



February 25, 2025

Senate Committee on Education, Energy, and the Environment

RE: Support for SB 536 – An Act Concerning Research Facilities and Testing Facilities That Use Animals

Dear Committee members,

On behalf of Cruelty Free International, a leading organization working to promote the use of modern non-animal testing methods around the world, I write in support of SB 536.

This bill will help ensure that animals are not used in outdated unnecessary tests when valid non-animal methods are available for ensuring the safety of cosmetics, household products, medicines, vaccines, and pesticides. The bill also prohibits certain particularly cruel and problematic practices such as devocalization and the acquisition of dogs and cats from shelters or class B dealers for laboratory use. Crucially, SB 536 will provide state accountability for the use of animal used in research and testing by requiring the facilities covered by the bill to annually report the number of animals used, waivers used for dog and cat toxicological experiments, the number of dogs and cats released for adoption, and data on their use of animal methods and non-animal methods.

Mandating alternatives

Historically, animals have been used in painful tests to assess the safety of many products and medicines used by people. However, in the past 35 years, due to innovations in science, animal tests are increasingly being replaced with non-animal approaches. Modern alternatives are required to go through a rigorous process to demonstrate that they are as or more effective than the animal tests they replace. SB 536 requires the use of alternatives that have been approved for use by the regulatory agencies responsible for regulating the product being tested.

It may be commonly assumed that once a non-animal alternative test is available the animal tests no longer occur, or at least rarely. The reality is that such animal tests can persist and even increase long after the adoption of suitable alternative methods. For example, Cruelty Free International has created a list of 10 regulatory animal tests that are still conducted in the US despite the availability of valid non-animal test methods. Such animal tests are long overdue for replacement. SB 536 will identify and what, if any, outdated tests are still being used in Maryland and help to complete the replacement process once and for all, for both scientific and ethical reasons.

Post research placement of dogs and cats.

In the past ten years laws governing post-research placement for dogs (and sometimes cats) have been passed by sixteen states and federal legislation has been considered on this issue. However, information on law compliance and the number of animals released for adoption in these states is lacking. Cruelty Free International conducted a review of state laboratory laws and concluded that without specific reporting requirements and publicly available information about research facilities, their adoption policies and availability of adoptable animals, it could be difficult if not impossible, to enforce such laws or to measure their life-saving impact. SB 536 would address this issue by requiring that laboratories in the state report the number of dogs and cats adopted into homes after their time in research has ended.

State Accountability

Requiring state research and testing facilities to annually report the on the type and purpose of animal tests conducted, waivers used, as well as the use of non-animal test methods will help evaluate Maryland's progress in achieving the goal of replacing the use of animals in testing whenever possible and will help identify areas where

more work needs to be done to either develop new non-animal methods or ensure the uptake of existing non-animal tests.

It has become clear that individual states must play a greater role in overseeing activities involving the use of animals in research and testing to meet public expectations for the protection and reduction of animals used in research and testing. SB 536 will help achieve this.

Again, I urge your support.

Sincerely

A handwritten signature in black ink, reading "Monica Engebretson". The signature is fluid and cursive, with a long horizontal stroke extending from the end of the name.

Monica Engebretson
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Cruelty Free International

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