

**From:** Russell Ashton  
**Sent:** Thursday, December 16, 2004 2:35 PM  
**To:** NIEHS ICCVAM

Please don't use animals for eye-irritation testing.

Please consider:

ICCVAM should follow the example set by European countries that accept the results of these *in vitro* methods, alone or in combination, to classify severely irritating and corrosive chemicals, and should eliminate proposals for "confirmatory" testing on animals.

ï ICCVAM's background-review documents should clearly address the limitations of the current animal test for eye irritation, including its subjectivity, reproducibility, and its over- and under-prediction rate. ICCVAM should not presume to "validate" a non-animal method against an animal test that has never been properly validated itself.

ï ICCVAM should take the time to learn that these tests are being used safely and effectively by the industry today.

ï ICCVAM should stop dragging its heels and setting up obstacles to the acceptance and use of non-animal test methods in the U.S.

Thank you for your attention and help.

Ann Russell Ashton