

**From:** Christina Timmerman  
**Sent:** Tuesday, December 14, 2004 10:01 AM  
**To:** NIEHS ICCVAM  
**Subject:** Eye Irritation Tests

Dear Dr. William Stokes,

I have heard about your stance on eye irritation testing on rabbits and would like to let you know that it is not the position of this and many other taxpayers. I do not see any value in putting known or unknown (for that matter) irritating substances into the eyes fo rabbits. I am requesting that your agency do the following:

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.

I look forward to your response,  
Christina Timmerman