

November 23, 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

RE: Report of the International Workshop on In Vitro Methods for Assessing Acute Systemic Toxicity

Dear Dr. Stokes:

I am writing to express my opinion in response to your recent request for public comments on the use of non-animal (in vitro cell culture) methods to study the toxic effects of chemicals from acute exposure. In my opinion, NIEHS should adopt the new non-animal test methods IMMEDIATELY. The non-animal test methods have been considered for almost 20 years, and animals should not continue to suffer and die because of bureaucratic inertia.

These tests are not only cruel; they are virtually irrelevant to humans (producing inaccurate and misleading results in almost half of all cases, whereas the non-animal culture tests have been found to be highly predictive of chemical toxicity in humans). In fact, one top scientist at the NIEHS workshop even stated that the results of lethal poisoning tests on rats aren't even relevant to rats, let alone to people!

NIEHS recommends using the non-animal method to set the starting dose for further animal-poisoning tests. While this may reduce the number of animals killed in acute poisoning studies, it does not go far enough. Government agencies should use in vitro cell culture tests to COMPLETELY REPLACE the use of animals in lethal dose studies.

At a minimum, 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 the use of this method as an eventual REPLACEMENT for lethal-dose poisoning studies. In particular, 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.

The absurdity, ignorance, and horror of poisoning and torturing animals unnecessarily are a disgrace. I urge you to please consider my comments, and to begin the exclusive use of non-animal cell culture tests.

Thank you for your time. I look forward to hearing from you.

Sincerely,

Alison Gollup