

From: Peggy Cunniff
Sent: Monday, March 13, 2006 12:28 PM
To: NIEHS NICEATM
Subject: Response to NICEATM nomination for workshop to replace Botulinum Toxin Potency Testing

Dr. William S. Stokes
NICEATM Director
NIEHS
P.O. Box 12233, MD EC-17,
Research Triangle Park, NC 27709

Dear Dr. Stokes,

As president of the International Foundation for Ethical Research (IFER) and as executive director of the National Anti-Vivisection Society (NAVS), I am writing to convey our endorsement for the proposed workshop to evaluate the state-of-the-science for potential alternatives to the mouse LD50 assay for botulinum toxin potency testing. We agree with the Scientific Advisory Committee on Alternative Toxicological Methods (SACATM) and the proposal of the Interagency Coordinating Committee on the Validation of Alternative Methods (ICCVAM) that the development, validation and regulatory acceptance of alternatives to the mouse LD50 assay for the testing of Botox-type products is a high priority. IFER and NAVS support the immediate formation of a workshop comprised of experts to consider scientifically viable alternatives that would replace the use of animals. This would be an advancement to the current testing regime that relies on an inhumane methodology for botulinum potency testing that has never been validated.

The National Anti-Vivisection Society is a non-profit educational organization that promotes the advancement of science without harming animals. The International Foundation for Ethical Research supports the development, validation and implementation of alternatives to the use of animals in research, education and testing. Again, thank you in advance for your thoughtful consideration of these comments on behalf of IFER and NAVS in support of the proposed workshop as an appropriate undertaking and as a priority.

Sincerely,

Mary Margaret Cunniff
President, International Foundation for Ethical Research
Executive Director, National Anti-Vivisection Society