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To the Vermont Senate Committee on Economic Development, Housing and General Affairs:

As the University Veterinarian at the University of Vermont (UVM). I am writing to express my concerns about S.161.

First, to set the stage, please understand that research utilizing animals is a highly regulated activity. For instance, UVM complies with the Animal Welfare Act (enforced by the United States Department of Agriculture) and the Public Health Service Policy on Humane Care and Use of Animals (enforced by the Office of Laboratory Animal Welfare at the National Institutes of Health). By federal law, all research utilizing vertebrate animals at UVM – or any other institution or organization which receives federal funding -- is first subject to review and approval by the University's Institutional Animal Care & Use Committee (the "IACUC"). In the process of submitting an application to work with animals, each researcher must demonstrate that he or she has considered alternatives to the use of animals, that the number of animals used does not exceed that required to meet the scientific objectives, and that measures to minimize any pain or distress to the animals are in place. The IACUC must approve all of the proposed procedures before any of the work can take place. Failure to follow these regulations can result in the loss of Federal research grants.

These regulations also apply to private companies which are developing safety data on products for purposes of Federal Drug Administration (FDA) approval. In October 2015, the FDA published "Product Development Under the Animal Rule Guidance for Industry," which states: "Animal studies must comply with applicable laws and regulations as prescribed by the Animal Welfare Act 48 and the Public Health Service Policy on Humane Care and Use of Laboratory Animals."

My concern with S.161 stems from the proposed prohibition of the use of vertebrate animals in *nonmedical research testing*. Researchers at UVM, and at institutions throughout the U.S., utilize animals for many studies which do not fall under the "biomedical" umbrella. For instance, animals may be used in research which evaluates the suitability of different feedstuffs for dairy cattle, which investigates the impact of stressors on learning, memory or addiction utilizing laboratory rats, or which seeks to understand ecological systems by surveying populations of small mammals or fishes in the wild. Even within the biomedical context, research in basic mechanisms of animal physiology, nutrition, or pathology may not yield results having an immediate impact on the treatment of diseases in a clinical setting, but may provide a crucial piece of the puzzle for future advances in therapy. Prohibiting the use of animals in all nonmedical research testing could have a chilling impact on research at UVM, particularly on that research which allows the University to fulfill its mission as a land-grant institution.

In summary, S.161 is redundant with federal regulations which govern the utilization of animals in a research setting. In addition, the lack of specificity in the proposed legislation could curtail research into subject areas which may not be considered "biomedical," but which can have important economic, societal and environmental impact.

I am very happy to serve as a resource for your Committee should you have further questions about this issue.

A handwritten signature in cursive script that reads "Ruth Blauwikel".

Ruth Blauwikel, DVM, PhD
University Veterinarian, University of Vermont