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 USDA-APHIS-VS
 Sanitary International Standards Team
 Riverdale, MD

Dear Drs. David and Beasley:

The AVMA appreciates the opportunity to provide comments on the following report extracted from the March 2008 meeting of the Terrestrial Animal Health Standards Commission: a proposed Appendix to the Terrestrial Animal Health Code (TAHC), currently under development as **ANNEX—OIE GUIDELINES ON RESEARCH ANIMAL WELFARE**. As requested, our responses are formulated for each section of the reports as suggested revised language and comments/rationale for the change. When language revision is suggested, recommended deletions are ~~struck through~~, recommended additions are underlined.

Title

We suggest the title be amended to **Appendix—OIE Guidelines for Animals Used in Research, Testing and Teaching** to better describe the range of activities covered by the document.

Preamble 1

Paragraph two, sentence two—Suggest revision as follows: “As stated in the OIE Guiding Principles, such use makes a major contribution to the well being of people (and animals).” Rationale—Because veterinary medicine has been significantly advanced through biomedical research, and because the recognition of same is important for acceptance of the use of animals in research, acknowledgement of the benefits of such research to animals should not be treated as a parenthetical thought.

Paragraph two, sentence three—Suggest revision as follows: “The OIE also recognizes the need for humane treatment of status of animals as sentient animals, beings and the OIE Guiding Principles for animal welfare emphasise the importance of the Three Rs of Russell and Burch.” Rationale—Further justification is required for the statement that the OIE recognizes all animals as sentient. Although it appears the OIE has recognized the need for humane treatment of sentient animals via the adoption of its Guiding Principles (as found in the Introduction to the Guidelines for Animal Welfare [Appendix 3.7.1]) and 2007 Resolution XIV, criteria for determining sentience and the applicability of those criteria to specific animal species have not been addressed. We believe such criteria must be clear and accepted by the Members of the OIE before such a generalized and impactful statement is made.

Paragraph four, sentence one—Suggest revision as follows: “The OIE recognizes the central role played by veterinarians not only for their training and specialist skills but also as a member of a team including scientists and animal care technicians.” Rationale—The AVMA and several other prominent national and regional veterinary professional nongovernmental organizations, as well as many governmental authorities regulating the practice of veterinary medicine, recognize specific criteria for the certification of veterinarians as ‘specialists’ and follow guidelines and protocols for identification of these individuals. Recognition as a ‘specialist’ typically involves advanced training and examination beyond that required for general competence as a veterinarian. Although the guidelines later suggest (see II. Assurance of Training and Competency) that attending veterinarians should have knowledge of and experience in the species used and a working knowledge of research methods, they do not require certification as a ‘specialist.’ Use of the modifier ‘special,’ rather than ‘specialist’ thereby seems more appropriate in this context.

Scope

Paragraph one, sentence three—Appears to be incomplete and reads as: “These recommendations are directed to:”? Rationale—No information is provided as to whom the recommendations are directed. The text that follows instead addresses species coverage and development of a regulatory framework.

Paragraph two, sentence one—The referenced ‘AHAW Report’ is not fully identified, nor is it appropriately cited. Rationale—We assume the phrase ‘AHAW Report’ refers to a report prepared by the EFSA Scientific Panel on Animal Health and Welfare, but the name of the report is not specified and no information is provided that would allow a person reviewing the guidelines to easily obtain a copy of this report.

Paragraph four—This paragraph appears to provide historical and contextual information, as opposed to guidance. We therefore recommend that this be deleted from the final guideline document. Similar information has been provided in published reports of OIE activities, so those may be a more appropriate alternate venue for these comments?

Preamble 2

General comment—This is the second instance of a “preamble” in the document. Perhaps the information in Preamble 2 might be combined with the information in Preamble 1 to create a single, more complete preamble for the document? An appropriate place for insertion and combination may be after paragraph two.

