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Laboratory Legislation

Revised Rogers-Javits Bill Ready

As we go to press, Congressman Paul Rogers of Florida is ready to introduce in the U. S. House of Representatives a "new" bill, The Humane Laboratory Animal Treatment Act of 1969. Senator Jacob Javits of New York has approved the bill and will introduce it in the Senate. The date of introduction of both House and Senate bills will be about the middle of June, depending partly upon the time required to obtain co-sponsors. Bill numbers and committee assignments will be given in our September Report to Humanitarians.

This new bill represents months of work by Congressman Rogers and others in revising the Rogers-Javits bill of the 90th Congress. The revised bill does not transfer responsibility for administration of any part of Public Law 89-544 (the Petting Act) from the Department of Agriculture to the Department of Health, Education, and Welfare. The new bill picks up where P. L. 89-544 leaves off, providing for more humane treatment of the animals throughout their stay in the laboratory. Other revisions clarify various portions of the bill to strengthen it and avoid some past misunderstandings.

Text of Bill and Explanations

In this Report No. 8 we give the text of the new bill, as we promised. This should reach you several weeks before the official bill is available. This text is taken from a galley proof which was printed before it was finally agreed to by all parties who participated in its consideration, but we believe that it is accurate. It begins below and continues on Pages 2 and 3.

Unavoidable Delays

The long delay in the introduction of the bill was due mainly to events connecting organizations. The National Society for Medical Research, under the leadership of its President, Dr. Maurice B. Visscher, has actively fought against approval of the bill by any other scientific organization. To the A-V people it is "all or nothing". To Dr. Visscher, it is "nothing at all". Both of these intransigent attitudes lead to the same dismal result so far as the suffering animals are concerned.

Fortunately for the animals, not all humanitarians are hard-core antivivisectionists and not all medical researchers oppose regulation designed to avoid unnecessary suffering by laboratory animals. There are many scientists who have studied the matter sympathetically and objectively, trying to divorce the issues from name calling and strait-jacketed thinking. Among these is Dr. Lowell Greenbaum, Professor of Pharmacology in the College of Physicians and Surgeons of Columbia University, whose position as Past President and Chairman of the Committee on Legislation of the New York State Society for Medical Research made his support particularly valuable. Dr. Greenbaum worked cooperatively with humanitarians to find a formula which would be acceptable to both humanitarians and the kind of constructively-minded scientists he represents.

As a result, the previous Rogers-Javits bill for the first time in the history of laboratory animal legislation received the approval of a very influential scientific group, the NYSSMR, and also of the American Society for Pharmacology and Experimental Therapeutics. Only because of this was it possible to obtain the support in the 90th Congress of Senator Javits and many others.

Personalities versus Issues

During the 90th Congress it became evident that even with the support of the leading humane societies and the two medical organizations, the bill could not be gotten through the committees of Congress without changes. After months of arduous work and negotiation the revised bill was produced. The humane societies which have been working constructively on laboratory animal legislation approved the new bill. And finally, in May, the New York State

REPORT TO HUMANITARIANS

No. 8 — June, 1969

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Society for Medical Research also approved the revisions.

During such delays, what frequently happens is that all kinds of unfounded rumors and misinformation start to circulate. We believe that it is better to get the available facts to you promptly, so you will not be sidetracked by conjecture.

The misinformation and half-truths which are circulated by opponents in a frantic effort to block any constructive efforts to help the laboratory animals are more likely to center around personalities than issues. This was shown in our Reports to Humanitarians Nos. 6 and 7. Another example is to be found in the abuse which has been heaped upon Dr. Greenbaum for his efforts in helping to find a common meeting ground for the two groups. His remarks at a medical society meeting in behalf of this legislation, which naturally were calculated to appeal to doctors rather than humanitarians, have been lifted from context and widely circulated in an attempt to discredit Dr. Greenbaum and the legislation itself. This undoubtedly has influenced many humanitarians against the bill.

The Main Point

The result of all of this kind of childish dealing in personalities and name calling, as opposed to objective consideration of the issues, is that much of the discussion of laboratory legislation has been ludicrously misinformed, and frequently misses entirely the real point, which is: Is this the best legislation that can be obtained in the foreseeable future? If we ask for more than that, we get nothing; if we ask for less, we do the animals a disservice. The answer to the matter of judgment. Those who have made this judgment are far more experienced in such matters than most humanitarians.

What Should You Do?

Humane Information Services is a tax-exempt national humane society which is not permitted to devote a substantial part of its activities to influencing legislation. We offer the text and analysis of the bill merely as an informational service, in response to many requests by our readers, to aid you in forming your own judgments. We think the bill is an excellent one, as strong as it could be and still offer any hope of passage. But that is merely our judgment. Your own position with respect to the bill, and what you should do to support or oppose it, is entirely up to you.

A BILL

To amend the Public Health Service Act to provide special assistance for the improvement of laboratory animal research facilities; to establish further standards for the humane care, handling, and treatment of laboratory animals in departments, agencies, and instrumentalities of the United States and by recipients of grants, awards, and contracts from the United States; to encourage the study and improvement of the care, handling, and treatment and the development of methods for minimizing pain and discomfort of laboratory animals used in biomedical activities; and to otherwise assure humane care, handling, and treatment of laboratory animals, and for other purposes.

Be it enacted by the Senate and House of Representatives of the United States of America in Congress assembled, That this Act may be cited as the "Humane Laboratory Animal Treatment Act of 1969".

DECLARATIONS OF POLICY

Sec. 2. The Congress hereby finds and declares that good health and high quality are essential in the laboratory animals used in the conduct of biomedical activities vital to the health and safety of the people of the United States, and that lab-

oratory animals used in biomedical activities should be spared unnecessary pain and discomfort.

DEFINITIONS

Sec. 3. For the purpose of this Act--

(a) The terms "department or agency" and "department and agency" mean any department, agency, or instrumentality of the United States, or of the District of Columbia.

(b) The term "Secretary" means the Secretary of Health, Education, and Welfare.

(c) The term "laboratory animal research facility" means any facility where laboratory animals are used or held for use in biomedical activities and which is either (1) owned, controlled, or used by a person engaged in biomedical activities who is a recipient of a grant or award from or has a contract with, or otherwise receives funds from any department or agency; or (2) which is owned, controlled, or used by any department or agency.

