                                                       | \$1,781,000                                      |
|                | NA                       | Estrogen Receptor Binding (Rat Uterine)                                                                                                                                                                                                                                                                      | \$33,600                                         |
|                | NA                       | Estrogen Receptor Transcriptional Activation (Human Cell Line)                                                                                                                                                                                                                                               | \$34,400                                         |
|                | NA                       | Estuarine and marine animal toxicity                                                                                                                                                                                                                                                                         | \$57,600                                         |
|                | NA                       | Evaluation of environmental impacts of gene flow between sexually compatible plants                                                                                                                                                                                                                          | \$144,800                                        |
|                | NA                       | Evaluation of potential weediness                                                                                                                                                                                                                                                                            | \$0                                              |
|                | NA                       | Expression level in plant                                                                                                                                                                                                                                                                                    | \$453,800                                        |
|                | NA                       | Female Pubertal (Rat)                                                                                                                                                                                                                                                                                        | \$139,700                                        |
|                | NA                       | Field persistence                                                                                                                                                                                                                                                                                            | \$135,700                                        |
|                | NA                       | Field studies                                                                                                                                                                                                                                                                                                | \$305,000                                        |
|                | NA                       | Fish Short-term Reproduction                                                                                                                                                                                                                                                                                 | \$160,200                                        |
|                | NA                       | Freshwater fish oral toxicity                                                                                                                                                                                                                                                                                | \$17,200                                         |
|                | NA                       | Freshwater invertebrate testing (aka Freshwater invertebrate - toxicity)                                                                                                                                                                                                                                     | \$54,000                                         |
|                | NA                       | Hershberger (Rat)                                                                                                                                                                                                                                                                                            | \$65,700                                         |
|                | NA                       | Honey bee adult acute oral toxicity                                                                                                                                                                                                                                                                          | \$12,400                                         |
|                | NA                       | Honey bee larvae acute oral toxicity                                                                                                                                                                                                                                                                         | \$28,300                                         |
|                | NA                       | Honey bee adult chronic oral toxicity                                                                                                                                                                                                                                                                        | \$32,800                                         |
|                | NA                       | Honey bee larvae chronic oral toxicity                                                                                                                                                                                                                                                                       | \$45,200                                         |
|                | NA                       | Human Subjects Review Board Costs                                                                                                                                                                                                                                                                            | \$37,800                                         |
|                | NA                       | Hypersensitivity incidents                                                                                                                                                                                                                                                                                   | \$1,200                                          |
|                | NA                       | Identification of transformation event and PIP ingredients (combination of OECD unique identifier for transformation event and appropriate identifier for active and inert ingredient(s))                                                                                                                    | \$800                                            |
|                | NA                       | If an analytical method for residue exists - analytical method for soil and/or water                                                                                                                                                                                                                         | \$21,600                                         |
|                | NA                       | If an analytical method for residue exists - independent lab validation of the completed analytical methods                                                                                                                                                                                                  | \$24,500                                         |
|                | NA                       | In vitro digestibility in simulated gastric fluid and simulated intestinal fluid (as defined in the U.S. Pharmacopeia)                                                                                                                                                                                       | \$55,500                                         |
|                | NA                       | Independent lab validation of an analytical method                                                                                                                                                                                                                                                           | \$24,500                                         |
|                | NA                       | Inheritance and stability                                                                                                                                                                                                                                                                                    | \$300                                            |
|                | NA                       | Japanese Quail Two-Generation Toxicity Test                                                                                                                                                                                                                                                                  | \$471,300                                        |
|                | NA                       | Laboratory and/or greenhouse testing to determine sexual compatibility/ability to form a viable hybrid between the modified crop plant and wild or weedy relatives in the United States. Testing would begin with the most closely related species in the same family that occur in the area of cultivation. | \$118,900                                        |



| Test Guideline | Guideline Section or NA* | Test Name                                                                                                                                                                                                                                                                                                                                                                                         | Average Test Cost Adjusted for Inflation to 2025 |
|----------------|--------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------|
