



May 17, 2018

Dr. Warren Casey  
Director, National Toxicology Program Interagency Center for the Evaluation of Alternative Toxicological Methods  
P.O. Box 12233  
Mail Drop K2-16  
Durham, NC 27709

Dear Dr. Casey,

On behalf of White Coat Waste Project and the New England Anti-Vivisection Society's nearly 500,000 combined members and supporters, we are writing to submit comments in advance of the May 24, 2018 Interagency Coordinating Committee on the Validation of Alternative Methods (ICCVAM) Public Forum. Thank you for the opportunity to share our views.

Attached is our new report, *Toxic Testing*, that examined data from the National Toxicology Program's (NTP) Management Status Report (MSR). Our novel analysis of NTP's intramural testing found a continued preponderance of animal testing, neglect of non-animal methods, and a lack of transparency and accountability about costs and animal use. In particular:

- NTP's most common animal tests in current agent assessments have used an estimated 115,000 animals and \$186 million taxpayer dollars
- Animal tests comprise 82% of all NTP tests listed in the MSR
- Less than half of agents in the MSR have non-animal tests planned; 100% call for animal tests
- Only 1 of 103 upcoming NTP tests listed in the MSR uses a non-animal method
- Based on the MSR, NTP uses 100+ different animal tests, and only 7 non-animal tests despite approving over 70
- MSR entries are often incomplete and inconsistent, and a lack of data on animal use and costs makes it impossible to assess NTP's work to reduce taxpayer-funded animal tests

We are grateful for your leadership on the development and release of *A Strategic Roadmap for Establishing New Approaches to Evaluate the Safety of Chemicals and Medical Products in the United States*. We especially appreciate the *Roadmap's* emphasis on the need to develop objective metrics by which to assess the effectiveness of well-intentioned government programs to reduce and replace wasteful animal tests. Our analysis found this is a area where reform is urgently needed.

Thank you for your time, consideration and work to reduce and replace wasteful government animal testing.

Respectfully,

Justin Goodman  
Vice President, Advocacy and Public Policy  
White Coat Waste Project  
PO Box 26029  
Washington, DC 20001  
[justin@whitecoatwaste.org](mailto:justin@whitecoatwaste.org)

Nathan Herschler  
Executive Director  
New England Anti-Vivisection Society  
333 Washington Street, Suite 850  
Boston, MA 02108  
[nherschler@neavs.org](mailto:nherschler@neavs.org)