June 30, 2011

CIOMS@msu.edu

RE: PRIM&R’s response to the revised International Guiding Principles for Biomedical Research Involving Animals

Dear Members of CIOMS/ICLAS:

Public Responsibility in Medicine and Research (PRIM&R) appreciates the opportunity to submit comments to CIOMS/ICLAS regarding the revised International Guiding Principles for Biomedical Research Involving Animals, per the April 19, 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 has been an integral aspect of 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 those committed to the ethical care and use of laboratory animals.

PRIM&R believes the revised International Guiding Principles for Biomedical Research Involving Animals offer a sound moral compass for guiding future research. Establishing clear international guidelines for the ethical conduct of research involving animals is particularly urgent due to the increasingly extensive and complex body of research conducted in developing nations. In our opinion, the revised International Guiding Principles are morally comprehensive and at the same time accessible, succinct, and achievable on an international scale. PRIM&R would particularly like to re-affirm the document’s call for institutions to embrace “a culture of care and conscience in which [individuals] willingly, deliberately, and consistently act in an ethical, humane and compliant way” (art. II). While specific regulatory policies may vary from nation to nation, this overarching ethical principle ought to lie at the core of all such policies.
When genuinely respected, such values provide a sound basis for the ethical treatment of animals in research.

The one change we respectfully suggest is for the drafters to make a stronger and more affirmative statement regarding a requirement for a comprehensive and continuous education for research personnel, as mentioned in article IX. In our opinion, research personnel will adhere to the revised International Guiding Principles more uniformly if the language in art. IX and that regarding “the humane and responsible treatment of animals” were expanded to include the explicit requirement that an ongoing program of institutional education is required for all individuals involved in the care and use of animals. Furthermore, we recommend that the statement require that such an educational program specifically include training and education in ethical principles, regulatory policies, husbandry practices, and the administrative procedures for the review and conduct of research with animals.

In closing, PRIM&R strongly supports the proposed revised guidelines and thanks the drafters for their thoughtful recommendations and hard work. We are grateful for the opportunity to respond to the revised International Guiding Principles, and would be happy to expand upon any of our comments if that would be helpful to the CIOMS-ICLAS 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