|                | NA                       | Lack of association of proteins in solution                                                                                                                                                                                                                                                                                                                                                       | \$5,200                                          |
|                | NA                       | Larval Amphibian Growth and Development Test                                                                                                                                                                                                                                                                                                                                                      | \$363,000                                        |
|                | NA                       | Male Pubertal (Rat)                                                                                                                                                                                                                                                                                                                                                                               | \$144,600                                        |
|                | NA                       | Medaka Extended One-Generation Reproduction Test                                                                                                                                                                                                                                                                                                                                                  | \$447,700                                        |
|                | NA                       | Nonarthropod invertebrate - toxicity (for a single species) (combination of Beneficial soil invertebrate testing for Collembola and Earthworms)                                                                                                                                                                                                                                                   | \$17,700                                         |
|                | NA                       | Non-target Arthropod Study (3 species)                                                                                                                                                                                                                                                                                                                                                            | \$172,900                                        |
|                | NA                       | Non-Target Hemiptera Study                                                                                                                                                                                                                                                                                                                                                                        | \$57,600                                         |
|                | NA                       | Non-target insect testing - Coleoptera                                                                                                                                                                                                                                                                                                                                                            | \$21,500                                         |
|                | NA                       | Nontarget insect testing - Ladybird beetles                                                                                                                                                                                                                                                                                                                                                       | \$21,500                                         |
|                | NA                       | Nontarget insect testing - Lepidoptera                                                                                                                                                                                                                                                                                                                                                            | \$21,500                                         |
|                | NA                       | Nontarget insect testing - Parasitic Hymenoptera                                                                                                                                                                                                                                                                                                                                                  | \$21,500                                         |
|                | NA                       | Nontarget insect testing - Predaceous Hemiptera                                                                                                                                                                                                                                                                                                                                                   | \$21,500                                         |
|                | NA                       | Nontarget insect testing - Predaceous Neuropteran                                                                                                                                                                                                                                                                                                                                                 | \$21,500                                         |
|                | NA                       | Nontarget plant studies (aka plant studies)                                                                                                                                                                                                                                                                                                                                                       | \$51,500                                         |
|                | NA                       | OECD unique identifier for transformation event                                                                                                                                                                                                                                                                                                                                                   | \$400                                            |
|                | NA                       | Outcrossing potential – information on potential outcrossing with all wild or weedy relatives with which the transformed plant can form viable hybrids in nature, e.g., degree of sexual compatibility, degree of overlap in the geographic distribution of relatives and crop cultivation areas, phenology assessment. (Information can be based upon literature, field experts, breeders, etc.) | \$5,600                                          |
|                | NA                       | Plant tissue testing                                                                                                                                                                                                                                                                                                                                                                              | \$6,100                                          |
|                | NA                       | Plant tissue testing (reflected in NTO data costs)                                                                                                                                                                                                                                                                                                                                                | \$37,300                                         |
|                | NA                       | Potential for cross resistance                                                                                                                                                                                                                                                                                                                                                                    | \$29,400                                         |
|                | NA                       | Potential for cross resistance                                                                                                                                                                                                                                                                                                                                                                    | \$360,900                                        |
|                | NA                       | Potential for horizontal gene transfer                                                                                                                                                                                                                                                                                                                                                            | \$51,500                                         |
|                | NA                       | Potential for horizontal gene transfer (lab estimate)                                                                                                                                                                                                                                                                                                                                             | \$7,900                                          |
|                | NA                       | Potential for vertical gene flow                                                                                                                                                                                                                                                                                                                                                                  | \$80,100                                         |
|                | NA                       | Potential for weediness                                                                                                                                                                                                                                                                                                                                                                           | \$276,400                                        |
|                | NA                       | Protein Digestion via Kinetic Enzyme                                                                                                                                                                                                                                                                                                                                                              | \$180,100                                        |
