

Naturewatch

Who will listen?

Animals in experiments -
a review of progress over the last 10 years

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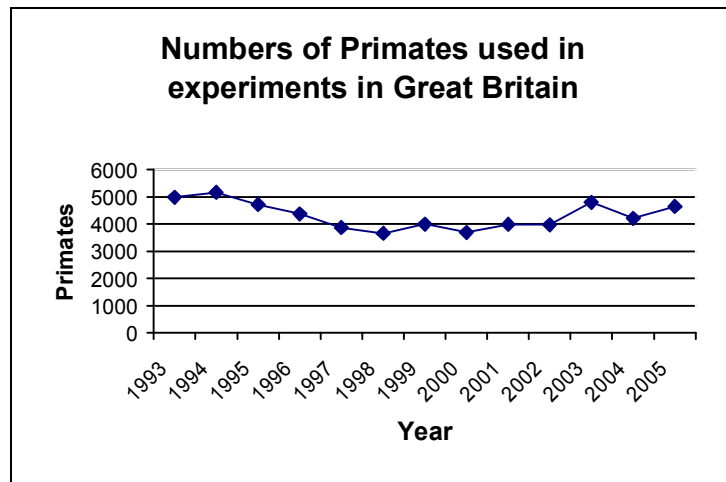
Who will listen?

1. A rundown on the history of animal experiments and the 3Rs

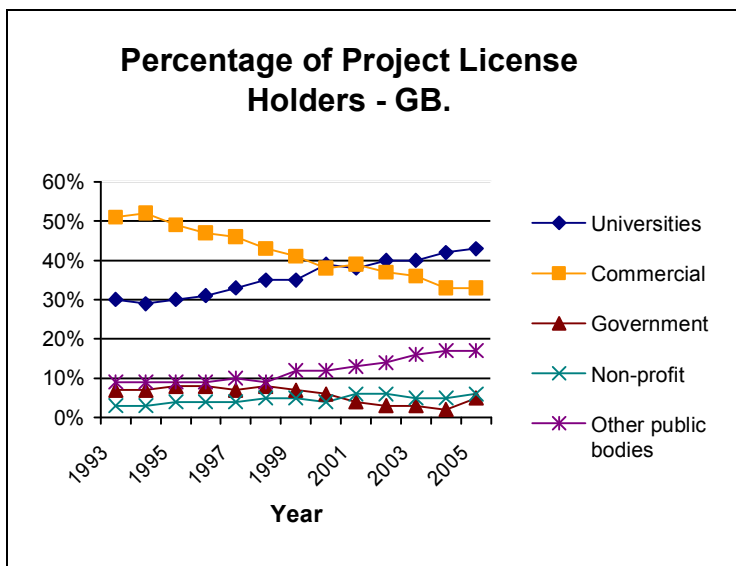
In 1959 British zoologist William M.S. Russell and microbiologist Rex L. Burch established the concept of the 3Rs- Replacement, Reduction and Refinement; aimed to achieve a high quality of scientific research whilst minimising the number of animals together with any associated suffering, pain and distress. Forty-eight years later, the science industry and animal welfare organisations are still waiting for the 3Rs to take the forefront within the scientific procedure field.

Statistics

- Over the last ten years since 1997, there has been an increase of 186,567 animals used in experiments, with a 12% increase between 2004 and 2005.
- From 1994 there was a significant decrease in the numbers of primates used, yet since 1998 statistics show their use is again on the increase; in fact in 1995 there were only 69 more primates used than in 2005, ten years later; as can be seen in the graph to the right.



If the 3Rs system was working then shouldn't the number of scientific procedures be decreasing? Given the Government was so intent with its 1997 pre-election promise to promote the 3Rs and examine replacement research techniques, these figures are a very disappointing reflection of its competence in this area.



- The percentage of project license holders has remained relatively constant since 1993.
- The academic sector dropped in 2002, but has since continued to increase, being at its highest percentage in 2005 since 1998.
- Whilst the academic sector has maintained the highest percentage of licenses overall, the commercial sector is the next most dominating, although the commercial sector has been decreasing slowly since 2000.

This is a clear indicator that the university sector requires the most amendments and development.

Experts call for improvements for the 3Rs process

Sir David Weatherall, a British physician and Professor at Oxford University, recently reported in December 2006 that “current approaches to reduce the numbers of animals involved and raise standards of welfare could be improved”.¹ Within the same month, in response to the new European Union REACH (Registration, Evaluation and Authorisation of Chemicals) regulation, an EU Science and Research Commissioner, Janez Potocnik, told a conference that “Europe should work harder at developing alternatives to animal testing and aim to reduce the number of animals used by half”.² Given the huge amount of public concern, coupled with statements from scientists themselves, the issues surrounding the use of animals for scientific procedures and the 3Rs should not be ignored.

1997

Labours pre-election promises

Prior to the 1997 election, in an effort to gain votes, party members and funding, the Labour party ran a campaign, highlighting its promises of a “new life for animals”. Labour promised to:

- “Insist on highest possible standards of welfare” for laboratory animals.
- Support a Royal Commission aimed at reviewing the effectiveness and viability of animal experiments.
- Promote the 3Rs and examine replacement research techniques.
- End the testing and development of cosmetics, tobacco, alcohol and weapons on animals and ban the LD50 test.
- Review biotechnology and the patenting of animals.
- Improve the standard of inspections.
- Initiate welfare committees.

90 million animal experiments, yet not one debate in Parliament

The fact that Prime Minister Tony Blair has added his signature to a pro-animal testing petition³, coupled with MP Rt Hon Frank Field’s Early Day

Motion 811 (dated 1st February ’07), highlighting that although there have been 90 million animal experiments carried out since 1979, the issue has not once been debated in Parliament, proves the shallowness to these pre-election promises.⁴

It’s a Dogs Life –Huntingdon Life Sciences

In March 1997, *It’s a Dog’s Life* was broadcast on Channel 4 revealing the cruel treatment toward animals within Huntingdon Life Sciences (HLS). Following this broadcast the Home Office launched an investigation, which resulted in two convictions. Other consequences of this undercover video included a review of Government procedures, contracts being withdrawn and HLS shares plummeting. The Home Office assured parliament this was a one-off and is not typical of the animal experiment industry.

However, at approximately the same time, People for the Ethical Treatment of Animals (PETA) were executing an identical undercover investigation into the U.S. Huntingdon Life Sciences, where further substandard welfare practices were witnessed and recorded. Unfortunately the evidence was dismissed as under U.S. law it had been obtained unlawfully. As a result PETA was prohibited from publishing or even discussing any information it had discovered, including to the American Department of Agriculture, who had been keen to carry out an investigation and inspect PETA’s evidence. Without the main witness to authenticate it, however, the investigation could not proceed.⁵

Before *It’s a Dogs Life* was broadcast, HLS was believed to be one of the highest credible laboratories in the country. The public were also of the belief that the animal experiment industry operated dutifully within the law due to the Home Office’s assurances and the exceptionally low amount of prosecutions. However, this broadcast proved otherwise, illustrating the harsh truth about what goes on behind closed doors and the Home Office’s incompetence in this area. Public opinion shifted and as a result began to doubt the industry; if this so-called highly-credible laboratory treated their animals with such abuse and lack of compassion, then what welfare standards were being practiced at less reputable establishments?

