Humane World for Animals
Humane World Action Fund

1255 23rd St. NW, Suite 450

Washington, DC 20037

humaneworld.org

Formerly called the Humane Society of the United States and Humane Society Legislative Fund

July 24, 2026

Helena Hogberg, PhD
Acting Director, D-NICEATM
Office of Research Innovation, Validation, and Application
National Institutes of Health
1 Center Drive, Bethesda, MD 20892

RE: Interagency Coordinating Committee on the Validation of Alternative Methods Public Forum

Dear Dr. Hogberg,

On behalf of Humane World for Animals and Humane World Action Fund, formerly called the Humane Society of the United States and Humane Society Legislative Fund, and our members and supporters, thank you for the opportunity to comment on the important ongoing work of the Interagency Coordinating Committee on the Validation of Alternative Methods (ICCVAM). Our organizations strongly support the continued efforts of ICCVAM, its member agencies and the Division of the National Interagency Center for the Evaluation of Alternative Test Methods (D-NICEATM) to advance the development, acceptance and use of new approach methodologies (NAMs) as well as more recent commitments made by several federal agencies that acknowledge the importance of moving toward better, more human-relevant science.[1,2,3] We were especially pleased to see the creation of D-NICETAM's new home, the Office of Research Innovation, Validation, and Application (ORIVA) in June of this year with Dr. Warren Casey at the helm.[4]

To achieve the ambitious goals put forward by ICCVAM member agencies to replace animal studies with non-animal NAMs, Humane World for Animals and Humane World Action Fund encourage D-NICEATM, ICCVAM and its member agencies to increase efforts on the suggested areas below.

Accelerating NAMs by prioritizing agency resources

The forward-looking goals laid out in ICCVAM member agency announcements to transition from animal tests to NAMs necessitate an equally significant allocation of agency resources to achieve them. ICCVAM member agencies must prioritize funding for the development and approval of non-animal methods as well as the necessary updates of regulations and guidance documents to communicate changes with regulated industries. The National Institutes of Health's (NIH) commitment announced in March of this year to dedicate $150 million to NAMs-based research via the Complement Animal Research in Experimentation (Complement-ARIE) program was a significant step in the right direction. In addition, the creation of the Standardized Organoid Modeling (SOM) Center demonstrates a long-term commitment to

[1] Food and Drug Administration. (2025, April 10). FDA Announces Plan to Phase Out Animal Testing Requirement for Monoclonal Antibodies and Other Drugs. https://www.fda.gov/news-events/press-announcements/fda-announces-plan-phase-out-animal-testing-requirement-monoclonal-antibodies-and-other-drugs
[2] National Institutes of Health. (2026, March 18). NIH invests $150 million in human-based research to reduce use of animal models. https://www.nih.gov/news-events/news-releases/nih-invests-150-million-human-based-research-reduce-use-animal-models
[3] Environmental Protection Agency (2026, June 2). Trump EPA Takes New Action to Eliminate Animal Testing. https://www.epa.gov/newsreleases/trump-epa-takes-new-action-eliminate-animal-testing
[4] National Institutes of Health. (2026, June 15). NIH launches new office to advance human-based research and reduce animal use. https://www.nih.gov/news-events/news-releases/nih-launches-new-office-advance-human-based-research-reduce-animal-use

developing new non-animal science and "establishing validated, fit-for-purpose protocols."[5] We are encouraged to see this kind of commitment to human-relevant research and urge NIH to increase dedicated funding for projects that develop and use better, human-relevant science.

In addition to increased funding for the development of NAMs, agency resources must also be allocated for acceptance of these methods and waivers to animal studies as appropriate. During the 2023 ICCVAM Public Forum, the Environmental Protection Agency (EPA) presented the agency's work to develop a waiver for the 90-day dog test for pesticides.[6] Three years later, without the dedicated staff time needed to complete a comprehensive retrospective analysis, efforts to create a formal waiver process that would allow pesticide companies to avoid this test have been delayed. It is vital that agencies ensure that adequate staff time is allotted to complete projects that will have a measurable impact on achieving goals of eliminating animal use.