(d) The term "laboratory animal" means any living warmblooded vertebrate animal (other than a human) which is used or intended for use in connection with biomedical activities.

(e) The term "biomedical activities" means research, testing, and education utilizing laboratory animals, except in elementary and secondary education, including research and testing with respect to the production and standardization of chemicals, detergents, pharmaceuticals, cosmetics, and drugs.

(f) The term "person" includes any individual, partnership, association, corporation (its affiliates and subsidiaries), trust, estate, firm, joint stock company,

union, or legal entity.

(g) The term "accredited" means that a laboratory animal research facility has been inspected by the Secretary, or his agents designated pursuant to section 5 (a)(1), and has been certified by the Secretary as being in compliance with the provisions and policy of this Act and with the standards and regulations issued pursuant hereto and the policies and procedures approved by the facility's Committee on Animal Care and Utilization: Provided, That the physical plants of laboratory animal research facilities which, under contracts let prior to the date of enactment of this Act, have been brought into conformance with the standards for laboratories promulgated by the Secretary of Agriculture under the Act of August 24, 1966 (Public Law 89-544), shall be deemed to be

(Continued on Page 2)

June, 1969

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LABORATORY LEGISLATION

Continued from Page 1

approved for purposes of initial accreditation.

(h) The term "Committee on Animal Care and Utilization" means a committee composed of two or more biomedical scientists, at least one of whom shall be a veterinarian employed either on a full-time or consultant basis, appointed by the laboratory animal research facility it serves, or by the organization or institution of which such facility is a part. The names of the members of this committee shall be on record with the Secretary.

(i) The term "unnecessary pain and suffering" means any pain, discomfort, or suffering which could be eliminated or reduced in intensity or duration without preventing the acquisition of that information which the experiment or test is seeking.

(j) The term "biological model" means any living organism or living or non-living system which represents the functions of a living body.

(k) The term "professionally qualified" refers to those persons who are scientifically trained and competent to judge whether any pain or discomfort is kept to a minimum commensurate with the experimental needs and physiological functions under study and whether the use to which such animals are put are for legitimate scientific and educational purposes.

(l) The term "professional accrediting body" means any professionally qualified individual or organization other than regular employees of the Department of Health, Education, and Welfare who may be put under contract by the Secretary at his pleasure, either on a full time or part time basis to inspect laboratory animal facilities under his direction.

EXPLANATION OF SECTION 3 ABOVE

THIS HIGHLY IMPORTANT SECTION DEFINES TERMS USED ELSEWHERE IN THE BILL, TO AVOID MISUNDERSTANDING AND AMBIGUITY. FOR EXAMPLE, SUBSECTION (c) DEFINES "LABORATORY ANIMAL RESEARCH FACILITY" IN SUCH A MANNER AS TO AVOID LEGAL LOOPHOLES WHICH MIGHT ARISE BECAUSE OF THE VARIETY OF CORPORATE ENTITIES INVOLVED. OTHER TERMS ALSO HAVE BEEN VERY CAREFULLY DEFINED TO INCLUDE ALL IMPORTANT ANIMAL USES. AND THE DEFINITION OF THE TERM "BIOLOGICAL MODEL" (SUBSECTION j) SHOULD CLEAR UP THE MISUNDERSTANDING ON THE PART OF SOME HUMANITARIANS WHO THOUGHT THIS TERM APPLIES ONLY TO LIVE ANIMALS, AND DOES NOT COVER SUCH NON-LIVING SYSTEMS AS MATHEMATICAL MODELS. EACH OF THE OTHER DEFINITIONS HAS BEEN CAREFULLY RESEARCHED, STUDIED AND DISCUSSED BEFORE INCLUSION IN THE BILL.

RESEARCH FACILITIES

(Section 4 of the bill is omitted here to save space, because it is highly technical and would not be understood by most humanitarians, and has little or nothing to do with the main purposes of the bill. The explanation below will suffice.)

EXPLANATION OF SECTION 4 ABOVE

THIS SECTION RELATES TO GRANTS FOR CONSTRUCTION OF LABORATORY ANIMAL RESEARCH FACILITIES. THE LABORATORIES MAKE THE VALID POINT THAT IF THE GOVERNMENT IS TO REQUIRE THEM TO PROVIDE MORE COMMODIOUS AND HUMANE HOUSEKEEPING FACILITIES FOR THE ANIMALS, WHICH WOULD RUN INTO MILLIONS OF DOLLARS, SOME PROVISION SHOULD BE MADE FOR PROVIDING PART OF THE FUNDS NECESSARY. HUMANITARIANS MIGHT SAY THAT THE LABORATORIES ALREADY ARE GETTING TOO MUCH MONEY, AND SHOULD USE FUNDS THEY NOW ARE DEVOTING TO OTHER PURPOSES FOR THE IMPROVED ANIMAL FACILITIES; BUT THIS IS A MATTER OF OPINION, FOR CONGRESS TO DECIDE.

(1) I wish _____ (do not wish _____) to be kept on the mailing list for future Reports to Humanitarians (you do not have to become a member or contribute to continue receiving them).

(2) My name, address and zip code on the reverse side are _____ (are not _____) correct. If not, they are as follows: _____

(3) I wish to become: _____

(a) an Associate Member and enclose \$1 annual dues; _____

(b) a Patron Member and enclose \$ _____ (any amount over \$1).

I am _____ (am not _____) able and willing to write occasional letters and report local conditions to you on request, in connection with programs for the protection of animals.