¹ Weatherall D & Working Group (2006) The use of non-human primates in research

²http://cordis.europa.eu/fetch?CALLER=EN_NEWS&ACTION=D&SESSION=&RCN=26849

³<http://cordis.europa.eu/search/index.cfm?fuseaction=news.simpldocument&Lucene&RCN=25741&CFID=349251&CFTOKEN=64596996>

⁴<http://edmi.parliament.uk/EDMi/EDMDetails.aspx?EDMID=32508&SESSION=885>

⁵http://findarticles.com/p/articles/mi_m2465/is_2_31/ai_71634854

1998

Voluntary ban on cosmetic animal testing

A voluntary ban on cosmetic testing was introduced in Great Britain, which caused two companies to end their experiments on animals. However this ban is ineffective without a marketing ban to complement it. As it stands the sale of products that have been tested on animals elsewhere in the world is still permitted.

1999

Ethical Review Process

In April 1999 it became law that all establishments operating under the *Animals (Scientific Procedures) Act 1986* must have a local Ethical Review Process (ERP) with the purpose of ensuring the 3Rs are implemented and a high standard of animal welfare is employed. This positive step forward for animal welfare meant that each project's ethical implication would be further evaluated by the means of the cost-benefit assessment, which weighs the predicted benefits of research against the potential costs to the animals.

SHAC

Later in the year, an animal rights group was successful in closing down a cat breeding establishment for vivisection. During the 18-month campaign Government spent £5.4 million protecting the Hillgrove Cat Farm. SHAC then shifted its focus to closing down Huntingdon Life Sciences; a campaign which is still running today. SHAC has continuously caused Government to be under extreme pressure as Huntingdon has needed to be saved from imminent closure on three occasions, and because of the increased public awareness and scepticism of animal research that SHAC has generated. Coupled with the Huntingdon's reputation due to the "*It's a Dog's Life*" broadcast, this turbulence proved demoralising for the Home Office's reputation.

2000

Government humiliated to silence

All was quiet in 2000. The Government closed doors on the animal research subject; both Ministers and MPs stopped replying to questions regarding animal experiments. This was due to animal rights activity, which resulted in an unsuccessful year. No progress was achieved.

2001

British Medical Journal criticises the 3Rs system

The *British Medical Journal* is a publication aimed at readers who work and study within the scientific research field. The authors and many of the readers are scientists, indicating that articles are not biased towards animal welfare groups' opinions and are rated as highly credible. An article published in the *British Medical Journal* states, "The beauty of the three Rs is that they provide a way for all parties to work together to advance the cause of both animals and humans".⁶ Yet the same article declares "After 20 years of research there are only a handful of validated and genuine replacements for animal methods". Also published in the *British Medical Journal* is a letter from a scientific officer proclaiming "more funding must go towards finding alternative non-animal methods," asserting "current levels of funding for research into alternative methods are disappointing".⁷ Dr Langley from the Dr Hadwen Trust is of the same opinion stating "we need co-ordination at national level, and we need more funding".⁸

Doctors reveal concerns over the 3Rs

Dr Bonner, the Director of Science and Technology at Huntingdon Life Sciences, told the House of Lords that "valid alternative methods have not been designed and implemented" and that "there are few in vitro tests available".⁹ His statements are supported by Dr Langley announcing "None of those bodies are doing enough to promote the replacement of animal experiments. There is no profile and, understandably, medical researchers are not drawn to this field". Dr Langley goes on to say "Whether the Government promotes alternatives enough: our point of view is that it does not".¹⁰ Professor Robert Combes from FRAME is in accord with Dr Bonner and Dr Langley, stating "The problem is exacerbated by the fact that existing information resources on the three Rs are limited, and improved opportunities for accessing more extensive and relevant data are urgently required".¹¹

⁶ Smith R (2001) Animal Research: the need for a middle ground, *British Medical Journal*

⁷ Gray S (2001) More funding must go towards finding alternative non-animal methods, *British Medical Journal*

⁸ House of Lords Select Committee on Animals in Scientific Procedures, Minutes of evidence #480

⁹ House of Lords Select Committee on Animals in Scientific Procedures, Minutes of evidence #289 & 294

¹⁰ House of Lords Select Committee on Animals in Scientific Procedures, Minutes of evidence #491

¹¹ House of Lords Select Committee on Animals in Scientific Procedures, Minutes of evidence - Supplementary memorandum by FRAME

2002

House of Lords Select Committee on Animals in Scientific Procedures

The House of Lords Select Committee published its report, *Animals in Scientific Procedures*.

The report was extremely comprehensive and was enthusiastically received by both scientists and animal welfare organisations. The Select Committee proposed a range of productive recommendations to the Government, some of which I have quoted below:

- 4.40 The Government should take greater steps to **promote** the adoption of **replacements** and the incorporation of **refinements** into animal test guidelines issued by the International Conference on harmonisation and the Organisation for Economic Co-operation and Development.
- 4.44 The Government and the scientific community should engage in a **systematic** and **visible search** for methods involving the **Three Rs** in toxicology. The Government should nominate one department to take the lead on this.
- 4.45 The UK Government should use its influence to urge the EU to make the **development** and **validation** of **replacements** for animal experiments a priority, particularly in toxicology.
- 4.49 The **promotion** of the **commercial advantages** of the **Three Rs** needs a clear lead from a nominated department within Government.
- 5.52 The **secretariat** of the **Animal Procedures Committee** should be **strengthened** and more clearly **separated** from the **Home Office** regulators.
- 7.18 A **Centre** for the **Three Rs** should be set up, consisting of a small, administrative hub which coordinates research units embedded in existing centres of scientific excellence.
- 7.23 The current Animal Procedures Committee research budget of £280,000 should be given to the Centre to disburse. The Centre should co-ordinate the Government spend on the Three Rs across all departments. A Centre would also require **further funding** from **Government, industry, and animal welfare charities**.
- 8.12 A **welfare assessment** of all **new strains** of **animals** used in experiments (whether produced by new technologies or by

more traditional methods) should be made as a matter of course.

- 9.18 **Section 24** of the **1986 Act** (the “confidentiality clause”) should be **repealed**. Specific justification should then be made for each class of information that needs to be kept confidential, such as the identity of researchers and matters of commercial confidentiality and intellectual property.
- 9.22 The **Inspectorate** should convene a regular forum to **discuss specific scientific and welfare issues** related to the use of animals in experiments.
- 9.29 A formal consultation on the **Statistics** should be carried out with a view to making them **easier to interpret**.
- 9.38 **Serious efforts** should be made to provide **better statistics** on animal **suffering**.

