PEOPLE FOR THE ETHICAL TREATMENT OF ANIMALS

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Dr. O.P. Chaudhary
Joint Secretary (Animal Welfare) and Chairman (CPCSEA)
Department of Animal Husbandry and Dairying
Ministry of Fisheries, Animal Husbandry and Dairying

11 October 2022

Via e-mail: jspf-dadf@nic.in

Dear Dr. Chaudhary,

I am writing on behalf of People for the Ethical Treatment of Animals (PETA) India and our more than 2 million members and supporters to humbly request that you **withdraw the recent recommendations for the use of stray dogs for vaccine trials made by the Committee for the Purpose of Control and Supervision of Experiments on Animals (CPCSEA) to all the registered establishments and nominees of CPCSEA during its 101st meeting**.[1]

These recommendations contravene the duties assigned to CPCSEA by the Government of India under Rule 10 of the Breeding of and Experiments on the Animals (Control and Supervision) Amendment Rules, 2006, which states that, "an establishment shall acquire animal(s) for experiments from registered breeders only", with exemptions only made if there is a shortage of animals, in which case they must still be legally sourced or imported.[2]

Besides being highly unethical, this recommendation is unjustifiable from a scientific perspective: other nations' policies already go further than India's by advising against the use of stray animals in scientific procedures, as shown by the following:

- The European Union Directive 2010/63 on the protection of animals used for scientific purposes guides national authorities against the use of stray animals in experiments, stating, "Since the background of stray and feral animals of domestic species is not known, and since capture and placement into establishments increases distress for such animals, they should not, as a general rule, be used in procedures."[3] Article 11 of this directive clarifies that "Stray and feral animals of domestic species shall not be used in procedures" and that exemptions may only be granted in very specific circumstances.[3]

- The United Kingdom has gone further to state that stray animals of domestic species should not be used in *any* scientific procedures.[4]

- In the United States, the National Institutes of Health no longer funds studies that use "random source" animals from "Class B dealers", including dogs acquired from pounds, breeders, and related sources.[5,6] The United States Department of Agriculture has also halted renewing or granting Class B dealer licenses for the purpose of selling dogs or cats to laboratories and for teaching or testing.[7] This measure has been adopted in all appropriation bills going forward preventing the use of live dogs or cats who have been acquired from

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sources other than approved breeders in research, experimentation, teaching, or testing.[8]

- In Australia, special conditions apply to the supply of dogs and cats used in laboratories, with the state of New South Wales explicitly stating that "an impounding authority may not supply to a licensed animal supplier, and a licensed animal supplier may not accept from an impounding authority, any animal for use in connection with animal research."[9]

As countries with whom India competes in science and technology effect more advanced policies on the acquisition of animals for use in scientific procedures, it is vital that India does not adopt such regressive policies that can negatively impact science, animal welfare, public health, and the economy.

Moreover, reliance on tests using dogs and other animals to predict human responses to vaccines, drugs, and other compounds can be dangerously misleading. Peer-reviewed publications have established that the results of drug testing studies using animals have salient differences and cannot be reliably used for predicting human responses, including tests using non-rodent species such as dogs and monkeys.[10,11,12] Studies regarding toxicity tests performed on dogs and rabbits have established that these tests are unreliable predictors of the safety of compounds for human use and do not accurately predict responses observed in humans.[13]

Extensive research has demonstrated the poor translatability of basic and applied research using animals to understand human disease and predictive failures when using animals to anticipate the safety and efficacy of human therapeutics and medical devices. Inherent species differences mean that other animals cannot reliably serve as analogues for understanding human disease and developing safe and effective treatments for humans.[14] It is estimated that fewer than 10% of "highly promising" basic science discoveries based on animal studies enter clinical use within 20 years.[15] A more recent analysis found that studies using animals have not furthered our knowledge in the field of human health or led to the development of treatments for conditions affecting humans.[16] There is a growing global scientific consensus that far more is to be gained, scientifically and economically, from enhanced support for *human-relevant* research methods that are better suited to solving human biomedical and regulatory assessment paradigms than from reliance on using animals.

