

FRIENDS OF THE ANIMALS INTERNATIONAL

Prepared (also subject resp. if other)	Web site: www.friends-of-the-animals.org			
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Agneta Riberth Toll, President	2001-11-08		URGENT ISSUE	I

Dr William Stokes, Director
NICEATM (MD EC-17), NIEHS
P.O. Box 12233
Research Triangle Park, NC 27709

Dear Dr. William Stokes,

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

Friends of the Animals International writes a letter on behalf of our members with deep concern for the use of animals in the LD50 Test.

We understand that a recent workshop held by the National Institute of Environmental Health Sciences, addressed the feasibility of going one step further and replacing the animal tests completely with in-vitro cell culture tests.

The objective must be to phase out the use of animals in experiments.

By nature, all animals are active, especially the highest developed creatures regarding physically and psychically and socially character. Keeping such animals in small barren is extremely stressful. The stress experienced by the animals can lead to a range of abnormal behaviors, such as stereotypes, self-mutilation and self-starvation and this is an indicator that they are under stress.

"In the continuing quest to provide optimal care for animals in captivity, the issue of abnormal behaviors is a cause for concern. Whether we call them stereotypic, neurotic, non adaptive, or atypical, behaviors of this kind are problematic".

Laule, G. (1993). The Use of Behavioural Management Techniques to Reduce or Eliminate Abnormal Behavior (Animal Welfare Information Center Newsletter 4(4):1-2, 8-11. October-December).

A powerful and convincing argument can be made that the development of new research techniques (e.g., paper chromatography, radioimmunoassay, monoclonal antibody production, genetic engineering, polymerase chain reaction, and positron emission tomography, to name a few) has been a critical factor behind rapid advances in biomedical knowledge. Since an alternative is nothing more than a new technique that also happens to lead to reduced animal use and/or distress, I find it hard to see how the pursuit of alternatives could be inimical to science. Toxicologists have begun to embrace the alternatives

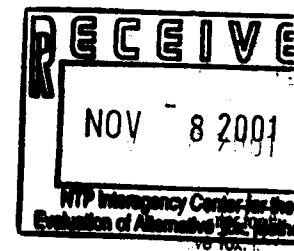
Friends of the Animals International

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concept in the last few years, but many other branches of science avoid the issue as much as possible despite considerable public and congressional pressure to do something about "alternatives."

Rowan, A.N. 1991. "Animal experimentation and society: A case study of an uneasy interaction." In: *Bioscience and Society*, J. Wiley and Sons, New York (in press).

"Computer simulations are well suited to creating scientific practica".

Peterson, N.S., J.R. Jungck, D.M. Sharpe, and W.F. Finzer. 1987. A design approach to science. *Machine Mediated Learning 2(1&2)*: 111-127.

"Definitions referring to an animal being in harmony with its environment (Lorz, 1973; Hughes, 1976). Animal welfare is "A state of complete mental and physical health, where the animal is in harmony with its environment" (Hughes, 1976). The animal has not only physical but also behavioural requirements. The welfare of the animal is basically the way the animal feels about, and is affected by, its environment and not the environment per se. It can result in positive mental states (pleasure) or negative mental states (fear, pain, etc).

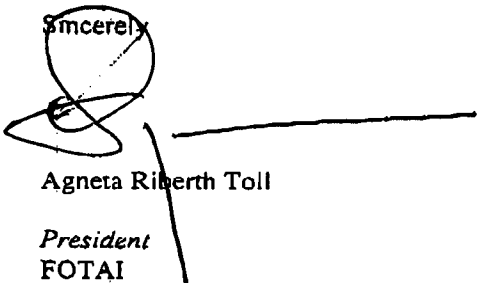
That definition is very close to the one of human health: "a state of complete physical, mental and social well being, and not merely the absence of disease or infirmity" WHO

"The debates about the welfare and rights of animals will continue, reliant on new information about cognition and consciousness in animals, Attitudes will change and those changes will also be resisted by those who have most to gain by thinking of animals as little more than clockwork machinery. The animals lives must not be used as products as we can trough away when we used it as we please". Rogers, L. *Minds of Their Own- Thinking Awareness in Animals*, Westview Press, Colorado, 1998.

The use of animals in the LD50 Test must urgently be replaced with non-animal, in vitro testing methods.

Thank you for your consideration.

Sincerely



Agneta Riberth Toll

President
FOTAI

Friends of the Animals International

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