

From: Michael Balls  
Sent: Tuesday, March 14, 2006 5:19 AM  
To: NIEHS NICEATM  
Subject: 2006.01.27 ICCVAM Federal Register Notice

Dear Sirs

I wish to record my concern about the use of LD50 testing in relation to botulinum toxin testing and the urgent need for alternative (non-animal) test procedures.

FRAME was one of the first organisations to draw attention to this issue, and our opinions are summarised in the attached three articles from *ATLA*.

FRAME strongly supports the suggestion that an ICCVAM Workshop should be held on this topic, and we hope that this will given a high priority, so that the most promising alternatives to animal testing for botulinum toxin can be identified, further developed, validated and accepted into regulatory practice as soon as possible.

Sincerely

Michael Balls

Professor Michael Balls  
Chairman of the FRAME Trustees  
Norfolk, UK

## **FRAME References**

Balls M. 2003. Editorial: What Price Vanity? No End in Sight for the Cosmetics Testing Saga. *ATLA* 31:373–375.

Balls M. 2003. Comment: Botulinum Toxin Testing in Animals: The Questions Remain Unanswered. *ATLA* 31:611-615.

Bottrill K. 2003. Growing Old Disgracefully: The Cosmetic Use of Botulinum Toxin. *ATLA* 31:381–391.