The creation of the Validation and Qualification Network (VQN)[7] by NIH and the Foundation for the National Institutes of Health (FNIH) is an encouraging step and we are proud to work in partnership on this component of the Complement-ARIE program that will hopefully contribute to fulfilling the agency's and non-profit's goal to advance the use of NAMs in safety testing and drug and disease research. We encourage NIH and FNIH to follow through with the timeline set forth for achieving their goals for this initiative. Other ICCVAM member agencies should continue or consider new similar public-private partnerships as one mechanism to fund the successful completion of work to develop and accept NAMs.

Resources also need to be allocated to continue to train staff on how to effectively interpret industry data submissions generated using NAMs and agencies should consider options for incentivizing staff training in NAMs. In addition, the agencies could capitalize on existing resources such as the Animal-Free Safety Assessment Collaboration Master Class, a free-online course authored by industry experts on the generation and use of existing information, in vitro and in silico tools for carrying out human health safety assessments.[8] Additional resources should be assigned to hire and train staff devoted to updating guidance and other policy documents that will clearly communicate to industry stakeholders about both acceptance and preferred use of non-animal data. In the process of updating guidance and policy documents, outdated references to animal tests that can be replaced should be promptly removed. Together, training staff to interpret NAMs data and updating guidance documents to refer to use of NAMs will help avoid confusion on what is acceptable and prevent unnecessary animal testing.

Although ICCVAM member agencies may not currently have extensive financial, personnel and physical resources, ICCVAM and D-NICEATM in particular can serve an important role in facilitating resource sharing across agencies to help fill gaps. ICCVAM member agencies can and should consider ways that they can benefit from the knowledge and expertise of colleagues across agencies.

Clarifying acceptance of data from NAMs and increasing transparency

In April 2025, the Food and Drug Administration (FDA) released its *Roadmap to Reducing Animal Testing in Preclinical Safety Studies*,[9] which laid out proposed agency actions to accelerate a transition to NAMs and help provide clarity for industry on when they can submit safety data utilizing NAMs and feel confident that data will be accepted by the agency in the drug approval process. In October 2025, FDA's Center for Drug Evaluation and Research (CDER) posted on its website the CDER Streamlined Nonclinical Studies and Acceptable New Approach Methodologies, an inventory of methods that may be

[5] National Institutes of Health. (2026). NIH Standardized Organoid Modeling (SOM) Center. https://www.nih.gov/som
[6] U.S. Environmental Protection Agency. (2023). *Update from EPA's Office of Pesticide Programs* [PowerPoint slides]. https://ntp.niehs.nih.gov/sites/default/files/2023-06/03_perron_iccvamforum2023_508.pdf
[7] Foundation for the National Institutes of Health. Validation & Qualification Network Design Phase. https://fnih.org/our-programs/validation-qualification-network-design-phase/
[8] Animal-Free Safety Assessment Collaboration. https://www.afsacollaboration.org/masterclass/
[9] U.S. Food and Drug Administration. (2025). Roadmap to Reducing Animal Testing in Preclinical Safety Studies. https://www.fda.gov/files/newsroom/published/roadmap_to_reducing_animal_testing_in_preclinical_safety_studies.pdf

used to reduce reliance on animal studies.[10] Following, in March of this year, we were pleased to see the publication of draft guidance providing a validation framework and encouraging drug companies to submit data from NAMs.[11] We submitted comprehensive comments on the draft guidance with recommendations for how to strengthen it to ensure the agency builds a regulatory system where human-relevant, non-animal evidence becomes the preferred basis for regulatory decision-making. This includes ensuring NAMs are benchmarked against human data whenever possible and the need for NAMs to serve as a replacement, rather than just a complement, to animal studies. This guidance, once finalized, and any future guidance documents describing acceptable NAMs must be regularly updated to ensure that the information contained within represents the agency's current acceptance of NAMs use in a regulatory context. While we welcome this NAMs draft guidance, we continue to call on FDA to update their regulations clarifying that animal testing is not required for drugs, as we recommended in our legal petition[12] submitted to the agency in 2024. We were pleased to see reference to this action in the Unified Agenda planned for December of this year.[13]

We commend NIH for the creation and continued development of the Collection of Alternative Methods for Regulatory Application (CAMERA).[14] This database increases transparency about available NAMs by providing a central point of access to validated methods, supporting evidence and regulatory context. This is crucial for clarifying when and how data from studies utilizing NAMs should be used and promoting greater acceptance of NAMs across regulatory agencies. D-NICEATM should ensure that this important tool is regularly updated to promote broader acceptance and use of non-animal methods and foster greater consistency and confidence across the regulatory community.

