FASEB
Federation of American Societies for Experimental Biology

Representing Over 110,000 Researchers

6120 Executive Blvd., Suite 230, Rockville, MD 20852 | faseb.org

The Honorable Earl L. "Buddy" Carter
1124 Longworth House Office Building
Washington, DC 20515

February 4, 2026

Dear Representative Carter,

The Federation of American Societies for Experimental Biology (FASEB) would like to express concern about your recent letter to Jayanta Bhattacharya, MD, PhD, Director of the National Institutes of Health (NIH), regarding animal research and the role of non-animal methodologies in federally funded science. Founded in 1912, FASEB is a coalition of 22 scientific societies representing over 110,000 researchers that work collaboratively to advance health and well-being by promoting research and education in biological and biomedical sciences.

Given that Georgia is home to one of the seven National Primate Research Centers (NPRCs), we are writing to provide you with the scientific context and reasoning behind the continued need for animal research, including nonhuman primate (NHP) models, within the modern biomedical research enterprise.

FASEB shares your commitment to advancing innovative science while ensuring that research is conducted ethically, responsibly, and with appropriate oversight. However, we are concerned that the letter to Dr. Bhattacharya does not fully reflect current scientific practices nor the technological realities that guide how scientists use animal models and non-animal approaches to conduct life-saving biomedical research and advance medical progress.

Animal Research Saves Lives

America's most serious health challenges – including cancer, Alzheimer's disease, chronic illnesses, infectious diseases, and rare pediatric illnesses – are varied and biologically complex. Addressing the scientific questions behind these health challenges requires diverse scientific approaches and in many cases, animal models.

Although clinical trial failure rates are often cited as evidence against the utility of animal research, attrition can reflect a number of factors from human variability to study design rather than a systematic failure of animal models. In fact, a recent scientific review showed that even at low rates of final regulatory approval, results from pre-clinical animal studies match the results of clinical trials 86% of the time[1], indicating translational challenges not brought on by the use of animal models.

Further, animal models have successfully underpinned biomedical science for years – from fundamental biological discovery to regulatory assessments of safety, toxicity, and appropriate dosing before human trials. Every therapy approved by the Food and Drug Administration (FDA) and available today relied on animal research at some stage of development. Even the foundational technology for monoclonal antibodies – which today may incorporate preclinical data from new approach methodologies (NAMs) for

[1] Ineichen et al. 2024 | PLOS Biology

regulatory submissions – was first discovered and validated through animal research[2]. Together, these realities underscore why animal research remains essential to patient safety and scientific progress.

Preserving animal research is necessary to protect patients and sustain biomedical discovery.

Animal Research and NAMs Are Complementary, Not Interchangeable

The biomedical research community strongly supports continued investment in NAMs, including advanced human tissue models, computational modeling, and artificial intelligence. These tools are already widely used, often in the same laboratories using animal models, to refine hypotheses, reduce animal use, and improve study design.

While these technologies are advancing rapidly, NAMs still have key limitations in their ability to fully model how the body functions as a whole. Current approaches, for example, allow for exploration of interactions between a limited number of organs and tissue types, but they cannot yet replicate the integrated physiology underlying complex biological processes such as aging, immune function, or behavior. In addition, most NAMs cannot capture long-term disease progression over time. These gaps are especially relevant for complex, chronic, and neurodegenerative conditions, where systemic interactions and behavioral outcomes are central to both disease understanding and therapeutic development. For these questions, animal models remain necessary.

Framing NAMs solely as replacements rather than complementary tools within a broader scientific toolkit does not reflect the current state of technological advancement nor the process of modern research advances. In many cases, NAMs depend on existing biological data derived from animal and human studies for validation and interpretive context.

NAMs should be advanced as complementary tools, not prematurely presented as full replacements for animal models.

Scientific Role of Nonhuman Primate Research

NHP research occupies a highly specialized and limited role within the broader biomedical research enterprise. NHPs are used only when no other scientifically appropriate model exists or when the research question requires biological features that closely mirror human physiology, immunology, or neurobiology[3].

NHP research is estimated to have saved around 236 million lives through contributions to major medical advances, including the most often prescribed medications for Type II diabetes, high cholesterol, and cardiovascular disease, in addition to treatments for neurological disorders, and therapies for infectious and immune-mediated diseases. In areas such as HIV/AIDS, Parkinson's disease, Alzheimer's disease, and emerging infectious threats, NHP models remain necessary to evaluate safety, immune responses, and disease progression in ways that cannot yet be replicated by NAMs. Importantly, NHP studies represent a small fraction (less than 1%) of total animal research and are subject to the highest levels of ethical justification and oversight.

Maintaining carefully justified nonhuman primate research is critical for advancing treatments in areas where no adequate alternative methods exist.

