

February 27, 2025

The Honorable 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 Pennsylvania Society for Biomedical Research (PSBR) opposes Senate Bill No. 536 - Research Facilities and Testing Facilities That Use Animals – Regulation, which would, among other provisions, require each research facility and testing facility in the State that uses animals in research, education, or testing to be licensed by the 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.

The research community continues to work diligently to develop testing models that do not require animals and remains committed to the 3Rs – the Refinement, Reduction and ultimate Replacement of animal models. But, the anti-research activists seek to end lifesaving work involving animals immediately, before reliable non-animal model (NAM) alternatives are fully developed and validated to replace them. This legislation advances the goals of anti-research activists. This ill-conceived and unrealistic agenda will be absolutely devastating to human and animal health worldwide. The biomedical research community encourages you to not fall victim to misleading animal extremists and others who refuse or fail to recognize the importance of animals, including dogs and cats, to the research we all demand for ourselves and our loved one.

First, it must be noted that research in dogs and cats is far from the first step in this incredibly important process. Typically, these tests are initiated using in silico (computer-based modeling) and in vitro (cell culture based) systems. Once these non-animal assessments are completed and initial safety indications are met, tests in rodents then take place. Barring any initial findings in these small animal models, an assessment in a larger animal species comes next. When this step is finally reached, dogs are often required because canines provide highly meaningful data that has been clearly shown to translate to safety in humans.

Dogs and cats are used in research when there is a critical need. Alternatives are utilized before research with dogs take place. Of course, these alternatives can only be used when they exist, are proven to work and provide all the necessary data. Adding administrative burdens to the research process is simply unnecessary. However, it is especially true for non-animal models. Government should be encouraging the use of NAMs, not adding red tape that could discourage the robust development and incorporation of alternatives.

The highly regulated use of animals in research must also be approved by an institution's Animal Care and Use Committee, which already reviews documentation to confirm that there are no viable non-animal alternatives available and that researchers demonstrate that the research adheres to the 3Rs principles previously mentioned, including documentation that shows the research utilizes the fewest number of animals to obtain reliable and relevant data.

Importantly, the reporting requirements in SB536 create significant issues for the research community. In some cases, the information is duplicative of reporting already publicly accessible at the federal level. Specifically, institutions already report annually the number and species of animals used in research and similar details are also reported in each inspection report. The reporting required by the federal government is so significant that legislation and regulations were specifically developed to seek ways to reduce administrative burdens. In other cases, the release of information required under SB 536 could include protected veterinary medical information, intellectual property, or trade secrets. For example, the purpose of any traditional animal test and the type of test used could lead to the identification of new drugs under development. While problematic for academic institutions, this is especially problematic for corporations and other private research institutions.

Similarly, the individuals and organizations who receive re-homed animals are kept anonymous and are subject to re-homing agreements that are confidential to protect both their own privacy and the animals placed with these individuals or organizations. There are well-documented incidents of harassment and intimidation by anti-research activists against those who assist in the re-homing of research animals. As such, the names of organizations and individuals involved in this process should remain confidential.

In summary, PSBR believes strongly that this legislation unnecessarily seeks to further regulate an already highly regulated research community, which could increase the cost, both in time and resources, of advancing research and science in Maryland. It also makes the state "unfriendly" to research that requires animal models and could drive away the best and brightest researchers to institutions located in other jurisdictions. That is, this legislation would make Maryland a less acceptable jurisdiction for research in a time when domestic research is critical and in need of promotion.

Thank you for considering our views on this important issue.

Pennsylvania Society for Biomedical Research

By:



Thomas A. Leach  
Executive Director