1984

Animal Rights Coalitions Coordinator's Report '83

Coalition to Abolish the LD50

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We, who are outraged by animal suffering, are the majority. Together, we are making the 1980s the decade of animal rights. As we move through 1983, members of the scientific and industrial communities have begun to join us by thinking, talking — and most important of all — behaving differently.

In a March/April 1983 *The Sciences* essay (New York Academy of Science), Bernard Dixon observed that "animal rights has become a fashionable issue, and this has greatly stimulated the search for alternative techniques. Scientists who until relatively recently argued that such special steps (alternatives) were unrealistic and unnecessary are now beginning to join a virtually new crusade."

The extent to which this crusade is succeeding can be seen in these recent events:

**BENCHMARKS**

**Government**
* Dr. David Rall, director of the National Toxicology Program (NTP), wrote to our Coalition that the LD50 "is now an anachronism... I do not think the LD50 test provides much useful information about the health hazards to humans from chemicals... The NTP does not use the LD50."
* The U.S. Senate passed the Durenberger amendment, directing federal agencies to set aside time and money to find alternatives to the Draize rabbit eye test.
* In the wake of our public awareness campaign, federal agencies have curbed some of their most outrageous requirements. Substances known to be caustic irritants, such as lye, ammonia and oven cleaners, need not be retested on the eyes of conscious rabbits. The suggested number of rabbits needed per test for other products has been reduced by one-half to one-third.
* In a related move, Dr. Ronald W. Hart, director of the National Center for Toxicological Research, sent us details of the NCTR's programs to "develop alternative model systems to wholesale animal testing."

**Industry**
* Procter & Gamble and Smith Kline & French Laboratories have just drafted thoughtful, detailed and integrated programs for upgrading toxicology methods on their lab benches. Other companies are expected to follow their lead. (continued)
The PermanenT Revolution

For the most part, our strategy has been an "incremental" one — a step by step approach that uses each victory as a stepping stone to more significant struggles. This approach has promoted rapid social change, as we moved from 60 cats in our American Museum of Natural History protest, to hundreds of thousands of rabbits in the Draize campaign, and now, to the literally millions of animals victimized in the painful LD50 death test.

In our overall plan, the next steps are:

* A coordinated effort to end use of the classic LD50 test and encourage industry to use existing knowledge for immediate, major reduction in animal suffering.
* Maintaining the momentum of the Draize rabbit blinding and animal test replacement and reduction campaigns by helping set up local action projects.
* Broadening our struggle to include a program for alleviating the plight of four billion confined "factory farm" animals. At the same time, we will tap into the energies of the as yet unfocused campus grassroots animal rights movement. We plan to mobilize the student population towards a non-violent life-style.

Also, an often overlooked part of strategic planning is flexibility. Since we must provide maximum incentives for industry, government and academia to respond to animal suffering, we need to change tactics when they shift direction. Our Coalition and responsible industry heads, legislators and researchers must cooperate and work together to most rapidly bring down the levels of pain and death.

**KEEP IN TOUCH**

To expand and energize our movement we need to keep in touch:

* What have you tried?
* What's worked?
* Why and how?

Share your successful experiences with us and we'll share them with others: Henry Spira

1 West 85 St., NYC 10024
1983: THE END OF THE LD50

With the consistent and increasing resistance to the LD50 test, which has galvanized industry and the scientific community in recent months, it appears that the end of this test is inevitable. Its elimination is largely a matter of time. We believe our primary objective right now is to speed this process by escalating a focused effort at what is essentially the final roadblock — the government regulatory agencies.

Immediate reduction is possible while still promoting the elimination of the test with innovative alternatives. For instance, regulatory agencies must stop accepting classic LD50 data. Prominent scientists have suggested that the precise LD50 be replaced by the Approximate Lethal Dose and the Limit Test. While the LD50 uses 50 to 200 animals per test, the alternatives use six to 10 animals and provide similar data.

Acceptance of alternative test data would be a first step towards abolition of the LD50; using alternative tests would, alone, save 88 to 97 percent of the millions of animals scheduled for painful deaths each year. There is no need to determine with mathematical precision the amount of a chemical needed to kill 50 percent of an animal population.

