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March 16, 2015

Animal Handling and Welfare Review Panel
c/o REE Advisory Board Office
Jamie L. Whitten Building, Room 332A
1400 Independence Avenue, SW
Washington, DC 20250

Via e-mail to ahwrpanel@usda.gov

Re: Pre-public hearing report: Findings and Recommendations on the Animal Care and Well-Being at the U.S. Meat Animal Research Center to the Secretary of Agriculture and the REE Under Secretary”

Dear Drs. Olsen, Dixon, Ford, Salmon and Clifford:

The AVMA appreciates the opportunity to offer comments on your pre-public hearing report, titled “Findings and Recommendations on the Animal Care and Well-Being at the U.S. Meat Animal Research Center to the Secretary of Agriculture and the REE Under Secretary” and published on March 9, 2015. We are pleased that the review panel observed no instances of poor animal handling, animal abuse or inadequate veterinary care during its visit, and anticipate that concerns regarding full compliance with Agricultural Research Service policies and procedures will be expediently and fully addressed. To facilitate your consideration of our comments, we have formatted them to correspond to the specific findings and recommendations within your report.

ARS Policies and Procedures

The AVMA concurs with the recommendation of the review panel that *The Guide for the Care and Use of Agricultural Animals* (third edition, 2010; hereafter referenced as *The Guide*) serve as a primary reference to support the responsible care and use of animals at U.S. MARC.

USMARC Administrative and Operational Structure

The AVMA supports the recommendation of the review panel that written agreements be established between USMARC and the University of Nebraska Lincoln (and other research and teaching partners) that will clearly delineate expectations for research oversight (to include utilization of a properly constituted and functioning Institutional Animal Care and Use Committee), financial responsibilities and accountabilities, responsibility for oversight and maintenance of physical facilities, and authorities and responsibilities for provision of veterinary medical care.

Animal Handling and Veterinary Care

As previously indicated in our January 26, 2015 letter to Secretary Vilsack, processes should be in place to ensure those caring for animals in federally operated facilities are well trained and competent. Quality animal care programs include clear expectations

for the design and conduct of employee training, and further require demonstration of competence (not simply “completion of appropriate training” as suggested in Finding 2 and recommendation 2 of the report). We support the concept of employee classifications that recognize, promote, and *appropriately utilize* individuals who display strong animal handling skills, and recommend this model be adopted across the organization (currently the report suggests this technician classification system is limited to particular animal units at USMARC).

In addition to assuring that the husbandry and management of all animals within federal facilities is conducted in accord with best practices, those conducting procedures on animals in association with research must be competent in performing those procedures. This includes medical and surgical procedures, pre- and post-procedural care, methods for minimizing pain and distress (e.g., use of anesthetics, analgesics, tranquilizers and non-pharmacologic approaches), and euthanasia as required. Training in medical and surgical procedures should occur with veterinary oversight and, just as for husbandry and management activities, expectations and mechanisms for demonstrating competence (not simply participation) must be in place.

The AVMA further supports the review panel’s comments on the importance of employees knowing to whom they may report concerns about animal care, while instilling confidence that they can do so without fear of reprisal (i.e., establishment and broad dissemination of clear whistleblower policies).

Selection of Research Topics and Research Oversight by the Institutional Animal Care and Use Committee

The AVMA concurs with the review panel that proposals for research to be conducted in USDA-supported facilities must be thoroughly and independently reviewed. Specifically, such proposals must be in keeping with the principles of the 3Rs: *replacement* of animals with non-animal methods wherever feasible, *reduction* in the number of animals consistent with sound experimental design, and *refinement* of experimental methods to eliminate or reduce animal pain and distress. As such, the review panel’s finding 3 that the Institutional Animal Care and Use Committee (IACUC) at USMARC was not adequately fulfilling its roles pertaining to research oversight is of substantial concern to the AVMA.

While assessment of compliance with criteria established for National Programs for ARS research is important to ensuring the relevance and impact of that research for stakeholders, such an evaluation does not negate the need for a formal and rigorous IACUC review, including implementation of its critical components as outlined in this section of your report and described in more detail in *The Guide*. We therefore fully support the review panel’s recommendation 4 that the USMARC develop and implement processes and training to ensure a robustly functioning IACUC that applies best practices in the field of animal research. Recommendations 5, 6 and 7 are similarly appropriate. We further recommend that USDA ensure that expectations for the robust establishment and operation of IACUCs are applied across its research facilities, rather than limiting such implementation to the USMARC.

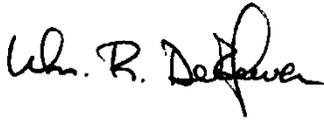
While not the explicit focus of this review, we noted frequent references, throughout the report, to “consistency with current best practices in the animal production industry.” We challenge the USMARC and other USDA research facilities to not only comply with current best practices, but to identify and strive for ongoing improvements as part of their research mission.

As a not-for-profit association established to advance the science and art of veterinary medicine, the AVMA thanks you for the opportunity to share its expertise and views. The Association’s more than

86,500 member veterinarians are involved in a myriad of areas of veterinary medical practice, including private, corporate, academic, industrial, government, not-for-profit, military and public health services.

Should you have questions or desire additional clarification regarding our comments, please feel free to contact Dr. Gail Golab, Director of the AVMA's Animal Welfare Division (ggolab@avma.org or 847-285-6618).

Sincerely,

A handwritten signature in black ink that reads "W. Ron DeHaven". The signature is written in a cursive style with a large, stylized initial "W".

W. Ron DeHaven, DVM, MBA
Chief Executive Officer and Executive Vice President

WRD/GCG