

June 22, 2009

Chair and Members
NTP Scientific Advisory Committee on
Alternative Toxicological Methods (SACATM)
National Institute of Environmental Health Sciences
P.O. Box 12233, MD EC-17
Research Triangle Park, NC 27709

Re: Pilot EPA/OPP Antimicrobial Cleaning Product
Labeling Program *vis-à-vis* Report of the
Independent Scientific Peer Review Panel on
Alternative Ocular Safety Testing Methods

Dear Dr. Freeman and SACATM Members:

These comments are submitted on behalf of The Humane Society of the United States, Humane Society Legislative Fund, People for the Ethical Treatment of Animals and Physicians Committee for Responsible Medicine. The parties to this submission are national animal protection scientific and public interest organizations with a combined membership of more than 12 million Americans, and longtime stakeholders in the 3Rs (replacement, reduction and refinement) efforts of US federal agencies and the interagency entities.


We wish to advise the Committee of our strong support for a recent initiative by the US Environmental Protection Agency's Office of Pesticide Programs (EPA/OPP) to implement a pilot eye irritation labeling program for antimicrobial cleaning products. As the federal agency responsible for establishing and implementing a regulatory scheme for the hazard labeling of pesticide products, it is fully within EPA/OPP's purview to determine whether a test method or strategy is valid for a particular use within the scope of its regulatory activities. Such a decision is made especially straightforward when a method or strategy has been subject to the degree of validation to which the antimicrobials ocular labeling strategy has undergone.

With this in mind, we respectfully encourage other US agencies to heed EPA/OPP's example by reserving ICCVAM reviews for tests/strategies with multi-agency applicability, as well as by adopting a streamlined approach to agency acceptance of methods/strategies deemed scientifically valid in other regions of the world.

Sincerely,


[Redacted]

Troy Seidle
Director of Science Policy
The Humane Society of the United States
[Redacted]

 Sara Amundson
Executive Director
Humane Society Legislative Fund

Martin Stephens, PhD
Vice President, Animal Research Issues
The Humane Society of the United States

Kate Willett, PhD
Science Policy Advisor
People for the Ethical Treatment of Animals

[Redacted]

Chad Sandusky, PhD
Director of Toxicology & Research
Physicians Committee for Responsible Medicine

cc: Dr. L. Birnbaum
Dr. D. Edwards
Dr. T. Levine
Dr. J. Fowle