Paragraph two, sentence one—Suggest revisions as follows: “Most scientists and ~~governments~~members of the public agree that the use of animals in science~~testing~~ should cause as little pain and/or distress to animals as possible, and ~~those that~~ animals ~~tests~~ should only be used~~performed~~ when ~~re~~ necessary.” Rationale—Because governments are public service entities, their actions are, in general, guided by public interests and the protection of those interests. For this reason, it may be more appropriate and encompassing to suggest the philosophical agreement of the community, rather than simply agreement of the authorities? We have also suggested use of the phrase ‘in science,’ rather than ‘in testing,’ to better accommodate the range of activities covered by the guidelines. The rest of the changes are editorial.

Paragraph two, sentence two—Because this is not the first mention of the Three Rs (they first appear on page one in Preamble 1 of the document), we believe the web link provided should be appropriately formatted as a citation and attached to the first mention. Also the following editorial revision is suggested to achieve consistency with the use of terms in the rest of the document: “The three Rs of Russell and Burch are guiding principles for the use of animals in research, testing and ~~training~~teaching.”

Paragraph two, bullet points—Suggest revisions as follows: “Reduction, which refers to methods that enable researchers to obtain comparable levels of information from fewer animals or to obtain more information from the same number of animals. Replacement, which refers to the use of non-animal methods over animal methods, or a lower order species, whenever it is possible to achieve the same scientific aim. Refinement, which refers to methods that prevent, alleviate or minimize known and potential pain and/or distress and enhance animal welfare for the animals ~~still~~ used.” Rationale—‘Which’ has been inserted to link the bullet points to the introductory phrase ‘They comprise:’. With respect to bullet point three (i.e., refinement), in good laboratory practice, when methods of pain control are contemplated, both known and potential pain are considered. Inclusion of ‘still’ is unnecessary in bullet point three.

Paragraph three—Suggest revision as follows: “It is the responsibility of all ~~researchers~~scientists using animals to ensure that they give due regard to these principles in designing and implementing their research protocols.” Rationale—‘Scientists’ better generalizes responsibilities to the range of individuals responsible under the document.

Animal Care and Use Programme

Paragraph one, sentence one—Suggest revision as follows: “Each facility using live animals for research, testing and teaching should have an Animal Care and Use Committee (ACUC) that is responsible, at the institutional level, for ensuring compliance with government regulatory requirements for the use of live animals, as well as cells, tissues and organs derived from live animals. and, in particular, their welfare.” Rationale—According to paragraph two, sentence one of this section, it is possible that requirements may be established and verification performed by governmental agencies or by delegation of authority to nongovernmental organizations. Our suggested addition of ‘as well as cells, tissues and organs’ is in line with responsibilities suggested in paragraph one of the section on “Scope.” We recommend deleting, ‘and, in particular, their welfare’ because concern for this aspect of animal use is evident from the purpose of this document.

Paragraph two, sentence one—Suggest revision as follows: “The role of the Competent Authority is to implement a system (governmental or ~~other nongovernmental~~) of verification of compliance by institutions.” Rationale—This editorial change is recommended in keeping with references in other guidance documents to governmental and nongovernmental authorities.

Paragraph two, sentence two—Suggest revisions as follows: “This often involves a system of approval (such as review of individual projects and licensing or registration of institutions, ~~scientists, and projects~~) and compliance is assessed by a variety of methods.” Rationale—In most countries having a regulatory framework for assurance of good laboratory animal welfare, institutions may be licensed or registered, but individual projects and scientists (while their details and competence, respectively, are usually reviewed) may not be.

Paragraph three, sentence one—Suggestion revisions as follows: “Critical elements of the Animal Care and Use Programme (ACUP) should be included in regulatory language having adequate authority~~the subject of legislation~~ to empower the government to take appropriate action to ensure compliance with requirements.” Rationale—Multiple levels of regulatory authority exist in addition to statute and different levels may be appropriate to codify different elements of the ACUP.

Paragraph three, sentence three—Suggested revisions as follows: “Likewise, a requirement for keeping records on animal use as appropriate to the institution, project protocol and species should be

included.” Rationale—Complexity of project (specifically degree of welfare risk) and species are variables, in addition to institution, that will affect what records are appropriate to demonstrate compliance with regulations.

