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Representing over 100,000 biological and biomedical researchers.

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Federation of American Societies for Experimental Biology

April 14, 2011

Dr. Christian E. Newcomer

Executive Director

Association for Assessment and Accreditation of Laboratory Animal Care International

5283 Corporate Drive, Suite 203

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VIA EMAIL TO: accredit@aaalac.org

Dear Dr. Newcomer,

The Federation of American Societies for Experimental Biology (FASEB) appreciates the opportunity to comment on the Association for Assessment and Accreditation of Laboratory Animal Care International's (AAALAC's) proposed position statements related to the Institute for Laboratory Animal Research *Guide for the Care and Use of Laboratory Animals (Guide)*. FASEB is a coalition of 23 life science societies representing more than 100,000 biomedical researchers, many of whom are involved in the humane use of animal models in research and education.

FASEB strongly supports deferring to the professional judgment of animal care staff in developing performance based standards that provide the best welfare for laboratory animals. Performance based standards are guiding principles that, while describing a desired outcome, provide flexibility in achieving that outcome by granting discretion to those responsible for managing the animal care and use program. Flexibility is important for providing optimal care to laboratory animals and ensuring the integrity of scientific research as it allows researchers, veterinarians, and animal care staff to take into consideration information on the species, individual animal, and research goals that may impact animal care and use. FASEB encourages AAALAC to follow the suggestions in the *Guide* by emphasizing performance based standards and professional judgment during the inspection and accreditation process of an institution's animal research program. In addition to this overarching comment, we are providing specific comments on two of the six new position statements: Cage Space and Social Housing.

Cage Space Position Statement

At a minimum, AAALAC International expects accredited institutions to comply with all national or regional regulations, policies and guidelines, as well as conditions of funding. Additionally, AAALAC International considers performance standards paramount when evaluating cages or pens for housing animals used for research, testing or teaching. The [performance criteria](#) described in the ILAR

Guide, Ag Guide and ETS 123 are used by AAALAC in assessing the adequacy of cage or pen space available to the animal(s). In those countries where regulations or guidelines do not exist or mandate cage or pen dimensions, AAALAC International suggests institutions consider the ILAR Guide's space recommendations as a minimum while always recognizing that performance standards also must be met.

FASEB Comments

FASEB appreciates the importance of housing animals in cages appropriate for their physical, physiologic, and behavioral needs. In evaluating appropriate cage space for laboratory animals, we, again, strongly encourage AAALAC to place greater emphasis on performance standards rather than engineering standards in its accreditation practices. Engineering standards are prescriptive and provide limited flexibility for implementation.

FASEB is particularly concerned about the new cage size requirements for rabbits and rodents. The cage height for rabbits has been increased from 14 inches (1996 *Guide*) to 16 inches (2011 *Guide*). FASEB recommends maintaining the current rabbit cage sizes at 14 inches in height as defined in the 1996 *Guide* as opposed to the 16 inches in the 2011 *Guide* unless animals cannot make postural adjustments in the cages. In those cases, performance standards dictate that larger caging should be used. The current Animal Welfare Act standard is 14 inches in height. The rationale for increasing the height two inches is unclear, and it is uncertain whether this change would improve the quality of care for laboratory rabbits. In the absence of a clear rationale, congruency between National Institutes of Health (NIH) and United States Department of Agriculture (USDA) should be maintained when possible in order to reduce confusion and maintain efficient work-flow among researchers and institutions. In addition, imposing the new 16-inch standard will render current rabbit caging systems obsolete and will necessitate a significant expenditure of funds by research facilities to replace this caging. The resulting expense in both equipment and administrative costs is not balanced by improvements in animal welfare. FASEB, therefore, recommends that AAALAC base its accreditation standards on the 14-inch cage size.

In a change to the rat standards, the 2011 *Guide* now requires that when the weight of paired rats increases to a point that they no longer meet the engineering standards of the *Guide*, they must be separated or moved to a larger cage. Individually housing these animals would conflict with the position statement on "Social Housing," yet meeting the new engineering standards of the *Guide* would require a larger cage size, which is potentially problematic in terms of additional cost. Again, the fiscal constraints that institutions are under due to reduced federal and state support may make it difficult for institutions to implement all the changes immediately. It is important for AAALAC to provide clear guidance about what should be done in these cases.

In addition, the 2011 *Guide* spells out specific cage size requirements for female rodents plus their litters, as well as other breeding configurations. Implementing these changes would add huge costs and reduce breeding capacity for many institutions. Again, performance standards should be paramount when evaluating cage spacing requirements.

