



October 20, 2001

Dr. William S. Stokes
Director, NICEATM (MD EC-17)
National Institute of Environmental Health Sciences
P.O. Box 12233
Research Triangle Park, NC 27709

Dear Dr. Stokes:

The following are my comments regarding the use of non-animal methods to study the toxic effects of chemicals from acute exposure:

1. The NIEHS should adopt new non-animal test methods immediately. Animals should not continue to suffer and die because of the slow movement of bureaucratic red tape.

2. NIEHS is recommending non-animal methods to set starting doses for further animal-poisoning tests. I applaud the fact that the number of animals sacrificed will be less, but I do not believe that reduction is enough. Government agencies should use in vitro cell culture tests to completely replace the use of animals in all lethal dose tests.

3. At the very least, all government agencies that currently require the acute animal-poisoning studies should immediately incorporate the in vitro cell culture method as a transitional means of reducing the number of animals killed and should fully support this method as an eventual replacement for lethal-dose poisoning studies. Most importantly, the EPA must immediately incorporate the non-animal cell culture method into its HPV chemical program, as promised in its October 1999 agreement with the animal protection community.

Sincerely,

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Judith E. Embry