I. Animal Care and Use Committee (ACUC)

a) Roles and Responsibilities; i) Project Proposal Review; Review; bullet five “assignment of a severity class”—Clarification as to what is to be assigned a ‘severity class’ is needed; one assumes this may relate to degree of pain and/or distress, but this is not stated.

a) Roles and Responsibilities; i) Project Proposal Review; Review; bullet six—Suggested revisions as follows: “an assessment of any health and safety risks for animals and personnel” Rationale—Risks to both animal health and welfare and occupational health and safety should be considered when evaluating the appropriateness of projects and protocols.

a) Roles and Responsibilities; i) Project Proposal Review; Review; bullet seven—Suggested revisions as follows: “~~an assessment of the~~ harm-benefit analysis, and” Rationale—Editorial suggestion.

a) Roles and Responsibilities; i) Project Proposal Review, Review;—In addition to the items currently listed, we suggest some consideration be given to review of any feed and water restrictions imposed. We recognize this may be intended to be covered under “consideration of the husbandry and care of the species to be used,” nevertheless we believe it is a sufficiently important point to be sure that is the case.

a) Roles and Responsibilities; iii) ACUP Review; The ACUC should be responsible for review of the overall ACUP including; bullet five—Suggested revision as follows: “sourcing and disposal of animals;” Rationale—Both the source and ultimate disposition of animals need to be addressed to ensure animal welfare and scientific needs are satisfied.

a) Roles and Responsibilities; iii) ACUP Review; The ACUC should be responsible for review of the overall ACUP including; bullet seven—Suggested revision as follows: “collection of accurate statistics on the use of animals within the facility to meet government regulatory requirements” Rationale—We believe this is a more appropriate language choice, given that these requirements may be established via different processes (e.g., authority may be governmental or delegated to nongovernmental agencies).

II. Assurance of Training and Competency

Paragraph one, sentence one—Suggested revision as follows: “An essential component of the animal care and use program is the assurance that the personnel working with the animals are appropriately trained and qualified to work with the species used and to support the research, testing or teaching mission.” Rationale—Addition of ‘testing or teaching’ is to accommodate the range of activities covered by the document and ACUCs.

a) Scientists, sentence one—Suggested revision as follows: “Due to the specialized nature of ~~animal~~ research, testing and teaching that uses animals, focused training should be offered to supplement educational and experiential backgrounds of ~~scientists, researchers (including visiting scientists)~~ before initiating these ~~study activities~~.” Rationale—These changes are recommended to accommodate the range of activities covered by the document.

a) Scientists, sentence three—Suggested revision as follows: “Competency in performance of procedures related to ~~their~~the research, testing or teaching (e.g., surgery, anaesthesia, dosing, etc.) should be

verified.” Rationale—Again, these changes are recommended to accommodate the range of activities covered by the document. The other suggestion is editorial.

b) Veterinarians, sentence one—Suggested revisions as follows: “It is important that veterinarians working in an animal research, testing or teaching environment have veterinary medical knowledge and experience in the species used and they should have a working knowledge of research, testing or teaching methodology.” Rationale—The suggested revision is editorial. ‘Methodology’ means ‘the study of methods’; therefore, ‘methods’ is a more appropriate word choice. The addition of ‘testing or teaching’ is to accommodate the range of activities covered by the document and ACUCs.

d) Students, sentence one—Suggested revisions as follows: “Whenever possible, students should learn ~~about animal research~~ scientific principles using non-animal methods (e.g., videos, computer models; etc).” Rationale—Animal models are used to teach students principles in a variety of scientific fields, including but not limited to anatomy, physiology, and biochemistry/pharmacology. We believe the term ‘scientific principles’ is a more encompassing term for this type of education than ‘animal research.’ The other suggestion is editorial.

III. Provisions of Veterinary Care

Paragraph one, sentence one—Suggested revisions as follows: “Adequate veterinary care includes responsibility for the promotion and monitoring of an animal’s welfare before, during and after experimentation, ~~or testing, or teaching~~.” Rationale—Once again, the range of activities covered by the document needs to be addressed.

