

# THE AMERICAN ASSOCIATION

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- *Exempt some biomedical procedures performed on agricultural animals from compliance with USDA regulations*

The guidelines contained in *Licensing and Registration Under the Animal Welfare Act (AWA), Guidelines for Dealers, Exhibitors, Transporters, and Researchers*, which were issued by the USDA's Animal and Plant Health Inspection Service (APHIS), specify that, "[i]nstitutions using any regulated live animals for research, testing, teaching, or experimentation must register with the USDA as 'research facilities'." Under the guidelines, however, "Agricultural Research Institutions" are exempt. These institutions include those that, "...perform work involving food, fiber, or agriculture and that use horses and domestic farm animals, including rabbits..." as long as they are not performing "nonagricultural biomedical research." At institutions that perform both agricultural research and nonagricultural biomedical research, the regulations require that different animals be used for agricultural research than are used for nonagricultural biomedical research, and that these groups be kept separate from each other. As a result, many institutions are forced to house and use many more animals than necessary, increasing paperwork and regulatory burden for researchers while also undermining institutional efforts to comply with the "3R's" (reduce, refine and replace). For example, blood draws are routinely used by veterinarians to assess the health of agricultural animals; these procedures do not require registration under the AWA. However, if any of that blood is used for "biomedical" purposes (e.g., sequencing or measurement of factors for experimental diagnostic purposes), then that animal would no longer be categorized as agricultural. [Examples of other AWA-prohibited activities include utilizing samples obtained from 1) agricultural animals that require more than one surgery, or 2) naturally occurring stillborn or naturally aborted fetuses.]

The AWA regulations, therefore, can increase regulatory burden and undermine efforts to reduce both the number of animals and the number of procedures that could cause pain or distress. Therefore, the USDA should exempt from AWA registration certain nonagricultural biomedical research procedures that occur in an agricultural research setting.

- *Reduce inspections from semi-annually to annually*

In section 2.31 (c) of the AWA regulations, Institutional Animal Care and Use Committees (IACUCs) are instructed to, "[r]eview, at least once every six months," the research facility's program for humane care and use of animals and animal facilities, and to submit reports to the "Institutional Office" of the research facility. IACUCs dedicate a significant amount of time to these activities. Reducing the number of reviews and reports required per year from two to one would decrease the burden on the committee without reducing the health or safety of research animals.