EPA has been transparent about their acceptance of NAMs including publishing a comprehensive list of non-animal alternative methods for chemical safety assessment that was created and must be maintained according to the 2016 update to the Toxic Substances Control Act. In June of this year, this list was updated and the agency also announced the creation of a streamlined process to enable the nomination of NAMs for consideration for inclusion on this list in the future.[15] EPA should follow these actions with a publicly available update to its NAMs workplan to provide clarity on how it will successfully implement the end of mammalian animal testing by 2035. All ICCVAM member agencies should adopt similar transparent and proactive ways to communicate with regulated industries about the acceptance (and preferred use) of NAMs and associated future plans with timelines.

International harmonization

ICCVAM member agencies should continue to work in harmony with regulatory agencies in other countries to reduce animal use and accelerate their replacement with NAMs globally. The July 7, 2025, cohosted "*FDA-NIH Workshop: Reducing Animal Testing*"[16] brought together regulatory authorities from around the world to discuss how NAMs can better be implemented to address regulatory needs for product safety. Collaborative workshops like these help ensure that individual countries are not working in silos while trying to accomplish a shared goal. We encourage D-NICEATM and ICCVAM member agencies to coordinate more events like this that foster collaboration and progress toward increased implementation of NAMs globally. ICCVAM should also continue to be a platform for global projects such as the work done by the Acute Toxicity Workgroup to aid in developing replacements for acute oral

---

[10] U.S. Food and Drug Administration. (2026). CDER Streamlined Nonclinical Studies and Acceptable New Approach Methodologies (NAMs). https://www.fda.gov/about-fda/center-drug-evaluation-and-research-cder/cder-streamlined-nonclinical-studies-and-acceptable-new-approach-methodologies-nams

[11] U.S. Food and Drug Administration. (2026, March 11). *General Considerations for the Use of New Approach Methodologies in Drug Development* [Draft guidance]. https://www.fda.gov/media/191589/download

[12] Humane World for Animals and Humane World Action Fund. (2024, May 15). *Citizen petition*. https://www.humaneworld.org/sites/default/files/docs/HSUS%20HSLF%20Citizen%20Petition%20May%2015%202024_0.pdf

[13] Executive Office of the President (2026) *Rule 0910-AJ27of the Unified Agenda* https://www.reginfo.gov/public/do/eAgendaViewRule?pubId=202510&RIN=0910-AJ27

[14] National Institutes of Health. (2025). Collection of Alternative Methods for Regulatory Application. https://camera.niehs.nih.gov/

[15] U.S. Environmental Protection Agency. (2026, June 2). *Trump EPA Takes New Action to Eliminate Animal Testing*. https://www.epa.gov/newsreleases/trump-epa-takes-new-action-eliminate-animal-testing

[16] Food and Drug Administration. (2025). *FDA-NIH Workshop: Reducing Animal Testing* [Webinar]. https://www.fda.gov/news-events/fda-meetings-conferences-and-workshops/fda-nih-workshop-reducing-animal-testing-07072025

systemic toxicity animal tests.[17] The resulting collection of models made available in the Collaborative Acute Toxicity Modeling Suite (CATMoS) is an excellent example of what can be accomplished when multiple regulatory agencies and scientists around the world collaborate to achieve a shared objective. D-NICEATM and ICCVAM member agencies should prioritize staff attendance, participation and contributions to international projects such as those with the Organisation for Economic Co-operation and Development (OECD), International Cooperation on Alternative Test Methods (ICATM), Health and Environmental Sciences Institute (HESI) and International Council for Harmonisation (ICH). For example, HESI is currently hosting multiple science committees composed of regulatory, industry and academia members that are working collaboratively on NAMs efforts related to agrochemical evaluation, developmental and reproduction toxicity (DART) studies, next-generation risk assessment, PBPK modeling and others[18] that, with participation by relevant ICCVAM member agencies, could benefit both parties.

