

Dear Dr. Stokes:

Please register my comments on The Report of the International Workshop on In Vitro Methods for Assessing Acute Systemic Toxicity as follows:

1. I believe NIEHS should adopt the new non-animal test methods as soon as possible. These methods have been under consideration for almost 20 years, and I think the time has come to implement them without delay. NIEHS recommends using the non-animal method to set the starting dose for further animal-poisoning tests. This is a positive step but it could go further and should preferably use in-vitro cell culture tests to replace the use of animals in lethal dose tests.

2. All government agencies that currently require the acute animal-poisoning studies should incorporate the in-vitro cell culture method as a transitional means of reducing the number of animals killed and should fully support the use of this method as an eventual replacement for lethal-dose poisoning studies. In particular, the EPA should 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.

Thank you for the opportunity to submit my comments on the use of non-animal (in vitro cell culture) methods to study the toxic effects of chemicals from acute exposure. This is an important issue to me and many others, and I appreciate your consideration of my comments.

Respectfully yours,
Grace M. Holden