Other valuable comments from the report include:

- 7.5 In considering the question of the use of animals in scientific procedures, we have been persuaded that benefits do arise from animal experiments. We are **not**, however, **persuaded** that enough **effort** is always made to **avoid the use of animals**. We are similarly **not persuaded** that where this is not possible, sufficient **effort** is always made to **minimise** the **number of animals** used, and to **minimise** the **pain** and **suffering** inflicted on each animal.
- 7.13 Many scientists have **insufficient time** to spend on the **Three Rs**, and we did **not** consider that there was a **consistent consideration** of them. We also consider that there is **inadequate recognition** for the work of scientists in this field.
- 4.12 The development and use of **non-animal methods** has always taken place, but it has had a **low profile**.
- 7.22 The public might be surprised to learn that the Home Office budget dedicated to searching for the **Three Rs** in animal experiments is a meagre **£280,000** per annum. Even the more optimistic figure, given by the Home Office, that across all departments the Government spend £2 million per annum is small in **comparison** with the **£6 billion** spent annually on **medicines** by the Department of Health.

Across the animal welfare and science industries there was huge optimism, whilst waiting with anticipation for the Government's response.

2003

Disappointing Government response

After six months the Government published its response to the House of Lords report on *Animals in Scientific Procedures*. It offered no commitment to any action on the recommendations. Its vacuous promises to further investigate and discuss these essential issues were extremely discouraging, although it did recognise that "The Government also accepts that more needs to be done and we reconfirm our commitment to the fullest possible application of the 3Rs".¹²

APC offer advice on the cost-benefit assessment system

The Animal Procedures Committee (APC) published its cost-benefit report; *Review of Cost-benefit Assessment in the Use of Animals in Research*¹³, offering conclusions and recommendations, predominantly focussing on the idea that the cost/benefit analysis should be an on-going, evolutionary process, not a one-off event determined at the project licensing phase. The APC made the following recommendations to Government:

- A user-friendly, comprehensive list of factors should be comprised to help with assessing costs, benefits and scientific validity.
- Phase out procedures that generate most concern due to the suffering they cause by negotiating targets of best practice.
- Cost-benefit analysis should incorporate the costs of capture, confinement, transport, husbandry systems and general handling of all species.
- The severity bands should be better defined with information on limits and case studies.
- The 'moderate' severity band should be further divided to specify more detail.
- Project license applications should be redesigned to guide applications to provide pertinent descriptions on the cost/benefit analysis.

¹² The Government reply to the report of the House of Lords Select Committee on animals in scientific procedures (2003)

¹³ Animal Procedures Committee (2003) Review of Cost-benefit Assessment in the Use of Animals in Research

- Increase the openness of cost-benefit assessments, procedure severities and project licenses.
- The Home Office should publish an annual Inspectorate report.
- Lay people should participate in each local Ethical Review Process.

It was hoped the Government would take these recommendations into account, but given its recent history, there was a high level of doubt this report would make any difference to the current process of the cost-benefit system.

2004

Congratulations to Government for the opening of the NC3Rs

In 2004, the Government established a National Centre for the Replacement, Refinement and Reduction of Animals in Research. "The NC3Rs brings together stakeholders in the 3Rs in academia, industry, Government and animal welfare organisations to facilitate the exchange of information and ideas, and the translation of research findings into practice that will benefit both animals and science."¹⁴ The development of such a centre was welcomed by scientists and animal welfare groups alike, and it was great to hear the Government planned to increase its 3R funding from £330,000 to £660,000.¹⁵ Although the funding doubled, it is still a very pitiful sum of money when compared with the £6 billion spent annually on medicines alone, by the Department of Health.¹⁶ This mere 0.01% of £6 billion reveals the Government's lack of effort to "reconfirm our commitment to the fullest possible application of the 3Rs".

British Medical Journal criticises the 3Rs system ...again

An article written by professors for the *British Medical Journal* calls for "urgent rigorous evaluation"¹⁷ of the value of animals used in research for the purpose of finding human treatments, emphasising the need for "systematic reviews of all existing and future research" in order to identify the validity of animal research. The article also mentioned the lack of funding allocated for clinical research, stating "Despite the lack of systematic evidence for its effectiveness, basic animal research in the United Kingdom

¹⁴ <http://www.nc3rs.org.uk/landing.asp?id=2>

¹⁵ <http://news.bbc.co.uk/1/hi/sci/tech/3732321.stm>

¹⁶ House of Lords (2002) Select Committee on Animals in Scientific Research paragraph #7.22

¹⁷ Pound P, Ebrahim S, Sandercock P, Bracken M, Roberts I (2004) Where is the evidence that animal research benefits humans?, *British Medical Journal*

receives much more funding than clinical research”.

An interesting point made by the professors is “Ideally, new animal studies should not be conducted until the best use has been made of existing animal studies and until their validity and generalisability to clinical medicine has been assessed”. This prompts the query; if the 3Rs procedure was managed competently and was functioning to its potential, then surely such practices would already be in place.

2005

A balanced & comprehensive report - The Ethics of Research Involving Animals

The Nuffield Council on Bioethics published a 334-page report, *The Ethics of Research Involving Animals*¹⁸, consisting of a working group of industry and academic scientists, philosophers, members of animal protection groups, and a lawyer.¹⁹ This very comprehensive report covers a wide variety of ethical issues involving the use of animals in scientific procedures, such as the research, development and implementation of the 3Rs, transparency and openness of information, and duplication. The working group identify that “it is unrealistic to assume that all experiments on animals will end in the short term” and therefore aim to “create a climate in which the necessity and justification for using animals is assessed and discussed fairly, and with due respect for all views”. Working within this fair ‘climate’, the working group requests further development and implementation of the 3Rs.

- “the question of **why alternatives** are **not available** and **what is required** to **make** them **available** must also be asked.”
- “in consultation with the NC3Rs, funding bodies should **encourage funding applications** for **three R-related** research in areas that pose challenges.”
- “A world in which the important benefits of such research could be achieved without causing **pain, suffering, distress, lasting harm** or **death** to animals involved in research must be the **ultimate goal**.”
- “We recommend that the **Home Office**, in liaison with major funders of research, animal protection groups and industry associations, **should consider** ways of **funding** and

carrying out **reviews** on the **scientific validity** of **animal research** in specific areas. In response to public concerns, priority should be given to research that causes substantial pain and suffering to animals, and research that involves primates.”²⁰

Disappointing Government response

Whilst Liberal Democrat MP Martin Horwood emphasised that the report “seems a thoughtful and impressively thorough examination of just about every nook and cranny of the animal research debate,”²¹ Andy Burnham, the Parliamentary Under-Secretary of State Home Office at the time merely quoted one sentence of the report that most suited his principles, ignoring any mention of animal welfare and ethics: “Animal research has been, and can potentially be, scientifically valid, in that it is possible to extrapolate from animal models to humans (or other animals) in specific cases (and) certain animal models have played significant roles in the study of particular diseases and led to the discovery of treatments for human diseases.” His response was simply “We believe these views reflect those of the great majority in the wider scientific community”.²²

Other parliamentary outcomes included a Parliamentary Briefing in the House of Lords and an early day motion welcoming the report “as a balanced contribution to a controversial debate” which received 72 supporting signatures.²³

What will it take to make Government listen?