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STANDARDS, REGULATIONS, AND ACCREDITATION

Sec. 5. (a) In order to effectuate the findings and declarations set forth in section 2 of this Act, the Secretary shall prescribe and publish in the Federal Register standards and regulations for the humane care, handling, and treatment of those laboratory animals used in any significant quantity and such other animals with respect to which he determines such standards and regulations are necessary and desirable, and for the accreditation of laboratory animal research facilities. In formulating such standards and regulations the Secretary shall consult with (1) departments and agencies which use laboratory animals or which make grants, awards, or contracts involving their use by the recipients of such grants, awards, or contracts; (2) the National Academy of Sciences-National Research Council; (3) and such humane, scientific, and other organizations as he may select. Such standards and regulations shall conform to the requirements prescribed below:

EXPLANATION OF SECTION 5(a) ABOVE

SOME MISINFORMED HUMANITARIANS HAVE SAID THAT STANDARDS AND REGULATIONS GOVERNING THE USE OF ANIMALS AS PROVIDED IN THE ACT WOULD BE ESTABLISHED BY THE LABORATORIES THEMSELVES, OR THE ACCREDITING BODIES WHICH THEY ASSUME WOULD BE INDEPENDENT OF THE SECRETARY OF H.E.W. IT MUST BE APPARENT FROM A READING OF SECTION 5, HOWEVER, THAT THE SECRETARY, AND ONLY THE SECRETARY, PRESCRIBES THESE STANDARDS AND REGULATIONS. IN FORMULATING THEM, HE MUST CONSULT WITH VARIOUS ORGANIZATIONS INCLUDING HUMANE SOCIETIES. THE ACT DOES NOT SAY THAT HE "MAY CONSULT", BUT SPECIFIES THAT HE "SHALL CONSULT". NATIONAL HUMANE SOCIETIES THAT ARE ABLE TO CONDUCT SUCH NEGOTIATIONS ON AN OBJECTIVE AND FACTUAL BASIS WILL HAVE OPPORTUNITY TO HAVE A VOICE IN FORMULATING THE STANDARDS AND REGULATIONS.

(1) each laboratory animal research facility shall be accredited and periodically inspected by the Secretary, or by his designated agents, who shall be professionally qualified employees of the Secretary or professional accrediting bodies, in order to determine if such facility is in compliance with the provisions and policy of this Act, and the standards and regulations issues pursuant hereto and the policies and procedures approved by the facility's Committee on Animal Care and Utilization. The Secretary shall issue certificates attesting to such accreditation;

EXPLANATION OF SECTION 5(a)(1) ABOVE

SOME HUMANITARIANS HAVE CLAIMED THAT THE BILL PROVIDES "FOR THE FOX TO GUARD THE CHICKENS". ON THE CONTRARY, SUBSECTION (1) OF SECTION (a) PLAINLY GIVES AUTHORITY AND RESPONSIBILITY TO THE SECRETARY, THROUGH HIS PROFESSIONALLY-QUALIFIED EMPLOYEES (SEE DEFINITION OF "PROFESSIONALLY-QUALIFIED" IN SECTION 3 (k)) OR HIS AGENTS TO KEEP THE LABORATORIES IN COMPLIANCE. ANY PROFESSIONAL ACCREDITING BODIES USED WILL NOT BE ACTING ON THEIR OWN, BUT AS AGENTS OF THE SECRETARY, WHO RETAINS FULL AUTHORITY TO DETERMINE THE STANDARDS, REGULATIONS AND POLICIES TO BE FOLLOWED. THERE CAN BE NO PASSING THE BUCK, AND NO ARBITRARY ACTION BY ANY PROFESSIONAL BODIES CONTRARY TO THE REGULATIONS OF THE SECRETARY.

(2) every laboratory animal research facility shall provide for the review and approval of policies and procedures governing the care, handling, treatment, and use of laboratory animals in such facility, for the purpose of assuring that laboratory animals (a) are cared for and handled humanely in accordance with this Act and the standards and regulations promulgated thereunder by the Secretary; (b) are used in such facility only for legitimate scientific or educational purposes; (c) are cared for, handled, treated, and used only by individuals qualified for their specific tasks and not found ineligible under section 6(e) of this Act; (d) and that sound and reasonable policies and procedures are followed to protect laboratory animals in such facility against unnecessary pain and suffering. Such review and approval shall be made by the Committee on Animal Care and Utilization for the facility. Commonly performed procedures need not be reviewed on an individual basis. Novel procedures likely to cause pain shall be reviewed individually;

EXPLANATION OF SECTION 5(a)(2) ABOVE

SOME HUMANITARIANS HAVE CLAIMED THAT THE BILL PROVIDES "FOR THE FOX TO GUARD THE CHICKENS". ON THE CONTRARY, SUBSECTION (2) OF SECTION (a) PLAINLY GIVES AUTHORITY AND RESPONSIBILITY TO THE SECRETARY, THROUGH HIS PROFESSIONALLY-QUALIFIED EMPLOYEES (SEE DEFINITION OF "PROFESSIONALLY-QUALIFIED" IN SECTION 3 (k)) OR HIS AGENTS TO KEEP THE LABORATORIES IN COMPLIANCE. ANY PROFESSIONAL ACCREDITING BODIES USED WILL NOT BE ACTING ON THEIR OWN, BUT AS AGENTS OF THE SECRETARY, WHO RETAINS FULL AUTHORITY TO DETERMINE THE STANDARDS, REGULATIONS AND POLICIES TO BE FOLLOWED. THERE CAN BE NO PASSING THE BUCK, AND NO ARBITRARY ACTION BY ANY PROFESSIONAL BODIES CONTRARY TO THE REGULATIONS OF THE SECRETARY.

