

From: Charlotte
Sent: Monday, December 13, 2004 8:28 PM
To: NIEHS ICCVAM
Subject: eye irritation tests

Dr. William Stokes, Director
NTP Interagency Center for the Evaluation of Alternative Toxicological Methods
National Institute of Environmental Health Sciences
P.O. Box 12233, MD EC-17
Research Triangle Park, NC 27709
919-541-0947 (fax)

Dear Dr. Stokes:

Despite its mandate to promote the acceptance of alternatives to cruel and outdated animal tests, the U.S. Interagency Coordinating Committee on the Validation of Alternative Methods (ICCVAM) seems bound and determined to do just the opposite. ICCVAM's proposed position on four well-established alternatives to the notorious Draize rabbit eye-irritation test is the latest example of this.

While most European countries have accepted the results of these alternative tests since the mid 1990s for the purpose of identifying and classifying chemicals that cause severe eye irritation, ICCVAM has taken the incomprehensible position that, regardless of the result of a non-animal test, "confirmatory" testing should be carried out on animals. According to ICCVAM, even chemicals that exhibit corrosive or severely irritating properties *in vitro* should still be dripped or smeared into rabbits' eyes Ö just to be sure!

Like many others, I would like to see the U.S. become the world leader—rather than the weakest link—in the move away from animal testing. To achieve this end, the following needs to be done:

ï ICCVAM should follow the example set by European countries that accept the results of these *in vitro* methods, alone or in combination, to classify severely irritating and corrosive chemicals, and should eliminate proposals for "confirmatory" testing on animals.

ï ICCVAM's background-review documents should clearly address the limitations of the current animal test for eye irritation, including its subjectivity, reproducibility, and its over- and under-prediction rate. ICCVAM should not presume to "validate" a non-animal method against an animal test that has never been properly validated itself.

ï ICCVAM should take the time to learn that these tests are being used safely and effectively by the industry today.

ï ICCVAM should stop dragging its heels and setting up obstacles to the acceptance and use of non-animal test methods in the U.S.

Please do your part to help achieve these not-unreasonable goals. Thank you for your time.

Sincerely,

Charlotte Gardiner