This is the third significant report concerning the welfare and ethics of the use of animals in scientific procedures since 2002. All three reports have been widely researched and written by expert working groups consisting of scientists, professors, philosophers, animal welfare members and MPs.

- House of Lord’s Select Committee on *Animals in Scientific Procedures* (2002)
- *APC Review of Cost-Benefit Assessment in the Use of Animals in Research* (2003), and
- Nuffield Council on Bioethics, *The Ethics of Research Involving Animals* (2005).

Other than establishing the NC3Rs and the ERP (with lay members), increasing 3R funding to a

¹⁸ Nuffield Council on Bioethics (2005) *The ethics of research involving animals*, London

¹⁹ http://www.nuffieldbioethics.org/go/ourwork/animalresearch/presrelease_176.html

²⁰ Nuffield Council on Bioethics (2005) *The ethics of research involving animals - a guide to the report*, London

²¹ Hansard, 9 Nov 2005 : Column 84WH

²² Hansard, 28 Nov 2005 : Column 26W

²³ http://www.nuffieldbioethics.org/go/ourwork/animalresearch/news_344.html

mere £660,000 and introducing a rather uninformative annual Inspectorate report, Government continues to ignore the major recommendations discussed in these extensively researched comprehensive reports.

2006

STILL hearing complaints about the 3Rs

Nine years since the pre-election Government promises, and reports and articles from scientists and professional working groups still contain comments such as “There is a need for education, access to information and increased funding (*for the 3Rs*). Respondents argued that some research institutes are lagging behind current best practice”.²⁴

Yet still Home Secretary John Reid insists that Government “remains committed to ensuring that the highest standards of animal welfare are applied.”²⁵

REACH regulation

The new European Union regulation, REACH: **Registration, Evaluation and Authorisation of Chemicals**, means a catastrophic future for millions of animals over the next 11 years, when 30,000 chemicals will be tested.

British Medical Journal – animal experiments not a reliable source of research

A group of experts recently conducted an experiment into the validity of animal research by implementing a systematic review of animal experiments and clinical trials, publishing their findings in the *British Medical Journal*.²⁶ The scientists examined 228 animal-based drug analysis’s focussing on six representative areas of research, comparing animal research results against human trial results to assess whether they matched or not. Out of the six cases, only half of them matched, suggesting that the results from animal experiments are not necessarily a reliable source of research. The report highlights that the “Lack of concordance between animal experiments and clinical trials may be due to bias, random error, or the failure of animal models to adequately represent human disease.”

However, Home Secretary John Reid maintains that animal experiments play “an essential part in producing new knowledge and insights that underpin advances in healthcare and bring other

benefits not currently achievable by other means.”²⁷

2007

European Commission to review Directive 86/609/EEC

The results from two European Commission surveys were published; a public survey and an expert survey. The questionnaires were aimed at gathering constructive information to help with the revision of Directive 86/609/EEC on the protection of animals used for animal experiments and other scientific purposes. The results from the public questionnaire were clearly biased, with 85% of the entries being from people affiliated with animal welfare organisations. Sadly the results have therefore not provided a balanced impression of the public’s opinion, reducing the credibility and value of this potentially significant survey.

The expert questionnaire, however, does provide more credible information. All questions which relate to animal welfare received a majority vote to improve ethical and welfare standards for animals used in basic research, not currently protected by the Directive. For example, 72% of experts support “Improved control on the use of these animals due to inclusion into authorisation and ethical review criteria” and 63% believe breeding, housing and care conditions should be improved during and after experiments. In regards to the 3Rs, 52% believe the inclusion of these extra 500,000 animals under the Directive’s protection would “provide an indication of the uptake of alternative techniques”.

Whilst the response to improving the welfare for the protection of additional animals was positive, the questionnaire did not ask opinions on the welfare standards for animals that are currently protected by the legislation. The experts were not asked about how the 3Rs could be best implemented and developed, nor were they invited to give their opinions on the ethical and scientific value of using non-human primates for scientific procedures.

Written Declaration 64 – call for EU ban of experiments on non-human primates

In preparation for the review of the Europe-wide legislation for animal experimentation later this year, the ADI in the European Parliament has called for an immediate ban in the EU of animal research carried out on apes and wild caught monkeys, and a six year phase-out of all experiments on primates. So far the Written

²⁴ Weatherall D & Working Group (2006) The use of non-human primates in research

²⁵ Letter from Home Secretary John Reid to MP Rt Peter Lilley dated 20 Nov 2006, Ref: M26411/6

²⁶ <http://www.bmj.com/cgi/rapidpdf/bmj.39048.407928.BEv1>

²⁷ Letter from Home Secretary John Reid to MP Rt Peter Lilley dated 20 Nov 2006, Ref: M26411/6

Declaration 64 has been supported by 88 MEPS, making this Declaration the third most successful currently presented before the European Parliament.

In support of the Declaration, John Bowis MEP writes "experiments on primates are both unethical and inefficient and can and should be replaced with more advanced scientific techniques". Also a supporter of the Declaration, Jan Creamer, Chief Executive of ADI states "This unprecedented level of support, shows that MEPS, like the public, are tiring of excuses on animal experimentation, they want to see real progress to end this suffering".²⁸

Sharon Bowles, a Liberal Democrat MEP was one of the first to sign the Declaration and is not surprised that 90% of the British public want non-animal alternative research to be better funded. She says that there is not enough investment or "commitment to innovation" to the cause and believes that investing into this research, regardless of its cost, would prove beneficial due to the "relevant, accurate and specific data" that could be collected "which animal models have failed to provide."²⁹

Leading neuroscientist criticises the value of animal experimentation

A leading neuroscientist, Marius Maxwell, completed his extensive studies at Cambridge, Oxford and Harvard Universities and now practises in the USA. In his recent paper, written for Animal Aid, he criticises the Oxford University's controversial laboratory and states "I fear that history will judge their animal rights opponents as less extreme than the very scientists who persist in non-human primate research in the face of an increasing body of consistent and compelling evidence that the resulting data has and will continue to endanger countless human lives".³⁰

Scientists turn their backs on an effective refinement method

The results of a study on training non-human primates as a refinement technique were published in the 2007 *Universities Federation for Animal Welfare* journal. The report reveals that trained animals display less stress-related and fearful behaviour, are more comfortable with being handled, and possess reduced levels of cortisol.

