To Whom It May Concern:

1. NIEHS should adopt the new non-animal test methods IMMEDIATELY. The non-animal test methods have been considered for almost 20 years, and animals should not continue to suffer and die because of bureaucratic inertia.

2. NIEHS recommends using the non-animal method to set the starting dose for further animal- poisoning tests. While this may reduce the number of animals killed in acute poisoning studies, it does not go far enough. Government agencies should use in vitro cell culture tests to COMPLETELY REPLACE the use of animals in lethal dose tests.

3. At a minimum, ALL government agencies that currently require the acute animal-poisoning studies should IMMEDIATELY incorporate the in vitro cell culture method as a transitional means of reducing the number of animals killed and should fully support the use of this method as an eventual REPLACEMENT for lethal-dose poisoning studies. In particular, the EPA must immediately incorporate the non-animal cell culture method into its HPV chemical program, as promised in its October 1999 agreement with the animal protection community.

Thank you for considering these comments.

Judy Giannini