



FASEB

Federation of American Societies
for Experimental Biology

Representing Over 130,000 Researchers

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9650 Rockville Pike
Bethesda, MD 20814

June 8, 2018

The Honorable David Purdue
455 Russell Senate Office Building
United States Senate
Washington, DC 20510

Dear Senator Purdue:

The Federation of American Societies for Experimental Biology (FASEB) supports the inclusion of language in the Agriculture and Nutrition Act of 2018 (the Farm Bill) to amend §2146 of the Animal Welfare Act (AWA) to remove the requirement for annual United States Department of Agriculture (USDA) inspection of research facilities and move towards inspection frequency based on compliance history. Removal of the annual inspection requirement would still allow the USDA Secretary to inspect facilities at any time deemed necessary.

Similar language was included as one of the recommendations in [“Reforming Animal Research Regulations: Workshop Recommendations to Reduce Regulatory Burden,”](#) released in October 2017. In an effort to streamline regulations, FASEB collaborated with the Association of American Medical Colleges (AAMC) and the Council on Governmental Relations (COGR), with support from the National Association for Biomedical Research (NABR) to seek recommendations from stakeholders about how to improve the regulation of animal research.

AWA §2146 requires the Secretary to “inspect each research facility at least once a year” and more often if necessary until all deficiencies or deviations from the standards are corrected. Since the enactment of this legislation, the research community has shown a commitment to compliance with the AWA requirements. In fact, in FY 2016, of the 1,339 inspection reports posted in the Animal Care Inspection Service database, only 21 percent of the research facility inspections resulted in a citation, and almost two-thirds of those had only one citation.

The majority of citations issued to research facilities involve administrative issues and not issues involving animal care. A comparison of the FY 2006 inspection results with those for FY 2016 show the number of citations with research facility-specific issues has declined by 87 percent. A review of FY 2016 citations also finds that 1.5 percent of facilities accounted for 30 percent of total citations, suggesting that a risk-based inspection process incorporating compliance history would significantly improve inspection process efficiency and overall compliance with the AWA.

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The use of animals in research continues to be vital to our understanding of human and animal disease and the development of treatments and cures. Providing exceptional welfare is paramount when conducting animal research, and regulatory requirements are vital to ensuring that research is executed safely, ethically, and humanely. FASEB believes that including the proposed language in the Farm Bill revising the frequency of inspections is an important step towards simultaneously promoting regulatory efficiency, animal welfare, and the progress of biomedical science.

Sincerely,

A handwritten signature in black ink, appearing to read "Thomas O. Baldwin". The signature is fluid and cursive, with a prominent initial "T" and a long, sweeping underline.

Thomas O. Baldwin, PhD

FASEB President