Unique Role of the National Primate Research Centers

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[2] The Nobel Prize in Physiology or Medicine 1984 | NobelPrize.org
[3] The Critical Role of Nonhuman Primates in Medical Research

NPRCs are a vital component of the U.S. biomedical research infrastructure. These centers are a valuable, shared national resource providing specialized facilities, genetically characterized NHP colonies, and veterinary and comparative pathology expertise that individual institutions cannot replicate. The research infrastructure they provide reflects over six decades of sustained federal investment. Today, that investment means critical scientific support for more than 1,700 scientists, training for the next generation of researchers and veterinarians, and rapid response to emerging public health threats.

Scientific excellence and animal welfare are foundational to the work of the NPRCs. As with other leading research facilities, NPRCs integrate new approach methodologies (NAMs) where scientifically appropriate to refine research protocols and reduce reliance on animal use, ensuring NHP research is conducted only when scientifically necessary and ethically justified. The integrated NPRC infrastructure underpins U.S. leadership in translational medicine, neurodegenerative disease research, and preparedness for infectious disease outbreaks.

In addition to their national scientific role, NPRCs represent significant investments in the research ecosystems of the states in which they operate – Georgia, California, Texas, Louisiana, Oregon, Washington, and Wisconsin. Together they employ over 2,000 well-paid workers[4]. Additionally, these centers foster collaborations with universities and private industry (76% of their supported scientists have primary affiliation with collaborating institutions), contribute to workforce development, and strengthen regional biomedical innovation. Reductions in federal support for NPRCs could therefore have disproportionate and long-lasting effects on both regional scientific capacity and local economies.

Recent assessments from the National Academies of Science[5] and the NIH Office Research Infrastructure Programs[6] highlight that current U.S. capacity for NHP research does not meet scientific need. This gap constrains NIH's ability to support high-merit research and increases the risk that essential studies will be outsourced abroad. At the same time, China – having banned the export of NHPs from its managed colonies in 2020 – will benefit from our missed opportunities. Against this backdrop, NPRCs represent one of the nation's greatest assets for sustaining U.S. scientific excellence and public-health readiness.

Reducing NIH support for NPRCs would not eliminate the need for NHP research; rather, it would fragment this work, shift work overseas, and undermine the centralized expertise that ensures the highest standards of animal welfare and scientific rigor.

Weakening funding for National Primate Research Centers would undermine U.S. research capacity, public health preparedness, and scientific leadership.

Concern for Animal Welfare Is Central to the Research Community
Animal welfare is integral to biomedical research. The United States maintains one of the most comprehensive systems of animal research oversight in the world, enforced by Department of Agriculture[7] and Public Health Service[8] regulations and guided by the principles of replacement, reduction, and refinement (3Rs). Researchers are required to justify animal use scientifically, minimize pain and distress, and comply with rigorous training and oversight requirements. Oversight boards, known as Institutional Animal Care and Use Committees[9], regularly monitor research facilities to confirm

[4] FAQs | NPRC.org
[5] Nonhuman Primate Models in Biomedical Research | National Academies of Science
[6] Nonhuman Primate Evaluation and Analysis: Final Report | NIH | ORIP
[7] Animal Welfare Act | USDA | National Agricultural Library
[8] PHS Policy on Humane Care and Use of Laboratory Animals | NIH | OLAW
[9] The IACUC | NIH | OLAW

humane treatment. PHS policy requires that these committees include independent members to maintain objectivity and ensure that animal welfare is prioritized.

Limiting animal research without scientifically validated alternatives risk shifting studies overseas to countries with fewer protections, undermining both animal welfare and U.S. biomedical research leadership.

Research animals in the U.S. receive top line care from highly trained professionals, as mandated by existing laws and regulations.

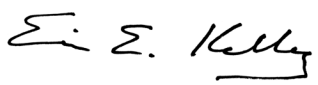
Preserving a Balanced, Evidence-Based Research Strategy

FASEB shares your interest in ensuring that federally funded research reflects scientific progress, ethical responsibility, and public trust[10]. Achieving these goals requires policies grounded in evidence and informed by the realities of modern biomedical research.

Therefore, we respectfully encourage you to reconsider the positions in the letter to Director Bhattacharya and support a research approach that sustains essential animal studies, including scientifically justified NHP research, while responsibly integrating NAMs where appropriate.

We welcome the opportunity to provide further information, briefings, or facilitated discussions with leading scientists and researchers to support informed policymaking. For any questions or requests for more information, please contact Galen Cobb, PhD, gcobb@faseb.org.

Sincerely,



Eric E. Kelley
FASEB President

Cc: NIH Director Jayanta "Jay" Bhattacharya, PhD

[10] FASEB Statement on Principles for the Use of Animals in Research and Education