April 24, 2012

The Honorable Senator ________________
United States Senate
Washington, DC 20515

Dear Senator:

As the largest coalition of biomedical research associations in the United States, representing 26 societies and over 100,000 scientists and engineers, the Federation of American Societies for Experimental Biology (FASEB) is writing to urge you to withdraw your support for the Great Ape Protection and Cost Savings Act (S. 810). This bill would ban all invasive research involving bonobos, gorillas, gibbons, orangutans, and chimpanzees based in part on the questionable premise that doing so would save money. The act would compromise human and animal health and increase the cost to the public.

Institute of Medicine Findings

In December 2010, NIH commissioned the Institute of Medicine (IOM) to assess the necessity of chimpanzees in biomedical and behavioral research. In their December 2011 report, the committee stated that they do not endorse a ban on the use of chimpanzees in research and established a set of principles and criteria by which all future research should be guided. The committee concluded that chimpanzees:

1.) Have been an invaluable animal model in the discovery of the hepatitis B vaccine
2.) Are needed to complete development of monoclonal antibodies aimed at treating cancers and autoimmune diseases
3.) Are needed in the development of a prophylactic hepatitis C vaccine
4.) Are needed for some behavioral and genomic analysis studies
5.) May be necessary for treating new, emerging, or reemerging infectious diseases in the future

NIH has accepted these principles and has begun the process of implementing them.

Chimpanzees are Necessary for Advances in Human and Animal Health

Relevant to the IOM findings, almost 200 million people suffer from chronic hepatitis C infection and are at risk for liver failure and liver cancer. A recent study estimates that more people in the U.S. are dying from hepatitis C infection than HIV infection. In fact, one in 33 people aged 45-64 may have the disease and not even know it. The prohibition of medical research involving chimpanzees will likely slow the development of a vaccine that can prevent the transmission of hepatitis C.

Research on chimpanzees also remains crucial for the development of important life-saving monoclonal antibodies. Chimpanzees are especially important because their biological receptors and immune proteins are virtually identical to those of humans. Monoclonal antibodies that are currently being used to treat B-cell non-Hodgkin’s lymphoma and several inflammatory and arthritic conditions were tested in chimpanzees.

If adopted, this bill will not only prevent the research needed for treatments to human diseases, but it will also prevent research that can directly benefit chimpanzees—inevitably harming the ones the legislation seeks to protect. The Ebola virus is ravaging wild populations of chimpanzees and gorillas. In 2010, the first studies were conducted on laboratory chimpanzees to test the safety of a potential vaccine against Ebola, which could be used to protect wild chimpanzees and gorillas from this deadly disease.

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Research involving chimpanzees could also be vital for the development of countermeasures against bioterrorism attacks. An October 2011 “Bio-Response Report Card” by the bipartisan Weapons of Mass Destruction Terrorism Research Center indicated that the U.S. is unprepared to respond to a global outbreak of a deadly virus for which we have no medical countermeasures. In an emergency, rapid access to a research population of chimpanzees could be needed in order to quickly develop and test prophylactic and therapeutic strategies against potential dangerous agents.

**Chimpanzees Receive High Quality Care in Research Institutions**

*The Great Ape Protection and Cost Savings Act* states that research laboratory environments involving invasive research cannot meet the physical, social, and psychological needs of great apes. In fact, chimpanzees housed at U.S. research facilities receive a very high level of care. They are socially housed with access to indoor-outdoor facilities and many enrichment devices and activities. These research facilities generally have a large veterinary staff, extensive clinic and hospital facilities, and sophisticated diagnostic pathology laboratories, which are necessary for caring for chimpanzees with chronic medical conditions. Not all sanctuaries can provide adequate care for chimpanzee with serious medical conditions. For example, Chimp Haven, the National Chimpanzee Sanctuary, states on its website that it is the only sanctuary able to care for chimpanzees that have been exposed to viruses such as HIV and hepatitis.

In addition, numerous laws, regulations, and accreditation organizations ensure that research involving great apes is ethical, necessary, and humane. Prior to any study involving great apes, an NIH peer review committee and an institutional animal care and use committee determine whether the proposed study is scientifically sound, determine whether the animal model proposed is the most appropriate to answer the study question, ensure that pain and distress of the animal is minimized, and make certain that the animals are cared for humanely. Furthermore, all future NIH research projects proposing to use chimpanzees will go through another layer of oversight to ensure that the research abides by the principles and criteria outlined in the IOM report.

**Retiring Chimpanzees Will Not Save Money**

Please do not be misled by the “cost savings” language in the title of the bill. The National Institutes of Health (NIH) has found just the opposite.\(^2\) If animals are removed from active research, costs for their care will likely increase. Data on the NIH Office of Extramural Research website clearly show that it is more expensive to provide care for chimpanzees in sanctuaries than in the laboratory setting ($46.70 day/chimpanzee in a sanctuary versus $34.50 day/chimpanzee in the laboratory).\(^3\) NIH currently provides lifetime care for chimpanzees it owns or supports. Additional costs will be incurred to build the infrastructure needed to house the chimpanzees in sanctuary settings.

Passage of the *Great Ape Protection and Cost Savings Act* would be contrary to the IOM committee’s recommendation, would inhibit medical progress, and delay our efforts to improve human and animal health. We urge you to withdraw your support from the *Great Ape Protection and Cost Savings Act*.

Respectfully,

Joseph C. LaManna, PhD
FASEB President

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\(^2\) [http://dpcpsi.nih.gov/council/working_group.aspx](http://dpcpsi.nih.gov/council/working_group.aspx)

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