

The response reproduced below was submitted to the consultation held by the Nuffield Council on Bioethics on the ethics of research involving animals during October-December 2003. The views expressed are solely those of the respondent(s) and not those of the Council.

Anonymous #29

1. Background : the use of animals in research

██████ believes that the use of animals in research is justifiable but with a number of caveats and comments, namely

- There is no in-vitro method that will yield the same result within a reasonable time frame
- While it may be convenient to carry out some research using rodents, there will always be a requirement to test drugs, vaccines and nutrients on the target species
- The animals used in veterinary research are of course sentient beings and a degree of suffering may well occur, depending on the procedure. No degree of pain or suffering can be considered as “acceptable” as there should be an ever-present awareness of the need to reduce and hopefully eliminate it
- We are required to work within the Animals (Scientific Procedures) Acts 1986. We believe that the workings of the Act and its operation through HO inspectors is sound, and currently offers a number of safeguards for the animals we use.
- Most of the population of the UK eat protein from animals, often reared under extreme and unnatural conditions; the use of animals in research in contrast is relatively small.

2. Genetically modified animals

██████ believes that the current use of GM animals only represents a natural evolution of science. Genetic modification of a food or show animal has been on-going for hundreds of years. Current GM techniques are only a logical advancement of that process and indeed will in the future be part of a more exact science. GM animals are therefore not unnatural but part of an evolutionary process.

If the use of GM animals accelerates the provision of cures or preventative strategies for serious, debilitating or life-threatening diseases, whether they be for animals or man, given the proviso of the need to avoid any suffering in those animals, then it is justifiable.

However, the creation of animals to suffer on a long-term basis despite the value of the work must be questioned. It is essential to limit the time that such animals can be used without termination.

The use of GM animals for xeno-transplantation is now – and will continue to be – controversial. However, we believe that the use of animals in this way is little different from those used for food. Nevertheless “harvesting” of major organs should immediately be followed by euthanasia without consciousness being regained.

It will always be difficult to reconcile those with extreme views on the use of animals as commodities. It is a fact that man exploits a multitude of animals. The emphasis should sensibly be on welfare of those animals used in research, GM or otherwise, with strong reference to the 3Rs rather than a pointless campaign to change the world.

3. Alternatives

██████████ believes that there will be a constant need to find alternative methods. Core funding from government sources is essential and animal right's groups should be encouraged to subscribe financially to this cause. Few would argue that alternative methods to primate research should be a priority on the human side. It is difficult to believe that, given adequate funding, alternative methods for all types of research, would not to a degree be found.

Sharing of information must be encouraged but ██████████ has found little problem in this area and has active collaboration in many parts of the world. Regrettably we need to be somewhat circumspect in reporting on the use of animals due to animal rights activities which can persist years after the study. It is possible that such circumspection acts against full and easy transference of knowledge.

While actively involved in the development of in-vitro techniques, it is difficult to foresee the complete elimination of animal tests. For instance, ██████████ is involved in the licensing of equine vaccines through challenge tests in live horses. This is a mandatory requirement.

4. Ethical issues

It is difficult for ██████████ to define the moral status of animals but it is certainly convenient to grade status from insect life through to the great apes. Our own work with animals is almost, although not completely, aimed at elimination or reduction of disease within the animal population. If indeed there is a spin-off to improve knowledge in human disease, this is viewed as a bonus. We believe that most researchers using animals are more comfortable using rodents than the larger mammals.

We believe the concepts of pain and suffering etc can be extended to animals but to a lesser degree related to their stage of evolution. Interestingly, 40 years ago the veterinary profession used little post-operative analgesia, content to say that animals did not experience the same human feelings of pain. Nowadays, pre-medication or post-operative analgesia is the norm and there is also growing awareness of psychological pain, although it is believed to be more of a problem with the more domesticated animals.

More research on animal perception is eminently worthwhile but should aim to be non-invasive.

As previously noted, we do not believe there is a real difference between a research animal, one that is ridden, exhibited in a zoo, or eaten. The difference is the degree of exploitation. Suffering can never be justified, nor can acceptance of it, and use of such

words can be damaging. Naturally occurring disease results inevitably in a degree of suffering and any study aims to create a reduction or elimination of it. Experimental protocols should aim to produce only the minimum manifestation of the disease before the putative treatment is applied. Full challenge tests must follow, but hopefully unpleasant signs in control animals can be rapidly treated and eliminated.

Justification for experimental work must be linked to the greater good that can be applied to the species as a whole. Full attention must be paid to the environment of captive animals of all kinds and consideration given to re-homing those species that are normally taken as domesticated.

5. The regulations

The UK does indeed have the strictest controls over research involving animals. However, given the diversity of species involved, much will depend on individual inspectors' assessments of conditions. There is clearly a case for regulation to be applied to each species of laboratory animal, together with detail and photographs of the ideal situations or facilities. There is certainly a case for welfare assessments before, during and after a project. With reference to GM animals, licences to breed should be required and inspectors given sufficient latitude with the regulations to make a proper assessment, geared to the new breed/type of animal produced by GM.

We consider the current provisions to be appropriate and believe that results should be published.

There is little doubt that stringent regulations, however laudable, add to the cost of any project and there is evidence to show that research can be impeded, researchers may leave for pastures new and companies may take their testing elsewhere.

6. Providing information to the public

The public require to know not just the numbers of animals used annually. In addition the public should be made aware of:-

- The numbers relative to the numbers of animals used for food, sport, entertainment, etc
- The workings of the Act
- The requirement for licences and inspections
- The penalties for infringement
- The role of inspectors
- The value of the work to both animal and human populations
- The value of the ethical review process

Labelling of products that were developed using research with animals is problematic. Some companies proudly deny using animals to develop their products but are utilizing expertise and information from others that have used animals. Nevertheless it is an avenue for education that should be considered.