Our regulatory agencies campaign includes conventional tools such as mass mailings, full-page ads, media coverage and demonstrations. However, there is a tremendous potential right now for new approaches such as these:

* Helping organize international working conferences including industry, regulators and scientists to review and change current regulatory practices.
* Legal actions that confront the regulatory agencies with the obligation to change their requirements.
* Encouraging appropriate executive and legislative bodies to review regulatory requirements and bring the requirements out of the Dark Ages. These bodies include Congressional authorizing and appropriations committees, agencies such as the Office of Technology Assessment, the General Accounting Office, the Presidential Task Force on Regulatory Relief, and the Office of Science and Technology Policy.

INDUSTRY ON THE FAST TRACK

Besides regulatory reform, we see fast-track approaches to immediately reducing animal suffering using existing knowledge.

We are asking every corporation that uses animals to develop and implement a formal, top-priority review of all in-house and contract testing procedures. This review, which would promote replacement, reduction and refinement, could include:

- creation of incentive awards
- inventive uses of data bases
- use of structure-toxicity relationship data
- use of alternative tests
- control of protocols by higher-level management
- questioning of tests now in use — can the data be obtained without animals, with fewer animals, with less intrusive, painful methods?

We want ongoing public access to these programs (proprietary information deleted). As mentioned earlier, Smith Kline & French and Procter & Gamble have prepared these reviews, and are sharing their results with the Coalition.

We are also urging other major corporations and trade associations to start a chain reaction — of methodology transfer, data sharing and technological exchange. Such professional collaboration could result in enormous reduction in the use of animals and savings for the consumer (for example, by reducing duplicate tests on similar products). This is part of the significance of opening up communications through such publications as In Touch and Cell Biology and Toxicology (Jane Gresek, Publisher, Princeton Scientific Publ., PO. Box 3159, Princeton, NJ 08540).

We will provide ongoing reports of our discussions with industry.

YOUTH CAN BUILD ANEW

It is no overstatement that our objective of rapidly phasing out all animal suffering is synonymous with the bigger issue of creating a caring, nonviolent society. Since we aim at lasting change, our Coalition must connect with young people while they are still sorting out their values. We must challenge the inconsistency to which they are very sensitive: be kind to cats and dogs who are part of the household; but eat other animals, and murder and dissect animals for course requirements.

We maintain that it is wrong to harm others — and we don’t limit who the “others” are. We believe that pain and pleasure are as vivid to other human and nonhuman animals as they are to us.

However, few of us can relate to billions of victims, and, if we could, we’d probably feel powerless to make an impact on such an enormous, institutionalized holocaust.

But, while recognizing the universe of animal suffering, we can identify — and identify with — what is happening in our own backyard and do something about it.

Schools are often institutions that desensitize youth and promote moral amnesia. Students, because their idealism is fused with intellectual curiosity, have often been the vanguard in the fight for justice. We suggest that they can be the bridge reaching out towards the four billion animals suffering on factory farms and in laboratories.

Efforts can be made in many possible directions:

* Students have the democratic right to non-violent meals in school cafeterias. A campaign by students in their schools provides an opportunity to focus on the routine and institutionalized violence inflicted on livestock. The campaign can be reinforced with posters and ads — for example, pictures of the expressive faces of animals with captions such as, “Can you look your dinner in the eye?” or “Which should you eat and which should you pet, and why?”

* Every student has the right to non-violent courses and projects. This type of campaign would demand the immediate elimination of the traditional and repetitive frog and fetal pig butcheries in under graduate courses.

* Furthermore, grade and high school students can submit projects on alternatives as their science fair projects.
* At campus rallies, the student body can be made aware that, within a two minute walk, hundreds or even thousands of innocent cats, dogs, primates, guinea pigs, mice, and rabbits are in confinement. Their minds and bodies will be repeatedly violated and their only release will be painful death.

