TOXBANK Public Forum
26 – 27 October 2015,
Wellcome Collection / London, United Kingdom

An Ethical Perspective

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About HSI and our affiliates

Research and Toxicology Department actively engaged with:

- The Be Cruelty-Free campaign: ending cosmetics testing world-wide
- OECD Test Guidelines, Chemicals & AOP development programs
- EU Competent Authorities for REACH and Classification and Labelling
- European Chemicals Agency Member State Committee, Endocrine Disruptors Expert Group, etc.
- USTR Trade and Environment Policy Committee & TTIP negotiations
- NTP Scientific Advisory Committee on Alternative Toxicological Methods
- European Union Reference Laboratory for Alternatives (EURL-ECVAM)
- European Partnership for Alternative Approaches to Animal Testing
- International Cooperation on Cosmetics Regulation & national laws
- International Conference on Harmonization (via ICAPPP)
- Human Toxicology Project Consortium
- Implementation of EU Directive 2010/63
- Replacing animals used in biomedical research
- ... and many others
Statistics on Animal Use UK 2014

- 3.87 million procedures were completed;
- 8% (150 thousand) were assessed as severe;
- Tox studies frequently require death as an endpoint.

Severe classification (EU categories) includes:

(i) use of metabolic cages involving severe restriction of movement over a prolonged period;
(j) inescapable electric shock (e.g. to produce learned helplessness);
(k) complete isolation for prolonged periods of social species e.g. dogs and non-human primates;
(l) immobilisation stress to induce gastric ulcers or cardiac failure in rats;
(m) forced swim or exercise tests with exhaustion as the end-point.
Public Opinion: IPSOS/MORI Survey

Attitudes to animal research in 2014

Commissioned by the Department for Business, Innovation & Skills (BIS):

• 68% agree acceptable ‘so long as it is for medical research purposes and there is no alternative’;
• 37% endorse use of animals for all types of research;
• 69% can accept such research ‘as long as there is no unnecessary suffering to the animals’;
• Almost a quarter of the public (23%) believe that the UK Government should ban the use of animals for any form of research.
Ethical approaches: 3Rs at EU Level

- Treaty for the Functioning of the European Union, 2009
- Article 13: animals defined as sentient beings
- Animal welfare a “European Value”
- Animal Welfare Action Plan (broad strategy)
- Directive 2010/63: 3Rs legal requirement
- Product safety laws: comply/complement
- 2015 Citizens’ Initiative “Stop Vivisection”
- 2016 EU Commission conference
- Questioning validity, evaluating plans
EU Directive 2010/63 EU: 3Rs Requirements + Drivers

1) 3Rs implementation
   • Required by law
     • Includes breeders, suppliers and users
     • Covers housing, procedures, euthanasia

2) 3Rs innovation
   • European Union Reference Laboratory (EURL includes ECVAM)
     - Extended remit from reg. tox to biomedical
     - Network of contact points

Member State contributions
   - Strategy setting, national and EU
   - Promote development and uptake
EU product safety legislation: supporting 3Rs

1) 2006 ‘REACH’ chemicals regulation
   - lists ‘promotion of alternative methods for assessment of hazards’ as one of three main objectives
   - requires data-sharing, one substance one registration (OSOR)
   - Requires updates to test requirements
   - Requires updates to list of accepted tests

2) 2003 cosmetics directive “7th Amendment”
   - Phase out animal testing, phase in marketing ban (complete 2009 + 2013)

4) 2012 biocides reg. and pesticide data requirements
   - 3Rs best practice, data sharing
Drug development without animals?

- 95% new drugs deemed safe and effective in animal studies fail at clinical trial stage.
- Efficacy testing under growing scrutiny:
  - Asthma: two new classes of drugs in 50 years;
  - MS: 99% candidate medicines failed;
  - AD: no progress . . .
UK “Delivery Plan”: Goals and Problems

2010 UK “Coalition Agreement”: included promise to reduce animal use identified problems:

• “Exporting” tests to overseas countries where welfare standards may be lower;
• Need for as yet undiscovered technologies;
• Conservatism and a risk-averse approach to adopting change;
• Conservatism on the part of journal editors and peer-review panels to accept publications based on non-animal techniques in lieu of the “traditional” animal models;
• Global market can mean repeat testing using animal method.

Opportunity:
• Recognition of significant economic benefits associated with new technologies.
Stepping back: the humanitarian tradition

Henry Salt (1892):

“We have to decide, not whether the practice of fox-hunting, for example, is more, or less, cruel than vivisection, but whether all practices which inflict unnecessary pain on sentient beings are not incompatible with the higher instincts of humanity.”

Leo Tolstoy:

“As long as there are slaughterhouses there will be battlefields.”
Conclusion

- Changing attitudes, new technologies;
- Changing relationships: environment; animals, each other;
- Political change reflecting public opinion – where next?
Thank you for your attention

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