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FASEB Statement on the EPA's "Directive to Prioritize Efforts to Reduce Animal Testing"

As the largest coalition of biomedical researchers in the United States, representing 29 societies and over 130,000 scientists and engineers, the Federation of American Societies for Experimental Biology (FASEB) strongly endorses continued federal support for animal research. Therefore, we are disappointed by the recent directive of the Environmental Protection Agency (EPA) Administrator to reduce—and ultimately eliminate—mammalian studies without certainty of robust and clearly validated alternative models by the arbitrary deadline of 2035.

For decades, animal models have been instrumental for accurately assessing the safety and risks of various biological agents, chemicals, and toxins. Examples include discovery of antibiotics, understanding of harmful endocrine effects of bisphenols in plastic, and the detrimental consequences of lead poisoning. Researchers are committed to the reduction, replacement, and refinement of the use of animals in research and thus employ a combination of methods, including non-animal alternatives, when answering research questions. However, computer simulations, cell culture, and organs on a chip augment rather than replace information gleaned from animal studies. The primary challenge to the use of alternative models is their ineffectiveness to predict complex biological processes. For example, evaluating the effects of chemicals on different life stages, such as embryonic development, remains a challenge because experimental systems that mimic all phases of human development do not exist. Thus, it is critical to conduct toxicological assessments in animal models capable of complete physiological responses to determine the range of potential adverse effects of toxicants.

Suspending mammalian studies is inconsistent with the scientific process and EPA's mission to protect human and environmental health. While FASEB recognizes EPA's concern regarding the time and monetary costs associated with animal research, we are more troubled by how the unintended consequences of mandating the use of unvalidated non-animal models could negatively impact scientific rigor and public health. Prior to implementation of the proposed directive, we urge the EPA Office of Chemical Safety and Pollution Prevention and the Office of Research and Development to engage with all stakeholders in the animal research community and be transparent about the practical limitations of the projected timeline.