

Subject: ECVAM, ICCVAM's European counterpart

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From: Clark, Maynard S.

ECVAM, the European counterpart of ICCVAM (the Interagency Coordinating Committee for the Validation of Alternative Methods), has approved several dozen non-animal testing methods. Sadly, as far as I can tell, ICCVAM has only approved one (1) nonanimal test method (originating in the US).

This sorry record deserves a full inquiry? Are American researchers (and the social, corporate, and funding cultures surrounding and influencing them) so disinterested in the scientific, economic, or even ethical issues of replacing animal testing with non-animal alternatives that few if any researchers are inspired to work in this direction?

Either way, I think it's a shameful record that, rather than supporting the development and adoption of animal-free testing, ICCVAM has done precious little in comparison to what can and should be done, and what has been done in Europe and elsewhere. Not only do animals die for research in ways that could be prevented were nonanimal methods more readily available AND implemented, but often human health suffers as animal tests continue to lead to less accurate and less sensitive information regarding human health. NIH should:

- 1) Support (at least provisionally) the immediate acceptance of those non-animal tests that are already validated internationally.
- 2) Investigate the slow rate of validation work by ICCVAM
- 3) Engage young and other promising researchers in developing nonanimal testing methods
- 4) Develop adequate funding to support the work of such promising researchers in developing nonanimal testing methods

Thank you for your attention and consideration.

Sincerely,

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