European Policy on Animal Welfare

EFPIA comments

EFPIA represents the pharmaceutical industry operating in Europe. Through its direct membership of 31 national associations and 40 leading pharmaceutical companies, EFPIA provides the voice of 2,200 companies committed to researching, developing and bringing new medicines to improve health and quality of life around the world.

EFPIA members are committed to delivering innovative medicines to address needs of patients and reducing the burden of chronic diseases for Europe’s ageing population. EFPIA believes in close cooperation with stakeholders to help create sustainable healthcare systems and to develop prompt responses to health threats.

Meeting the demand for these new, safe and innovative medicines cannot be achieved without a small - but indispensable - component of animal research. The pharmaceutical industry takes ethical concerns related to animal research very seriously, and the complete replacement of animals in medical research is the long-term objective. The principle of ‘3Rs’ - replacement, reduction and refinement - is already a holistic and integral part of R&D processes.

Continued improvement of welfare of laboratory animals is part of EFPIA values and subject of several dedicated work streams aiming amongst others at sharing and disseminating good practice in use, handling and care, as well as at rationalising application of EU regulatory requirements.

It is important to note that the recently adopted Directive 2010/63 on the protection of animals used for scientific purposes sets the most demanding framework for lab animal protection ever. The transposition of this new legislation into national legal systems should be finalised by January 2013. The EU should support and guide member states efforts to adequately enforce this legislation.

The review of EU Policies on Animal Welfare offers several opportunities to complement the very extensive framework set by the recently adopted Directive 2010/63 without duplicating its provisions:

- **Funding for public research and academia to upgrade their facilities up to standards set by Directive 2010/63**

Beyond promotion, education and increased communication of new standards to end users in labs about the Directive requirements, the EU should provide funding or support access to **0% loans for refurbishing and equipping public research animal houses** up to new Directive’s standards.
The EU Directive 2010/63 sets new standards for housing of laboratory animals. In many cases this would require full refurbishing and equipment of animal houses. Without adequate financial support (financing or co-financing) these heavy investments could not take place putting at risk continuity of essential biomedical research projects.

- **Platforms for sharing good practice**
  Sharing good practice to enhance reduction and refinement of animal use would provide direct and tangible animal welfare benefits. The EU should support good practice sharing tools development via renewed communication and education tools (web based, publications, and conference), promote them and facilitate access to them.

- **Support research into refinement methods**
  It is important to recognize that as long as animals would be used in product development, refinement would bring most tangible and direct benefits in term of welfare. The new European Policy on Animal Welfare should recognize refinement methods as much as reduction and replacement methods to stakeholders. While a lot of resources from EU R&D funding are dedicated to development of replacement strategies, no funds at EU level have ever been dedicated to refinement methods.

- **Education and training in laboratory animal sciences**
  EFPIA believes education is central to make sure dissemination of animal welfare education and training latest methods is efficient. EFPIA would support setting mechanism for exchange of good laboratory practice, dissemination of training information and improving inspection standards (in collaboration with other international bodies such as OIE). This initiative could be achieved via a European Network of Reference Centres.

- **Improve communication to stakeholders and rationalize access to information**
  Communication about welfare of laboratory animals should be complemented with information on the objectives of research and the way different stakeholders - in particular the research community - contribute to animal welfare and rationalize animal use in research. Activities such as ‘Farmland’ could be expanded to cover life sciences. This could explain R&D current reality and prospects as well the role of in vivo studies and alternative approaches (such as integrated testing strategies) play in the development of safe products for European patients to European stakeholders and consumers. Results from science and innovation could be illustrated through a program such as a virtual lab visit showing the reality of research.
• Making better use of funding – chasing results making sure that they are applied in practice

Consequently, EU funding should be better used, in particular through a thorough review and implementation of research projects’ results and their dissemination in Europe but also worldwide. Information on animal welfare and various aspects of use of animals in farming, research etc. is fragmented and spread between several Commission DGs sites. A streamlining would be necessary to make the most of these available funds and increase their effect.

• One stop shop/internal consistency and coordination

EFPIA would support reflection on how to bring more consistency between different regulatory requirements – those related to product safety, research and animal welfare to make sure that appropriate balance is kept between the economic/research reality and welfare.

• Transport of laboratory animals

Currently transport of animal used for scientific purposes is challenged. However, as long as use of live animals in research is inevitable, securing transport in best possible conditions and through shortest routes is a must. Moratoria on transport of animals by experienced and well equipped airline companies are therefore counterproductive from animal welfare point of view. On the contrary, transport of animals in good conditions decreases stress and health risks during transport.

It also secures availability of healthy animals for research. The quality of animals impacts on quality of scientific outcomes and therefore the need to use fewer animals per study. EFPIA would therefore encourage a dialogue with key players, including with the private sector and public authorities on best practice and explore ways of how to best address these.

• Advocating for European standards through international bodies

Collaboration to promote animal welfare standards with international bodies such as OIE is crucial to keep European competitiveness and attractiveness as a location to conduct fundamental and applied research. In the context of the Euro 2020 objectives, EFPIA wishes European regulators to step in the international debate to create level playing field for all.
In summary, without duplicating rules newly set by Directive 2010/63, the EU Policy on Animal Welfare could support its implementation through training, communication, dissemination, sharing good practice and removing red tape which does not translate into animal welfare benefits. Funding for upgrading public research animal houses and specific budget lines in EU funding would also deliver direct and tangible outcomes. Public private partnerships could also be considered to find additional financial and in kind resources.

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