



## United States Department of the Interior

U.S. GEOLOGICAL SURVEY  
Reston, Virginia 20192NICE ATM  
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APR 17 2008

Rear Admiral William S. Stokes  
Executive Director, ICCVAM  
NIEHS, P.O. Box 12233  
Mail Code EC-17  
Research Park, North Carolina 27709

Dear Admiral Stokes:

Thank you for the opportunity to review and comment on the Interagency Coordinating Committee on the Validation of Alternative Methods (ICCVAM) recommendations for ocular safety testing. Pursuant with Sections 3(e)(4), 4(a) and 4(d) of the ICCVAM Authorization Act of 2000 (42 U.S.C. 2851-3), the comments from the Department of Interior (DOI) on the four alternative *in vitro* toxicological test methods for ocular irritants follow below.

Alternative test methods for ocular safety testing have been an important goal in toxicological testing for decades. So, the alternative test methods proposed: (1) Bovine Corneal Opacity and Permeability (BCOP) assay; (2) the Isolated Chicken Eye (ICE) assay; (3) the Isolated Rabbit Eye (IRE) assay; and (4) the Hen's Egg Test - Chorioallantoic Membrane (HET-CAM) assay are welcome and critical to advance chemical safety testing capabilities. These tests and the tiered testing strategy will reduce the need for animal testing and as such enhance our progress toward ICCVAM goals and federal policies related to animal welfare, care and use.

The DOI does not conduct ocular safety tests, and as such, does not have the expertise to provide comments on the technical details of these alternative, *in vitro* screening assays. However, the reviews, comments and discussions from international experts in this area have been thorough and well documented. Limitations of the four *in vitro* safety screening assays have been clearly defined and strategies for use of these assays which minimize negative effects of those limitations have been developed. The ICCVAM is to be commended for the extensive reviews of these methods. In general, the tiered testing approach suggested by the ICCVAM is standard practice in toxicological screening and assessment strategies. We support this type of approach and the tenants of reductions in animal testing and use. Thus, DOI has no technical basis to question or oppose the four ocular safety screening assays within the context of the proposed tiered testing strategy.

Sincerely,

/s/

Susan D. Haseltine  
Associate Director for Biology