

February 13, 2026

The Honorable Senator Brian J. Feldman, Chair
The Honorable Cheryl Kagan, Vice Chair
Committee on Education, Energy, and the Environment
Maryland Senate
Annapolis, Maryland 21401

Subject: SB 423, *Animal Research Modernization and Best Practices Act of 2026*

Dear Chairman Feldman, Vice Chair Kagan & Members of the Committee on Education, Energy, & the Environment:

I write on behalf of the Animal Health Institute (AHI) to respectfully oppose SB 423 and respectfully request an unfavorable report. (I also write as a lifelong resident of Maryland, who currently resides in District 9.) AHI is the U.S. trade association for research-based manufacturers of animal health products – the medicines that keep pets, service animals, and livestock healthy. While we share the goal of incentivizing the use of non-traditional test methods to reduce the need for animal testing, we are concerned about the necessity for and workability of SB 423 and the confusion it would create.

Outlined below are federal requirements mandating the testing of animals in the development and release of animal drugs and biologics that underscore **the animal health industry is unique among industries that use animals for research since the products the industry develops are intended for the very treatment of animals, including pets, service, and agricultural animals.**

From cancer therapies to insulin to lifesaving biologics, research involving animals has played a key role in nearly every major medical advance of the past century. Additionally, treatments for heartworm infestation (a painful and ultimately fatal affliction in dogs), therapies for cholera in hogs, and diagnostic and preventative techniques for brucellosis and tuberculosis in cattle are now all available because of animal research.

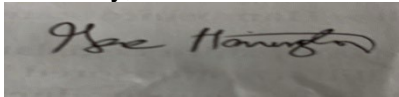
Despite recent federal law and statements from top federal health officials that aspire to dramatically reduce animal testing, there is currently no full replacement for animal models in biomedical research and animal and human drug and biologics development. While AHI supports innovation and the responsible integration of scientifically validated approaches, such as artificial intelligence (AI), organ-on-chip systems, and cell-based assays — when appropriate – these alternative testing methods are not yet capable of fully replicating all the intricacies and unknowns of a full living system. For example, while AI holds great promise and could speed up many aspects of medical research, one of the problems with these technologies is that they largely depend on pulling from existing data. In other words, scientists can't model something they don't know. That is one reason why humane animal research conducted under the strict parameters of the federal Animal Welfare Act (AWA) remains indispensable. Indeed, animal testing facilities are already licensed by the U.S. Department of Agriculture and subject to the data reporting requirements of the AWA.

Moreover, numerous federal regulations and policies in place today under the statutory authority of the Federal Food, Drug and Cosmetic Act ([21 U.S.C. § 301 et seq.](#)) and Virus-Serum-Toxin Act (VSTA) ([21 U.S.C. § 151-159 et seq.](#)) mandate testing of animals to determine the safety and effectiveness of animal and human drugs and biologics. In addition, regulations and policies adopted under the VSTA mandate that a batch of animal biological products be tested on the target animal for safety before it is released from the manufacturing facility.

In closing, AHI must reiterate that animal health industry is unique among industries that use animals for research. In animal health, laboratory animals are used in the research and development process. But, since the sector is also making products for use in animals, those products must be tested on the target animal. The use of animals is required by the regulatory agencies which approve animal health products. While the animal health industry will continue to work on reducing the need for animal testing, some amount will always be required because we are making products to improve the health and welfare of animals. **As such, we urge you to report SB 423 unfavorably.**

I appreciate your time and consideration of AHI's opposition to SB 423 and urge you to contact me at gharrington@ahi.org or (202) 549-5934 if you have any questions.

Sincerely,

A rectangular area containing a handwritten signature in black ink on a light-colored background. The signature appears to read "Gene Harrington".

Gene Harrington
Senior Director, State Affairs
Animal Health Institute