

Subject: Federal Register Notice Vol 72, No. 89, May 9, 2007 (p 26396)

Date: Monday, June 25, 2007 1:48 PM

From: Robert Guest

Dear Dr Stokes,

Safepharma Laboratories Ltd. (SPL) supports the activity of ICCVAM-NICEATM to review ways to alleviate pain and suffering that might arise from current in vivo eye irritation testing. In response to the Federal Register Request for Data on the Use of Topical Anesthetics and Systemic Analgesics for In Vivo Eye Irritation Testing (Vol 72, No. 89, May 9, 2007), I would like to inform you that SPL has a policy of use of local anaesthetics to minimise pain and distress on administration of test substances in rabbit eye irritation studies. Whilst SPL is unable to provide data for review without the permission of its Sponsors, we are willing to provide further details of our current procedures for use of local anaesthetic. We also consider that there may be ways in which we could provide data from studies involving the use of local anaesthetic, without breach of confidentiality. Unfortunately the data is not yet in a form suitable for transmission but this can be arranged if required.

Please do not hesitate to contact me if this is of interest to ICCVAM-NICEATM.

Yours sincerely,

Mr Robert Guest
Head of Alternative and Acute Toxicology
Safepharma Laboratories Ltd.