Social Housing Position Statement

Appropriate social interactions among members of the same species (conspecifics) are essential to normal development and well-being. An understanding of species-typical social behavior (e.g., natural social

composition, population density, ability to disperse, familiarity among the animals and social ranking) is key to successful social housing. Cage complexities and important resources (e.g., perches/shelves, visual barriers, refuges, food, water, shelter, litter boxes, enrichment devices) should be provided in such a way that they cannot be monopolized by dominant animals or elicit aggression between animals.

In general, social animals ~~must~~ **should** be housed in stable pairs or groups of compatible individuals, ~~and social housing will be considered by AAALAC International as the default method of housing~~ unless otherwise justified based on scientific necessity, social incompatibility resulting from inappropriate behavior, **pragmatic concerns, known incompatibility of adult animals of certain species**, or veterinary concerns regarding animal well-being. In these cases, single housing of social animals should be limited to the minimum period necessary, and where possible, visual, auditory, olfactory and tactile contact with compatible conspecifics should be provided. **In lieu of direct social housing, some individual animals may be allowed daily opportunities to interact with conspecifics under direct supervision. However, in the complete absence of contact with other animals, enrichment should be offered, such as safe and positive interaction with the animal care staff, as appropriate to the species of concern, and supplemental enrichment items or the addition of a companion animal in the room or housing area. The need for single housing An institution's social housing program** should be reviewed on a regular basis and approved by the IACUC (or comparable oversight body) and/or veterinarian.

FASEB Comments

The proposed position statement mandates that “social animals **must** be housed in stable pairs or groups of compatible individuals, and social housing will be considered by AAALAC as the default method of housing unless otherwise justified based on scientific necessity, social incompatibility resulting from inappropriate behavior, or veterinary concerns regarding animal well-being.” The 2011 *Guide* itself states that “social animals **should** be housed in stable pairs or groups unless they must be housed alone for experimental reasons or because of social incompatibility.” While both the 2011 *Guide* and AAALAC’s position statements have some caveats regarding social housing, the position statement is much more restrictive (“must” vs. “should”). We urge AAALAC to adopt the language in the *Guide* to limit confusion in interpretation and ensure that all relevant personnel, including AAALAC accreditors, are aware that there are circumstances under which social housing would not be appropriate or required. We also recommend that AAALAC modify the first sentence of the position statement such that social housing is not specified as the default method of housing and such that pragmatic concerns and social incompatibility of animals are specified as valid reasons not to house animals socially.

In evaluating appropriate social housing for laboratory animals, we strongly encourage AAALAC to place greater emphasis on performance standards rather than engineering standards as we stated in our comments regarding cage space. There are several pragmatic reasons why it may not be appropriate to socially house social animals: First, the 2011 *Guide* states that “animals may have to be introduced to each other over a period of time and should be monitored closely during this introductory period and thereafter to ensure compatibility.” However, such introductions may not be feasible for animals who are not housed in the vivarium for a long period. Second, logistical barriers may prevent social housing of animals in some situations. For instance, odd numbers of animals would leave one animal not pair-housed. Moreover, for scientific reasons, it is not always possible to house animals from multiple experiments and/or investigators in pairs. In order to ensure all animals are socially housed, more animals than necessary would be utilized, which is inconsistent with the goal of reducing the number of animals used for research. Third, in a change

to the rat standards, the 2011 *Guide* now requires that when the weight of paired rats increases to a point that they no longer meet the engineering standards of the 2011 *Guide*, they must be separated or moved to a larger cage. Individually housing these animals would conflict with this position statement, yet meeting the new engineering standards of the *Guide* would require larger cage size, which is potentially problematic in terms of additional cost. It is important for AAALAC to provide clear guidance about what should be done in these cases.

Other situations arise where it is difficult to socially house animals. Rabbits and non-human primates are notoriously difficult to house socially in adulthood. AAALAC's position statement should reflect the exceptions for such animals.

We also recommend that AAALAC add a sentence to the position statement stating that, "In lieu of direct social housing, some individual animals may be allowed daily opportunities to interact with conspecifics under direct supervision." Such "temporal social housing" is an appropriate form of social housing, especially for dogs and cats. Giving animals access to a common play area or allowing group exercise could provide the positive effects of socialization, and such an arrangement could be monitored by laboratory animal personnel.

FASEB recognizes that humane animal care and high-quality science go hand in hand, and we take humane care very seriously. FASEB also appreciates AAALAC's commitment to providing an interpretation of the *Guide* that ensures the optimal care and welfare for research animals and hopes that the AAALAC Board of Trustees is involved in the process of adopting these new position statements. We thank you for this opportunity to provide comments. If you have questions or need additional information, please do not hesitate to contact us.

Sincerely,

A handwritten signature in black ink, appearing to read "William T. Talman". The signature is fluid and cursive, with a long horizontal stroke at the end.

William T. Talman, MD
FASEB President