Fifteen establishments were visited, including 6 universities, 3 pharmaceutical companies, 3

contract research organisations and 3 breeding establishments. All 15 establishments are of the belief that primates become increasingly comfortable with human interaction as a consequence of their accommodation and husbandry, and believe that training could be used as a refinement method, yet only 4 establishments employ a formal socialisation programme and only 6 establishments utilise a formal training programme. The report highlights the "need for better communication between establishments" and gives emphasis to the "surprise" at the Home Office Inspectors and the Ethical Review Processes, at their lack of encouragement of this refinement technique, especially as their role is ultimately to "encourage the widest possible application of the 3Rs".³¹

This report highlights a huge flaw in the policing of the *Animals (Scientific Procedures) Act 1986*. It is illegal to conduct experiments on animals without full consideration and implementation of the 3Rs, yet this survey demonstrates that a highly effective refinement technique is widely acknowledged and scarcely used.

2. Failing the 3Rs

The European Partnership for Alternative Approaches to Animal Testing (EPAA)³² was launched on November 7 2005 at a conference called "*Europe goes alternative*". This is not a Government body but is made up of multinational companies who use animals in product development. Their work involves promoting:

- the development of new refinement, reduction and replacement safety testing methods
- communication and education amongst researchers
- validation of alternative practices
- mapping existing research

Five working groups will carry out the research consisting of European Commission services and industry associates. There are currently 27 industry members with a combined turnover of some £259 billion.

This is an astronomical figure when compared to the income of organisations dedicated to developing the 3Rs. Last year FRAME received a

²⁸ <http://uk.oneworld.net/article/view/145195/1/5795>

²⁹ <http://www.sharonbowles.org.uk/news/000090.html?PHPSESSID=bd697e64d1dba7519a6a2>

³⁰ http://www.animalaid.org.uk/h/n/NEWS/news_experiments/ALL/1474/

³¹ Prescott, MJ. & Buchanan-Smith (2007) Training laboratory-housed non-human primates, part 1: a UK survey, *Universities Federation for Animal Welfare* Volume 16 Issue 1

³² European Partnership for Alternative Approaches to Animal Testing: First Annual Progress Report (2006)

mere £714,741 and the Dr Hadwen Trust received £769,488 in order to research a subject that could potentially save millions of lives that the 27 EPAA members currently kill for their profits.

FRAME outlines which companies donate to them on an annual basis in their *05-06 Annual Review* and again this provides strong evidence that some of these 27 member companies don't walk their talk in regards to how much they support the 3Rs.

- Unilever £20,000 +
- Astra Zeneca £10,000 - £20,000
- Procter & Gamble £10,000 - £20,000
- GlaxSmithKline £5,000 - £10,000
- Colgate – Palmolive £1,000 - £5,000
- Johnson & Johnson £1,000 - £5,000

Even if Procter & Gamble does donate the maximum £20,000, this is only 0.00005% of their yearly turnover, of £35,000,000,000.

The current 3R process proves disappointing

EPAA have identified areas where the 3Rs system is failing:

- Testing strategies and approaches to researching alternatives to animal experiments are not sufficiently coordinated, and therefore cannot be managed at a national, European or international level.
- There are “no methods in sight that totally replace this kind of safety (toxicology) testing”
- There is room for improvement in the communication, consistency and implementation of the 3Rs.
- Many organisations throughout Europe are responsible for promoting the 3Rs, yet their activities are fragmented “with 15 different remits, scope, funding and level of impact”.
- EPAA's research, with experts from industry, authorities, academia and animal welfare associations, has identified problems with current and impending legislation that has the potential to cause unnecessary duplication of animal testing.
- The availability of alternative testing methods is not widely known amongst many scientists and there are reports that the “situation with the 3Rs is not always clear”.

The above bullet points are strong reinforcements for the issues that have been raised so far in this report. Although the concept of the 3Rs is widely

recognised and accepted amongst scientists, their promotion, consistency and implementation are not sufficiently practiced and as a result, millions of animals are being experimented on that needn't be. Since Russell and Burch initiated the 3Rs, there has been an inadequate rate of development given the 48-year time frame and degree of knowledge and intelligence of European scientists. The EPAA's *First Annual Progress Report* clearly outlines these serious issues, and the fact this was published in December 2006 indicates that they are of current concern and need addressing immediately.

3. Over-breeding

In January 1998 Norman Baker MP asked a parliamentary question regarding the number of animals bred and used in scientific procedures at Porton Down. The Minister's answer concluded that up to three times as many animals were killed due to over-breeding than were used in experimentation.³³ This initiated years of dispute on this extremely controversial issue.

50% of animals bred as surplus

Millions of animals that are bred for the purpose of scientific procedures are killed without being experimented on, following the decision that they are of no use. It is estimated that 50% of the total number of animals used in scientific procedures are bred as surplus and it is even more infuriating that no law is in place for such astronomical statistics to be published. If these 'surplus to requirements' were included into the annual statistics, the total would increase by millions. Genetically modified mice are included in the annual *Statistics of Scientific Procedures on Living Animals*, so why not include the figures on over-breeding?

APC's report on over-breeding

In 1998, the Animal Procedures Committee (APC) suggested “that establishments be required to report to the Home Office figures for over-breeding of those animals listed in Schedule 2 to the 1986 Act”.³⁴ The response to this recommendation was “we will consider this” which was never acted upon. However in 2003 the APC's annual report, which included a section on over-breeding,³⁵ concluded “that the present survey did not provide evidence of a need to have formal reporting of figures for breeding included in the Home Office Annual Statistical Returns at this

³³http://www.rdsonline.org.uk/pages/news.asp?i_ToolbarID=6&i_PageID=209

³⁴ Hansard, 30 Nov 1998 : Column: 81

³⁵ Report of the Animal Procedures Committee for 2003

time". Yet a year later in their annual report they admitted that "more could be done to reduce surpluses of rodents".³⁶ Such quotes suggest there is an over-breeding problem that all parties seem to wish to keep under wraps.

But how accurate are these results?

The 2003 annual APC report also concluded that "At the time of the review for dogs, cats and non-human primates there was no evidence of a problem of surplus animals" yet in 1999 Jane Eastwood from BUAV worked undercover at Harlan UK, only to discover "About 250 healthy dogs were killed off by injection, just because they were surplus".³⁷ According to the 2003 APC report "the response rate to the survey of cats, dogs and non-human primates was 65% of the establishments contacted." This low response rate suggests to me that the remaining 35% had figures to hide and were the remaining centres culling a majority of these healthy animals. Publishing these figures would, however, end this scepticism. Breeding establishments are required to maintain records of numbers of animals along with their fate. Why are these statistics collected by the Home Office but not published?