THEY MAY BE CONDUCTING A NUMBER OF INDIVIDUAL PROJECTS. WITH ALL OF THESE MANY THOUSANDS OF SEPARATE ACTIVITIES GOING ON SIMULTANEOUSLY IN THE THOUSANDS OF LABORATORIES, INVOLVING MANY MORE THOUSANDS OF WORKERS AND MANY MILLIONS OF ANIMALS, IT WOULD BE ABSOLUTELY IMPOSSIBLE FOR THE SECRETARY OR HIS EMPLOYEES TO OBSERVE EACH OPERATION, TO EXAMINE ALL OF THE DETAILED PLANS INCLUDING THE PROVISIONS FOR ANESTHESIA AND OTHER TREATMENT OF THE ANIMALS, AND TO FREQUENTLY VISIT THE VARIOUS LABORATORY ROOMS IN WHICH THE WORK IS GOING ON. TO DO THIS WOULD REQUIRE A REGULATORY STAFF ALMOST AS LARGE AS THE STAFFS OF THE LABORATORIES THEMSELVES. OBVIOUSLY, CONGRESS WILL NOT PROVIDE THE HUNDREDS OF MILLIONS OF DOLLARS WHICH WOULD BE REQUIRED TO FINANCE THAT KIND OF SUPERVISION. THIS HAS BEEN ONE OF THE PRINCIPAL OBJECTIONS TO LABORATORY ANIMAL REGULATION BY CONGRESS AND THE LABORATORIES THEMSELVES, WHICH SHUDDER TO THINK OF THE MANY THOUSANDS OF INSPECTORS RUNNING AROUND THE LABORATORIES GETTING IN THE WAY OF THOSE WHO ARE DOING THE WORK. FOR A LONG TIME THIS PROBLEM SEEMED TO BE INSOLUBLE UNTIL THOSE WORKING ON THIS LEGISLATION CAME UP WITH THE IDEA OF USING COMMITTEES ON ANIMAL CARE AND UTILIZATION IN EACH LABORATORY FACILITY. THESE COMMITTEES WILL BE SUFFICIENTLY CLOSE TO THE OPERATIONS, AND BY THE TERMS OF THE BILL ARE REQUIRED TO BE RESPONSIBLE FOR THE PLANS FOR EACH OF THE RESEARCH OR TESTING PROJECTS, THE PROPER INSTRUCTION OF THOSE CONDUCTING THE PROJECTS SO THEY WILL KNOW WHAT IS REQUIRED TO MEET THE REGULATIONS SET FORTH BY THE SECRETARY, AND FOR THE CONTINUOUS INSPECTION OF THE OPERATIONS TO SEE THAT THE PROJECTS ARE CARRIED OUT AS PLANNED AND APPROVED. SPOT CHECKS BY EMPLOYEES OF THE SECRETARY WOULD MAKE SURE THAT THE COMMITTEES ON ANIMAL CARE AND UTILIZATION WERE PROPERLY CARRYING OUT THEIR DUTIES. AND IT MUST BE REMEMBERED THAT THESE COMMITTEES WOULD HAVE GRAVE RESPONSIBILITIES, NOT ONLY TO THE SECRETARY, BUT ALSO TO THE LABORATORIES BY WHICH THEY ARE EMPLOYED AND TO THEMSELVES. ANY EVIDENCE OF INTENTIONAL VIOLATION OF THE SECRETARY'S STANDARDS AND REGULATIONS WOULD MAKE THE MEMBERS OF THE COMMITTEE, THE LABORATORIES EMPLOYING THEM, AND THE INDIVIDUAL SCIENTISTS CONDUCTING THE PROJECTS SUBJECT TO SEVERE PENALTIES WHICH ARE COVERED IN A LATER SECTION. ANYONE WHO KNOWS THE WAY IN WHICH PROFESSIONAL PEOPLE OPERATE WILL UNDERSTAND THAT THE MEMBERS OF THESE COMMITTEES WOULD BE EXTREMELY RELUCTANT TO BLINK AT OBVIOUS VIOLATIONS OF THE STANDARDS AND REGULATIONS LAID DOWN BY THE SECRETARY. IF THEY TRIED TO PASS THE BUCK TO THEIR SUPERIORS IN THE LABORATORY ORGANIZATION, THE GUILT OF THE LABORATORY ITSELF WOULD BE EVEN MORE EVIDENT, AND THE LABORATORY ADMINISTRATORS WOULD BE EXTREMELY RELUCTANT TO APPROVE OR CONDONE A VIOLATION. THIS PROVISION IN THE BILL FOR COMMITTEES ON ANIMAL CARE AND UTILIZATION IN EACH LABORATORY FACILITY, FAR FROM BEING THE FOX-GUARDING-THE-CHICKENS PROVISION WHICH MISINFORMED HUMANITARIANS HAVE CLAIMED, IS ONE OF THE MOST USEFUL AND VALUABLE PROVISIONS OF THE BILL, FOR WHICH ALL CONCERNED IN ITS FORMULATION SHOULD BE CONGRATULATED. IF THE BILL PASSED WITHOUT THIS PROVISION, WE WOULD HAVE JUST ANOTHER UNENFORCED LAW ON THE STATUTE BOOKS; AND KNOWING THIS, CONGRESS WOULD BE VERY UNLIKELY TO PASS THE BILL. SO, THIS PROVISION FOR COMMITTEES ON ANIMAL CARE AND UTILIZATION SERVES TWO ESSENTIAL PURPOSES: HELPING TO GET THE BILL PASSED, AND ENFORCING THE ACT AFTERWARDS.

(3) commensurate with experimental needs and with the physiological functions under study, all biomedical activities likely to cause pain or discomfort greater than that attending anesthetization, shall be performed under adequate anesthesia. Exceptions to the use of such anesthesia shall be made only when anesthesia would defeat the objective of the biomedical activity, and then only with the express certification of this fact by the facility's Committee on Animal Care and Utilization;

EXPLANATION OF SECTION 5(a)(3) ABOVE

THIS SECTION SETS FORTH THE GENERAL LIMITATIONS UNDER WHICH EXPERIMENTS AND TESTS MAY BE CONDUCTED. CRITICS WHO HAVE CLAIMED THAT THE SCIENTISTS CAN DO ANYTHING THEY WANT TO CANNOT HAVE READ THIS SECTION WITH AN OPEN MIND. FIRST, IT PROVIDES THAT ANIMALS WHICH MIGHT SUFFER PAIN OR DISCOMFORT SHALL BE ANESTHETIZED. THERE ARE, AND ALWAYS MUST BE, SOME EXCEPTIONS TO THE ANESTHESIA REQUIREMENT. FOR EXAMPLE, IN THE ATTEMPTS TO FIND THE CAUSE OF AND CURE FOR CANCER, ANIMALS IN WHICH MALIGNANT GROWTHS HAVE BEEN INDUCED ARE BOUND TO SUFFER SOME PAIN OR DISCOMFORT. IT WOULD BE IMPOSSIBLE TO KEEP THEM ANESTHETIZED THROUGHOUT THE PERIOD IN WHICH SUCH PAIN OR DISCOMFORT IS EXPERIENCED. IT MUST BE OBVIOUS TO ANYONE THAT IN THE PRESENT STATE OF PUBLIC OPINION NO CONGRESS WOULD POSSIBLY PASS LEGISLATION PREVENTING THE SEARCH FOR THE CAUSE AND CURE OF