Paragraph one, sentence two—This statement is quite similar to a statement included in the definition adopted for ‘animal welfare’ during the May 2008 annual session of the OIE. Because an additional opportunity is being provided to comment on that definition and suggest revisions, we recommend that this sentence be made consistent with any revisions to that definition that may be adopted.

c) Advice on zoonotic risks and notifiable diseases—Suggested revision as follows: “The use of some species of ~~research~~ animals poses a risk of the transmission of zoonotic disease (e.g., nonhuman primates).” Rationale—We recommend deletion of ‘research’ to generalize the statement to the range of activities covered by the document.

f) Advice on humane endpoints and euthanasia—Suggest addition to end of paragraph as follows: “Humane endpoints should also be established for any teaching activities for which these may be deemed to be necessary.” Rationale—We believe this inclusion is necessary to extend guidance to the range of activities covered by the document.

Concluding paragraph, sentences one and two—Suggested revisions as follows: “The veterinarian has a key role in ensuring that humane endpoints, as approved by the ACUC, are followed during the course of the study or teaching exercise. It is essential that the veterinarian have the responsibility and authority to ensure euthanasia is administered as required to relieve pain and distress in ~~research~~ animals used for scientific purposes, provided such intervention is not specifically precluded in protocols reviewed and approved by the ACUC.” Rationale—Revisions are recommended to extend guidance to the range of activities covered by the document.

IV. Physical Facility and Environmental Conditions

Sentence two—Suggested revisions as follows: “The design and size of an animal facility depend on the scope of institutional ~~research~~ activities, the animals to be housed, the physical relationship to the rest of

the institution, and the geographic location.” Rationale—Recommended change to accommodate activities covered by the document in addition to research.

Sentence six—Suggested revisions as follows: “For many species (e.g., rodents), environmental conditions should be controllable to minimize physiological changes in the animals ~~due to the stress of accommodating to~~ caused by stressors, such as changing temperature, humidity, light, and noise, etc.”

V. Husbandry

General comment—There seems to be an overemphasis on behavior in this section with insufficient attention paid to equally critical issues such as health, disease, and injury.

First paragraph, sentence one—Suggested revision as follows: “High standards of care and accommodation enhance the welfare of the animals used and ~~promote~~ ensure the scientific validity of ~~animal~~ research, testing, and teaching that uses animals.” Rationale—We believe that scientific validity in research, testing and teaching is only protected when animals are used appropriately; therefore, this is not a question of ‘promoting’ scientific validity, it is a question of ‘ensuring’ it. In addition, the document is scoped to animal research, testing, and teaching, not simply research, and (once again) all components should be consistently mentioned throughout the document.

a) Acclimatisation, sentence one—Suggested revisions as follows: “Regardless of the duration of quarantine, newly received animals should be given a period for physiological, and psychological, ~~and biochemical~~ stabilization before their use.” Rationale—Biochemical stabilization is necessary for physiological stabilization, therefore inclusion of biochemical stabilization seems redundant.

b) Enrichment, sentences two and three—Suggested revisions as follows: “One way to achieve this is to enrich the structural and social environment of the ~~research~~ animals, and to provide opportunities for physical and cognitive activity. Such provision should not compromise the health and safety of the animals or people or interfere with the ~~research~~ project goals.” Rationale—Once again we are generalizing to the range of activities covered by the document.

c) Normal Behavior—We suggest deleting point c) in its entirety because its salient points have been covered in point b).

VI. Source of animals

Sentence one—Suggested revisions as follows: “Animals to be used for research, testing and teaching should be of high quality to ensure ~~reproducibility~~ the validity of research, ~~and testing and teaching~~ accordingly.” Rationale—We believe ‘validity’ better encompasses the importance of appropriate animal model selection to usefulness and quality of research, as well as to reproducibility.

a) Legal and humane procurement, sentence one—Suggested revisions as follows: “~~The acquisition of~~ Animals should ~~must~~ be ~~made~~ legally acquired.” Rationale—We believe that legal acquisition of animals is a ‘must,’ rather than a ‘should.’

