

January 19, 2001

Via facsimile to: 919.558.7067

Dr Scott Masten
NIEHS/NTP
P.O. Box 12233
Research Triangle Park
North Carolina 27709

Dear Dr Masten:

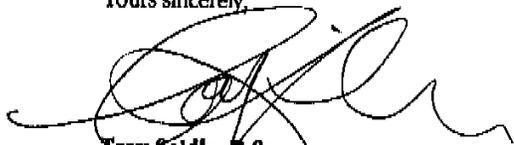
The following is in response to your *Federal Register* notice of 4 December 2000 requesting comments on substances nominated to the National Toxicology Program (NTP) for toxicological studies and on testing recommendations made by the NTP Interagency Committee for Chemical Evaluation and Coordination (ICCEB). These comments are submitted on behalf of People for the Ethical Treatment of Animals (PETA) and our over 700,000 members.

Given that the NTP's stated objective in soliciting nominations for toxicological studies is "to identify and select for study chemicals and agents with the highest potential for adversely impacting public health...based on human exposure and suspicion of toxicity," we find it highly objectionable that natural dietary supplements have been included in the proposed testing scheme. As you know, many of the identified substances have been in routine use in various cultures for centuries or more, without adverse health effects having been noted.

A case in point is the proposed testing of the extract from bilberry fruit (a relative to the common blueberry), for genotoxicity both *in vitro* and *in vivo*. The only rationale for this testing is a stated "lack of toxicity information." As we trust you are aware, the proposed *in vitro* genotoxicity assay is not only capable of identifying the effects of genetic toxicity, but has been found to be *more* sensitive to these effects than animal models. For this reason, the *in vitro* assay has become the preferred (and required) method in European countries such as the United Kingdom and Germany. You may also be aware that in an October 1999 agreement with animal protection organizations, the U.S. Environmental Protection Agency stated that companies "are encouraged to use *in vitro* genetic toxicity testing to generate any needed genetic toxicity screening data, unless known chemical properties preclude its use."

We likewise submit that the proposed use of animals in subchronic and two-generation reproductive and developmental toxicity studies of black cohosh, subchronic toxicity and neurotoxicity studies of blue-green algae, photogenotoxicity testing of lemon oil, and possible subchronic toxicity testing of S-Adenosylmethionine, is cruel and unnecessary. We regard the proposed ICCBC testing of herbal dietary supplements is little more than the curiosity-driven poisoning of animals, and urge the NTP to consider the impact of this proposal on animal suffering, and withdraw this proposed testing requirement.

Yours sincerely,



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