CANCER. IT SHOULD CANNOT POSSIBLY SET STANCES UNDER WHICH MTTED; IT HAS NOT WILL TO PUT THE SC ET. THE ONLY POSS SECRETARY TO SET F LATIONS THAN COULD

(4) when an operation conditions and care situation, consistent with to minimize postoperative such procedures would activity, and then on fact by the facility's tion;

(5) commensurate with physiological functions shall receive proper laboratory animal shall treated, and properly

(6) when mechanical used, care shall be taken against unnecessary suffering

EXPLANATION OF THESE SUBSECTIONS, HUMANE CARE OF THE EXPERIMENTATION OR POSTOPERATIVE PERIOD AFFORDED IN ANY DE

(7) reasonable record of all laboratory animal on Animal Care and Utilization (2) of this section in such manner as the ble the evaluation of Act.

(b) Initial standards shall be prescribed by not later than one year The Secretary shall g tions which may have the Act of August 24, amendments thereto ma Secretary determines.

EXPLAN THE REQUIREMENT TH MITTEES ON ANIMAL THE SECRETARY, IS UNDER THE ACT. WI COMPLETE FORM, THE CHECK ON COMPLIANCE LY DETERMINE THE P SECTION. NON-COM FAILURE TO MAINTAIN BE EASILY ASCERTAIN THOSE RECORDS. ON AS A RESULT OF SPOT PLOYER, THE BLAME UTILIZATION. NO C THING, OR THAT THE ON, WOULD BE VALID THEY VALUED THEIR WITH ANIMALS IN LA PARTICIPATE IN FED THE RISK OF DISCOV RETARY'S STANDARDS WHO HAVE PARTICIPA WHO HAVE STUDIED A PROBLEM, ARE FULLY OF THE BILL WOULD ANCE WITH THE SECR

Sec. 6. On and after lations provided for the Federal Register facility shall (1) co this Act and the stan thereto and the polic ty's Committee on Ani inspections by the Se to section 5(a)(1), a as the Secretary deem such facility is in c of this Act and the s hereto and the polic ty's Committee on Ani such reports as may b ed, That the provisio ards and regulations such laboratory anima facility as are subje law 89-544) nor to an use for research and and treatment is subj That the Secretary ma tory animal research standards and regulat al funds for construc chase of new equipmen is evidence that the making reasonable eff such standards and re such cases the Secret section 5(a)(1), shal animal research facil facility shall comply which do not depend u Secretary shall issue sional accreditation.

EXPLAN AMONG OTHER THING ARDS AND REGULATIO THE TERMS OF THE A SUBJECT TO THE PRO MINISTERED BY THE ANIMALS WHILE THEY 89-544. THIS DESI NEW BILL WOULD IMI P. L. 89-544 BY TE THE STANDARDS, REC WHICH ARE THE RES

OUS, ALSO, THAT CONGRESS ITSELF ALL OF THE DIFFERENT CIRCUMSTANCES TO THE RULE SHALL BE PER- TECHNICAL KNOWLEDGE NOR THE IN SUCH A LEGAL STRAIGHT JACK-ERNATIVE IS TO INSTRUCT THE E DETAILED STANDARDS AND REGU- JUDGED IN THE BILL.

erformed on any laboratory animal, observed during and after the op- surgical and veterinary practice, comfort and infection, except when the objective of the biomedical the express certification of this tee on Animal Care and Utiliza-

experimental needs and with the study, each laboratory animal on for its bodily comfort and each manely cared for, handled and itered; and housed; ical, or restraining devices are protect the laboratory animal ; and pain; and

ON 5(a)(4)(5)(6) ABOVE OTHER THINGS, PROVIDE FOR THE ; THROUGHOUT THE PERIOD IN WHICH ; IS BEING CONDUCTED, AND THE ;H PROTECTION, OF COURSE, IS NOT EEVER BY PUBLIC LAW 89-544.

ating to the use and disposition the proceedings of each Committee n, as provided for under subsec- ll be maintained in such form and ry may prescribe as to make possi- with the requirements of this

regulations under this section ecretary as soon as reasonable but the date of enactment of this Act. regard to any standards or regula- mulgated under the provisions of ublic Law 89-544). Additions and scribed from time to time as the

SECTION 5(7) ABOVE DATE RECORDS BE KEPT BY THE COM- UTILIZATION, AS PRESCRIBED BY ORTANT IN OBTAINING COMPLIANCE ; RECORDS KEPT IN REASONABLY OR EMPLOYED BY THE SECRETARY TO ENTER THE LABORATORY AND QUICK- REQUIRING HIS MORE DETAILED IN- COULD TAKE ONLY TWO FORMS: CORDS PRESCRIBED, WHICH WOULD DELIBERATE FALSIFICATION OF FALSIFICATION WERE UNEARTHED, TIONS BY THE SECRETARY'S EM- PLACED SPECIFICALLY AND THERE E THE COMMITTEE ON ANIMAL CARE AND T THEY HAD OVERLOOKED SOME- OO BUSY TO KNOW WHAT WAS GOING EMBERS OF THE COMMITTEE, IF) ABILITY TO CONTINUE WORKING RESEARCH OR TESTING AND TO NTS, CERTAINLY WOULD NOT RUN A SERIOUS VIOLATION OF THE SEC- ULATIONS. THE HUMANITARIANS ORMULATION OF THIS BILL, AND E CONDITIONS RELATING TO THIS ED THAT THIS IMPORTANT SECTION HONEST AND EFFECTIVE COMPLI- STANDARDS AND REGULATIONS.

