

Private Citizen

Public Comment

September 1, 2025

Dear Scientific Advisory Committee on Alternative Toxicological Methods;
Re: Federal Register Notice 90 FR 29572.

I appreciate the opportunity to provide comments to the Scientific Advisory Committee for Alternative Toxicological Methods (SACATM) at its September meeting. I recognize SACATM's vital role in advancing the thoughtful integration of new approach methodologies into toxicological testing.

As a neuroscientist who studies animal models, I appreciate the potential of new approach methodologies in reducing the need for animals in toxicological testing. At the same time, it is evident that research on animals is required to make discoveries that will advance human health in areas involving complex biological systems, which characterizes the lion's share of our unmet clinical challenges. Moving forward, I encourage SACATM, alongside the Interagency Coordinating Committee on the Validation of Alternative Methods (ICCVAM), to continue emphasizing collaboration, transparency, and rigorous validation in its recommendation. This includes engaging with the full range of stakeholders who support this work, from scientists to animal caretakers and IACUC members. Only then can (SACATM) arrive at a balanced view of how to integrate new approach methodologies in parallel with animal studies. Pursuing new approach methodologies at the expense of animal research at the present time would violate NIH's responsibility to pursue advances in public health related to complex biological systems and would constitute a breach of the public trust.