



Centers for Disease Control  
and Prevention (CDC)  
Atlanta GA 30333

February 8, 2011

RADM William S. Stokes  
Executive Director  
ICCVAM  
National Institute of Environmental Health Sciences  
National Institutes of Health  
P. O. Box 12233  
Mail Code EC-17  
Research Triangle Park, North Carolina 27709

Dear RADM Stokes:

This letter is in response to correspondence from Dr. Linda Birnbaum, Director, National Institute of Environmental Health Sciences (NIEHS), National Institutes of Health (NIH) requesting that the Agency for Toxic Substances and Disease Registry (ATSDR) review the following products of the Interagency Coordinating Committee on the Validation of Alternative Methods (ICCVAM) and the National Toxicology Program Interagency Center for the Evaluation of Alternative Toxicological Methods (NICEATM):

*ICCVAM Test Method Evaluation Report, "Recommendations for routine use of topical anesthetics, systemic analgesics, and human endpoints to avoid or minimize pain and distress in ocular safety testing"* (NIH Publication No: 10-7514).

*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: 10-7553A/B).

*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).

*ICCVAM Test Method Evaluation Report, "Recommendation to discontinue use of the low volume eye test for ocular safety testing"* (NIH Publication No: 10-7515),

First and foremost, I would like to commend the work of the ICCVAM toward reduction, refinement, and replacement of animals in toxicity testing. This is a tremendous challenge our society faces, as new chemicals are being introduced into commerce at an ever increasing pace, while the resources to test them are indeed limited. However, promoting advances in alternative

methods and maintaining scientific quality without compromise of human, animal, and the environmental health should remain our goal.

Thank you for the opportunity to review and comment on these proposed test methods. The Centers for Disease Control and Prevention/ATSDR concurs with your recommendations regarding these methods and agrees that these test methods should be considered before using whole animals for toxicity testing. These ICCVAM-recommended methods should be used as appropriate.

If you need any further information, please contact Dr. Moiz Mumtaz, Science Advisor, Division of Toxicology and Environmental Medicine (DTEM), our principal agency representative to ICCVAM, at (770) 488-3349, or Dr. Bruce Fowler, Associate Director of Science, DTEM, ATSDR at (770) 488-7250.

Sincerely,

Thomas R. Frieden, M.D., M.P.H.  
Director, CDC, and  
Administrator, ATSDR

cc:

Linda Birnbaum, Director, NIEHS  
Moiz Mumtaz, Ph.D.  
Bruce Fowler, Ph.D.