OMPLIANCE year after the standards and regu- on 5 of this Act are published in very laboratory animal research h the provisions and policy of d regulations issued pursuant procedures approved by the facili- and Utilization; (2) permit such or his agents designated pursuant : prescribed in such regulations or ary in order to determine whether e with the provisions and policy and regulations issued pursuant procedures approved by the facili- and Utilization; and (3) file ived by the regulations: Provid- policy of this Act and the stand- pursuant thereto shall not apply to rs of a laboratory animal research e Act of August 24, 1966 (Public s during any period prior to their during which their care, handling, uch Act: And provided further, extensions of time to such labora- es for compliance with those ch depend upon obtaining addition- renovation of facilities or pur- e Secretary determines that there ry animal research facility is obtain such funds and will meet is within a reasonable time. In his agents designated pursuant to ionally accredit such laboratory d the laboratory animal research l other standards and regulations ining such additional funds. The tificates attesting to such provi-

SECTION 6(a) ABOVE SECTION PROVIDES THAT THE STAND- D BY THE SECRETARY PURSUANT TO NOT APPLY TO ANIMAL QUARTERS OF P. L. 89-544, WHICH IS AD- NT OF AGRICULTURE, NOR TO ANY DER THE JURISDICTION OF P. L. ; VALIDITY OF ANY CLAIM THAT THE IN ANY WAY WITH CARRYING OUT OF 'MENT OF AGRICULTURE. ALL OF ; AND ENFORCEMENT PROCEDURES EITY OF THE SECRETARY OF H.E.W.

UNDER THE TERMS OF THE NEW BILL REPRESENT A NET ADDITION TO SUCH PROTECTION OF THE ANIMALS AS IS AFFORDED BY P. L. 89-544.

(b) If the Secretary determines that a laboratory animal re- search facility has failed to comply with any of the provisions or policy of this Act, or any of the standards and regulations issued pursuant hereto or the policies and procedures approved by the facility's Committee on Animal Care and Utilization (ex- cept those standards and regulations especially provided for in subsection (a) of this section), he shall notify the Committee on Animal Care and Utilization of the laboratory animal re- search facility, specifying the nature of such noncompliance and the time within which the noncompliance must be remedied.

(c) Any laboratory animal research facility (or subdivision thereof) not owned or controlled by a department or agency which knowingly fails to obey after a reasonable period of time, as determined by the Secretary, a notice of noncompliance issued by the Secretary under this section shall (1) be subject to a civil penalty of up to \$500 for each offense, and each day during which such failure continues shall be deemed a separate offense; and (2) be ineligible to receive or use funds for bio- medical activities from a department or agency under a grant, award, or contract made after the effective date of the stand- ards and regulations issued pursuant to this Act, and shall re- main so ineligible until such time as the Secretary determines that such laboratory animal research facility is in compliance with the provisions and policy of this Act and the standards and regulations issued pursuant hereto and the policies and procedures approved by the facility's Committee on Animal Care and Utilization: Provided, That the Secretary may limit such ineligibility to receive or use such funds in any given case of noncompliance to the particular grant, award, or contract in connection with which such noncompliance occurred.

(d) If any laboratory animal research facility owned or con- trolled by a department or agency knowingly fails to obey a no- tice of noncompliance issued by the Secretary under this sec- tion, the Secretary shall give public notice of such noncompli- ance in the Federal Register.

EXPLANATION OF SECTION 6(b)(c)(d) ABOVE THESE SUBSECTIONS PROVIDE THAT ANY NON-GOVERNMENTAL LABO- RATORIES FOUND TO BE NOT IN COMPLIANCE WITH THE STANDARDS AND REGULATIONS PROMULGATED BY THE SECRETARY SHALL BE SUBJECT TO A CIVIL PENALTY OF UP TO \$500 FOR EACH SEPA- RATE OFFENSE, AND FOR EACH DAY DURING WHICH SUCH FAILURE TO COMPLY CONTINUES. THIS DAILY PENALTY SOON COULD AMOUNT TO A VERY SIZABLE SUM, AND CERTAINLY WOULD BE STRENUOUSLY AVOIDED BY THE LABORATORIES. IN ADDITION, HOWEVER, THE LABORATORY WOULD BE INELIGIBLE TO RECEIVE OR USE ANY FUNDS FROM THE FEDERAL GOVERNMENT UNDER GRANTS, AWARDS OR CONTRACTS, AND WOULD REMAIN SO INELIGIBLE UNTIL THE SECRETARY FOUND THE LABORATORY TO AGAIN BE IN COMPLI- ANCE. THESE PENALTIES ARE SO SEVERE THAT SOME OBJECTING SCIENTISTS HAVE COMPLAINED THAT THE SECRETARY COULD CALL UP A GREAT RESEARCH INSTITUTION SUCH AS COLUMBIA UNIVER- SITY AND TELL THEM TO SHUT DOWN ALL ACTIVITIES SUPPORTED BY GOVERNMENT GRANTS BECAUSE SOME UNDERLING IN A LABORA- TORY CONTROLLED BY THE UNIVERSITY HAD MISTREATED ONE DOG. THIS KIND OF CLAIM BY SOME SCIENTISTS IS JUST AS RIDICU- LOUS AS THOSE MADE BY SOME OBJECTING HUMANITARIANS. THE BILL PROVIDES ADEQUATE PROTECTION AGAINST ARBITRARY OR WHIMSICAL ACTIONS OF THIS B S AMISING TO SEE TWO OFFICEL GROUPS, SCIENTISTS AND HUMANITARIANS, CHAIR- ING AT ONE AND THE SAME TIME THAT THE BILL IS SO LENTENT AS TO GIVE NO PROTECTION TO THE ANIMALS AND SO RESTRIC- TIVE AS TO ENDANGER THE OPERATIONS OF GREAT RESEARCH IN- STITUTIONS!

(e) The individual who conducts or supervises any biomedical activity involving the use of any laboratory animal protected by this Act shall be deemed accountable for such animal during the period of such activity and the period of its postoperative care, and shall, during such periods, insure compliance with the provisions and policy of this Act, the standards and regu- lations issued pursuant hereto, and the policies and procedures approved by the facility's Committee on Animal Care and Utili- zation. Any such individual who, after opportunity for agency hearing, has been found by the Secretary to be guilty of vio- lating any such requirements shall be (1) ineligible to use laboratory animals in any laboratory animal research facility and (2) be ineligible to receive a grant, award, or contract from the United States involving the use of laboratory animals. The Secretary shall prescribe by regulation the conditions un- der which such an individual may have such eligibility re- stored.

