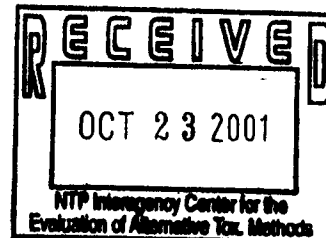


October 20, 2001



Dr. William S. Stokes  
Director, NICEATM (MD EC-17)  
National Institute of Environmental Health Sciences  
P.O. Box 12233  
Research Triangle Park, NC 27709

Subject: Report of the International Workshop on In Vitro Methods for Assessing Acute Systemic Toxicity.

Dear Dr. Stokes:

As requested here are my comments on the use of non-animal methods to study the toxic effects of chemicals from acute exposure.

- The NIEHS should adopt the new non-animal test methods **IMMEDIATELY**. The non-animal test methods have been considered for almost 20 years, and animals should not continue to suffer and die because of bureaucratic inertia.
- The NIEHS recommends using the non-animal method to set the starting dose for further animal- poisoning tests. While this may reduce the number of animals killed in acute poisoning studies, it does not go far enough. Government agencies should use in vitro cell culture tests to **COMPLETELY REPLACE** the use of animals in lethal dose tests.
- At a minimum, **ALL** government agencies that currently require the acute animal-poisoning studies should **IMMEDIATELY** incorporate the in vitro cell culture method as a transitional means of reducing the number of animals killed and should fully support the use of this method as an eventual **REPLACEMENT** for lethal-dose poisoning studies. In particular, the EPA must immediately incorporate the non-animal cell culture method into its HPV chemical program, as promised in its agreement with the animal protection community.

Thank you for registering my comments.

Sincerely,

Joseph Mangine