

THE AMERICAN ASSOCIATION OF  
IMMUNOLOGISTS

May 28, 2015

**Response of the American Association of Immunologists to the USDA “Petition To Define Alternatives to Procedures That May Cause Pain or Distress and To Establish Standards Regarding Consideration of These Alternatives”**

<https://www.federalregister.gov/articles/2015/03/30/2015-07221/petition-to-define-alternatives->



likely have to handle without any increased budget or additional staff). If both APHIS and the IACUC had a role in making this determination, it would substantially increase the burden for all parties, including investigators, without a tangible improvement in animal welfare.

**5. If the IACUC and APHIS should jointly make a determination, which responsibilities should fall to APHIS and which to the IACUC in terms of evaluating thoroughness?**

AAI does not support a role for APHIS in the determination process. We firmly believe that such responsibilities should remain with the IACUC.

**6. What documentation should the primary investigator provide to demonstrate that he or she has done a thorough consideration of alternatives?**

AAI supports the suggestion made by FASEB that investigators should provide a narrative that evaluates the proposed research in terms of replacement, refinement, and reduction (The 3Rs).