Department of Energy
Office of Science
Washington, DC 20585

February 22, 2011

Rear Admiral William S. Stokes
Director
National Toxicology Program
Interagency Center for the Evaluation of Alternative Toxicological Methods
National Institute of Environmental Health Sciences
P.O. Box 12233, Mail Code K2-16
Research Triangle Park, NC 27709

Dear Admiral Stokes,

This letter is in response to a request from Dr. Linda Birnbaum, Director, National Institute of Environmental Health Sciences, in a letter dated September 2, 2010. Dr. Birnbaum requested the Department of Energy's review of the test method recommendations for four reports applicable to alternative testing methods and strategies proposed to further reduce and refine the use of animals for assessing the ocular hazard potential of chemicals and products. These recommendations are contained in four documents entitled:

ICCVAM Test Method Evaluation Report: Recommendations for Routine Use of Topical Anesthetics, Systemic Analgesics, and Humane Endpoints to Avoid or Minimize Pain and Distress in Ocular Safety Testing (NIH Publication No. 10-7514) [Routine use of topical anesthetics, systemic analgesics, and humane endpoints to avoid or minimize pain and distress during in vivo ocular irritation testing];

ICCVAM Test Method Evaluation Report: Current Validation Status of In Vitro Test Methods Proposed for Identifying Eye Injury Hazard Potential of Chemicals and Products (NIH Publication No. 10-7553) [Validation status of in vitro test methods for assessing the potential of test substances to cause reversible and nonsevere injury to the eye, or for identifying substances as not requiring ocular hazard labeling];

ICCVAM Test Method Evaluation Report: Current Validation Status of a Proposed In Vitro Testing Strategy for U.S. Environmental Protection Agency Ocular Hazard Classification and Labeling of Antimicrobial Cleaning Products (NIH Publication No. 10-7513) [Validation status of a testing strategy that proposes the use of three in vitro test methods to assess the eye injury hazard potential for antimicrobial cleaning products]; and

ICCVAM Test Method Evaluation Report: Recommendation to Discontinue Use of The Low Volume Eye Test for Ocular Safety Testing (NIH Publication No. 10-7515) [Validation status of in vitro test methods for assessing the potential of test substances to cause severe or permanent injury to the eye].

Regulatory agencies require testing of chemicals and products to protect workers and consumers from potential eye injury hazards. These tests are commonly used in the evaluation of product safety. The test methods evaluated seek to evaluate the effectiveness of these tests and to "reduce, refine, and replace animal use" in their implementation. Regarding routine use of analgesia in ocular toxicity testing, ICCVAM recommends that "balanced preemptive pain management should always be provided when the Draize rabbit eye test is conducted for regulatory safety testing." At the request of the EPA, ICCVAM evaluated a number of alternatives to the use of rabbits in the current in vivo eye irritation test method and made recommendations concerning the priority applications for, and limitations of each test. In response to another EPA request, ICCVAM evaluated an in vitro testing strategy developed to evaluate, categorize, and label antimicrobial cleaning products (AMCPs) for eye irritation and determined that current data do not support the AMCP testing strategy as an approach to classify substances in EPA's four ocular hazard categories. Finally, ICCVAM evaluated the low volume eye test (LVET) as an alternative to the Draize test (both are in vivo rabbit eye tests that seek to determine the extent of potential ocular hazard of a test substance) and determined that LVET was not a complete replacement for the Draize rabbit eye test and did not recommend it for prospective testing.

These documents, and the processes used in their development, were reviewed by staff in the Department of Energy's Office of Science. Based on this review, the Department of Energy finds that the recommendations are consistent with the ICCVAM efforts to identify test protocols that "more accurately assess the safety and hazards of chemicals and products and that refine, reduce, or replace animal use." The Test Method Evaluation Reports and the included Background Review Documents have been developed in a thorough, open and technically defensible manner. These reports and their underlying documentation have been reviewed rigorously and made available for general public comment. Both reviewer and public comments were considered and responded to carefully.

The Department of Energy does not promulgate regulations or guidelines regarding the assessment of allergic contact dermatitis in regulated products and thus does not have relevant test methods for which the ICCVAM test recommendations may be added or substituted.

Thank you for opportunity to review these documents and please accept our appreciation for the time, effort, and expertise that were taken to develop these recommendations and their supporting background review documents.

Sincerely,

/s/

J. Michael Kaperberg, Ph.D.
Office of Biological and Environmental Research