



**House Health and Government Operations Committee
House Bill 1448
Animal Testing and Research - Alternative Nonanimal Test Methods
March 10, 2025
Unfavorable**

Chair Pena-Melnyk, Vice Chair Cullison and committee members, thank you for the opportunity to offer testimony on HB 1448. The bill prohibits certain research facilities in the State from using a traditional animal test method if an alternative nonanimal test method has received certain approval or the requirement to use a traditional animal test method is waived. It also specifies how research facilities are to conduct testing using traditional animal test methods. Finally, it requires the Office of the Attorney General to enforce the act. Our position is that animal testing should continue to be managed according to existing guidelines and approaches for their ethical and humane treatment that are backed by oversight organizations and established scientific practice. Therefore, we believe the proposed legislation is unnecessary.

All laboratory animal work at University System of Maryland (USM) institutions must be approved by the Institutional Animal Care and Use Committee (IACUC) in accordance with the Animal Welfare Act, The Guide for the Care and Use of Laboratory Animals, and other federal regulations. Researchers consider all alternatives to procedures by employing appropriate, protocol specific search strategies, regardless of species. They are guided by the approach of the "Three Rs" which represents a practical method for implementation referring to replacement, refinement, and reduction when deciding to use animals in research and in designing humane animal research studies. In terms of justifying the use of an animal model, the principal investigator must submit to the IACUC whether other alternatives (e.g., cell culture, computer/modeling/simulation) to animal usage exist and why they are not feasible for the particular research protocol.

As drafted, HB 1448 undermines established protocols and procedures set by the IACUC, bypassing rigorous scientific review and peer evaluation. Granting the State of Maryland - through the Office of the Attorney General - the authority to review waivers and assess alternative research methods sets a concerning and unnecessary precedent. Scientific research, including studies involving animals, is already subject to thorough evaluation to ensure both scientific merit and ethical integrity. The IACUC carefully reviews research methodologies and animal use, while facility inspections further safeguard compliance with

legal and ethical standards. Introducing an additional layer of oversight by the Attorney General's office is redundant and risks politicizing a process that should remain grounded in scientific expertise.

This bill creates unnecessary restrictions on the scientific process. Science relies on rigorous evaluation and innovation, not predetermined lists of "approved" methods that require waivers for anything outside of them. Restricting research methods in this way could limit scientific progress. Additionally, existing regulations already prohibit unethical research, making this additional oversight redundant.

It is important to remember that animal-based research has resulted in groundbreaking discoveries that have helped to save or improve the lives of countless individuals in the United States and throughout the world. At University of Maryland, Baltimore, for example, researchers have carried out major life saving medical research using animal models including the development of aromatase inhibitors for the treatment of breast cancer. Recently, University of Maryland, College Park researchers developed an inhalable coronavirus vaccine making it safe for children and the immunocompromised after conducting animal trials. More broadly, animal-based research has resulted in treatments for asthma, dementia, epilepsy, diabetes, high blood pressure, and numerous other medical conditions. Accordingly, we continue to see the benefits of animal-based research in our everyday lives and the lives of animals.

USM institutions strictly comply with all federal laws governing animal research. We implement rigorous protocols and procedures to ensure humane treatment of animals. Our facilities undergo annual inspections and are subject to unannounced inspections by federal agencies. Additionally, we have robust internal protocol measures and oversight in place, and we submit an annual report to the U.S. Department of Agriculture (USDA) as a registered research facility.

Additionally, the emphasis on minimizing the number of animals used, while a reasonable goal, may be difficult to assess from outside the scientific community. How would this determination be made? Currently, these decisions are carefully reviewed through established protocols, IACUC evaluations, oversight by attending veterinarians, and inspections by USDA, National Institutes of Health Office of Laboratory Animal Welfare, and accrediting bodies.

This existing system ensures ethical and responsible research without the need for additional regulatory layers. The USM remains committed to the ethical and humane treatment of all animals in our care.

We respectfully urge an unfavorable report on HB 1448.



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