

Subject: public comments

Date: Tuesday, May 22, 2007 4:01 PM

The federal government has only one agency devoted to the development of non-animal test methods, namely the Interagency Coordinating Committee for the Validation of Alternative Methods (ICCVAM). In its 10 years of existence, ICCVAM has approved only one non-animal test method that originated in the U.S. This is dismal!

This is not because there are no non-animal test methods. To the contrary, ICCVAM's European counterpart has approved dozens of non-animal test methods. Yet your agency is working to keep U.S. policies in the Dark Ages. ICCVAM finds a reason to ignore or to refuse to approve even those methods that are accepted and used internationally.

In fact, ICCVAM has become a major obstacle to the adoption of more sophisticated and accurate test methods. ICCVAM clings to decades-old animal-poisoning tests that were never proved to be relevant to humans to begin with.

This causes two major problems. First, animals are being killed needlessly, when non-animal tests could be adopted instead. Second, public health is jeopardized, as non-animal test methods have been demonstrated to be more accurate, more sensitive, and more protective of public health.

As a result of its poor performance and pressure from dedicated groups concerned about the welfare of animals, ICCVAM was told by Congress last year to develop a five-year plan to identify areas of high priority. Shamefully, ICCVAM's "new" draft plan is nothing new and shows that ICCVAM has no intention of entering the 21st century.

It is time for ICCVAM officials to accept internationally validated non-animal methods, including non-animal test methods for skin and eye irritation, phototoxicity, and pyrogenicity (fever induction), and to follow the additional December 2006 recommendations of the animal protection community <<http://www.stopanimaltests.com/pdfs/ICCVAM-5yearplan-Final.pdf>> .

It is time for you to do your job.

Sincerely,
Marc I. Hoffman