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# Fight for Alternatives Gathers Momentum: Commitments to Help Lab Animals are Extracted from Industry and Government

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## Recommended Citation

"Fight for Alternatives Gathers Momentum: Commitments to Help Lab Animals are Extracted from Industry and Government" (1981). *CUP*. 9.

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# OF THE UNITED STATES The Humane Society

## CLOSE-UP REPORT

### *Fight for alternatives gathers momentum*

#### *Commitments to Help Lab Animals Are Extracted from Industry and Government*

The national campaign to eliminate the Draize eye irritancy test made headline news when Revlon announced in December a three-year, \$750,000 grant to The Rockefeller University for the purpose of developing an alternative to the test.

The Draize test, in which the irritancy of cosmetics, toiletries, pesticides, drugs, and other household products is determined by testing them in the eyes of rabbits, has been the special target of a coalition of more than 400 national and local humane groups. Pat Clagett, coordinator of the Draize campaign for The Humane Society of the United States talked to Revlon vice president Roger Shelley shortly after the company's announcement. "He credits the national Draize campaign with hastening this commitment to finding a non-animal method of testing the safety of beauty and household products," reports Clagett. "With Revlon taking this initiative, we will continue to pressure other companies and government agencies to do their part to end the Draize."

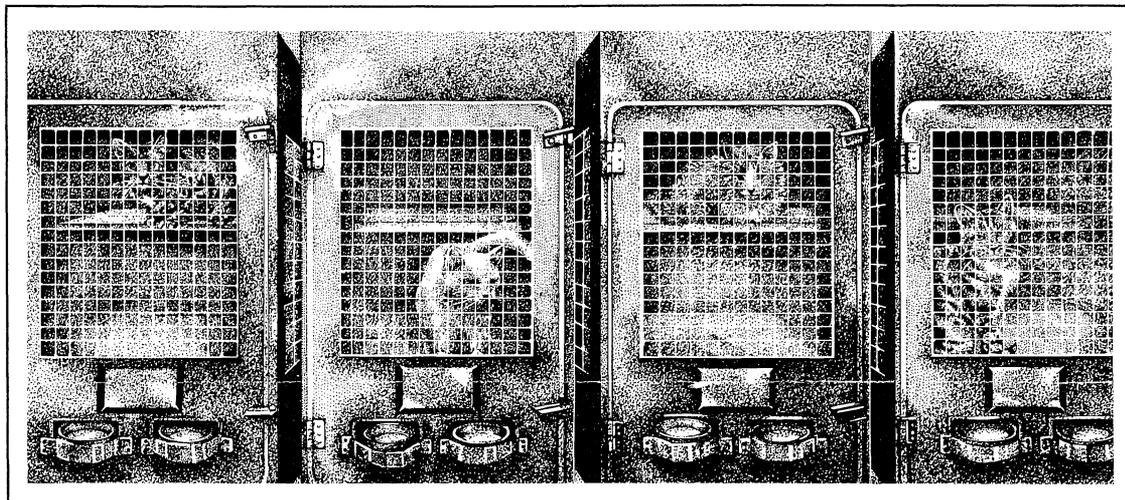
One way the companies can do their part is to donate money to a

special fund established in early March by the Cosmetic, Toiletry and Fragrance Association (CTFA). The fund will support general research in alternatives to animal testing. CTFA hopes to receive initial donations totaling at least a million dollars.

With the momentum building, The Humane Society of the United States is expanding its efforts to promote alternatives to animal use

cially stressed, infected with disease, and administered electric shocks. Anesthetic and pain killers are seldom used, because scientists worry they might skew the test results.

