1 INTERAGENCY COORDINATING COMMITTEE ON THE VALIDATION OF 2 ALTERNATIVE METHODS (ICCVAM) TEST METHOD NOMINATION: 3 THE NATIONAL TOXICOLOGY PROGRAM (NTP) TWO-YEAR RODENT BIOASSAY 4 5 DRAFT ICCVAM RECOMMENDED PRIORITY 6 7 In October 2007, the NTP Interagency Center for the Evaluation of Alternative 8 Toxicological Methods (NICEATM) received a nomination (Appendix 1) requesting that 9 the Interagency Coordinating Committee on the Validation of Alternative Methods 10 (ICCVAM) evaluate the current validation status of the NTP two-year rodent bioassay for 11 differentiating human carcinogens from human noncarcinogens. Carcinogenicity studies 12 (i.e., two-year bioassays) conducted at the National Toxicology Program (NTP) generally 13 employ both sexes of rats (Fischer 344/N or Wistar Han) and mice (B6C3F1 hybrid), and 14 generally include three dose levels of a test substance plus an untreated control using 50 15 animals per sex per dose group (Chhabra et al. 2003, King-Herbert and Thayer 2006). In 16 accordance with its established test method nomination process (ICCVAM 2003), 17 ICCVAM considered this nomination in conjunction with currently available information 18 on this test method's usefulness and limitations, and proposed that the evaluation of this 19 test method be assigned a "low priority", pending consideration of comments received from the public and its scientific advisory board, the Scientific Advisory Committee on 20 21 Alternative Toxicological Methods. The rationale for this decision follows. As stated in the 11th Edition of the NTP Report on Carcinogens¹, "The strongest evidence 22 23 for establishing a relationship between exposure to any given substance and cancer in 24 humans comes from epidemiological studies—studies of the occurrence of a disease in a 25 defined population and the factors that affect its occurrence (Bradford 1971). 26 Epidemiological studies of human exposure and cancer are difficult (Rothman 1986). 27 They must rely on natural, not experimental, human exposures and must therefore 28 consider many factors that may affect cancer prevalence besides the exposure under 29 study. One such factor is the latency period for cancer development. The exposure to a

¹ Report on Carcinogens, 2004. Eleventh Edition; U.S. Department of Health and Human Services, Public Health Service, National Toxicology Program, Introduction.

30 carcinogen often occurs many years (sometimes 20 to 30 years or more) before the first 31 sign of cancer appears. 32 Another valuable method for identifying substances as potential human carcinogens is 33 the long-term animal bioassay. These studies provide accurate information about dose 34 and duration of exposure and they are less affected than epidemiology studies by possible 35 interaction of the test substance with other chemicals or modifying factors (Huff 1999). In 36 these studies, the substance is given to one or (usually) two species of laboratory rodents 37 over a range of doses for nearly the animals' entire lives. Experimental cancer research is based on the scientific assumption that substances causing cancer in animals will have 38 39 similar effects in humans. It is not possible to predict with complete certainty from 40 animal studies alone which substances will be carcinogenic in humans. However, known 41 human carcinogens that have been tested adequately in laboratory animals also cause 42 cancer in laboratory animals (Fung et al. 1995). In many cases, a substance first was 43 found to cause cancer in animals and later confirmed to cause cancer in humans (Huff 44 1993). How laboratory animals respond to substances, including developing cancer and 45 other illnesses, does not always strictly correspond to how people will respond. 46 Nevertheless, laboratory animal studies remain the best tool for detecting potential 47 human health hazards of all kinds, including cancer (OTA 1981, Tomatis et al. 1997)." 48 49 The above information supports the basis for the current utility of the two-year bioassay, 50 which is further supported by extensive literature. It is important to recognize that short-51 term studies are conducted when deemed appropriate on species-comparative 52 pharmacokinetics, metabolism, and epigenetic and genetic mechanisms to extend and 53 clarify the cancer bioassay findings. ICCVAM concluded that, in light of this 54 information and ICCVAM priorities described in the recent NICEATM-ICCVAM 5-Year Plan² (ICCVAM 2008), any further evaluation of this assay should have a low priority at 55 56 this time. However, while this represents the proposed current priority for this test 57 method. ICCVAM and NICEATM recognize that future planning and priorities must be 58 flexible in order to take advantage of opportunities resulting from advances in science 59 and technology, development of new methods, and to respond to new testing needs.

² http://iccvam.niehs.nih.gov/docs/5yearplan.htm

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