This response was submitted using the online facility:

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QUESTIONS ANSWERED:
1. Background: the use of animals in research
ANSWER:
p.9: The first page presents figures in a way that is too obviously trying to convey the message that we have already greatly reduced the use of animals, that it is mainly mice and rats, and that we are breading many more of them for eating anyway. Whereas the factual information may be correct, it would be more appropriate as the beginning of a hopefully unbiased analysis to acknowledge that this is a large number, and that the widespread existence of one practice (eating animals) does not by itself legitimize the other (use of animals in research). - p. 11: Why do experiments that cause the death of an animal fall under the category unclassified? From the viewpoint of the individual animal, one would assume that such a procedure is a "severe" one? Or what exactly does "severity of procedure" refer to? - p. 12, last question: This question implies that there is an acceptable level of suffering. Why not formulate the question the other way around: What level of suffering do you consider acceptable..."; why independently from the potential benefits? Apart from that it is not easy to describe the level of suffering - what kind of language do you use, what do you refer to: the manifestation, the degree of pain, the type of suffering, the stimulus causing it?

4. Ethical issues
ANSWER:
- p. 19: If it is "very difficult to know how animals experience pain or suffering", on what basis do you make the distinction between "moderate" and "severe" procedures (cf. p. 11.) If we really do not know, maybe we should err on the side of being more restrictive? - p. 20, first question in grey box: I am not convinced the attribution of moral status is the right approach, in animal ethics or otherwise in ethics (cf. Biller-Andorno N: Can They Reason? Can They Talk? Can We Do Without Moral Price Tags in Animal Ethics? In: Gluck JP, DiPasquale T, and Orlans FB (eds.): Applied Ethics in Animal Research: Philosophy, Regulation, and Laboratory Applications. West Lafayette: Purdue University Press, 2001, S. 25-54.) What will such an attribution of moral status be based on - on beliefs, as the first subquestion implies? Please note that all the comments I submitted are personal statements and do not necessarily reflect the position of WHO on these matters.