Some of the experiments may form the basis of an important scientific breakthrough that will substantially benefit man and even other animals. Some of the experiments are painless, and some experimenters take



in laboratory experimentation. An incredible 90 million animals a year go through the hands of scientists. Most don't survive the experience. If the experiment itself doesn't kill them, they are usually euthanized—sometimes gently, sometimes harshly. But in the laboratory, death may be the least serious injury done to an animal. Rats, rabbits, mice, monkeys, sheep, hamsters, dogs, cats, pigs, and guinea pigs, to name a few species, are routinely burned, injected with poisonous substances, artifi-

great care of the animals they use. Unfortunately, it is not unusual to find pointless, repetitious procedures causing severe pain and suffering to the animals. Often scientists, trained to view the animals objectively as "subjects," refuse to believe that animals actually feel pain and suffer much as a human would in similar circumstances.

The Humane Society of the United States wants to see an eventual end to all pain and suffering inflicted on animals in the laboratory. We are

working hard to make this happen, and the "alternatives" concept is basic to our program. We want scientists to find alternative methods of testing and experimentation that do not involve the use of animals.

## Alternatives

It will be a long time before all use of animals can be terminated, but there are already many areas where the numbers of animals can be cut back significantly and pain and suffering can be mitigated. There are many areas where a concentrated effort to find alternatives to animal use could be expected to yield results quickly. If scientists want to do it, and if laboratories are willing to invest the money necessary to research these alternatives, many millions of animals could be saved from experimentation in the next five to ten years.

Our aim is to show scientists the advantages, both morally and economically, of finding these alternatives. We are also pressuring drug and cosmetic manufacturers, researchers, and government agencies through public opinion and legislative action to make the search for alternatives a top priority.

The vast majority of lab animals are used in drug development and safety and efficacy testing. The Draize test is a prime example. Another is vaccines, which are routinely tested for potency and safety. Although the *production* of vaccines is one area where alternatives to live animal use *have* been developed, the *testing* of vaccines is another story.

A number of animals are injected with each batch of vaccine, then exposed to the disease in question. These animals, protected by the vaccine, usually suffer little pain from the experience. But the "control" animals, those who are exposed to the disease without being vaccinated, must sicken and die in order for the test to be a success. The diseases at issue are usually ones that cause a great deal of pain before death, such as cholera, typhoid, and tetanus.

Safety and efficacy testing are areas especially ripe for the development of alternatives. Usually, the same test must be done over and

over again with batches of drugs, or new products that are very similar to products already in use. The use of tissue cultures, computer models, and bacterial studies can revolutionize this area of science, and save millions of animals.

This *can* be done, as has been proven in the past. An example is pregnancy testing. The old line, "the rabbit died," used to be one way of announcing pregnancy. Actually, mice and toads as well as rabbits were once used in great numbers for this purpose. Now, test-tube methods have been developed that give results quickly and accurately, and animals have been just about eliminated from the pregnancy testing process.

Vaccine production is another example of an area where animals are being phased out. In the past, most vaccines were produced in tissue cultures such a kidney tissue taken directly from an animal, which had to be killed in the process. New methods of vaccine production using duck or chicken eggs, or cell cultures that can be propagated for many generations before dying, have largely replaced the use of live animals for production of vaccines for such diseases as distemper, measles, rabies, rubella, and smallpox.

