**To:** ICCVAM
**Comments to:** Update of ICCVAM Document on Validation and Regulatory Acceptance, "Validation, Qualification, and Regulatory Acceptance of New Approach Methodologies" (Draft)"

Gowan Company stands for building trust through practical, science-based solutions. Gowan welcomes the revision of validation standards, moving away from petrified specific processes towards focusing on biological relevance, technical characterization, data integrity and information transparency.
However, the integrity and reliability of scientific research are threatened when results cannot be reproduced independently. Recent past has seen several discussions on the lack of reproducibility of key experiments, triggering mistrust of the general public in science (reproducibility crisis). Achieving societal trust in methods is the prerequisite for alternative method endorsement. Gowan would like to suggest caution in (a) introducing the possibility to have contradictory validation outcomes on the same method across different regulatory contexts, and (b) cutting short on inter-laboratory assay transferability and reproducibility assessment in any validation that yields a method considered fit for regulatory decision making, even if in combination with other data.

Specifically in the draft document, Lines

> 536: "5) interlaboratory evaluation (**if needed**)",
> 540: "Determination of method transferability (**if necessary**)",
> 556/557: "**it may be necessary for some** NAMs to assess their transferability through interlaboratory testing"
> 764: "Technical reproducibility should be included with the information submitted, **where applicable**"

deemphasize the necessity to demonstrate transferability, assess inter-laboratory variability and understand the source thereof. As a conscientious coordinating committee, ICCVAM should clearly advise that methods skipping interlaboratory transferability assessment shall not be used as stand-alone or dominating key evidence in regulatory decision making.

The context of use is now proposed to be defined by the user of the method, i.e. the regulatory body. Gowan supports this concept. However, to avoid emergence of contradictory policies on application of the same method in ultimate decision making, ICCVAM should specify minimum standards how to establish the fitness-for-purpose in the context of similar, recurring domains of use, like screening assessments (prioritization), hazard characterization (classification decisions), and use in quantitative risk assessment.

With best regards,
Dr. Christian Strupp
cstrupp@gowanco.com