

Subject: FR Notice Comments - 72FR23832: Draft Five-Year Plan
Date: Wednesday, May 23, 2007 5:01 AM

Below is the result of your feedback form. It was submitted by
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Comment_date: May 23rd

Prefix: Ms.

FirstName: Nathalie

LastName: Alduc

Degree: MA

onBehalfOf: no

Title:

Department:

Company:

Country: UK

Phone:

EMail:

Comments: ICCVAM seems to always find a reason to ignore or to refuse to approve replacement methods that are accepted and in widespread use internationally.

ICCVAM has become a major obstacle to the adoption of more sophisticated and accurate test methods and clings to decades-old animal-poisoning tests that are ethically and medically unjustifiable and were never proved to be relevant to humans to begin with.

This causes two major problems. First, animals are being killed needlessly, when non-animal tests could be adopted instead. Second, public health is jeopardized, as non-animal test methods have been demonstrated to be more accurate, more sensitive, and more protective of public health.

As a result of its poor performance and pressure from PETA and other members of the U.S. animal protection community, ICCVAM was told by Congress last year to develop a five-year plan to identify areas of high priority. Shamefully, ICCVAM's "new" draft plan is nothing new and shows that ICCVAM has no intention of entering the 21st century.

Please accept internationally validated non-animal methods, including non-animal test methods for skin and eye irritation, phototoxicity, and pyrogenicity (fever induction), and to follow the additional December 2006 recommendations of the animal protection community.
