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To : National Toxicology Program

Public comment to „A new vision and direction for ICCVAM“

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Ladies and Gentlemen!

Personally I miss a supportive statement on the use of the Monocyte Activation Test (MAT) as a general replacement for the rabbit pyrogen test.

From our perspective the lacking US-acceptance for the MAT is a major hurdle for the globally acting pharmaceutical industry to replace the rabbit pyrogen test.

After the negative ICCVAM-peer-panel review in April 2007 there was a long period of stagnancy in the MAT-acceptance worldwide. On several occasions we and others had discussions with ICCVAM- or FDA representatives on these issues. On May 23th. 2011 there was a call for public comments and data in the Federal Register (Vol. 76., No. 99) on the detection of Non-Endotoxin-Pyrogens (NEP) by MAT and other methods. During our discussions on behalf of the 8th World Congress on Alternatives and animal use in the life sciences in Montral (August 2011) several stakeholders agreed in contributing these data by preparing a review paper.

During the preparation of this review paper the FDA-“Guidance for Industry: Pyrogen and Endotoxins Testing: Questions and Answers” was released in June 2012 which mentioned as alternative methods the use of either MAT or recombinant Factor C.

Finally in 2013 the review paper “Evidence for the Detection of Non-Endotoxin Pyrogens by the Whole Blood Monocyte Activation Test” by Hasiwa et al. was published in ALTEX 30 (2/13; pp. 1-40).

Taking together the fact that the FDA already accepted the MAT for NEP-detection in a certain drug product several years ago, the FDA-Guideline from 2012 and the data compilation from the 2013 paper, I come to the conclusion that the MAT should become a fully accepted alternative pyrogen test method in the US too.



As a lot of work has been done on the different MAT-versions during the last two decades, supportive action of ICCVAM on the MAT belongs to the field of short (<5 years) to mid-term success without the need for further official validation studies (I'm not talking about the product specific validation).

For the global acceptance of the MAT a little effort by ICCVAM may have big impact.

I appreciate your work.

With best regards

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