PhysiciansCommittee
for Responsible Medicine
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9/03/2025

Re: Advancing Nonanimal Research in Federal Priorities; September 11-12, 2025, Scientific Advisory Committee on Alternative Toxicology Methods Meeting Written Comment

Dear Dr. Marty and SACATM members:

On behalf of the Physicians Committee for Responsible Medicine, a 501(c)(3) nonprofit organization supported by nearly one million members and supporters worldwide working for effective, efficient, and ethical medical research and product testing, thank you for the opportunity to provide input on this meeting and the activities of the Scientific Advisory Committee on Alternative Toxicological Methods (SACATM) and the Interagency Coordinating Committee on the Validation of Alternative Methods (ICCVAM).

We commend the recent strides federal agencies have made to improve human health, including the National Institutes of Health (NIH) landmark initiative to expand human-based science while reducing animal use[1] and the Food and Drug Administration (FDA) plan to phase out animal testing requirements for monoclonal antibodies and other drugs.[2] To build on these groundbreaking plans to advance human health and redirect focus toward human-based technologies, including new approach methodologies (NAMs), the Physicians Committee offers the comments below to SACATM for consideration.

Sincerely,

Janine McCarthy, MPH
Acting Director of Research Policy
Physicians Committee for Responsible Medicine

Shagun Krishna, PhD
Director of Toxicology
Physicians Committee for Responsible Medicine

[1] NIH to prioritize human-based research technologies. National Institutes of Health. April 29, 2025. Accessed August 18, 2025. https://www.nih.gov/nih-prioritize-human-based-research-technologies.

[2] FDA Announces Plan to Phase Out Animal Testing Requirement for Monoclonal Antibodies and Other Drugs. U.S. Food and Drug Administration. April 10, 2025. Accessed August 18, 2025. https://www.fda.gov/news-events/press-announcements/fda-announces-plan-phase-out-animal-testing-requirement-monoclonal-antibodies-and-other-drugs.

Appreciation for NIH Priorities and Leadership in Human-Based Methods

The Physicians Committee applauds the NIH for the recent initiative prioritizing human-based research, including the establishment of the Office of Research Innovation, Validation, and application (ORIVA) within the NIH's Office of the Director. This office aims to "coordinate NIH-wide efforts to develop, validate, and scale" nonanimal methods and lead necessary, interagency coordination efforts.[3] Creating targeted, NAMs-specific funding opportunities to accelerate human-based research will be fundamental to ensuring the success of this initiative, and ORIVA's role in expanding training in and infrastructure for nonanimal approaches will be a key asset in making these methodologies more accessible. We encourage NICEATM to aid in these efforts, particularly by tapping into its network of experts on alternative methods to integrate into study sections.

Additionally, we recognize the instrumental roles that Drs. Nicole Kleinstreuer and Warren Casey have played in advancing human-based research. As leaders in the field, they have helped drive nonanimal innovation to advance medical research and regulatory testing, moving us toward a future where animal experimentation is no longer used. We are confident in their continued leadership to carry out the NIH's exciting new goals toward this end.

Requesting TSCA Updates to Protect NAM Advancement

The Physicians Committee is concerned that EPA's restructuring of research and development could undermine the Agency's ability to meet its statutory obligations and to support the adoption of alternative toxicological methods. TSCA requires EPA to prioritize performance assessment, validation, and translational studies to identify scientifically valid alternative test methods and strategies that provide reliable, relevant information for regulatory decisions. Federal and state regulators, industry, academia, and nongovernmental organizations rely on EPA's expertise and resources to protect human health and the environment while bringing innovative products to market. We urge SACATM to recommend that ICCVAM obtain from EPA a plan that identifies the offices and leadership accountable for carrying out TSCA-mandated research, updating the list of identified alternatives, and reporting to Congress on progress in reducing and replacing animal use. The plan should also specify how EPA will continue to develop, maintain, and support key tools and resources, such as the CompTox Chemicals Dashboard, the ECOTOX Knowledgebase, ToxCast/Tox21 high-throughput screening data and prediction models, and IRIS assessments used by regulatory agencies and stakeholders worldwide. Securing these commitments will help ensure EPA's continued leadership in advancing the use of alternative toxicological methods for regulatory applications.

[3] NIH to prioritize human-based research technologies. National Institutes of Health. April 29, 2025. Accessed August 18, 2025. https://www.nih.gov/nih-prioritize-human-based-research-technologies.