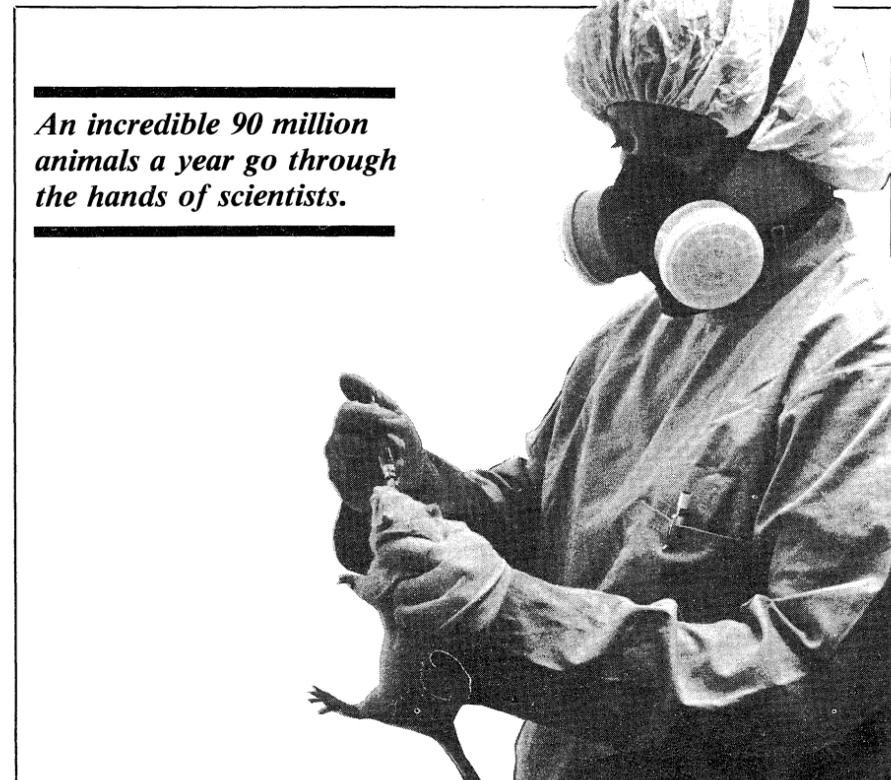
These instances of alternatives being used indicate that much more

can be done in this area. Developing new techniques, however, costs money and requires a commitment which the scientific community has up until now been reluctant to assume. Several pieces of legislation aimed at providing for the development of alternatives have been introduced in the U.S. House of Representatives. HSUS supports such legislation and is working for its passage. In addition, we are developing ties with the scientific community through participation in seminars, conferences, and committees on animal use in experimentation. We use our influence within the scientific community to propose and promote the development of alternatives to animal use.

## Painful Experiments

The other major area of animal use is in basic and applied research. This is the type of experimentation that might result in new surgical techniques or the development of knowledge leading to cures for life-threatening diseases. It is also an area where much can be done immediately to protect animals.

First of all, we believe many of these experiments are performed



**An incredible 90 million animals a year go through the hands of scientists.**

# Success of the Draize campaign

Revlon's announcement of a \$750,000 grant to search for alternatives to the Draize is only one milestone in the campaign to bring an end to this painful procedure. As part of a coalition of more than 400 national and local groups, HSUS launched a full-scale effort last year to prod cosmetics companies to find a non-animal alternative to the Draize, and to convince government agencies to change regulations and recommendations that promote the test.

Several important successes followed. First, the Consumer Product Safety Commission (CPSC) and the Environmental Protection Agency (EPA) instituted in-house moratoriums on use of the Draize while reviewing the test. Their review resulted in new, more humane testing guidelines such as using one rabbit instead of six, lower dosages of the tested substance, and permitting the use of painkillers. The Food and Drug Administration will also implement these guidelines.

Further, we recently received a letter from EPA's Office of Pesticides and Toxic Substances stating that as a result of a meeting with HSUS' Draize campaign coordinator Pat Clagett, EPA will "establish the search for alternative test methods to the Draize as a research priority for the coming year."

These advances, along with Revlon's funding of alternatives research and the establishment of another fund for the same purpose by the Cosmetic, Toiletry and Fragrance Association, represent real progress in this campaign. In addition, Representative Andy Jacobs (D-IN) and Senator David Durenberger (R-MN) have introduced resolutions in Congress calling on federal agencies to eliminate the Draize test.

We are continuing to wage war against the Draize. Although it is only one procedure among hundreds performed on animals in laboratories that cause great suffering, a victory here will give us strength to widen the attack on painful testing and experimentation.

*Shortly after HSUS ran this large ad in the Washington Post, the FDA, CPSC and EPA announced new, more humane guidelines for the Draize test that will reduce animal suffering.*

**The FDA and CPSC should outlaw this agonizing test. Instead they require it.**

In 1944, a new product safety test was introduced. Rabbits were locked into cramped wooden enclosures to sniff their heads away. Chemical substances were poured directly into their eyes, with no anesthesia to ease the pain. And in this often agonizing act, the eyes of thousands of rabbits were slowly, systematically, "scientifically" overused and ended.