Harnessing advanced technologies and data sharing through the creation of new workgroups

D-NICEATM and ICCVAM should consider creating new workgroups to address two emerging and related priorities for the successful implementation of NAMs: Artificial intelligence (AI) and data sharing. As described in the January 2018 publication, *A Strategic Roadmap for Establishing New Approaches to Evaluate the Safety of Chemicals and Medical Products in the United States,* ICCVAM workgroups are established to complete "tasks identified by the committee as being important for the development or validation of new approach methodologies."[19] Both AI and data sharing are priorities for achieving the goals of ICCVAM and its member agencies.

The rapid advancement of AI should be capitalized on for interpreting large sets of safety data for products regulated by ICCVAM member agencies. This potential is already being realized in drug development. For example, scientists from Humane World for Animals along with the biopharmaceutical industry and academia recently collaborated on research exploring how AI can be applied to drug development. This work demonstrated the potential for AI to reduce the time and costs associated with the development pipeline, while improving the prediction of drug safety before clinical trials.[20] As AI continues to advance our understanding of human responses to substances, now is a good time to ensure that all ICCVAM member agencies are able to evaluate and use these tools to achieve the shared goal of reducing and replacing animal testing.

Relatedly, ICCVAM member agencies should also work together to determine best practices for more open and inclusive data sharing across regulatory jurisdictions. Large, accessible datasets enable the development and evaluation of predictive computational models and artificial intelligence approaches while generating the evidence required to establish biological relevance, technical performance and fit-for-purpose applicability, without requiring further animal use. Shared validation data, benchmark datasets, regulatory case studies and accumulated regulatory experience across jurisdictions can be used to evaluate the reproducibility and predictive performance of NAMs, support independent scientific review, identify appropriate contexts of use and build confidence in their regulatory application. A discussion among ICCVAM member agencies on optimal approaches for data sharing should be prioritized.

Because the incorporation of AI and the need for data sharing are best approached collaboratively, we encourage the creation of ICCVAM workgroups to focus on these topics.

---

[17] National Institutes of Health (2026, May). *Replacing Animals for Acute Systemic Toxicity Testing*. https://ntp.niehs.nih.gov/whatwestudy/niceatm/test-method-evaluations/acute-systemic-tox/iv-data-req

[18] Health and Environmental Sciences Institute. Scientific Committees & Resources. https://hesiglobal.org/committees/

[19] ICCVAM (Interagency Coordinating Committee on the Validation of Alternative Methods). (2018, January). A Strategic Roadmap for Establishing New Approaches to Evaluate the Safety of Chemicals and Medical Products in the United States. https://dx.doi.org/10.22427/NTP-ICCVAM-ROADMAP2018

[20] Gupta, D., Jenkins, I., Marshall, L., & Lakey, J. RT. (2026). Harnessing AI to Revolutionize Drug Discovery. *American Journal of Biomedical Science & Research*, 30(6), Article AJBSR.MS.ID.003983. https://biomedgrid.com/pdf/AJBSR.MS.ID.003983.pdf

Conclusion

We are encouraged by recent and continued efforts by D-NICEATM and ICCVAM member agencies to accelerate the development and implementation of NAMs. To ensure success, we recommend prioritizing investment in and the development of incentives for implementation, increasing transparency and more effectively communicating acceptance of NAMs, expanding international collaboration and harmonization efforts and creating specialized workgroups to address developing technologies and data needs.

Humane World for Animals and Humane World Action Fund welcome the opportunity to work with D-NICEATM or any ICCVAM member agency to help achieve the common goal of replacing animals with human-relevant test methods and strategies.

Thank you for your consideration of our comments.

Sincerely,

Vicki Katrinak
Director, Animal Research and Testing
Humane World for Animals

Gillian Lyons
Director of Regulatory Affairs
Federal Affairs
Humane World Action Fund