[Congressional Members]

RE: Modernize chemical toxicity testing by ensuring animals are used only as a “last resort”

Reform of chemical safety legislation will succeed only by modernizing toxicity testing. We lack information on many chemicals, and how they affect a diverse human population, because we rely too heavily on slow, unreliable, and expensive animal tests.

To protect public health and the environment, the National Research Council recommended in a 2007 report, *Toxicity Testing in the 21st Century: A Vision and a Strategy* (“Tox21”), a shift away from this heavy reliance on animal tests and toward efficient and human-relevant methods.

The Environmental Protection Agency, the Food and Drug Administration, and the National Institutes of Health have all committed to the vision of Tox21, but more must be done to modernize toxicity testing for better public health.

We, the undersigned organizations, urge you to modernize chemical toxicity testing by requiring that animal tests be used only as a last resort after all other methods have been exhausted. Such a requirement places focus on the best methods first and is crucial to the rapid development and use of new methods and the continued improvements in toxicity testing required to offer superior protection for public health and the environment.

The Tox21 report outlines a practical plan for revolutionizing toxicity testing by harnessing scientific advances in molecular and cell biology, genetics, computational power, and robotic testing systems that can test more chemicals in a single day than have been tested in the past 20 years using animals. These advances allow scientists to test mixtures of chemicals, assess chemical effects on sensitive populations or life stages, and detect sensitive effects animal tests cannot. Assessing chemicals in commerce individually is extremely inefficient and not practical. Such an approach delays protection from the most harmful chemicals.

Animal tests involve administering supersized doses of chemicals, up to 1,000 times higher than humans would ever be exposed to. Assessing high doses of chemicals—one at a time—on young, genetically homogenous animals in artificial lab conditions does not protect the public’s health from an increasingly complex chemical and product market.

While current legislative proposals attempt to incorporate these principles, they do not go far enough. We urge you, in this respect, to harmonize the bill with the European Union law, which requires modernizing toxicity testing so that animal tests are only conducted as a last resort.

Inertia can be a powerful force. Too often, risk assessors at chemical companies and regulatory agencies default to their comfort zone—animal tests—and do not know of more effective, human-relevant methods. By requiring that human-relevant methods and strategies be explored first, the focus of toxicity testing returns to human health effects and ways to prevent them.

The undersigned organizations support the modernization of TSCA that includes “last resort” language for animal testing.

Sincerely,

Physicians Committee for Responsible Medicine