



**Humane  
World for  
Animals™**

February 19, 2025

House Committee on Agriculture, Food Resiliency, and Forestry  
115 State Street  
Montpelier, VT 05633

**Re: Support of H.14, An act relating to prohibiting the use of animals in product testing**

Dear Chair Durfee and members of the House Committee on Agriculture, Food Resiliency, and Forestry:

I appreciate the opportunity to express support on behalf of Humane World for Animals (formerly called Humane Society of the United States) and our Vermont members and supporters for H.14. We appreciate you holding a recent hearing with the bill's sponsor, Rep. Krasnow, and would encourage your committee to take further action on this legislation.

H.14 requires product testing facilities to use test methods that replace animal testing when they are available and provide information of equivalent or better scientific quality and relevance. It also requires companies engaged in testing these products to annually report about their use of traditional animal methods and alternatives to the Office of the Attorney General. The bill applies to cosmetics, household cleaners, drugs, pesticides, and industrial chemicals. The bill does not prohibit the use of animal tests to comply with specific requirements of state or federal agencies.

Every year in the United States, hundreds of thousands of animals suffer and die to assess the safety of products, including cosmetics, household cleaners, drugs, pesticides, and industrial chemicals. In common toxicity testing, chemicals are applied to an animal's skin, forced down their throat or into their lungs, or dripped into their eyes. Thousands of animals may be used for a single test, and they can suffer for months or years before being killed.

Animal tests are not the best predictors of human safety. No longer considered the gold standard of testing, animal models carry serious scientific limitations. Different species can respond differently when exposed to the same chemicals. In fact, 90% of human drugs fail during clinical trials after having completed animal studies either due to unexpected toxicity or lack of efficacy. Alternative methods, based on human biology, are much more likely to provide results predictive of human responses and can save time and money. Human cell-based tests and advanced computer models, for example, deliver human-relevant results in hours or days, unlike some animal tests that can take months or years.

Modern science is rapidly moving away from outdated animal tests as many faster, less expensive, and more human-relevant alternative methods have become available, including

artificial human tissue, organs-on-chips, and sophisticated computer programs. This legislation will simply ensure that companies in Vermont take advantage of these new testing strategies as soon as they are approved for use.

To further your understanding of the legislation, I have provided answers to several thoughtful questions raised during the committee hearing. I hope you find these helpful, and I stand willing to provide additional information upon request.

**Will this impact UVM cancer research?**

H.14 would not prevent cancer research, or any other biomedical research, conducted at UVM or other academic institutions in Vermont. First, the legislation provides a full exemption for “biomedical research,” defined as the investigation of the biological processes and causes of disease or research conducted to increase fundamental scientific knowledge or to expand the understanding about how processes in living organisms develop and function. This would fully exempt much of the research conducted at these institutions. Second, the bill only requires the use of alternatives when they are available, provide information of equivalent or better scientific quality, and are affirmatively approved by a federal regulatory agency.

**Will this impact fistulated cows or other agricultural practices?**

No, fistulated cows that have been surgically fitted with a cannula used to perform research and analysis of the digestive system would not be prohibited. The bill would not cover any efforts to monitor or evaluate the health or safety of farm animals, such as drawing blood or administering vaccines or other treatments.

**What information do we have about animal testing? How many animals impacted?**

It is estimated that more than 50 million animals are used in experiments each year in the United States. Unfortunately, no accurate figures are available to determine precisely how many animals are used in experiments in the U.S. or worldwide.

The U.S. Department of Agriculture (USDA) does compile annual statistics on some animals used in experiments, including cats, dogs, guinea pigs, hamsters, pigs, primates, rabbits and sheep. However, the animals most commonly used in experiments, “purpose-bred” mice and rats, are not counted in annual USDA statistics nor afforded the minimal protections provided by the Animal Welfare Act. Because these animals are not counted, we do not know how many are suffering in laboratories. For this reason, research conducted on rats at Middlebury College was unknown until a public records request revealed failures to properly care for animals in the laboratory. In addition, even for species that are reported to USDA, the purpose of the experiments is not disclosed, making it impossible to ascertain how many are used for the type of testing covered by H. 14.

**Are there companies based in Vermont that are doing this type of testing?**

The lack of comprehensive data collection by the USDA as described above prevents the public from knowing all possible companies that may be affected. We have no record of a private company that would be impacted, but again this list excludes many species. H.14 is a reasonable, forward-looking effort to expedite the transition to alternatives. The legislation will become even more impactful in the years ahead, incentivizing the development and use of alternatives.

**What impact for products made elsewhere?**

The bill covers only *testing* that occurs in Vermont. It would not regulate the sale of products. This is similar to laws passed in other states.

**Do other states have similar laws?**

Four states have already passed similar laws, including Virginia, New Jersey, New York and California. Comparable bills are under consideration in New Hampshire, Massachusetts, and Maryland this session.

**What are products?**


In H. 14, a product testing facility is defined as “an entity, institution, business partnership, corporation, association, or other legal relationship that tests chemicals, ingredients, drugs, vaccines, product formulations, or products.” Products could include items as varied as household cleaners, laundry detergents, paint, or shoe polish. The bill would not prevent efforts to monitor or evaluate the health or safety of farm animals, such as drawing blood or administering vaccines or other treatments, or other agricultural activities that fall outside the definition of a traditional animal test.

**What state agencies would be asking for data? Have any state agencies accepted an alternative?**

The state does not directly regulate testing facilities in Vermont, and we are not aware of any specific state regulatory requirements for animal testing conducted on products covered by the bill. Requirements for product testing are usually provided by federal agencies, most notably the Environmental Protection Agency and the Food and Drug Administration.

Humane World strongly supports H.14 and urges the committee to pass this legislation to make Vermont the next state to ensure the replacement of cruel animal tests with modern human-relevant test methods and strategies.

Sincerely,



Joanne Bourbeau

Joanne Bourbeau  
Northeast Regional Director, State Affairs  
Humane World for Animals