POLICY PROPOSALS

A. OFFICIAL PANEL ON ANIMAL RESEARCH

An officially sanctioned forum should be established with representatives from animal protection and research organizations, independent analysts and an experienced chairperson and moderator to determine how much reasonable common ground exists and to address specific assertions and claims by either side.

The obvious question that arises is what is the most appropriate institutional home for such a forum. The National Institutes of Health already have bureaucratic structures (e.g. the Office for Protection from Research Risks) that deal with these issues but they are far from the only government agency that is faced with laboratory animal issues. The National Science Board could also provide a home for such a forum and there are ongoing discussions on Capitol Hill about the need for a Bioethics Board (possibly to fulfill a function in values evaluation similar to the Office of Technology Assessment in technology evaluation). If such a board were established, the animal research controversy certainly qualifies as a bioethical issue (although bioethics has traditionally concentrated on human biology and medicine) and could become one of the problems addressed by the Board.

B. DATA AND INFORMATION

The USDA should develop a more extensive annual report form so that those involved in making and influencing public policy can have reliable data to support or refute arguments.

Discussion of animal research issues in the United States has always been severely compromised by the lack of basic and agreed data on the numbers of animals
used, on how the animals are used, on the types of research that is conducted on laboratory animals, and on the trends in animal use over the years. In Europe, where such data have been generated by Great Britain for many years and are now becoming more widely available in other countries because of a European Union directive, it is possible to identify trends and problem areas with some reliability. Critics may not always agree with how the data are interpreted but the two sides would not have to spend as much time simply trying to establish a baseline set of agreed "facts."

The Regulatory Enforcement and Animal Care (REAC) group in the Animal and Plant Health Inspection Service of the U.S. Department of Agriculture is already charged under the Animal Welfare Act with collecting some information on animal numbers (rat and mousedata are not collected although rats and mice account for 80-85% of all laboratory animal use). The reliability of the current data has been questioned and no independent audit has ever been undertaken of the REAC annual reports. The USDA has always resisted expanding its data-collection activities. However, REAC is the obvious institution to be charged with collecting and reporting such data.

C. LABORATORY ANIMAL SUFFERING AND DISTRESS

Because the public is chiefly concerned about how much distress and suffering laboratory animals experience, mechanisms should be developed:

1. to establish a more accurate assessment of the extent of animal pain and distress in research and testing (see B above); and
2. to investigate ways that laboratory animal suffering and distress can be minimized and to support appropriate research on the topic.
Gathering information on the nature and extent of laboratory animal pain, distress and suffering could be another of the charges given to REAC if its data-collection role were to be expanded (see B above). There are models that have been tried in Europe that might be modified for the United States so it need not be a completely "blind" activity. The development of accurate (and trusted) data would prevent exaggerated claims by both sides in the debate and would provide guidance on the areas where efforts to develop alternatives (to reduce animal pain and distress) would directly address a major public concern.

There are also important philosophical and technical components to the issue of animal pain, distress and suffering, but there is little systematic and coordinated effort to develop new technical approaches that would significantly reduce laboratory animal pain and distress. Institutional Animal Care and Use Committees have set a variety of limits on what can and cannot be done to research animals to reduce animal distress but there is little data to support the effectiveness of those limits. Funding for research into this issue is very limited and such research is not of high prestige. Nonetheless, it is important from both the animal's point of view and also to promote and support the best science. It can be relatively easily shown that animals that experience pain and distress generally are not good research subjects and will give rise to data of questionable quality.

D. ALTERNATIVES TO ANIMAL TESTING

The new Applied Toxicology program authorized under the 1993 NIH Revitalization Act should be funded and built into a program that addresses new method (i.e. alternative) development, validation and implementation.
Representatives of a group of corporations and animal protection organizations agreed on language that was inserted into the NIH Revitalization Act that authorized a new program to develop and validate new toxicity tests, especially tests that would reduce animal use or animal distress. Both the corporations and animal protection groups agree that there is an urgent need for government coordination of the many private initiatives to develop, validate and implement alternatives so that the needs of both the corporate and regulatory sectors can be properly addressed. In addition, the European Union has recently set up a European Centre for the Validation of Alternatives Methods (ECVAM) that will be driving the development and use of new testing techniques in Europe. Given the global economy, any initiatives taken by Europe will have immediate consequences for companies in the U.S., and it is important that there are strong communication and collaborative ties between ECVAM and the U.S. Such ties would be most productive and constructive if they were established between ECVAM and a program in the U.S. that had similar responsibilities.

E. BUILDING BLOCKS FOR CONSENSUS DEVELOPMENT

Scientific organizations should formally accept that the use of animals in research entails some costs in animal death and distress and should establish programs that specifically support efforts to minimize those costs. At the same time, animal protection groups should recognize that clinical (i.e. human), animal and non-animal research techniques have all played a significant role in the advance of biological knowledge and that removal of one of these three elements is likely to slow down the advance of biological knowledge.