



Quality Life Through Research

Federation of American Societies for Experimental Biology

Member Societies

(in chronological order by date joined)

The American Physiological Society

American Society for Biochemistry
and Molecular Biology

American Society for Pharmacology
and Experimental Therapeutics

American Society for Investigative
Pathology

American Society for Nutrition

The American Association of
Immunologists

American Association of Anatomists

The Protein Society

Society for Developmental Biology

American Peptide Society

Association of Biomolecular
Resource Facilities

The American Society for Bone and
Mineral Research

American Society for Clinical
Investigation

Society for the Study of
Reproduction

Teratology Society

The Endocrine Society

The American Society of Human
Genetics

Environmental Mutagen Society

International Society for
Computational Biology

American College of Sports
Medicine

Biomedical Engineering Society

Genetics Society of America

American Federation for Medical
Research

The Histochemical Society

*Representing over 100,000
biological and biomedical
researchers.*

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July 7, 2011

Ad Hoc Committee to Review Principles
International Council on Laboratory Animal Science
Council for International Organizations of Medical Sciences

RE: Comments on International Guiding Principles for Biomedical Research
Involving Animals

VIA EMAIL TO: CIOMS@msu.edu

Dear Committee Co-Chairs,

Thank you for the opportunity to provide comments on the “2011 International Guiding Principles for Biomedical Research Involving Animals” drafted jointly by the International Council on Laboratory Animal Science and the Council for International Organizations of Medical Sciences. The Federation of American Societies for Experimental Biology (FASEB), which is the largest coalition of biomedical research associations in the United States, commends the authors of these updated principles for developing achievable and culturally sensitive guidelines that provide a solid foundation upon which countries can develop their animal research programs.

FASEB endorses the use of “should” in lieu of “must” in describing the actions the scientific community should take to ensure that research with vertebrate animals is conducted responsibly. The word “should” provides flexibility in an animal care and use program and defers to the professional judgment of animal care staff in developing standards. 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, local environment, individual animal, and research goals that may impact animal care and use.

However, we feel that some wording in principle number ten may be too prescriptive. The sentence, “It should promote a risk-benefit analysis for animal use, balancing the benefits derived from the research and/or educational activity with the potential for pain and/or distress experienced by the animal,” may cause unintentional burden in animal use programs. We agree that the risks to animals associated with a particular line of research should be reasonable in relation to the anticipated benefits. However, this is a judgment that often depends on prevailing

community standards and somewhat subjective determinations of a risk and benefit. The use of the word “analysis” is too technical and suggests that there is a single objective method for making these determinations. This implication may make it difficult for animal care and use committees to make a determination as to whether the anticipated benefits of a research project outweigh the risk, potentially slowing down or preventing the approval of important, humanely-crafted studies. We, therefore, recommend that the sentence state, “It should consider the goals of the research and/or education activity against potential animal welfare concerns, including pain and/or distress.”

Finally, we are pleased that the committee has identified vertebrate animals as the main focus of these principles. Consensus has not been reached within the animal care and use communities as to the appropriate standard of care for invertebrate species, and many countries do not currently regulate the use of invertebrates in research. Under these circumstances, developing internationally recognized guiding principles would be premature and impractical. Therefore, we believe the decision as to if and how to regulate invertebrates should be left to individual countries, which can make these determinations based on the standards set within their own communities.

FASEB strongly affirms the essential contribution of animals in improving the health of both humans and animals, and we take seriously the responsibility to provide for their proper care and humane treatment. We praise the authors for developing workable guidelines that facilitate the advancement of science while ensuring the utmost in animal welfare. If you have questions or need additional information, please do not hesitate to contact us.

Sincerely,

A handwritten signature in black ink that reads "Joseph C. LaManna". The signature is written in a cursive, flowing style.

Joseph C. LaManna, PhD
FASEB President