Students can demand that the school develop and publicize a formal plan to reduce and eliminate the suffering for which the university or high school is responsible. Specifically, we suggest that they ask for immediate:
* Elimination of the routine use of animals in undergraduate courses.
* A halt to all pseudo-scientific painful behavioral experiments, including electric shocking, air pressure hosing and food, water and sleep deprivation.
* Creation of mandatory courses in alternative methods for all life-sciences graduate students.
* Critical review of information needs and whether they can be met without the use of animals, with fewer animals, or with less trauma to the animals.

We envision a loose-knit network of animal rights campus organizations that hold regional meetings; a resource center that can supply leaflets, posters, fact sheets, contacts, skills training; and a newsletter to share experiences and techniques that work.

An ongoing, effective student voice for networking, exchanging experiences and promoting school activities is Rosa Feldman and Marshal Weisfeld's Student Action Corps for Animals (SACA) which publishes the lively, activist SACA News, 423 Fifth Street SE, Washington DC 20003, (202) 543-8983.

**PERSONAL INVOLVEMENT: GIVE YOUR TIME, ENERGY & SKILLS**

Students can change their campuses, parents can change their children's schools, lawyers can change the legal system, scientists can break archaic paradigms. And you, through your own personal involvement and professional skills, will make the difference — will make the 1980s the decade for animal rights.

Some of the successes mentioned earlier in this newsletter were started on local levels. One example is Ann Koter's effect on the National Toxicology Program.

Ann, who lives in North Carolina where the program is based, first researched the NTP; then developed and discussed the project with us. Using a plan tailored for the NTP, she started discussions there on the LD50. The result — Rail, the government's chief toxicologist, took a public position against the LD50.

Another example: Staff members of The Unicorn, the Pennsylvania Animal Rights Coalition's (PaARC) monthly newspaper, which reports on the struggles against animal exploitation from the personal, to the local, to the global, raised consciousness concerning the LD50 in the area surrounding Smith Kline's research labs. In the process, they established contact with the corporation which resulted in a sophisticated program to reduce animal use on lab benches. (PaARC/The Unicorn, PO Box 11216, Elkins Park, PA 19117 $8. per year)

A note: We need to focus on every lab — corporate, university and government — to make sure that there's a sense of serious urgency and top management involvement to measurably replace and reduce lab animals. It's not enough for a corporation to write out a check to support alternatives research on a campus somewhere — animal reduction is feasible with our current knowledge. And animal reduction can best be monitored on the local level — more on this later.

Led by Pegeen Fitzgerald, the Millennium Guild (MG) is building incentives on the scientists' local levels. Through one half million dollars for awards and networking, the MG is helping speed interest in the elimination and significant reduction of animal use. MG's co-sponsorship of the first issues of *In Touch* and *Cell Biology and Toxicology* with the New England Anti-Vivisection Society (NEAVS) gives researchers the information, contacts, ideas and encouragement they need to develop alternative tests. Future support for both publications is expected from industry (The Millennium Guild, 40 Central Park South, NY NY 10019).

NEAVS has also funded an alternative research project and a course on modern tissue culture techniques. NEAVS is currently increasing the public's LD50 awareness through an effective major advertising campaign in the NY Times and Washington Post. To further accelerate the impact, NEAVS offers the ad to other organizations (NEAVS, 1 Bulfinch Pl, Boston, MA 02114, (617) 523-6020).

The rapidly growing, activist British Animal Aid, founded by Jean Pink, has highlighted the LD50 and coordinated much of our worldwide campaign (Animal Aid, 11 High St, Tonbridge, Kent TN9 1LD, England). In addition, the HSUS did a mass mailing, Animal Rights spokespersons with media access, including Pegeen Fitzgerald on her WOR program; Cleveland Amory and Gretchen Wyler of the Fund for Animals; Loretta Swit, Christine Stevens, John Kulberg and Elinor Molebogott of the ASPCA; Nellie Shiver of American Vegetarians; Dee Dunheim, Ester Mechtel, Helaine & Sid Lerner, and many others, are popularizing our LD50 campaign.