EXPLANATION OF SECTION 6(e) ABOVE THE BILL PROVIDES PENALTIES FOR NONCOMPLIANCE NOT ONLY AGAINST LABORATORIES, BUT ALSO AGAINST THE INDIVIDUALS WHO CONDUCT OR SUPERVISE ANY BIOMEDICAL ACTIVITY INVOLV- ING THE USE OF ANIMALS. THE GUILTY INDIVIDUAL BECOMES INELIGIBLE TO USE LABORATORY ANIMALS IN ANY LABORATORY ANIMAL RESEARCH FACILITY, AND INELIGIBLE TO RECEIVE A GRANT OR CONTRACT FROM THE UNITED STATES INVOLVING THE USE OF LABORATORY ANIMALS. THIS WOULD EFFECTIVELY STOP EMPLOYMENT OF THE INDIVIDUAL IN ANY EXPERIMENTS OR TESTS USING ANIMALS. HE WOULD ALMOST SURELY LOSE HIS JOB, AND BE UNABLE TO OBTAIN ANOTHER ONE IN ANY OTHER LABORATORY. SUCH POSSIBILITIES DISTURB SOME SCIENTISTS WHO DO NOT UN- DERSTAND THE SAFEGUARDS AGAINST ARBITRARY OR WHIMSICAL ACTIONS BY THE SECRETARY. BANKING LAWS AND REGULATIONS COULD PUT BANKS OUT OF BUSINESS, TOO, BUT SUCH PROVISIONS ARE NOT USED TO COERCE PEOPLE WHO ARE HONESTLY TRYING TO COMPLY.

JUDICIAL REVIEW (Section 7 of the bill is omitted here to save space, and because it consists of highly technical legal specifications.)

EXPLANATION OF SECTION 7 ABOVE THIS SECTION PROVIDES FOR JUDICIAL REVIEW OF ANY ACTIONS TAKEN BY THE SECRETARY, AND IS FOR THE PURPOSE OF PRE- VENTING ARBITRARY OR WHIMSICAL ACTIONS BY THE SECRETARY TAKEN CONTRARY TO THE ACTUAL FACTS OF THE CASE OR A REA- SONABLE INTERPRETATION OF THESE FACTS AND THE ACT. WHETHER OR NOT THESE PROVISIONS WERE CONTAINED IN THE BILL, THE CONSTITUTION AND THE RIGHTS OF INDIVIDUALS AGAINST ARBITRARY ACTIONS BY THE GOVERNMENT WOULD MAKE IT POSSIBLE FOR AGGRIEVED PARTIES TO RESORT TO THE COURTS. THE PROVISIONS OF THIS SECTION MERELY SPELL OUT THE CON- DITIONS UNDER WHICH SUCH RESORT MUST BE FOLLOWED, PARTLY IN ORDER TO AVOID LONG-DRAWN-OUT COURT CASES AND DIFFI- CULTIES IN DETERMINING WHEN ACTS TAKEN BY THE SECRETARY WOULD BECOME FINAL.

FINANCIAL ASSISTANCE Sec. 8. (a) The Secretary shall encourage research, promote, and make such funds available as Congress may appropriate for

promoting the efficient and humane care, handling, treatment, and use of laboratory animals through the training of personnel in laboratory animal care and use; the improvement and develop- ment of laboratory animal methods and techniques; the develop- ment of humane instruments; the improvement and development of humane methods for the care, handling, treatment, and use of laboratory animals; the diagnosis, study, and control of labo- ratory animal disease; the study and definition of more effi- cient biological models; the development and maintenance of unique and valuable colonies of research animals; the improved operation of institutional laboratory animal resources; the re- duction of pain to laboratory animals; the use of the least sensitive or nonsentient biological models commensurate with particular experimental purposes; and the effective retrieval and use of scientific information. (b) The Secretary is au- thorized to make, on such terms and conditions as he may deem appropriate, grants to or contracts with professional accredi- ting bodies employed by him, to assist in meeting the costs of such bodies in carrying out the function of accreditation pro- vided for in this Act.

EXPLANATION OF SECTION 8 ABOVE THIS VERY IMPORTANT SECTION OF THE BILL HAS BEEN LEFT AL- MOST AS IT WAS IN THE BILL INTRODUCED IN THE PREVIOUS CONGRESS. HUMANE INFORMATION SERVICES BELIEVED IT WOULD BE DESIRABLE TO SUBSTITUTE DIFFERENT LANGUAGE FOR SECTION 8(a), BECAUSE OF THE FACT THAT SOME HUMANITARIANS HAD COMPLETELY MISCONSTRUED THE PROVISIONS OF THIS SECTION. THE RATHER INVOLVED AND TECHNICAL LANGUAGE FAILS TO MAKE PLAIN TO THE LAYMAN THE PRINCIPAL INTENT OF THE SECTION, WHICH IS TWOFOLD: TO DEVELOP AND PROMOTE THE USE OF MORE HUMANE EXPERIMENTAL AND TESTING TECHNIQUES, AND TO EN- COURAGE THE SUBSTITUTION OF NON-SENTIENT BIOLOGICAL MOD- ELS SUCH AS TISSUE CULTURES AND MATHEMATICAL MODELS FOR LIVE ANIMALS IN EXPERIMENTATION AND TESTING. OTHERS OB- JECTED TO THE PROPOSED CHANGE IN WORDING OF THIS SECTION, FOR VARIOUS REASONS WHICH WE CANNOT TAKE THE SPACE TO GO INTO HERE. HOWEVER, IT WAS AGREED TO INSERT THE DEFINI- TION OF BIOLOGICAL MODEL IN SECTION 3, AND WITH THIS CLARIFICATION SECTION 8 PROVIDES FOR ATTAINING ESSENTIAL- LY THE SAME OBJECTIVES, ALTHOUGH THE LANGUAGE OF THE SEC- TION IS NOT AS CLEAR AS IS DESIRABLE FROM THE STANDPOINT OF GAINING UNDERSTANDING AND ACCEPTANCE BY HUMANITARIANS.

