

**From:** Shane K Lanzendorfer  
**Sent:** Thursday, December 16, 2004 2:34 PM  
**To:** NIEHS ICCVAM  
**Subject:** Alternative Eye-Irritation Tests

Dear Dr. William Stokes,

ï 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.

ï ICCVAM’s 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.

ï ICCVAM should take the time to learn that these tests are being used safely and effectively by the industry today.

ï ICCVAM should stop dragging its heels and setting up obstacles to the acceptance and use of non-animal test methods in the U.S.

Sincerely,  
Shane

***"The question is not, Can they reason? nor Can they talk? but, Can they suffer?"  
Jeremy Bentham***