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**HERE'S WHAT YOU CAN DO**

Remember: A single action is, at best, influential. The same action creatively repeated a thousand times by activists in their own communities, creates the pressure which results in change. And here's what you can do:
* Start a media campaign about the LD50 in your area. The LD50 is 55 years old, and causes painful death to about 5 million animals a year — the test is indefensible. Even the bureaucracy responsible for its use will not defend it in public debate. If your neighbors and coworkers knew about the LD50, they'd be as outraged as you are.

We have a fantastic opportunity to rescue millions of innocent animals from misery and death within weeks or months. Make the LD50 issue as vivid to the people around you as Watergate was, then help channel their outrage into abolishing the LD50. To begin, ask your local newspapers, magazines, radio and TV stations to tell the LD50 story — help them do their research by passing along a copy of this report and our LD50 leaflet.

* Live animals are routinely force-fed every new oven cleaner, dish detergent, and bar of soap to come on the market. Find out how pervasive the LD50 is in your life by keeping track of the household products you use for a single day. Then, with your list and product labels in hand, write to the companies that make the products and ask what steps they've taken to limit or end their use of the LD50.

Coordinated by Cheryl Mouras, the Animal Protection Institute will track corporate responses to these queries and will then publicize who is and who is not responsive. API plans to follow up on promises to reduce animal suffering. If a company says it will eliminate 25% of their animal testing within six months, API will check back in six months to report on what they have actually accomplished (API, P.O. Box 22505, Sacramento, CA 95822; (916) 422-1921).

* Make animal rights a force in local and national politics. Our potential power is awesome — some 58 percent of American households include animals; opposition, in varying degrees, to the harming of animals concerns the majority of Americans. Be sure legislators understand the issue which are of importance to us — starting with the LD50. Get public commitments from candidates running for office and from political parties as they prepare election platforms. We want action to reduce the routine suffering of tens of millions of lab animals and billions of farm animals from our legislators now.

* Buy one share of stock in companies in your area so that you can lobby them from the inside. If the companies are not responsive to our concerns, the price of one share gives you access to the presidents of multibillion dollar corporations at annual stockholders meetings. You can also submit a shareholder's resolution that then appears on the stockholder's ballot (this is similar to a political referendum). You can help assure that senior management develops and implements programs that rapidly reduce animal pain and death.
Highlights from: The Procter & Gamble Company, May 11, 1983

Procter & Gamble has made significant progress in developing and adopting new testing methods which have reduced our use of laboratory animals. More importantly, our company is committed to further reduce the use of animals in our safety testing programs. . . . We have an ongoing program to seek out and develop the most reliable and efficient safety testing methods to provide the data needed to fulfill these responsibilities. One result of this effort has been the development of new testing methods which require no animals, fewer animals or less stressful tests on animals.

There are several examples of our progress thus far:

- **Eye irritation test:** P&G scientists have developed an alternative to the Draize eye irritation test which significantly reduces the stress on the test animals. . . . Importantly, the work on alternatives to the Draize illustrates the development of better testing methods through systematic scientific progress. While the new methods do not alleviate the need for animals totally, they represent important first steps in the discovery of animal-free alternatives . . . .

- **Chronic testing:** Significant progress has been made in recent years in reducing the number of animals used for determining the chronic toxicity of new materials. Only five years ago, 300 rats and years of testing were required just to screen a new substance for mutagenicity and carcinogenicity potential. New testing methods now enable us to do first level mutagenicity screening which does not use live animals at all. This battery of tests include the Ames bacterial assay.

If second level tests are required to resolve questions raised in the first level of tests or to satisfy regulatory requirements, lower animal forms or newly developed methods requiring greatly reduced numbers of animals are used. For example, our scientists are using a mutagenicity test which uses fruit flies in place of a mouse test that previously required 10,000-20,000 mice. Within the next year or two, we expect to validate a cell transformation test which, when used with the cell screening tests, can help clear a compound for cancer potency. The cancer bioassay currently requires 500-600 animals and two years' time for each compound. The cell transformation test uses only a few animals and can be completed within a short period as one month . . . .