Facts and figures

The Laboratory Animal Science Association (LASA) carried out an investigation into the actual numbers of 'surplus to requirement' animals, and published *The Production and Disposition of Laboratory Rodents Surplus to Requirements for Scientific Procedures* report. Their statistics illustrate that there was a surplus of 50% of rodents; 15%-18% of those being unavoidable due to biological reasons, leaving 32%-35% of those being surplus due to excess animals bred to ensure enough of the right sex, weight, size and age of animals are bred. This is known as managed surplus which could be reduced by implementing systems recommended in the APC Select Committee report.³⁸

4. Home Office Inspectorate

Role of the inspectorate team

The following is a job specification, details of which were obtained from the *Animals (Scientific Procedures) Inspectorate report 2005*. This long list of responsibilities rests in the hands of only 24 inspectors (some of which work part-time) and 4 superintending inspectors; totalling 28 professional staff who are involved with

inspections. The four superintending inspectors' time is divided into half inspecting and half managerial, and the chief inspector's role is predominantly managerial with no inspection duties. I have therefore not included the Chief Inspector position in the total number of inspectors.

- Spend 40% of time preparing for visits, travelling, inspecting breeding establishments and laboratories, and subsequent reporting.
- Full time inspectors are required to complete around 100 visits of inspection per year.
- The inspectorate team's cumulative contact time is a minimum of 6400 hours.
- Inspect overseas breeding and animal holding establishments.
- Disseminate and clarify sound practice and ministerial proposal and policies.
- Offer guidance in regards to issues surrounding animal experimentation.
- Evaluate and offer advice on applications for personal licences, project licences and establishment certificates of designation. In 2005, 28 inspectors (full-time and part-time) were responsible for 2886 project licences and 14,188 personal licensees throughout 218 establishments.
- Carry out cost-benefit analysis for each project licence, weighing the potential pain and suffering of the animals against the expected benefits of the research.
- Dr. Jonathan Richmond, Chief Inspector, Animals (Scientific Procedures) Inspectorate states that a primary function that involves "a large amount of current resources" is assessing applications in the view to "looking at opportunities to replace animals and refine procedures".³⁹
- Evaluate and offer advice on amendment requests for existing licences.
- Discuss proposals with scientists, analysing and querying their arguments and methods.
- Consult with and help scientists refine their applications in advance of submission.

³⁶ Report of the Animal Procedures Committee for 2004

³⁷ <http://www.buav.org/undercover/harlan.html>

³⁸ http://www.rdsonline.org.uk/pages/news.asp?i_ToolbarID=6&i_PageID=209

³⁹ House of Lords Select Committee on Animals in Scientific Procedures, Minutes of evidence #119

- Take part in continuing professional development (CPD) and maintain a sound knowledge of relevant science and animal welfare issues.
- Inform ministers and officials on animal experiment issues.
- Contribute towards the training of new inspectors.
- Remain accessible and contactable for consultation to licensees and certificate holders, in order to offer advice and guidance throughout the development of their projects.
- During an infringement investigation the inspector must ascertain the nature of the breach, collect the evidence and determine the circumstances surrounding the case. Results must be reported to the Animals (Scientific Procedures) Division licensing team, together with rational advice on possible action.⁴⁰

Understaffed + overworked + stressed = poor work quality

This extensive work load is to be carried out by a mere 28 inspectors, some of whom work on a part-time basis. I find it hard to believe that this number of inspectors are able to manage this level of responsibility competently, which is paramount due to the nature of their work. On 13th November 2001 Dr Richmond, the Chief Inspector of the Animals (Scientific Procedures) Inspectorate from the Home Office told the House of Lords the Home Office's plan to employ a further 12 inspectors over the next three years, expanding the team to 33.⁴¹ As outlined above, the latest *Animals (Scientific Procedures) Inspectorate Annual Report* for 2005 specifies that only 28 inspectors are currently employed, some of whom work on a part-time basis indicating that the Home Office's target for 33 inspectors has not been met and is over a year behind schedule; it must be incredibly stressful working with a short-staffed team for this length of time, not knowing when the circumstances are likely to improve.

Andy Burnham, the Parliamentary Under-Secretary of State for the Home Department was still of the opinion on 21st November 2005 that the Home Office's "long-term goal target is to have 33 (*inspectors*)". How long is "long-term"?

There is obviously a necessity for this number of Inspectors otherwise this target would not have been assigned. Until the number of inspectors increases, the existing 28 remain under tremendous pressure, which in turn could result in substandard inspections, ultimately allowing animal welfare standards to slip.

Who inspects the inspectors?

There is also a lot of controversy over whether inspectors should operate independently from the Home Office. The House of Lords Select Committee concluded that the Home Office Inspectorate should be reviewed periodically by an independent body,⁴² which I believe is a fair compromise between the current system which is not policed at all, and employing a team of completely independent inspectors.

APC's view

Reverend Professor Banner from the Animal Procedures Committee made a justifiable point in 2001 stating that whilst some committee members maintain the view that the inspectorate system is failing due to the low numbers of prosecutions and inspectors, others believe that these minimal prosecution figures are confirmation of a flawless system. He then proceeds with his personal view that "it is surprising that there are so few allegations of serious breaches and abuse given the number of experiments that go on in a year".⁴³

Home Office's reputation

Considering the extensive record of Home Office blunders occurring over the past few months, I find it very hard to believe that the animal experiment field is as squeaky clean as it is made out to be. Shadow Home Secretary David Davies recently stated that "the last three years at the Home Office have been its worst three years in its two centuries of existence". How can the public trust that this secret Home Office animal research department operates so efficiently when the Home Office is failing in most other areas of its responsibilities and is described as "not fit for purpose" by Dr John Reid himself?⁴⁴

⁴⁰ Animals (Scientific Procedures) Inspectorate Annual Report 2005

⁴¹ House of Lords Select Committee on Animals in Scientific Procedures, Minutes of evidence #116

⁴² House of Lords Select Committee Animals in Scientific Procedures Report, 2002

⁴³ House of Lords Select Committee on Animals in Scientific Procedures, Minutes of evidence 56

⁴⁴ [http://www.inthenews.co.uk/news/news/politics/reid-mulls-home-office-split-\\$1043627.htm](http://www.inthenews.co.uk/news/news/politics/reid-mulls-home-office-split-$1043627.htm)

5. Openness and transparency Animals (Scientific Procedures) Act 1986 Section 24 v Animal rights activists

If the openness and transparency of animal experiments improved, it would benefit members of the public, scientists and animal welfare groups alike. Across the board people are requesting more information on the animal research field; however a balance must be established in order to satisfy “the needs of commercial confidentiality and personal security, and the greater good of making things more open”.⁴⁵ Whilst some scientists argue their concerns of potential acts of violence from animal activists, many believe increasing this openness would in fact be of benefit to the animal research field, end the misinformed public’s scepticism, and even decrease animal rights’ activities.

