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# Draize: A Blueprint for Change

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### ***Draize: A Blueprint for Change***

As coordinator, I prepared the following pages for the campaign to abolish the Draize rabbit blinding test. The plan includes background information, short and long range goals and step by step initiatives. This working blueprint was circulated to individuals and organizations interested in supporting the campaign. And we made a point of sharing copies of our plan with the cosmetics industry and any interested observers. It has always been our policy to have an up-front, open agenda.

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FROM: Henry Spira

DATE: August 23, 1979

### **Abolishing the Draize Rabbit Blinding Test**

- To challenge the archaic ritual whereby regulatory agencies force the testing of every chemical on tens of millions of animals every year.
- To focus on a single, grotesque, massively used-and particularly vulnerable animal test, the Draize eye mutilations, as a specific, concrete target.
- To set the precedent of replacing crude, painful and outdated methods with elegant, modern, non-violent science through a realistic, effective and winnable campaign.

### **THE DRAIZE TEST**

The Draize Test, named for John H. Draize the experimenter who developed it, is the routine standard use of the eyes of conscious, restrained rabbits to test every substance which may be hazardous to human eyes, from cosmetics to lye. Rabbits are used because their eyes are more sensitive than the human eye, and they have no tear ducts which would cause tears to wash the substance from the eye. The animals are immobilized in stocks and the chemical placed in one eye of each rabbit by pulling the lower lid away from the eyeball to form a cup. The eyes are examined for injury at 24, 48 and 72 hours. The current, revised guide also suggested grading at 7, 14 and 21 days. The increasingly severe reactions observed are: "ulceration of the cornea; opacity of the cornea; inflammation of the iris; hemorrhage; gross destruction." The ultimate injury to animals whose eyes have been seared with corrosive chemicals is death.

## **CAMPAIGN TO ABOLISH THE DRAIZE TEST**

### **Program Rationale**

Our American Museum of Natural History, Amnesty International, and Metcalf-Hatch Repeal victories were necessary to shift animal welfare from defeatism and frustration towards self confidence. We raised awareness and consciousness. We established our credibility, expertise, organizational capacities and tenacity. Still, the struggles were limited and basically symbolic.

Thus, unless we use our successes as stepping stones for bigger struggles and more significant victories, we'll create a false sense of complacency among people who care about animals, -- and betray the billions of animals who suffer from birth to death.

### **The Problem**

Focusing on the one hundred million laboratory animals, the largest number is used for safety testing, which is a rapidly expanding field. But it is also an arena where we can be effective catalysts. We can turn it all around by encouraging the research community to pursue alternatives, instead of misusing animals as "lab tools."

To date, despite massive publicity and significant funding, not one single animal test has been displaced by alternatives, even though much research has been generated concerning the accuracy and reliability of alternatives.

This resistance to change, this straight-jacketing, is perpetuated by the bureaucratic inertia of regulatory agencies. They force the scientific community into the routine, repeated testing of all chemicals and household products on live animals. And these crude rituals discourage innovation. Except for pre-screening, there is little incentive for industry to unleash its scientific creativity, to develop efficient and economic testing breakthroughs, as long as government agencies insist that, regardless of alternatives, they must, in addition, continue to perform the archaic live animal tests.

But the regulatory agencies are coming under tremendous pressure because the animal tests are crude, cumbersome and expensive. Not only are they unreliable, but they require such great expenditures of time and money that it's impossible to test the large number of chemicals we live with.

### **The Focus**

The Draize test, unchanged during the past 35 years, is both grotesque and dramatically unreliable; it is, therefore, totally indefensible and vulnerable.

The Draize test forces every chemical and household product, from shampoos to oven cleaners into the eyes of conscious, totally restrained rabbits, to then observe the damage done over a period of days and weeks. And despite this obscene torture producing unimaginable suffering, the results are neither reliable nor meaningful. A comprehensive study by Weil and Scala of 25 laboratories found "extreme variation" in evaluating the same chemical.