- **LD50:** Our scientists have been moving toward a greater and greater use of alternatives to the classic LD50 to determine the acute oral toxicity potential of new ingredients or compositions. In addition to use of the "limit LD50," which uses a maximum of 20 rats compared to 50-60 rats for a classical LD50, our scientists have developed another alternative called the "up/down LD50." This new method also requires less than 20 rats, and enables a scientist to pinpoint more precisely the expected toxicity range . . . .

Here again, we have worked with Federal regulatory agencies to gain their acceptance of these alternative testing methods.

- **Animal Science Task Force:** While Procter & Gamble is proud of the progress that has been made in reducing the use and suffering of laboratory animals, our Management has recognized the increased level of public awareness and concern being expressed about the use of animals in product safety testing. To ensure that our company is taking all appropriate steps to respond to this concern, an Animal Science Special Task Force was established in 1982. This was a diverse group of some of P&G's top scientists representing several disciplines, with each clear directive to investigate and recommend how P&G can further minimize animal use and suffering in our safety assessment program.

The establishment of this Task Force represents a clear signal from the senior management of Procter & Gamble that reducing animal use and suffering is one of the objectives of our research effort. It is a management challenge to our scientists to find and adopt new methods which will provide the safety data we need and reduce the use of animals to obtain that data.

After conducting a thorough review, the Task Force made several recommendations for achieving further reductions, including:

- **Maximize** the use of existing safety information systems to avoid unnecessary or redundant animal testing. This will be accomplished by improving our internal systems for sharing testing data across divisions . . . .

- **Encourage** the Federal regulatory agencies to modify unnecessary or scientifically unsound requirements for animal test data . . . .

- **Develop** an internal policy statement on the use of laboratory animals and institute an auditing program to monitor progress in reducing the use of animals . . . .

Additionally, our Company's policy is to share our new safety testing methods as they are validated with others in the scientific community through publication in peer-reviewed scientific literature. In this regard, our scientists regularly author and publish articles in numerous scientific journals reporting on our developments.

Highlights from: Smith Kline & French Laboratories, May 5, 1983

Historically, scientists and animal welfare groups have often treated each other's views with skepticism and, on occasions, with overt hostility. Such attitudes are not constructive, and we advocate mutually helpful discussions and actions . . . . We are dedicated to the development of new methods to conserve animals and to seek alternative test procedures. Scientists and other employees of the Research and Development Division are expected to recognize their responsibilities in meeting these objectives and to work consistently in a manner that demonstrates appropriate concern . . . .

Much of our currently expanding research effort focuses on the action of drugs at the subcellular and molecular level. Although the use of animals is still necessary, the increasing emphasis on research at the molecular level will further facilitate efforts to reduce animal usage . . . .

Additionally, a new series of Animal Welfare Achievement Awards will be instituted to encourage a maximum effort toward conserving animals and developing in-vitro techniques. Animal Welfare Awards will be funded at the same level as the Distinguished Personal Contribution Awards . . . .

**Specific Operational Policies**

The Director, Laboratory Animal Science, will develop and implement the following policies:

- Each animal experiment shall be scientifically justifiable.
- The number of animals utilized for each experiment shall be the minimum necessary to obtain the required data . . . .
- Wherever feasible, alternative methods that do not require animals shall be utilized.
- Animal studies of a seemingly unwarranted nature, but which are required to meet regulations set by external agencies, will be reported to the Director of Laboratory Animal Science.
- Animal tests required by regulatory authorities in certain countries, but generally not by others, will be reported to the Director of Laboratory Animal Science . . . .

...continued
THE COALITION STRATEGY
WHY WE DO IT THE WAY WE DO IT

* One reason our coalitions have worked so well is that professional people have volunteered their time and expertise. For instance, scientists and doctors have helped prepare position papers and advised us on feasible options. Publicists and advertising directors have helped develop publicity campaigns. Secretaries have volunteered their skills. Capitol Hill staffers have been our eyes and brains in Washington. A rapidly growing national organization of lawyers, Attorneys for Animal Rights (AFAR), are marshalling their collective legal expertise to end the LD50 test. (Joyce Tischler, Esq., AFAR, 333 Market St., 23rd Floor, San Francisco, CA 94105; (415) 665-5896).

