

Subject: Interagency Coordinating Committee for the Validation of Alternative Methods
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I am upset that the government is currently spending hundreds of millions every year needlessly testing chemicals on animals. Our government has only one agency devoted to the development of non-animal test methods—the Interagency Coordinating Committee for the Validation of Alternative Methods (ICCVAM). Disappointingly, in its 10 years of existence, ICCVAM has approved exactly one non-animal test method that originated in the U.S.

This is not because there are no non-animal test methods. To the contrary, ICCVAM's European counterpart has approved dozens of non-animal test methods. ICCVAM finds a reason to ignore or to refuse to approve even those 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. ICCVAM clings to decades-old animal-poisoning tests that 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.

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.