

SUBJECT: "Report of the International Workshop on In Vitro Methods for Assessing Acute Systemic Toxicity". (DOCID : fr28se01-128 )

Dear Director of NIEHS,

We are urging you :

Please adopt the new non-animal test methods immediately. Please use in-vitro cell cultures as a permanent replacement for lethal animal tests. The non-animal test methods have been considered for nearly 20 years. However, every year millions upon millions of sentient animals are continuously suffering and dying in the excruciating pain and agony because of bureaucratic inertia.

NIEHS recommends using the non-animal method to set the "starting dose" for further animal-poisoning tests. While this is a step in the right direction because it may reduce the number of animals killed, 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 as well as many other painful killing tests and torturing the innocent.

The typical lethal dose (or LD) test measures the amount of a toxic substance that will, in a single dose, kill a certain percentage of animals in a test group. "To avoid interference with results" No painkillers are administered. Each year, millions of sentient dogs, rabbits, rats, monkeys, and other animals die in the excruciating pain in lethal dose tests performed in U.S. During the lethal dose test, the experimental substance is forced into the animal's throats or is pumped into their stomachs by a tube, sometimes causing death by stomach rupture or from the sheer bulk of the chemical dosage. The deadly substance also are injected under the skin, into a vein, or into the peritoneal lining of the abdomen. They are also often applied to the eyes, rectum, or vagina, or forcible inhaled through a gas mask.

Animal experimentation continually falls short of providing the rigorous criteria that define real science - Accuracy, Predictability and Applicability. Applying animal data to humans meets none of these requirements consistently. Why submit another species to pseudo-scientific exploration of human disease when human-based methods are available? As Dr. Richard Klausner, the director of the National Cancer Institute in the United States said :

"The history of cancer research has been a history of curing cancer in the mouse.....We have cured mice of cancer for decades--and it simply didn't work in humans."

The LD50 is slowly being phased out internationally . The non-animal, in vitro tests were put through rigorous, international scientific scrutiny. They provide much more accurate estimates of human toxicity than animal tests:

We enclosed some important References at the end of this letter for your review. Again, Please use in-vitro cell cultures as a permanent replacement for the outdated, very cruel and terrified lethal animal tests. Please adopt the new non-animal test methods immediately. Please push this most meaningful way of tests which is beneficial for humans and animals to every corner of the United States. Thanks for your kindness, wisdom and help.

Sincerely,

William Burgess