Similar groups, such as Educators, Photographers or Media for Animal Rights, could be organized. Educators might act as faculty advisers to students trying to develop non-violent meal campaigns, as described earlier.

Photographers could organize exhibits around Edward Steichen's concept of the family of man, except in this case, it would be expanded to include the entire family of animals. In matters of feelings — love, compassion, fear, joy, sadness, anger, loneliness — human and nonhuman animals behave in about the same way. In an exhibit (or book) we can all be vividly depicted as one big family, each of us trying to avoid pain and to get some pleasure out of life.

Members of the media could analyze the ways different publications and electronic media handle animal rights issues, and develop suitable articles for each publication or news program.

* Another reason our coalitions are effective in achieving measurable results is the planning which precedes every campaign.

Through meticulous preparation, a small group can release an enormous amount of energy. After all, the power structure has problems and weaknesses that render it susceptible to successful attack.

INDUSTRY... continued

In-vitro test methods developed to replace in-vivo studies are to be documented so that other areas may consider potential applications.

Test methods developed as substitutes for animal testing shall be recorded in a centralized reference entitled "Alternative Methods for Animal Testing." The same publication consideration should be given to these methods as to other scientific publications.

Mistreatment of animals is a serious violation of policy and may be grounds for dismissal.

Procedures

Development and Use of In-vitro Test Methods

This procedure coordinates and formalizes our efforts to locate, document and distribute information concerning alternative test methods. The gathering and dissemination of alternative test methods in an organized manner makes this information available for efficient future use.

Animal Welfare Award

This procedure establishes the importance of individual efforts to develop alternative test methods and other conservation practices. It defines the criteria for the award and outlines the mechanism for applicants to follow . . . .

SUMMARY

The responsibility to identify or develop valid test methods that do not require the use of animals is to be accorded the highest priority. This plan outlines a series of specific policies and procedures that address our commitments to the conservation and humane treatment of experimental animals.

and these offer us the needed openings. The task is to find these openings and to move in boldly.

To create bridges connecting us with the public's current awareness, we must first check an issue out with a wide variety of people, and listen carefully to their responses. How do they react? Can they feel themselves in the place of the victim? Are they outraged? What in particular do they focus on? Will this action propel their consciousness forward?

We need personally to research and analyze all available verifiable materials, to find patterns and connections, and to see the vulnerable points that offer us maximum leverage.

On the local level, study groups can request or even develop animal reduction plans for every corporate, government and university lab in their area. These study groups can solicit and use the help of professionals and of concerned organizations in their areas.

As you can tell from our report, we forge ahead with a flexible, step-by-step movement towards animal rights. You may know, however, that a few individuals have characterized this approach as a "sell out" and a "compromise" because it doesn't fit into their all-or-nothing formula.

We refuse to compromise with injustice. Compromise does not belong in the tool bag of effective activists. Our aim is to abolish all exploitation and suffering of human and nonhuman animals as rapidly as possible.

Earlier parts of this report have documented the Coalition's successes. By contrast, our critics' track record is equally clear. The 100 years of hysterical and self-righteous demands for immediate abolition has led to neither short-term nor long-term results. In fact, it paralleled an enormous escalation in the use of laboratory animals.

ON A PERSONAL NOTE

On a personal note, I feel that every institution involved with the suffering of animals, be they within the corporate, government, academic or humane sectors should be held accountable for the best use of the financial resources available to them. Resources which directly or indirectly come from the same members of the public who increasingly oppose the systematic abuse of animals.

This accountability should include fully defined objectives, with strategies, rationales, time tables and checkpoints. Plans which can be monitored by impartial and knowledgeable observers as to their basic effectiveness in rapidly and measurably reducing pain and death.

Our final goal is to create a society in which creative genius and technology raises the quality of all life; where we live in harmony with one another — with human and nonhuman animals, and with all of nature. We will get there not by crying or wishful thinking, but by understanding and effective action.

Henry Spira