

**From:** C Hodges  
**Sent:** Wednesday, December 15, 2004 11:43 AM  
**To:** NIEHS ICCVAM  
**Subject:** no animal testing, please

Dr. William Stokes,

I am horrified that ICCVAM is proposing to require “confirmatory” testing on animals of chemicals that exhibit corrosive or severely irritating properties *in vitro*. This is unnecessary, cruel and just plain wrong.

I propose that ICCVAM should follow the example set by European countries that accept the results of these *in vitro* methods, alone or in combination, to classify severely irritating and corrosive chemicals, and should eliminate proposals for “confirmatory” testing on animals. Its background-review documents should clearly address the limitations of the current animal test for eye irritation, including its subjectivity, reproducibility, and its over- and under-prediction rate. ICCVAM should not presume to “validate” a non-animal method against an animal test that has never been properly validated itself. ICCVAM should take the time to learn that these tests are being used safely and effectively by the industry today. It should also stop dragging its heels and setting up obstacles to the acceptance and use of non-animal test methods in the U.S.

And for your information, I only buy products that have not been tested on animals. Shame on anyone who tortures animals.

Sincerely,

Cynthia Hodges