Because Draize is such an obvious perversion of science, even Dr. D. H. Smyth, head of the British Research Defense Society, which promotes animal experimentation, admitted that developing alternatives to Draize "is a good project which would not be difficult to organize."

Generating alternatives to Draize is a realistic target because Draize has so few defenders. And this project will set an enormously significant precedent; the first replacement of a specific animal test with reliable batteries of elegant non-animal methods. It could reorient safety testing from medieval tortures to productive science at the frontiers of modern technology.

## **Scenario**

As with our previous actions, we need a variety of approaches.

- Through Revlon and/or Avon we'll pressure the cosmetic trade association to tax their members one hundredths of 1% of the industry's \$11 billion gross. This \$1.1 million to fund, through an established research institution, such as the Chemical Industry Institute of Toxicology in Research Triangle, the development, on a crash basis, of alternatives to the Draize test.
- To promote a bill which mandates regulatory agencies to encourage innovation and optimize safety testing by accepting reliable non-animal methods as they are developed. In addition to phasing out animal suffering, such new technologies can lead to more effective health and safety standards for humans. As with our Metcalf-Hatch campaign, we'll mobilize public support joined with a united humane community to contact legislators. We'll urge them to cosponsor our bill and request congressional hearing.
- We'll make our voices heard at congressional oversight, authorization and appropriation hearings dealing with regulatory agencies. Accountability demands the effective use of our research capabilities. Thus, regulators need to encourage new, faster, more reliable methods to facilitate the massive testing of chemicals.
- We'll contact legislators to facilitate meetings with scientists and high level regulatory officials to encourage the approval, as they are developed, of reliable alternatives to live animal tests.

## **Step by Step**

- Prepare fact sheet and articles (as with Metcalf-Hatch).
- Develop a bill in conjunction with Washington legislative aides, Elinor Molbegott, Esq. and others.
- Organize a Coalition for Alternatives to the Draize test.
- Organize a (coalition of) Scientists for Optimizing In Vitro Safety Testing.
- A national campaign focused on the cosmetic industry; escalating, until they fund, on a crash basis, the development of alternatives to the Draize test.

- Research regulatory agencies through the Freedom of Information Act.
- Provide media with press releases, photos, film and other original material.
- National campaign to introduce bill in House and Senate.
- High level meetings with cosmetic industry.
- High level meetings with regulatory agencies.
- Impact on regulatory agencies through legislative committee hearings.
- Contact executive department to issue a policy statement.
- Contact government agencies concerned with national research requirements, including: General Accounting Office; Office of Technology Assessment; Office of Science and Technology Policy; National Toxicology Program.
- Legislative hearings with input by coalition of scientists.

### **Short Range Goals**

- Introduction of bill in the House and the Senate.
- Statements from regulatory agencies.
- Statement from Scientists for Optimizing In Vitro.
- Safety Testing.
- Cosmetic industry funding the development of alternatives to the Draize test.
- Congressional hearings with media publicity.
- Passage of bill.

### **Long Range Goals**

- Development of a viable alternative for the Draize test in the cosmetic industry.
- Injunctions against all private and government labs using Draize tests. There being an alternative, this now constitutes unnecessary cruelty with no human health impact.
- Coalition for alternatives to the LD50 and other traditional major animal using testing methods.

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The underpinning of this proposal includes a coalition—the combined, united energies of these considerable constituencies linked with citizens who are concerned with the suffering of others, all focusing on one target to provide the necessary political clout for effective action.

And we're approaching this effort with the expertise and confidence developed through initiating, researching, conceptualizing and organizing to victory, actions focusing on Amnesty International, the Museum of Natural History and Repealing Metcalf-Hatch.

A victory in the Draize campaign, made possible through the evolution of science, will have an enormous real impact—a possible beginning of the end of live animal safety testing.