Dear Members of the APA Committee on Animal Research and Ethics:

Public Responsibility in Medicine and Research (PRIM&R) appreciates the opportunity to submit comments to the APA CARE regarding the Guidelines for Ethical Conduct in the Care and Use of Nonhuman Animals in Research, per the April 3, 2011 request for comments.

PRIM&R is a non-profit organization dedicated to advancing the highest ethical standards in the conduct of research. Since 1974, PRIM&R has served the full array of individuals and organizations involved in biomedical, social science, behavioral, and educational research. PRIM&R’s membership community includes professionals representing animal care and use, human subjects protection, and institutional biosafety programs, as well as researchers, institutional officials, government personnel, subject advocates, ethicists, policy makers, pharmaceutical and biotechnology leaders, and attorneys. Via a wide variety of conferences and other educational activities, PRIM&R provides balanced, thorough, and accurate information on a range of ethical and regulatory issues affecting research, while also offering access to certification, networking, and other professional development resources.

Advancing the ethical treatment of animals in research is integral to PRIM&R’s mission, and the organization sponsored the first of its almost 30 conferences dedicated to institutional animal care and use committees (IACUCs) in 1983. We are proud of the almost three decades PRIM&R has spent creating a strong, principled, and educated community of individuals committed to the ethical care and use of laboratory animals.

PRIM&R fully supports the APA’s effort to require adherence to comprehensive ethical guidelines by its professional research community. It is important that professional organizations such as the APA not only facilitate scientific research, but also ensure that such research continues to adhere to high ethical standards in its treatment of research subjects, both human and animal alike. Dissemination and enforcement of guidelines like those under consideration lend credibility to the issuing organization, and help promote the overall social good.

Much of the document seems to reiterate existing laws and regulations regarding the care and use of animals in research, and PRIM&R acknowledges the value of both officially endorsing such laws and putting them in concise, accessible language for the professional community. But we especially appreciate the efforts to craft ethical principles that go “above and beyond” the letter of the law, reflecting a commitment to advancing ever-higher standards of ethical conduct. In particular, the requirement that “Laboratory animals are to be provided with humane care and healthful conditions during
their stay in any facilities” (III.C) is a powerful call to the better natures of researchers, and demonstrates that the APA sets a higher level of ethical conduct than that codified in the law.

However, we would encourage the authors to reconsider the sentence in article I.B that reads, “Psychologists should act on the assumption that procedures that would produce pain in humans will also do so in other animals.” Our position is that acting on the assumption mentioned here may very well be necessary for ensuring that animal care and use is ethically sound, but it is not sufficient. After all, certain stimuli might distress or pain non-human animals but not human beings. An explicit acknowledgement of this fact would be valuable in urging researchers not to take for granted that a given procedure is acceptable simply because it would not cause pain in humans, and to be vigilant in observing animal distress.

In closing, PRIM&R strongly supports the proposed guidelines and thanks the drafters for their thoughtful recommendations and hard work. We are grateful for the opportunity to respond to the Guidelines for Ethical Conduct in the Care and Use of Nonhuman Animals in Research, and would be happy to expand upon any of our comments if that would be helpful to the APA CARE project members.

Respectfully Submitted,

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Executive Director
Public Responsibility in Medicine and Research (PRIM&R)

Cc: PRIM&R Board of Directors, PRIM&R Public Policy Committee