

**From:** Debbie Bevelaqua  
**Sent:** Wednesday, December 15, 2004 3:41 PM  
**To:** NIEHS ICCVAM  
**Subject:** Alternative Eye Irritation Tests

Dr. William Stokes, Director  
NTP Interagency Center for the Evaluation of Alternative Toxicological Methods  
National Institute of Environmental Health Sciences  
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Dear Mr. Stokes;

I am writing to express my concerns regarding animal testing. I believe that it is sick, unnecessary, and extremely cruel. Computers can simulate any types of tests these days. I truly hope that it is completely banned in my lifetime.

Please consider the following points:

• 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.

• 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.

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

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

The United States should be a world leader in the move away from animal testing, not a follower.

Thank you,

Debbie Bevelaqua