April 7, 2005

Dr. William Stokes, D.V.M.
Director of NICEATM/NTP
P.O. Box 12233, EC-17
Research Triangle Park, NC 27709

RECEIVED
APR 18 2005

Dear Dr. Stokes:

In a welcome step toward developing and validating non-animal tests, the federal government is evaluating alternative methods for the infamous Draize eye irritancy test.

In the Draize test, a chemical or product formulation is placed in one eye of several rabbits who are monitored for several days for eye irritation that can range from mild to severe or corrosive. Three of the four alternative tests under consideration use eyes salvaged from animals killed for other purposes and one test uses a membrane from a chicken embryo. Chemicals found to be severely irritating or corrosive in one or more of the alternative tests won't undergo Draize testing, while chemicals that register lesser or no irritation will be followed up with the Draize test.

The Interagency Coordinating Committee on the Validation of Alternative Methods (ICCVAM) and the National Toxicology Program Interagency Center

for the Evaluation of Alternative Toxicological Methods (NICEATM) recently convened an expert panel to review these alternatives. The panel concluded that at least three are useful for assessing severe eye irritation and corrosion and that all four methods could be further improved.

Dr. Stokes, I am writing to urge ICCVAM/NICEATM to:

1) recommend that federal agencies immediately begin accepting the alternative methods found to be useful;
2) move forward with recommended improvements in the alternatives without delaying the acceptance of the tests' current forms; and
3) go beyond the current efforts by developing and validating non-animal methods to completely replace the use of the Draize test.

I thank you for your time and serious consideration of this matter, Dr. Stokes. I look forward to your reply.

Sincerely,

Mrs. Kathleen D. LeFauve