Over the past several years the Physicians Committee and other groups have worked to share with Congress the importance of fixing an integral part of the regulatory process—toxicity testing. To ensure robust protection of public health and the environment, we need to move away from our current heavy reliance on animal tests and toward more human-relevant methods.

The Chemical Safety Improvement Act of 2013 (CSIA), introduced by Sens. Frank Lautenberg and David Vitter on May 22, 2013, contains many provisions that are consistent with this goal and the recommendations made by the National Academies in their 2007 report *Toxicity Testing in the 21st Century: A Vision and a Strategy*. Importantly, it requires the EPA to fund research and validation studies to replace, reduce, and refine the use of animals.

"We are pleased to see that our legislators understand the need to upgrade toxicity testing with more human-relevant, nonanimal methods and have proposed legislation that will speed this transition," says Kristie Sullivan, M.P.H., director of regulatory testing issues for the Physicians Committee. "However, faster progress could be made by requiring, rather than encouraging, new methods to be used in place of animals wherever possible."

Many of the suggestions PCRM scientists provided to Congress in past hearing testimony and meetings are included in the CSIA. Principles to replace and reduce animal-based test methods and to increase the use of information from human-based and mechanistic tools are integrated into the heart of the legislation. The bill's prioritization process will focus energy first on chemicals likely to be hazardous. The bill also directs the EPA to consider all available information on a chemical and similar chemicals, including mechanistic and "toxicity-pathway" information, in assessing safety and before requiring new testing. New testing requirements are to follow a tiered, strategic approach.

Unfortunately, by directing the EPA to "encourage and facilitate" the use of nonanimal test methods, grouping of chemicals, formation of industry consortia, and other strategies to minimize animal testing, they have missed an opportunity. The Physicians Committee urges Congress to, in this respect, harmonize the bill with the European Union law, which requires that new animal tests only be conducted as a last resort, when all other methods of obtaining data have been utilized. A “last resort” clause is crucial to the rapid development and uptake of new methods as it allows flexibility to incorporate continued improvements in toxicity testing that offer superior protection for public health and the environment.