In view of the above evidence, I respectfully request that you withdraw this decision and encourage all the registered establishments and nominees of CPCSEA to adopt the use of superior, human-relevant animal-free research methods, which are more effective, ethical, and economical and do not cause dogs or any other animals to suffer.

Thank you for your time and consideration for this crucial issue. I would be pleased to meet with you to discuss this matter further. Please inform me of any action taken in this regard by your office.

Most respectfully,

Muskan Bhatia, PhD
Science Research Associate,
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## References


[1]Dutta SK. No 11011(13)/9/2022-CPCSEA-DADF. Vaccine Trials Using Dogs. Accessed on 10 October 2022. https://cpcsea.nic.in/WriteReadData/LnPdf/VaccineTrialsusingDogs.pdf.

[2]Dave ST. Ministry of Environment and Forests Notification. The Breeding of and Experiments on Animals (Control and Supervision) Amendment Rules, 2006. Accessed on 10 October 2022. https://cpcsea.nic.in/WriteReadData/userfiles/file/2006.pdf.

[3]Directive 2010/63/EU of the European Parliament and of the Council of 22 September 2010 on the Protection of Animals Used for Scientific Purposes Text with EEA Relevance. Accessed 10 October 2022. https://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=OJ:L:2010:276:0033:0079:en:PDF.

[4]UK Home Office. Guidance on the Operation of the Animals (Scientific Procedures) Act 1986. Accessed 10 October 2022. https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/662364/Guidance_on_the_Operation_of_ASPA.pdf.

[5]US NIH. NIH Grants Policy Statement. Accessed 10 October 2022. https://grants.nih.gov/grants/policy/nihgps/nihgps.pdf.

[6]Grimm D. NIH Ends Funding for Experiments Using "Random Source" Dogs. *Science*. Published 1 October 2014. Accessed 7 October 2022. https://www.science.org/content/article/nih-ends-funding-experiments-using-random-source-dogs.

[7]Animal and Plant Health Inspection Service, US Department of Agriculture. License Renewals for Random Source B Dealers Put on Hold Until Oct. 1, 2016. Published 29 March 2016. Accessed 10 October 2022. https://content.govdelivery.com/accounts/USDAAPHIS/bulletins/13e89a2.

[8]US Department of Agriculture. Licensing and Registration Under the Animal Welfare Act. Accessed 10 October 2022. https://www.aphis.usda.gov/animal_welfare/downloads/aw/awlicreg_gray-book.pdf.

[9]Whan S. Animal Research Regulation. 2010. Accessed 10 October 2022. https://legislation.nsw.gov.au/view/html/inforce/current/sl-2010-0425.

[10]Nishimuta H, Sato K, Mizuki Y, Yabuki M, Komuro S. Species differences in intestinal metabolic activities of cytochrome P450 isoforms between cynomolgus monkeys and humans. *Drug Metab Pharmacokinet*. 2011;26(3):300-306. doi:10.2133/dmpk.DMPK-10-SH-119.

[11]Martinez MN, et al. Challenges in exploring the cytochrome $P_{450}$ system as a source of variation in canine drug pharmacokinetics. *Drug Metab Rev*. 2013;45(2):218-230. doi:10.3109/03602532.2013.765445.

[12]Gad SC. *Animal Models in Toxicology*. Boca Raton, FL, USA: CRC Press; 2006.

[13]Bailey J, Thew M, Balls M. An analysis of the use of animal models in predicting human toxicology and drug safety. *Altern Lab Anim*. 2014;42(3):181-199. doi:10.1177/026119291404200306.

[14]Wall RJ, Shani M. Are animal models as good as we think? *Theriogenology*. 2008;69(1):2-9. https://doi.org/10.1016/j.theriogenology.2007.09.030.

[15]Contopoulos-Ioannidis DG, Ntzani E, Ioannidis JP. Translation of highly promising basic science research into clinical applications. *Am J Med*. 2003;114(6):477-484. doi: 10.1016/s0002-9343(03)00013-5.

[16]Pound P, Braken MB. Is animal research sufficiently evidence based to be a cornerstone of biomedical research? *BMJ*. 2014;348:g3387. https://doi.org/10.1136/bmj.g3387.