

August 7, 2007

The Honorable Stephen Johnson  
Administrator, Environmental Protection Agency  
Ariel Rios Bldg.  
1280 Pennsylvania Ave. N.W.  
Washington, DC 20460

Dear Mr. Johnson:

Please accept this gift of a clock as a reminder that **an animal is killed every two seconds** of every day in a toxicity test mandated by the U.S. government. The Environmental Protection Agency's (EPA) complicity in this scandal is **alarming**.

The EPA is a member of the Interagency Coordinating Committee on the Validation of Alternatives Methods (ICCVAM). As such, your agency is charged with helping to streamline the acceptance and use of non-animal test methods. Yet instead of acting to *reduce* animal testing, as envisioned by Congress when it created ICCVAM 10 years ago, ICCVAM has, in fact, become *the* obstacle to the implementation of non-animal alternative methods. To date, ICCVAM has approved only *one* non-animal test method that originated in the U.S. and has ignored or failed to approve dozens of other methods developed and validated for use in the European Union. ICCVAM's inaction is directly responsible for the needless suffering of animals in gruesome chemical toxicity tests in which animals are forced to swallow or inhale poisons or endure the pain of chemical burns in their eyes and on their skin. None of these animal tests has ever been validated for its relevance to humans.

There is a way to put this broken system back on track. The National Academy of Sciences (NAS) recently issued a landmark report, "Toxicity Testing in the 21<sup>st</sup> Century: A Vision and a Strategy," that calls for a major shift that would "rely less heavily on animal studies and instead focus on in vitro methods. ... This new approach would generate more relevant data to evaluate risks people face, expand the number of chemicals that could be scrutinized, and reduce the time, money, and animals involved in testing."

**The EPA and ICCVAM need to get with the times.** There has been a revolution in our understanding of biology since the 1950s and '60s, when many of the animal tests that are in current use were devised. The NAS report describes the potential effect of this revolution: "Toxicity testing is approaching a scientific pivot point .... It is poised to take advantage of the revolutions in biology and biotechnology. Advances in toxicogenomics, bioinformatics, systems biology, epigenetics, and computational toxicology could transform toxicity testing from a system based on whole-animal testing to one founded primarily on in vitro [non-animal] methods that evaluate changes in biologic processes using cells, cell lines, or cellular components, preferably of human origin." Yet the government's current animal testing programs virtually ignore this entire era of scientific progress.



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**Time stands still for the animals suffering in laboratories.** We await your assurance that the EPA's representative(s) to ICCVAM will **wake up**, study the NAS report cover to cover, and implement its recommendations with all due speed. **The clock is ticking.**

Sincerely,

Jessica Sandler  
Director, Regulatory Testing Division