Today, there is a procedure in America, this same procedure—the Draize test—is required by the Food and Drug Administration (FDA) and Consumer Product Safety Commission (CPSC) to determine whether household and beauty products may be harmful to our eyes.

**The Draize test is inhumane.**

In 1971, two American toxicologists conducted a study and made a survey to see exactly how accurate the Draize test was. The result? The Draize test proved crude and unreliable, primarily because it depends on subjective human judgment. And even though these findings were disseminated in a follow-up study by the FDA, the agency continues to recommend the use of Draize testing.

**Alternatives are humane.**

Today, in other testing situations, new cell culture systems have been developed that don't involve animals. They're faster, cheaper, and far more accurate.

If you think it's time for government agencies to take action, no one wants to use products that haven't been tested. But why limit that testing to live animal pain and suffering?

Already, the Environmental Protection Agency (EPA) is working toward the development of a better test.

If you think it's time for CPSC and FDA officials to join this effort for better, more humane eyes, here's what you can do:

Write to the Consumer Product Safety Commission and Food and Drug Administration urging them to stop drafting and start searching for ways to stop the Draize test. Use one of the people to contact: Stuart Slater, Acting Chairman, Consumer Product Safety Commission, Washington, D.C. 20207; Mark Northington, General Counsel, Food and Drug Administration, Rockville, MD 20857.

Another effective step you can take is contacting Members of Congress to ask for their support of legislation that will compel federal agencies and industries to develop alternatives.

And remember to send in our coupon for more information about what you can do to help.

The problem is painfully real. And the Draize is more than 30 years overdue.

**Here's what you can do to help:**

Include these letters to your constituents or the Human Society of the United States in the next issue of your newsletter.

Please do not return this coupon to the Human Society of the United States.

Name \_\_\_\_\_

Address \_\_\_\_\_

City \_\_\_\_\_ State \_\_\_\_\_ Zip \_\_\_\_\_

**The Humane Society of the United States**  
1001 16th St., N.W., Washington, D.C. 20036

without justification, or any real cause to believe they will yield any significant or useful information for the betterment or protection of human or animal lives. Secondly, even those experiments that could yield such results may be performed with little or no thought given to the ways in which the animals can be protected from unnecessary pain and suffering.

Examples of the first problem—badly conceived experiments—abound. Several of them involve use of the Noble-Collip drum, a torture device invented almost forty years ago. Its purpose is to produce traumatic shock in an animal. It is a

metal revolving drum in which an animal is placed, then spun at a rate of about forty turns per minute. The animal is subjected to two falls for each revolution of the drum. To prevent it from trying to break its falls, the animal's paws are usually taped together. A standard initial "drumming" consisted of 360 revolutions, or 720 falls. Typical injuries received are teeth broken or knocked out, bruising of the head and paws, internal hemorrhages, and the later appearance of ulcers in the stomach and intestines.

The quality of information that can be gleaned from battering a rat in the drum is certainly question-

able. The terrific amount of pain the animal must endure, since anesthetics are often not given due to their supposed interference with test results, cannot be justified in this case. Many scientists, themselves, have spoken out against use of the Noble-Collip drum, including the distinguished British medical journal, *The Lancet*, which called use of the drum "shocking to a normal human conscience." Though most scientists have now rejected the drum, it can still be found in use.

The second problem, ways in which animals can be protected from unnecessary pain and suffering, means insisting on the use of

# What you can do...

HSUS has launched a major effort to end animal suffering in the laboratory by promoting the development of alternatives and tighter controls on painful experiments. We have initiated the formation of a Council for Alternatives and Laboratory Animal Welfare, composed of several major animal welfare organizations, to address these issues. In Congress we are working for legislation that would provide research funding for alternatives and more closely regulate experimentation likely to cause pain or suffering.

We have recently employed a full-time staff member, Mark Solomon, to work with federal agencies, monitoring their activities and promoting sound and justified regulation providing more protection for laboratory animals.

