



National Association for BIOMEDICAL RESEARCH

February 25, 2025

The Honorable Senator Brian J. Feldman
Chair, Education, Energy, and the Environment
2 West-Miller Senate Office Building
11 Bladen Street
Annapolis, Maryland 21401

Dear Chairman Feldman:

The National Association for Biomedical Research (NABR) is writing in opposition to SB 536, Testing Facilities That Use Animals – Regulation.

This bill would require facilities that use animals in research, education, or testing to be licensed by the State Department of Agriculture; establish a State Inspector of Animal Welfare in the Department to inspect research facilities and testing facilities; and require a research facility and a testing facility to notify the State Inspector of certain violations. In addition, this bill establishes requirements for the use of dogs or cats by a research facility including prohibiting a research facility and testing facility from using certain dogs and cats for research or testing purposes, performing devocalization procedures on dogs or cats, and prohibiting a research facility and testing facility from using traditional animal test methods under certain circumstances.

For more than 46 years, NABR has been the nation's only organization solely dedicated to advocating for sound public policy in support of ethical and essential laboratory animal research and the lifesaving discoveries they produce. NABR's diverse and unified membership includes more than 330 universities, medical and veterinary schools, teaching hospitals, pharmaceutical and biotechnology companies, patient groups and academic and professional societies that rely on humane and responsible animal research to advance global human and animal health.

Animal research remains vital to our nation's mission to understand disease, discover targeted therapies, alleviate suffering, and improve and increase the quality of life. Biomedical research projects involving animals are governed by a strict structure of laws, regulations and guidelines and continue to yield invaluable data in the process of discovering new therapies to treat, cure and prevent disease. Cancer therapies, immunizations, organ transplants, reconstructive surgeries and other medical innovations have been brought to fruition through research conducted at Maryland based companies and institutions.

NABR believes this legislation is unnecessarily duplicative of oversight that is already required at the federal level. Under current federal law, research facilities are subject to unannounced USDA inspections and must comply with the Animal Welfare Act as well as the Public Health Service Policy *The Guide for the Care and Use of Laboratory Animals*. Policies and protocols are in place, and strictly adhered to, that address animal housing and care, veterinary medical care, facilities management, training, and occupational health. Furthermore, most research institutions are also accredited by AAALAC International. AAALAC International is the primary accrediting body for animal research programs in the United States and elsewhere.

We support efforts to replace, reduce, and refine the use of animals in drug and vaccine development. However, new drug and vaccine testing technologies to realize this vision at a broad scale and that meet regulatory acceptance are still many years away.

We ask the committee to unfavorably report SB 536 so Maryland research facilities can continue to create lifesaving treatments for diseases, discover targeted therapies, alleviate suffering, and improve and increase the quality of life for both humans and animals. Should you or your staff have questions please contact Brandon Morton, NABR's Vice President of Government Affairs via email at bmorton@nabr.org.

Sincerely,

Matthew R. Bailey, President