Secrecy has caused public scepticism

During discussions with the House of Lords Select Committee in 2001, the chairman of the APC, Reverend Professor Banner stated “The fear of violence has led to concealing establishments and yet it is the openness and understanding of what is going on which I think is a key part in dispelling many of the misconceptions”.⁴⁶ He adds that the APC has made recommendations to the Home Office requesting more information to be available about license applications, which the Government has somewhat addressed by including abstracts of project licences on the Home Office website; however they don’t detail the costs and benefits of projects, as the APC recommended in their *Review of Cost-benefit Assessment in the Use of Animals in Research* report, nor do they include the species and numbers of animals used, the extent of their suffering or the methods adopted to meet the 3R regulations. Angela Eagle from the Home Office believes “the suspicion that secrecy has created means that people imagine the worst rather than being put in a position where they can see the reality”.⁴⁷

Hiding behind extremists’ threats

This catch-22 situation is perceived by the public in a variety of ways. One of which is that the Government and the science industry are using these threats by animal rights groups to their advantage by claiming the need to retain the Section 24 clause, as this piece of legislation

permits the concealment of what really goes on in laboratories. The section should be diluted, permitting openness whilst protecting personal information.

Project licences

In 2003, the APC’s *Review of Cost-benefit Assessment in the Use of Animals in Research* recommended that the Home Office should provide more information to the public about good practice within the inspectorate department in order to “facilitate public involvement in identifying areas of concern and to assist licensees”. The APC perceives this as being extremely beneficial due to the “Inspectorate’s unique, comprehensive knowledge of how animals actually are used”.⁴⁸

The 2005 Nuffield Council on Bioethics report proposed an extensive set of recommendations that reflects Naturewatch’s, and I am sure, the public’s thoughts in regards to the content that should be revealed about project licences.⁴⁹ These include:

- The predicted benefits and aims of the research.
- The probability of accomplishing these aims.
- The predicted number of animals and their species with a justification for their use.
- The predicted physical experience the animals may endure, including adverse consequences of husbandry, supply, transport and experiments.
- How the 3Rs have been applied to the research project.
- For what reason potential non-animal alternatives were rejected.
- How the project will be funded.

The Annual Statistics of Scientific Procedures on Living Animals, Great Britain

The House of Lords Select Committee’s report on *Animals in Scientific Procedures* recommends “Serious efforts should be made to provide better statistics on animal suffering. The Home Office Inspectorate should develop or approve a “scoring system” for animal suffering which could be

⁴⁵ House of Lords Select Committee on Animals in Scientific Procedures, Minutes of evidence # 84

⁴⁶ House of Lords Select Committee on Animals in Scientific Procedures, Minutes of evidence # 72

⁴⁷ House of Lords Select Committee on Animals in Scientific Procedures, Minutes of evidence # 566

⁴⁸ Animal Procedures Committee (2003) *Review of Cost-benefit assessment in the Use of Animals in research*

⁴⁹ Nuffield Council on Bioethics (2005) *The ethics of research involving animals*, London

operated by Named Animal Care and Welfare Officers and Named Veterinary Surgeons, and used to provide data for the statistics”.⁵⁰ This recommendation is the result of numerous discussions with animal welfarists and scientists in 2001, all of whom are of the same opinion that the annual statistics need to be more informative and user-friendly.

- Mr Whittaker, the Director of Laboratory Animal Sciences states “We perhaps do need to make more information available on the cost benefit analysis of the project licence”.⁵¹
- This is later supported by Dr Langley from the Dr Hadwen trust; “But to maintain public confidence in a difficult area, the cost/benefit assessment needs to be completely transparent, critically applied, and audited retrospectively”.⁵²
- Professor Purchase, the Chairman of the Expert Group on Efficient Regulation, believes the statistics are currently “complicated and it is very difficult to analyse the information you want. It is time that they were revised and presented in a way which was more useful”.⁵³

Disappointing layout changes

During the 2001 discussions with the House of Lords Select Committee, Mr Trevor Colby, Head of the Animals, Bylaws and Coroners Unit stated that the Home Office does plan to improve the content and layout of the annual statistics publication. Five years later in 2006 the *Annual Statistics of Scientific Procedures on Living Animals Great Britain 2005* was published, which was received with anticipation for a more user-friendly layout and in-depth content. The changes were introduced at the start of the publication as an “intention of making the publication easier to comprehend and follow”. Although it is useful to be able to view the difference in figures between 2004 and 2005 within tables 1, 5 and 10, Naturewatch has been competently calculating these figures for years.

Honest and transparent

What the public and animal welfare groups really want to know are details of the cost/benefit system and the level of suffering caused to the animals, but the report claims “It is not possible to

lay down hard and fast rules about how the severity should be assessed. It depends not only upon the amount of suffering caused, but also the duration, the number of animals and what action is taken to reduce suffering, such as the use of anaesthesia or early endpoints. The overall severity is used in weighing the likely adverse effects on the animals against the benefits likely to accrue, as required by section 5(4) of the Act”.⁵⁴ This statement is followed by a table providing figures of mild, moderate, substantial and severe experiments, but details or statistics on how these experiments and degrees of suffering are measured is not revealed.

British Medical Journal – supports view on openness

At around the same time as these amended Inspectorate statistics were collated and written, the *British Medical Journal* published an article with the opening statement of “The Home Office must make available clear and accessible information on the degree and length of suffering experienced by animals involved in scientific research in the United Kingdom”.⁵⁵

This article was written in response to *The Ethics of Research Involving Animals 2005* report, which recommends:

- “That the Home Office should make retrospective information about the level of suffering involved during procedures publicly available.”
- Clear reports should specify “how many animals of a particular species experience pain, suffering and distress, to what degree, and for how long”.
- “The Home Office should also obtain and make available, retrospectively, information about the extent to which the scientific objectives set out in applications have been achieved.”
- Case studies should detail experiments categorised as mild, moderate, substantial and severe.⁵⁶

⁵⁰ House of Lords Select Committee on Animals in Scientific Procedures, 2002

⁵¹ House of Lords Select Committee on Animals in Scientific Procedures, Minutes of evidence # 364

⁵² House of Lords Select Committee on Animals in Scientific Procedures, Minutes of evidence – Supplementary memorandum by Dr Hadwen Trust for Humane Research

⁵³ House of Lords Select Committee on Animals in Scientific Procedures, Minutes of evidence # 676

⁵⁴ Annual Statistics of Scientific Procedures on Living Animals Great Britain, 2005

⁵⁵ <http://www.bmj.com/cgi/content/full/330/7502/1226a?maxtoshow=&HITS=10&hits=10&RESULTFORMAT=&fulltext=animal+experiment&andorexactfulltext=and&searchid=1&FIRSTINDEX=10&sortspec=relevance&resource=HW CIT>

⁵⁶ Nuffield Council on Bioethics (2005) *The Ethics of Research Involving Animals*

Will Government listen?

