



October 23, 2001

Meredith Mohr

Dr. William Stokes
Director, NIEHS (MD E-17)
National Institute of Environmental Health Sciences
PO Box 12233
Research Triangle Park, NC 27709

Dear Mr. Stokes,

I am writing to you in response to your agency's request for public comments on the use of non-animal methods to study the toxic effects of chemicals from acute exposure. I believe that the NIEHS should adopt the new non-animal methods immediately. Non-animal tests have been considered for almost 20 years, and should be implemented. I disagree with your agency's recommendation to use non-animal methods to set the starting dose for further animal tests. While this practice may reduce the number of animals killed in acute poisoning studies, it does not go far enough. I urge you to use in vitro culture tests to completely replace the use of animals in lethal dose tests. I encourage all government agencies that currently require the acute animal poisoning studies to 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 October 1999 agreement with the animal protection community. Thank you for your consideration of public comments.

Sincerely,

Meredith Mohr