a) Legal and humane procurement, sentence two—Suggested revisions as follows: “It is preferable that animals are purchased from recognized ~~institutions~~ sources producing or securing high quality ~~research~~ animals.” Rationale—Sources of quality animals for research, testing or teaching may be institutions; however, these animals may also be provided by other types of dealers (e.g., random-source dealers, animal shelters [especially anatomic specimens]), who may or may not actually produce these animals, so

we recommend the more generic ‘sources’ replace the more specific ‘institutions’ and that ‘and securing’ be added to accommodate those dealers who do not actually produce the animals they supply.

a) Legal and humane procurement, sentence three—Suggested revisions as follows: “The use of non-purpose-bred animals, including farm animals, non-traditional breeds and species and animals acquired from random sources or captured in the wild, is sometimes necessary to achieve study goals.”

Rationale—We recommend the addition of ‘acquired from random sources’ to encompass the range of animals that might be used for research, testing or education. Animals ‘acquired from random sources’ might include animals received from random-source dealers, as well as client-owned animals.

b) Animal health status, sentence two—Suggested revision as follows: “Health status of animals should be known before initiating research projects.” Rationale—Change suggested to accommodate scope of document.

c) Genetically altered animals, sentence one—Suggested revisions as follows: “If genetically altered animals have to be used, such use should be conducted in accord with relevant regulatory guidance ~~legislation should be observed.~~” Rationale—Use of ‘regulatory guidance,’ rather than ‘legislation,’ provides more flexibility for member countries by recognizing that the details of such use might be encompassed in implementing regulations, rather than a statute. It also accommodates countries that for reasons of practicality or best use of available resources may relegate some implementation or enforcement authority to nongovernmental agencies.

c) Genetically altered animals, sentence two—Suggested revisions as follows: “Records, including compliance with of biocontainment requirements, genetic information, and individual identification, should be kept and communicated between the provider and recipient.” Rationale—Editorial recommendation.

e) Reuse of animals—This section is incomplete as per the notation “JM to provide further advice.”

f) Transport, importation and exportation—Suggested revisions as follows: “Animals should be transported under conditions that are appropriate to their physiological and behavioral needs, and microbiologic pathogen status, with care to ensure appropriate containment (see OIE Appendix on transport of animals).” Rationale—We believe use of ‘pathogen’ is more specific to the concerns to be addressed.

g) Biosecurity risks, sentence one—Suggested revisions as follows: “To reduce biosecurity risks related to ~~research~~ animals, the microbiological pathogen status of ~~research~~ animals should be confirmed and appropriate biocontainment and bioexclusion should be provided practiced.” Rationale—We recommend deletion of ‘research’ so that the statement is generalized to the uses covered by the document (i.e., research, testing and teaching). ‘Pathogen’ rather than ‘microbiological’ is suggested for the reasons given in point f) above. ‘Practiced’ is a recommended editorial change.

General comment—Points f) and g) address similar issues and probably could be combined into a single point.

VII. Occupational Health and Safety (To be developed –scratch, biting, kicking, physical, chemical and radiation risks Study related risk)

General comment—The very early draft stage of this section does not lend itself well to substantive comment.

a) Infectious diseases including zoonotic diseases, sentence one—Suggested revision as follows: “To protect the staff ~~in research settings~~, infectious diseases including zoonotic diseases should be identified.” Rationale—Change suggested to expand the statement to the range of activities covered by the document.

b) Allergies—Suggested revision as follows: “Risks can be minimized by ~~the occupational health and safety programme, including~~ adequate facility ventilation, biocontainment, and use of appropriate protective equipment and health protection measures (e.g., mask, eye protection, gown, gloves).

As always, we appreciate the opportunity to provide input. Should you have questions or require additional information, please do not hesitate to contact me. I may be reached at the phone number as provided in the letterhead (ext. 6618), or you may contact me on my direct line at 847-285-6618 or via e-mail at ggolab@avma.org.

Sincerely,

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Gail C. Golab, PhD, DVM, MACVSc (Animal Welfare)
Director, Animal Welfare Division