

**U.S. Department of Labor**

Assistant Secretary for  
Occupational Safety and Health  
Washington, D.C. 20210



Kenneth Olden, Ph.D.  
Director  
National Institute of  
Environmental Health Sciences  
P.O. Box 12233  
Research Triangle Park, N.C. 27709

Dear Dr. Olden:


Thank you for your letter of March 21 to the Occupational Safety and Health Administration (OSHA) in which you forwarded toxicological recommendations from the Interagency Coordinating Committee on the Validation of Alternative Methods (ICCVAM) for our consideration. Please accept my apologies for the delay in response.

In your letter, you request that we review the ICCVAM test recommendations on the "Up-and-Down Procedure (UDP)" for acute oral toxicity testing and identify relevant test methods at OSHA for which the ICCVAM test recommendations may be added or substituted. We have reviewed the method and agree with you that this method may be a useful tool in toxicity testing and will likely reduce and refine animal use. As you may know, OSHA does not require or enforce toxicity testing as a part of its activities. Therefore, at this time we have no relevant test methods for which the ICCVAM test recommendations may be added or substituted. However, OSHA does use the results of toxicity testing conducted by others in a variety of ways, and we appreciate the advances in test methods in the ICCVAM recommendations.

Thank you for your valuable work in this field. We look forward to continued participation on the ICCVAM.

Sincerely,

/s/

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 John L. Henshaw