

To the President of the European Commission, Mr José Manuel Barroso,
To the Health Commissioner Mr John Dalli

Dear President Barroso, dear Commissioner Dalli,

according to the 7th amendment, dated 2003, of the Cosmetics Directive (76/768/EEC), a ban on all animal testing for cosmetic products is due to come into effect in March 2013. Now, seven years later, you announce that the European Commission is unable to fulfil its commitment on the grounds that some replacement methods will not be available in time to meet the 2013 deadline.

We completely reject your arguments and demand that you adhere to your legal obligations on the following grounds:

1. A civilised society can get by without new cosmetics if it means that animals will be blinded, scalded, poisoned, choked and killed in order to produce them. We are quite happy to go on buying the cruelty-free products that already exist on the market.
2. The animal tests that the EC is willing to perpetuate are invalid with respect to human health. The fact that animal experimentation is not predictive for the human species is now recognised by a growing number of respected academics and institutions advocating a radical paradigm shift in toxicity testing. Animal tests will be replaced with in vitro, in silico and -omics technologies using human material.
3. Since animal tests are not predictive for the human species we, the consumer, are the real guinea pigs when it comes to risk assessment of industrial and cosmetic chemicals.
4. An approach based on the "weight of evidence" (epidemiology, clinical observation, in vitro and in silico studies) should replace the present procedure of validation of new methods. As a matter of fact the validation procedure currently in place has been the main obstacle to their regulatory approval and has delayed the use of innovative technologies, which are far more reliable, faster and relevant with respect to human health risk of chemicals. Replacement methods are to be supported by all means: they must be funded, promoted, publicized, made compulsory by law.
5. The fact that animal tests have never undergone the same formal validation which is required for replacement methods is a blatant example of double standards in science. Had animal tests been subjected to validation, they would have been banned a long time ago!

For all of these reasons we ask that you abide by the 2013 deadline.
BAN once for all the deadly animal testing for cosmetics!

NOME	COGNOME	INDIRIZZO	CITTA'	PROV.	NAZIONALITA'	FIRMA