The Animal Procedures Committee discussed the subject of openness in regards to the severity levels of experiments in their 2003 report; *Review of the Cost-Benefit Assessment in the Use of Animals in Research*. Professor Michael Banner states "We have concluded that the overall severity banding process could be improved, both for purposes of cost-benefit assessment and for providing public information about the level of severity of individual scientific projects," and continues to recommend that the Home Office should formulate a new system that will improve the availability of information to the public.⁵⁷

The Animal Procedure Committee was established for the purpose of providing independent recommendations about the 1986 Act to the Home Secretary and the Minister for the Department of Health, Social Services and Public Safety for Northern Ireland, and their functions within the Act's legislation.

It is becoming increasingly apparent that the Government dismisses much of the advice offered from expert groups, even groups that the Government initiated itself. Are these Committees something for Government to hide behind as it appears to do behind the 3Rs and animal rights groups; fooling the public into believing the Government's functions are being regulated and can therefore be trusted?

Animals (Scientific Procedures) Inspectorate Annual Report

In response to the House of Lords Select Committee Report along with the APC's recommendation in their *Review of Cost-benefit Assessment in the Use of Animals in Research* report, the Home Office announced it's publication of an annual *Animals (Scientific Procedures) Inspectorate* report; the first of which was published in November 2005. Naturewatch anticipated gaining valuable insight into the hidden industry of animal research, but instead was presented with a report comprising of extremely generalised summaries of various topics and figures, a lot of which is already available to the public. The report does not contain any commentaries "on significant and interesting judgements"⁵⁸, as recommended by the APC. The 'Inspection' part was interesting due to the inspections and infringements content, but again it was very generalised and merely prompted further questions.

⁵⁷ http://www.apc.gov.uk/press_releases/2003071.pdf

⁵⁸ Animal Procedures Committee (2003) *Review of Cost-benefit Assessment in the Use of Animals in Research*

Honest and transparent

The kind of information the public and animal welfare groups really want to know is:

- How inspectors go about conducting surprise visits. How can they guarantee their impending visits are kept confidential?
- How inspectors categorise experiments as mild, moderate, substantial or severe. Providing examples.
- More details on the overseas inspections:
 - ✗ Numbers of establishments visited
 - ✗ Hours spent at the establishments
 - ✗ The countries & regions visited
 - ✗ Results of the visits

The 2005 report mentioned that "during their visits to two primate breeding centres in Asia the inspectors were able to offer suggestions for improving and enriching the animals' environment." This statement is manipulative, conveying that it is encouraging to be able to assist with improvements, but to me this suggests the establishments were operating at a substandard level.

What were these suggestions? What were the establishments doing to provoke these suggestions? Were they operating below the UK regulatory standard? Has their aptitude to comply with UK laws been addressed?

- More comprehensive information on infringements and prosecutions:
 - ✗ Who, what, when, where and why?
 - ✗ If other criminals have their names revealed, then why are unlawful scientists' names kept suppressed and, according to the inspectorate reports, often not prosecuted?

Nine infringements involving "significant avoidable suffering" occurred throughout 2005, yet "no contravention was taken further by the prosecuting authorities." The investigations revealed "unforeseeable accidents or human error without evident negligence resulting in considerable avoidable suffering or death of the animals." These included "excessive food deprivation, overdosing or conducting unauthorised minor surgical procedures incompetently".⁵⁹

⁵⁹ Animals (Scientific Procedures) Inspectorate report 2005

I would like to draw your attention to section 10(6) of the *Animals (Scientific Procedures) Act 1986* that specifies the lawful responsibilities of the care of protected animals.

(6B) The conditions of a certificate issued under section 6 or 7 above shall include such conditions relating to the **general care and accommodation** of protected animals bred, kept or used at the establishment as the Secretary of State considers appropriate in order to **ensure—**

(a) that the **environment, housing, freedom of movement, food, water and care** provided for each such animal are appropriate for the animal's health and well-being;

(b) that any restrictions on the extent to which each such animal can **satisfy its physiological and ethological needs** are kept to the absolute minimum;

(c) that the **environmental conditions** in which such animals are bred, kept or used are **checked daily**;

(d) that the well-being and state of health of such animals are monitored by a suitably qualified person in order to **prevent pain or avoidable suffering, distress or lasting harm**; and

(e) that arrangements are made to ensure that any **defect or suffering** discovered is **eliminated** as quickly as possible.

Non-compliance with this set of legislation is prosecutable, yet the offenders got away with gentle reproof admonition letters, some job losses and only two had their licenses revoked. With such minor consequences, anyone would assume they had played truant; not allowed countless animals to suffer unnecessarily, some even dying as a result.

6. EU worldwide influence

On a positive note, recent news reveals that the European Union regulation to ban animal testing for cosmetic products and the importation of any animal-tested product is influencing other countries to follow suit.⁶⁰

⁶⁰http://www.headlinesindia.com/archive_html/28January2007_24185.html#

India is building 2 non-animal testing research establishments

In a move towards complying with the 2013 EU regulation, India is building two institutions that will research into non-animal testing methods. The secretary of the Department of Science and Technology, T. Ramasamy states "The ultimate goal should be to completely stop use of animals in experiments," however in the mean time "attempts can be made to reduce tests on animals and stop dissection and other experiments in education".⁶¹ This is significant progress for India and, to a large extent, a necessity, as they export more than RS.200 billion worth of pharmaceutical and cosmetic products, with cosmetic manufacturing steadily on the increase.⁶²

Israel's proposed bill to end cosmetic and household product animal testing

"Following the cue of new EU regulations", the Knesset Ministerial Committee and the Education & Culture Committee have approved a bill for legislation that is welcomed by all animal welfare groups. The bill proposes a complete ban on testing cosmetics and household products on animals.⁶³ It is interesting that Israel is taking the animal testing ban a step further than Europe, by proposing to ban animal testing on household products as well. If Israel is able to achieve this, then Europe should have no difficulty, given the EU's wealth and degree of scientific expertise.

The fact that India and Israel are taking steps to conform to European regulations demonstrates how influential Europe is on a worldwide scale. If we continue to improve animal welfare standards and move towards the goal to end all animal experiments, we will not only help to improve the lives of millions of animals throughout Europe, but millions more worldwide.

7. and finally...

Whilst I understand animal experimentation is not going to end over-night, I do hope to achieve higher welfare standards for animals currently in use and will continue to emphasise the necessity of formulating and further developing non-animal replacements.

In order to do this I need your help, as your influence as an MP is the key to successful improvements to current laws within Great Britain.

⁶¹<http://www.indiaenews.com/india/20070129/37412.htm>

⁶²http://www.headlinesindia.com/archive_html/28January2007_24185.html#

⁶³<http://www.haaretz.com/hasen/spages/819879.html>