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July 14, 2015

Submitted via e-mail: ahwrpanel@usda.gov
Michele Esch, Executive Director
REE Advisory Board Office
U.S. Department of Agriculture
Jamie L Whitten Building, Room 332A
1400 Independence Avenue, SW
Washington, DC 20250

Dear Ms. Esch,

On behalf of the American Anti-Vivisection Society (AAVS) and our more than 25,000 members and supporters, I thank you for the opportunity to submit written comments in response to the Pre-Public Hearing July 6 Report, *Findings and Recommendations on the Phase II Review of the Animal Care and Well-Being at the Agriculture Research Service to the REE Under Secretary*.

AAVS appreciates USDA's time-sensitive efforts to address concerns raised about animal welfare and research practices occurring at its facilities under the Animal Research Services (ARS). However, the Phase II report could be more useful if additional information was included.

For public knowledge, the findings of the review lack sufficient detail to produce a fair understanding of the sites visited by the Panel. Recounted in a summary form, they include anecdotal information, where objective data would be much more valuable. The report often uses the term 'evidence' but unfortunately, none is presented.

As a result it is difficult to assess whether or not the recommendations are adequate to address concerns about animal welfare.

We recommend that the final review report include objective information such as: the number of animals at the time of visit and how many animals were seen as part of the visit; lists of IACUC documents reviewed at each site, including dates; and the process for selection of IACUC documents, type and number.

Additionally, it would be helpful if the final version of this ARS review included appendices with key documents that were reviewed and referenced in the report, such as the Memorandum of Agreement between LARRL and MSU, detailing oversight of animal use by the IACUC. This could be a start to sharing good practices, which is encouraged in the recommendations.

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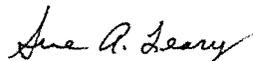
Conclusion

Considering that the panel was given the task of assessing whether policies and procedures are adequate at ARS facilities, its procedures seemed informal, which was identified as a problem at the Meat Animal Research Center in the Phase 1 report.

In addition, the panel's charge was to provide a report to the department and the public regarding the important condition of animal welfare at such facilities. But the report is insufficient to inspire additional public confidence. In order to enhance the value and credibility of the report, it should disclose processes, methods, documents and data from the panel's review.

Thank you for the consideration of AAVS's comments.

Sincerely,

A handwritten signature in cursive script that reads "Sue A. Leary".

Sue Leary
President