

Attention: Scientific Advisory Committee on Alternative Toxicological Methods Meeting

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Private Citizen

Comments: "NAMs are currently not able to replace In vivo research for many areas of research, such as studies on cognition, affect regulation, social behavior (incl autism, a purported priority of this administration), and longitudinal studies in development and aging processes. Similarly, drug and gene therapy distribution studies require in vivo study. Immune studies with an intact system and organ transplantation studies likewise cannot be done without in vivo models. AI, ML, and existing human data cannot substitute for this either because we do not yet know everything about the human body. If we do not yet have all the relevant knowledge about all body systems, their interactions, emergent properties, disease progression, developmental processes, and aging processes, then we cannot model it computationally. This seems to be a logical fallacy or some kind of magical thinking that is being promulgated by NAMs enthusiasts. NAMs certainly have their place and their development should be encouraged, but if research with animals is curtailed prematurely by ideological and wishful thinking, it will be to the detriment of medical advances and the health of people."