

Subject: FR Notice Comments - 72FR23832: Draft Five-Year Plan

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Comments: I am leaving a comment here after reading about the ICCVAM and its newly-required "five-year plan" on the web site of People for the Ethical Treatment of Animals (PETA). From what I read about how the agency does and doesn't function, saying that I am disappointed with the operation of the ICCVAM would be a severe understatement. According to PETA, the ICCVAM was established in 1997 with the goal of approving new forms of testing that are progressive, more efficient, and less painful for both humans and animals. This objective is a laudable one, and if the ICCVAM was doing what it was established to do, both humans and animals would be greatly benefitting from the agency's work.

Unfortunately, however, almost no one is benefitting from the work of the ICCVAM. In fact, almost exactly the opposite is occurring. PETA writes that in the ten years that the agency has been in existence, it has only ever approved of ONE non-animal testing method originating in the United States. While the ICCVAM's European counterpart, the ECVAM, has approved of many alternatives to animal testing, the ICCVAM constantly finds reason after reason to turn down non-animal proposals. Instead of creating progress in the fields of medical and chemical testing, the ICCVAM is, in actuality, a roadblock to progress. The agency is nearly always unwilling to validate new methods of testing, and their consistent refusals are keeping the world of testing at a standstill. This is a detriment to people as we are not able to benefit from newer, more effective, and less painful testing methods, and it is a profoundly greater detriment to the vast multitude of animals of many different kinds who are subjected to tests that cause extreme amounts of suffering and, in many cases, death.

Based on the purpose of the ICCVAM, the agency could be making huge strides to help significantly lessen animal suffering. Instead, it consistently maintains that suffering by refusing to accept alternative testing methods, including those methods that have already been validated by the ECVAM and are ALREADY IN USE internationally. Not only are these refusals non-progressive and horrifically cruel to animals, but they additionally violate the Organization for Economic Cooperation and Development (OECD) Council Decision of which the ICCVAM is a part. Under this agreement, the ICCVAM is REQUIRED to accept non-animal tests that are validated in other OECD member countries as long as the test data is generated according to appropriate guidelines. Even though the ICCVAM is a member of this agreement, however, they are not honoring it. According to PETA, the ECVAM has approved of "dozens" of non-animal tests. The ICCVAM has accepted none of them.

I found it rather pathetic when I read that ICCVAM's refusals to approve of alternative testing methods are so well-known that companies actually make efforts to CIRCUMVENT the ICCVAM when they are trying to get approval for non-animal testing methods. Clearly,

companies do not hold the ICCVAM in high regard and are making conscious efforts to avoid having to work with the agency at all, being well aware that there is almost zero chance of the ICCVAM approving an alternative testing method. The behavior of these companies makes painfully obvious the ICCVAM's notoriety as a roadblock to progress in the fields of testing.

For ten years now, the ICCVAM has been refusing to accept alternatives to cruel, outdated, and often unnecessary animal tests, including many tests that have been approved by the ECVAM. In doing so, they have forced an astronomical number of animals to suffer intensely when this suffering could have been spared, and they have also deprived human beings of benefitting from newer, more efficient testing. Instead of the extensive progress that the agency could be making in America, the agency is instead blocking this progress. Companies are annoyed and fed up with the ICCVAM as are several animal protection organizations and health organizations. I know that PETA, Physicians Committee for Responsible Medicine (PCRM), and several other organizations have sent extensive commentary to the NICEATM detailing changes that the organizations want to see made in the ICCVAM. I put my support behind these organizations and the requests that they are making. The ICCVAM's constant refusals to be progressive and lessen animal suffering are ridiculous and unacceptable. The agency needs to be held responsible for its choices, and when it refuses acceptance for a non-animal test, it should be required to give a detailed, intelligent explanation for doing so.

I strongly hope to see the ICCVAM become the kind of agency that it can and should be - one that stands for progression and the reduction - and ultimately elimination - of animal suffering in the fields of testing.

Thank you very much for your time.