|                | NA                       | Protein synthesis inhibition study                                                                                                                                                                                                                                                                                                                                                                | \$184,000                                        |
|                | NA                       | Quantified concentration of protein produced in various tissues, e.g., leaf, seed, fruit, pollen, and whole plant by Western blot or ELISA                                                                                                                                                                                                                                                        | \$80,700                                         |
|                | NA                       | Reproduction and Fertility Effects                                                                                                                                                                                                                                                                                                                                                                | \$530,600                                        |
|                | NA                       | Reproductive timing and output, e.g., timing of flowering and seed set and amount of seed produced; for root crops including also size, mass, and shape of tubers at harvest time. Stability of the acquired transgene in the hybrids and their progeny.                                                                                                                                          | \$32,900                                         |
|                | NA                       | Residues in Pollen and Nectar/Field Residue Analysis                                                                                                                                                                                                                                                                                                                                              | \$161,700                                        |
|                | NA                       | Resistance monitoring plan                                                                                                                                                                                                                                                                                                                                                                        | \$2,165,300                                      |
|                | NA                       | Semi-field testing for pollinators – Colony Feeding Study only                                                                                                                                                                                                                                                                                                                                    | \$127,200                                        |
|                | NA                       | Semi-field testing for pollinators – Tunnel Study only                                                                                                                                                                                                                                                                                                                                            | \$355,400                                        |
|                | NA                       | Simulation models to predict PIP durability and evaluate resistance management options                                                                                                                                                                                                                                                                                                            | \$106,800                                        |
|                | NA                       | Soil microbial community toxicity test                                                                                                                                                                                                                                                                                                                                                            | \$19,100                                         |
|                | NA                       | Specific serum binding test                                                                                                                                                                                                                                                                                                                                                                       | \$158,500                                        |
|                | NA                       | Spectrum of pesticidal activity; Mode of action; Characterization of expressed substance(s) (molecular characterization data) (combination of Description of the intended trait, Expression level in plant, and Characterization of protein (active/inert))                                                                                                                                       | \$189,600                                        |
|                | NA                       | Steroidogenesis (Human Cell Line)                                                                                                                                                                                                                                                                                                                                                                 | \$25,100                                         |

| Test Guideline | Guideline Section or NA* | Test Name                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      | Average Test Cost Adjusted for Inflation to 2025 |
|----------------|--------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------|
|                | NA                       | Studies to evaluate the potential impact of transgene introgression, for example:<br>· plant community dynamics modeling (with hybrids and plants expected in the communities in which the hybrids exist).<br>· plant competition growth chamber studies, e.g., series replacement under controlled conditions.<br>· plant competition mesocosm studies (with hybrids and plants expected in the communities in which the hybrids exist).<br>· field studies, e.g., to investigate impact of virus infection on wild or weedy relatives of the modified plant. | \$2,378,700                                      |
|                | NA                       | Submittal of samples                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           | \$700                                            |
|                | NA                       | Surrogate protein production                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   | \$32,700                                         |
|                | NA                       | Target organism biology and ecology                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            | \$579,800                                        |
|                | NA                       | Target organism susceptibility - above ground target                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           | \$469,600                                        |
|                | NA                       | Target organism susceptibility - below ground target                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           | \$340,300                                        |
|                | NA                       | Target pest biology and ecology                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                | \$19,800                                         |
|                | NA                       | Toxicity and Allergenicity info: in vitro digestibility in SIF                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 | \$50,400                                         |
|                | NA                       | Toxicity of substances other than proteins                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     | NA                                               |
|                | NA                       | Transformation system                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          | \$1,300                                          |
|                | NA                       | Tritrophic testing of selected beneficial insects                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              | \$131,800                                        |
|                | NA                       | Tritrophic Testing of Selected Beneficial Insects                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              | \$427,400                                        |
|                | NA                       | Uterotrophic (Rat)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             | \$59,400                                         |
|                | NA                       | Whole sediment - chronic invertebrates freshwater and marine test: 28 day                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      | \$71,300                                         |
|                | NA                       | Whole sediment - chronic invertebrates freshwater and marine test: 42 day                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      | \$71,300                                         |
|                | NA                       | Whole sediment - chronic invertebrates freshwater and marine test: 60 day                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      | \$90,500                                         |
|                | NA                       | Whole sediment - chronic invertebrates freshwater and marine test: unspecified length                                                                                                                                                                                                                                                                                                                                                                                                                                                                          | \$79,200                                         |
|                | NA                       | Wild mammal oral toxicity                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      | \$64,800                                         |

Source: EPA Estimates, adjusted for inflation using the U.S. Bureau of Labor Statistics National Occupational Employment and Wage Estimates wage rate for occupation code 19-0000