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Peter Taylor
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To: Dr. William S. Stokes, Director, NICEATM (MD EC-17), National Institute of Environmental Health Sciences, P.O. Box 12233, Research Triangle Park, NC 27709, Fax: 919-541-0947

cc:

Subject: "Report of the International Workshop on In Vitro Methods for Assessing Acute Systemic Toxicity."

Dear Sir

On September 23, your National Institute of Environmental Health Sciences (NEIHS), a government agency charged with researching the health effects of environmental hazards, asked for public comments on the use of non-animal (in vitro cell culture) methods to study the toxic effects of chemicals from acute (short-term) exposure.

1. NIEHS should adopt the new non-animal test methods IMMEDIATELY. The non-animal test methods have been considered for almost 20 years, and animals should not continue to suffer and die because of bureaucratic inertia.

2. NIEHS recommends using the non-animal method to set the starting dose for further animal- poisoning tests. While this may reduce the number of animals killed in acute poisoning studies, it does not go far enough. Government agen should use in vitro cell culture tests to COMPLETELY REPLACE the use of animals in lethal dose tests.

3. At a minimum, ALL government agencies that currently require the acute animal-poisoning studies should IMMEDIA incorporate the in vitro cell culture method as a transitional means of reducing the number of animals killed and shoul support the use of this method as an eventual REPLACEMENT for lethal-dose poisoning studies. In particular, the EP Immediately incorporate the non-animal cell culture method into its HPV chemical program, as promised in its Octobe agreement with the animal protection community.

Thank you

Peter Taylor