

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

Dr. Stokes:

Please register my comments Re: Report of the  
International Workshop on In Vitro Methods for  
Assessing Acute Systemic Toxicity as follows:

1. 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.

2. 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.

3. 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 October 1999 agreement with the animal  
protection community.

Thank you for the opportunity to submit my comments on  
the use of non-animal (in vitro cell culture) methods  
to study the toxic effects of chemicals from acute  
exposure, and for your consideration of this very  
important matter.

Sincerely,  
Cathy Prall