

November 13, 2001

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

Dear Dr. Stokes:

I am writing to you on behalf of the Coalition of Louisiana Animal Advocates, Louisiana's state-wide coalition of humane organizations and individuals dedicated to the abatement of cruelty and needless suffering.

We believe that the biomedical research community has until relatively recently had little or no ethical consideration for the animal subjects it has used in experiments and tests. In fact, much of the animal-based procedures conducted over the past century in the name of scientific research has been extremely cruel to an extent that those sensitive to animal suffering would consider barbaric. Many of those procedures were needless, without scientific merit, and they were done without respect for the feelings or lives of the experimental subjects and without regard for their pain and emotional distress.

We believe that the LD-50 test is an example. It is superficial and is of no legitimate value. Once a product for human use or consumption is determined to be toxic to the extent of being dangerous enough to cause death, it is sufficient to know that, but there is no justifiable reason to know its level of toxicity more precisely by comparison to other toxic substances. Doing so falls into the category of "research" that Charles Darwin deplored and condemned as being only to satisfy "damnable curiosity."

We know that tests such as the LD-50 have come under significant criticism, and rightly so, and have consequently been banned or practically banned.

We hope that this trend continues, and that all that can conceivably be done will be done to eliminate the use of animals for the purpose of invasive scientific research. Surely, experimental tests using living organisms are impossible to adequately manage in terms of controlling the test so that there is a definite and well defined correlation between the observed results and the variable being tested. Study at the molecular level gives more scientifically satisfying results. And, when molecular-level studies are not possible, cellular material, cell and tissue cultures are the next best things. Please concentrate on developing these more productive and very promising methods, and leave gross use of animals merely as test tubes or biochemical testing devices in the past along with the other outmoded methods of biomedical research and practice.

Thank you for your kind attention.

Sincerely,

Pinckney A. Wood