From:	Andre Menache
Sent:	Tuesday, February 21, 2006 11:03 AM
To:	NIEHS NICEATM
Subject:	Comment on the Mouse LD50 Assay for Botulinum Toxin PotencyTesting

Animal Aid UK fully supports the Humane Society of the United States campaign to replace the Mouse LD50 assay for botulinum toxin potency testing and welcomes the opportunity afforded by ICCVAM to receive submissions.

In a letter dated 13 February and signed by Mr Andy Burnham, parliamentary under secretary of state, The British Home Office indicated to Animal Aid that 'significant progress' is expected in the near future with respect to the validation of the non animal SNAP-25 assay.

Although a purely cell-based method (neural cells) to replace the use of animals at the purified bulk toxin stage is not yet available, there is no scientific need to use living animals at any stage of botulinum production.

If ICCVAM is considering a validation study of the SNAP-25, it would make sense to also validate the ex vivo mouse diaphragm method, as a replacement for the in vivo tests (the LD50 and the non-lethal endpoint mouse test). The mouse diaphragm method typically requires four (killed) mice for each purified bulk toxin, compared with up to 50 live mice using the non-lethal end point, and considerably more using the LD50.

Please do not miss this important and timely opportunity to eliminate the use of live animals in the production and testing of botulinum toxin.

Yours sincerely,

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