U.S. Department of Labor

Assistant Secretary for
Occupational Safety and Health
Washington, D.C. 20210

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RADM William S. Stokes
Director
National Toxicology Program
Interagency Center for the Evaluation
of Alternative Toxicological Methods
NIEHS
P.O. Box 12233, Mail Code K2-16
Research Triangle Park, NC 27709

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Dear RADM Stokes:

This letter is in response to Dr. Linda Birnbaum's letter of September 2, 2010, to the Occupational Safety and Health Administration (OSHA), in which she forwarded the following test methods:

1. Recommendations for Routine Use of Topical Anesthetics, Systemic Analgesics, and Humane Endpoints to Avoid or Minimize Pain and Distress in Ocular Safety Testing.

2. Current Validation Status of In Vitro Test Methods Proposed for Identifying Eye Injury Hazard Potential of Chemicals and Products.

3. Current Validation Status of a Proposed In Vitro Testing Strategy for U.S. Environmental Protection Agency Ocular Hazard Classification and Labeling of Antimicrobial Cleaning Products.

4. Recommendation to Discontinue Use of the Low Volume Eye Test for Ocular Safety Testing.

Sections 4(a) and 4(d) of the ICCVAM Authorization Act require agencies to review ICCVAM test method recommendations and notify ICCVAM in writing of their findings, including identification of the relevant test methods for which the ICCVAM test recommendations may be added or substituted.

The received documents were reviewed by staff in OSHA's Directorate of Standards and Guidance. As you may know, OSHA does not require or enforce toxicity testing as a part of its regulatory activities. At this time, we have no relevant test methods for which the ICCVAM recommendations may be added or substituted. OSHA does, however, endorse the recommendations and the continued work to promote the development and use of alternative test methods.

Thank you for your valuable work in the field. We look forward to continued participation on the ICCVAM.

Sincerely,

/s/

David Michaels, PhD, MPH