Through two staff scientists, Dr. Michael Fox and Dr. Andrew Rowan, The HSUS is able to communicate with research and testing scientists on their own ground, persuading them to devote more time and effort to the development of alternatives to animal use.

Your support is instrumental to achieving and protecting the rights of millions of laboratory animals. There are several ways you can help in this effort:

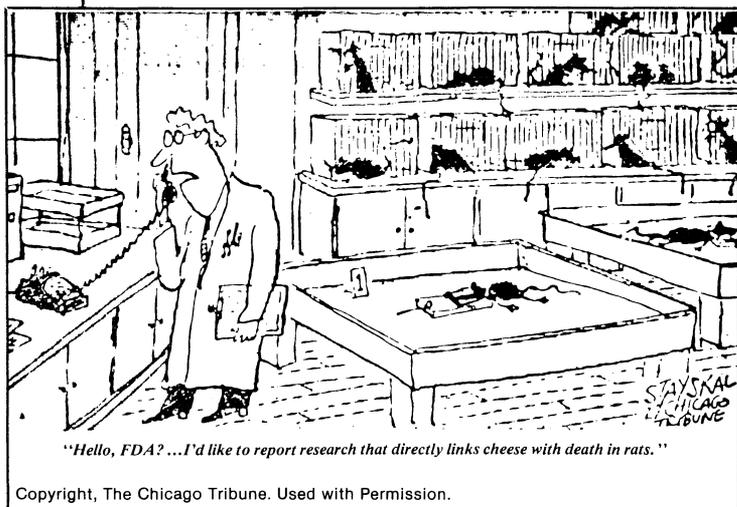
- Use the enclosed postcards to inform your Senators of your feelings about laboratory animals. Send the same message to your representative by postcard or letter. Your representative can be addressed in Washington D.C. at zip code 20215. Help make animal alternatives a priority issue in the 97th Congress!

- Avoid using cosmetics tested on animals, and let the companies know you want the Draize eliminated. HSUS will send you a list of some of the larger companies that routinely use the Draize so you can make your views known. Write them and ask them to follow Revlon's lead by committing money and resources via the CTFA fund to the development and use of alternatives to animal tests they currently use.

- If you belong to a local animal welfare organization, make sure it is part of the Draize coalition. If it is not, send us the name and address and we will invite the organization to join. The strength of hundreds of humane groups banded together in one cause has been a decisive factor in this campaign.

## Help us continue the battle

**Your contribution of \$10, \$25, or more will help us continue working to protect laboratory animals. The cause is gathering momentum and more and more scientists, government officials, and legislators are seeing it our way—the animal's way. We can't stop now! Send your tax-deductible contribution today. Join with us in this vital work!**



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anesthetics in every case where it cannot be proven that they would interfere with test results, and euthanasia by an acceptable, painless method, when the test is finished.

The HSUS is concerned with painful experiments on animals, and is working for controls which will reduce the suffering inflicted, and reduce the number of such experiments.

An important aspect of this problem is the lack of jurisdiction of the Animal Welfare Act. The Act regulates care, feeding, and housing of lab animals, but it expressly forbids the Department of Agriculture (the

agency which enforces the Act) from interfering with any experiment, no matter how cruel or painful it may be.

Last year, federal legislation was introduced by Congresswoman Pat Schroeder (D-CO) to deal with this problem by giving the USDA some oversight authority for actual experimentation. The bill would have amended the Animal Welfare Act to create animal care committees in all registered facilities using lab animals. These committees would be composed of no fewer than five members, knowledgeable in and

concerned for the welfare of animals. This group would not only oversee the proper care and housing of all the facility's animals, but would place a tight rein on all projects likely to cause pain, requiring adequate use of painkillers and proper euthanasia. Although no action was taken on the bill last year, a similar bill will be introduced in 1981. Until alternatives can be implemented, we believe this bill is the quickest way to bring a new measure of protection to laboratory animals. HSUS is working aggressively with several legislators to promote its passage.



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