Support for FDA Qualification of NAMs

The Physicians Committee welcomes the FDA Human Food Program's ENTRÉE qualification pilot program. In addition to food safety, animal testing is required to measure protein digestibility to support content claims on food labeling. We are working with stakeholders to submit a validated in vitro protein digestibility test method for this context of use. We encourage SACATM to promote its acceptance into the ENTRÉE program and to recommend comparisons to human and existing in vivo digestibility data for any additional qualification that is required to ensure its adoption.

We strongly support the qualification of NAMs through the FDA ISTAND qualification program. We were pleased to see the recent promotion of ISTAND to a permanent program,[4] and we urge for this transition to include the addition of dedicated staff and resources to accelerate the progression of applications through the program.

Encouragement for In-Person Engagement

The Physicians Committee encourages SACATM and ICCVAM to continue providing in-person opportunities for dialogue among regulators, researchers, and agency leadership. While virtual participation has broadened access, in-person meetings remain invaluable for building trust, fostering collaboration, and engaging in deeper discussions that can accelerate the acceptance of human-relevant methods. These opportunities help stakeholders move from information sharing to practical, coordinated actions that advance regulatory science.

Recognition of NICEATM Method Developers Forum

We appreciate NICEATM's launch of the Method Developers Forum, which provides a critical venue for researchers to share new approaches and receive feedback from regulators and other stakeholders. These forums help bridge the gap between method innovation and regulatory acceptance by promoting early dialogue and alignment. We urge NICEATM and ICCVAM to continue supporting and expanding this initiative to ensure that promising NAMs can advance more efficiently toward qualification and implementation.

Support for CAMERA Launch and Integration

The Physicians Committee welcomes the launch of the Collection of Alternative Methods for Regulatory Application (CAMERA) in August 2025. CAMERA represents an important step forward in making validated NAMs more visible, accessible, and usable across regulatory contexts. We note that the database currently contains 27 OECD-endorsed NAMs, primarily focused on skin and eye testing, including the QSAR Toolbox. While this is a strong foundation, we encourage

[4] FDA advances drug development innovation by establishing ISTAND as permanent qualification program. News release. FDA Voices. July 31, 2025. Accessed August 8, 2025. https://www.fda.gov/news-events/fda-voices/fda-advances-drug-development-innovation-establishing-istand-permanent-qualification-program

expansion to include additional human-relevant NAMs such as those addressing systemic toxicity or CiPA-related endpoints.

We also request to include more details on how information on NAMs will be applied in regulatory decision-making, particularly by the regulatory agencies like FDA. At present, the Regulatory Guidance and Test Guidelines information's organization-specific guidelines suggest that NAMs may only be applicable where an agency already has guidance, which could limit CAMERA's broader utility. We urge SACATM to provide guidance on how CAMERA NAMs should be interpreted and applied across and between all member agencies. Information on how NAM methods can be pursued for additional test method endpoints beyond the current OECD/other validation body endpoint, to ensure that promising methods are not artificially constrained to narrow endpoints.

Strengthening Training and Capacity Building

We reiterate the importance of training programs to accelerate NAM adoption, a point we have consistently raised in previous SACATM and ICCVAM comments. Reviewer (at NIH, FDA and EPA) and stakeholder education is critical to overcoming bias toward animal-based methods and ensuring human-relevant approaches are evaluated fairly. The Physicians Committee offers support in this area through our NURA (NAM Use for Regulatory Application) program, which provides training modules, webinars, and practical case studies designed for regulators, researchers, and industry stakeholders. We are already partnering with NICEATM to co-host a webinar on the SARA-ICE tool, and we would welcome additional opportunities to collaborate with federal agencies and NICEATM to scale this type of training and make it more widely available.

We would also like to recognize the leadership of Dr. Helena Högberg-Durdock, Acting Director of NICEATM. Dr. Högberg's vision and commitment to advancing nonanimal methods have been instrumental in guiding NICEATM during this pivotal period. Her leadership continues to inspire confidence in the future direction of NICEATM and its critical role in the global shift toward human-relevant science.

The Physicians Committee commends SACATM, ICCVAM, NICEATM, and partner agencies for their ongoing leadership in advancing New Approach Methodologies. Building on recent progress, we urge SACATM to hold agencies accountable to deliver concrete timelines, measurable reductions in animal use, and transparent reporting mechanisms. Building on existing leadership, strong agency direction, interagency collaboration, and robust training will help the U.S. drive global progress toward modern, ethical, and human-relevant science.

We stand ready to collaborate through our expertise and training resources to help achieve the shared goal of eliminating animal testing while improving human health. Thank you for your continued efforts and dedication to advancing nonanimal methods.