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Letter from Henry Spira to David W. Mitchell

Henry Spira

Coalition to Stop Draize Rabbit Blinding Tests

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COALITION TO STOP DRAIZE RABBIT BLINDING TESTS

507 Fifth Avenue, New York, N.Y. 10017

February 27, 1981

Steering Committee:

Cleveland Amory
Robert A. Brown
Peggy Fitzgerald
Regina Frankenberg
John A. Hoyt
Ed & Arlene Kayatt
John F. Kullberg
Henry Spira, Coordinator

Mr. David W. Mitchell
Chairman
Avon Products, Inc.
9 West 57th Street
New York, N.Y. 10019

Science Advisors:

Leonard Rack, M.D.
Andrew N. Rowan,
BSc MA DPhil

Legal/legislative:

Patricia Forkan
Elinor Moibegott, Esq.

Sponsoring Organizations:

ASPCA
The Anti-Cruelty Society
Fund for Animals
Humane Society of the
United States
Millennium Guild
Our Town

Dear Mr. Mitchell:

We feel that our movement to modernize and humanize toxicology should be viewed not as a problem, but as an opportunity, --not only an opportunity to create a world with fewer tears and less suffering, but an historic entrance into modern toxicology to provide a more elegant and relevant experimental method which will lead to advances in biology and medicine and superior protection for humans; which will rationalize and innovate testing programs in an efficient, rapid and economical fashion.

It is likely that you have already discussed and contemplated much of what follows, still, there may be a need within the rapid movement of events, to attempt to crystallize some idea of our planning and to invite responses to these ideas.

Current toxicology is expensive and time consuming, and in the opinion of many experts, may yield results that are often irrelevant and unreliable. Many protocols in use are based on ideas and techniques developed several decades ago. Putting aside the issue of whether animals should be used at all, when they are used, there appears to be considerable wastage of animals, time and money.

Dr. Joshua Lederberg, Nobel Prize winning geneticist and president of Rockefeller University, said recently: "The one or two or three hundred millions of dollars that we're now spending on routine animal tests are almost all worthless... I would think the most immediate solution is to redeploy some of our resources...industry has no choice but to invest a great deal of money in this area" (World Environment Center 2/2/81).

Former FDA Commissioner Donald Kennedy noted that "Compared with most other contemporary biological techniques, animal testing is crude, cumbersome and expensive." And a report from the President's Office of Science & Technology Policy asserts that "Extrapolation from the

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Chairman
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animal mode to humans represents something of a leap of faith."

Not only is there a problem with current archaic animal tests, but the state of the art makes good science feasible. Proposals have been made and work is proceeding to develop combinations of various predictive non-animal testing systems; there are increasingly sensitive techniques for identifying substances as minute as one trillionth of a gram; there's an enormous expansion of genetic engineering which is generating basic information on cell culture systems, which will assist in developing the technology needed for in-vitro systems; improved methodologies are coming on line, quantitative measures with a number of different systems measuring specific activities of cells instead of merely observing whether cells live or die.

New ideas are now being developed. If attempts to modernize toxicology through non-animal systems had been made in earlier years, it may have been much more difficult to accomplish substantive progress with a reasonable expenditure of time, effort and money. But now, you can seize the moment, not simply in response to public pressure but as an opportunity to mesh with the new scientific possibilities recognized by the best brains in science.

Activity is snowballing. The recent NIH conference suggested that the wave of the future is away from current animal tests. Accelerating pressure is focusing on regulatory agency inertia straightjacketing toxicology into arcane patterns.

And there is a rapidly expanding constituency which insists on the introduction of this new technology. There is the animal rights movement capable of organizing massive demonstrations clear around the globe and mounting sophisticated publicity campaigns which have generated an unprecedented avalanche of consumer reaction and swept the movement into the forefront of public awareness. A movement which can organize tens of thousands of dedicated people ready to march, to spread the word and turn words into action. And in this expanding circle, links are being established with the environmental movement to promote better science to improve public health.

The existence of this restless public desirous of these changes, ensures that a generous contribution to this effort will be recouped multifold through positive public relations.

There are a great many pots boiling, reinforcing one

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another. The end result, we believe, will benefit industry, consumers, science and the lab animals. A turn towards good science implies intelligence, sensitivity and elegance.

It is fortuitous that the rapidly increasing concern with humanizing and modernizing toxicology meshes with the rapid development of the science and technology of cell culture systems. And we want to realize the maximum potential with the greatest speed.

Undoubtedly, Revlon has set a standard with its \$750,000 grant to Rockefeller University and additional funding for the coordinating center. We trust that Avon does not feel that Revlon has set standards that are too high for you to meet, but rather, that you will match, if not exceed their contribution, recognizing that your cosmetics sales are the larger. And we assume that the rest of the industry will follow the lead of the two flag-ships.

In sum, we feel there's a problem with current toxicology, there's an impatient, restless public which demands change now and there's the opportunity to humanize and modernize safety testing through massive funding.

Revlon has shown that a corporate giant can have the vision to be responsive in a constructive, innovative and substantive fashion. We expect no less from Avon. A letter dated February 20, 1981 asserts that: "Avon expects to make a major financial contribution to an industry-wide research project." We assume that Avon's share in this super-fund will at least match Revlon's efforts and that others will likewise contribute their fair share based on their sales figures.

Revlon struck the keynote for the cosmetics industry. With the Avon-Revlon flagships leading the way, the cosmetics industry as a whole, can set the standard for all other industries engaged in safety testing.

We foresee that all industries will contribute to the development of better techniques and likewise, they will all benefit from this scientific progress through tests which will be faster, cheaper and safer. The general technology, once established, will be relevant to the various specific industries.

It is well known that problems are often opportunities in disguise. This may seem painful at the time, but can be seen as

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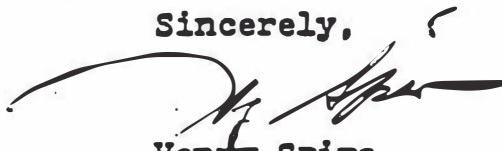
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beneficial when viewed in perspective. Your wholehearted commitment to this project can most reasonably be viewed as enlightened self interest and a notable example of business uniting, not for special interests, but uniting in an enterprise which raises the quality of life.

We look forward to a cooperative, collaborative relation.

Sincerely,



Henry Spira
1 West 85th St.
New York, N.Y. 10024
212 873 3674