



Animal Welfare Institute

900 Pennsylvania Avenue, SE, Washington, DC 20003
awionline.org phone: (202) 337-2332 fax: (202) 446-2131

COMMENTS REGARDING THE REPORT: FINDINGS AND RECOMMENDATIONS ON PHASE II REVIEW OF THE ANIMAL CARE AND WELL-BEING AT THE AGRICULTURAL RESEARCH SERVICE TO THE REE UNDER SECRETARY

Submitted July 14, 2015

We appreciate the opportunity to comment on the Animal Handling and Welfare Review Panel's findings and recommendation from its visits to five additional animal research laboratories operated by the Agricultural Research Service.

- We welcome the decision to expand the investigation beyond MARC to include other ARS facilities. However, there were shortcomings in the process: The visits were prearranged, the review process was unclear, and there was no explanation of the extent of any records review. There was also no discussion of the criteria by which the facilities were chosen for review.
- It is clear from the panel's **Agency-wide Findings and Recommendations** that ARS provides insufficient guidance to its facilities.
- The panel's report refers to multiple sets of standards, including "industry standards." Adhering to "industry standards" is a minimalist approach. ARS research facilities should be *exceeding* industry standards. The goal should be to conduct their research while also setting higher standards of animal care.
- Part of the panel's charge was to "[r]eview processes used to select and evaluate experimental design and protocols under the IACUC at each location." However, very little was said about this. In only two of the reports was there mention of "humane endpoints" for the animals involved in experiments, and one of those reports also noted that "animal use protocols should include more robust justification for the number of animals requested for research projects." Another report observed the need for clarifying "the procedure for how and when the IACUC will make use of the Designated Member Review (DMR) process for review and approval of IACUC protocols," with no elaboration on the circumstances, if any, that currently give rise to such review. We believe there should have been more discussion of IACUC review processes, the extent to which use was made of resources that would help investigators reduce the number of animal used, find alternatives to painful procedures, etc.
- Apropos the above, as well as the panel's findings and recommendations regarding dissemination of best practices and the need for enhanced training, AWI recommends

that ARS facilities be directed to make more productive use of the resources of the Animal Welfare Information Center at the National Agricultural Library.

- With the exception of the RRARC, the panel concluded specifically that all the IACUCs are “compliant with ARS Policies and Procedures.” Yet, with the exception of the LBRU/Purdue (whose IACUC was described as “robustly functioning,” making the lack of such superlatives for the others painfully obvious), the panel suggested many so-called “potential refinements.” No question: no matter how well something is working there is always room for improvement. However, in the case of these IACUCs, the shortcomings, coupled with Agency-wide Finding 1 that “[t]he role and expectations of the [IACUC] and Attending Veterinarian is *[sic]* not uniformly understood at all ARS sites,” are troubling.
- We understand that there is an effort to have two non-affiliated members on each IACUC and we strongly support doing so. Both should have a demonstrable interest in animal welfare and we suggest that one of them be a bioethicist.
- We were encouraged by the panel’s statement regarding the housing of mice at the RRARC in wire-bottomed cages and pointing out that, whenever possible, “mice should be socially housed in solid bottom cages with bedding and appropriate environmental enrichment.” Justification for wire-bottomed cages should be required and reviewed quite critically.

In conclusion, while appreciative of the work of the panel in identifying many areas in need of improvement, we are puzzled that, even in the face of noted deficiencies, the panel insists that all the facilities “were found to be in compliance with ARS Policies and Procedures in regards to the composition and function of the local animal care oversight committees.” Moreover, given that these visits were known well in advance, it would have been rather surprising had the panel found evidence of poor animal care. Addressing the panel’s site-specific and agency-wide findings and recommendations is a necessary first step to establishing confidence in ARS’ research function, but it will take more than that. We encourage ARS to continue on the path toward registering all its facilities under the Animal Welfare Act and to ensure that all facilities comply with all Animal Welfare Act regulations, including being subject to unannounced inspections.