TECHNICAL ASSISTANCE AND DISSEMINATION OF INFORMATION Sec. 9. The Secretary shall collect and make available through publications, conferences, films, demonstrations, and other appropriate means, information relating to the humane care, handling, treatment, and use of laboratory animals used for biomedical activities, including, but not limited to, the proper use of anesthesia, design and analysis of experiments, selection of the biological model, and the effective use of informational tools, and, insofar as possible, shall provide technical assistance with respect to the means of providing and training the personnel necessary to assure such humane care, handling, treatment, and use of laboratory animals to depart- ments, or agencies, persons, laboratory animal research facili- ties, and other entities.

EXPLANATION OF SECTION 9 ABOVE HUMANITARIANS MIGHT BETTER UNDERSTAND THE IMPORTANCE OF THIS SECTION IF THEY WILL CONSIDER WHAT WOULD HAPPEN IF NO BILL OF THIS KIND WERE PASSED, BUT THAT SOME RICH PER- GRANT OF MONEY TO EMPLOY QUALIFIED TECHNICIANS WHO WOULD INFORM THEMSELVES REGARDING ALL KINDS OF IMPROVED METHODS FOR THE MORE HUMANE CARE, HANDLING, TREATMENT AND USE OF LABORATORY ANIMALS. THESE IMPROVED METHODS WOULD INCLUDE THE PROPER USE OF ANESTHESIA, THE PROPER DESIGN AND ANAL- YSIS OF EXPERIMENTS IN ORDER TO REDUCE THE NUMBER OF ANI- MALS REQUIRED TO BE USED, AND THE SELECTION AND USE OF BIOLOGICAL MODELS OTHER THAN LIVE ANIMALS. FURTHER, LET US SUPPOSE THAT THE HUMANE SOCIETIES COULD BY SOME MAGI- CAL STROKE RECEIVE EASY ENTREE TO THOSE PEOPLE IN THE LABORATORIES WHO PLAN AND CONDUCT EXPERIMENTS AND TESTS, AND THAT THE LATTER WOULD BE RECEPTIVE TO THEIR SUGGES- TIONS. IT CAN BE READILY SEEN THAT ALL OF THIS WOULD HAVE A TREMENDOUSLY BENEFICIAL EDUCATIONAL EFFECT UPON LABORATORY PERSONNEL OVER A PERIOD OF TIME. IN THE LONG RUN, AND IN THE FINAL ANALYSIS, THE MOST EFFECTIVE WAY OF GETTING BETTER TREATMENT FOR LABORATORY ANIMALS AND PRO- MOTING THE SUBSTITUTION OF OTHER BIOLOGICAL MODELS FOR LIVE ANIMALS IS THROUGH EDUCATION AND PERSUASION. BUT OBVIOUSLY, SUCH AN OPPORTUNITY WILL NEVER BE PRESENTED TO HUMANE ORGANIZATIONS. THE BILL, HOWEVER, DOES PROVIDE FOR THE SAME KIND OF EDUCATIONAL WORK WITH THE LABORATOR- IES, TO BE CONDUCTED BY EMPLOYEES OF THE SECRETARY WHOSE JOB IT WOULD BE TO BECOME FULLY INFORMED ON THE POSSIBIL- ITIES OF THESE IMPROVEMENTS, AND WHOSE SUCCESS ON THE JOB WOULD BE MEASURED LARGELY IN TERMS OF HOW WELL THEY WERE ABLE TO BRING ABOUT THE INTRODUCTION OF IMPROVED AND MORE HUMANE LABORATORY TECHNIQUES.

SAVINGS CLAUSE Sec. 10. If any provision of this Act or the application thereof to any person, department, or agency, or to any circum- stance shall be held invalid, the remainder of the Act and the application of any such provision to persons, departments, or agencies, or circumstances other than those as to which it is held invalid, shall not be affected thereby.

EXPLANATION OF SECTION 10 ABOVE THIS IS THE LEGAL CLAUSE INCLUDED IN NEARLY ALL FEDERAL LEGISLATION, DESIGNED TO PREVENT DECLARATION OF THE EN- TIRE ACT TO BE UNCONSTITUTIONAL IF ANY PART OF IT WERE HELD TO BE INVALID. IT IS FOR THE PROTECTION OF THE ANI- MALS.

RULES AND REGULATIONS Sec. 11. The Secretary is authorized to promulgate such standards, rules, regulations, and orders as he may deem neces- sary in order to effectuate the policy and purposes of this Act.

HOW TO REGISTER YOUR OPINION - In our Report to Humanitarians No. 7 we answered your questions about what could be done about the bill before introduction. Immediately after introduction in June, when the bill numbers are available, you may wish to write "The Honorable Harley O. Staggers, Chairman, House Committee on Interstate and Foreign Commerce, House Office Building, Washington, D. C. 20515", asking him please to hold hearings on the House bill as soon as possi- ble. You could also write to Senator Ralph Yarborough, Chairman, Senate Committee on Labor and Public Welfare, Sen- ate Office Building, Washington, D. C. 20510, asking him to hold hearings on the Senate bill at the earliest time possi- ble.

Our Officers' Corner

"News About Animals"

Many humane societies fill their house organs and other reports with cute stories about animals. They have nothing to do with specific humane problems or programs, and are designed mostly to produce more contributions from animal lovers who are moved to action by such sentimental stories. Since most humane societies are short of funds, this is an important consideration. But our Reports to Humanitarians are intended for those whose love for animals is beyond question, and who are sufficiently interested to want the real meat about humane problems and programs for dealing with them.

From the beginning, however, we have intended publishing, in addition to our Reports to Humanitarians, materials designed to reach those who know little or nothing about humane problems and programs, whose interest in animals is confined to their own pets, and who do not know enough about animals to cause them to take any real interest in the welfare of animals generally and in programs to promote animal welfare.

We have given a great deal of thought to the type of publication which might be most suitable for this purpose. Expensive, slick paper magazines cost too much to receive wide distribution. They are good only for keeping humane society members as happy contributors. We need something which can be distributed free on a mass basis, at a very low cost per copy to allow for inevitable waste. Our four-page newspaper tabloid is less expensive than even small job-printed leaflets, yet permits the variety of stories and disguised messages necessary to elicit public interest in animal problems. Another very inexpensive format is that customarily used for small religious tracts, printed on cheap paper and folded once to fit in the pocket. We will try both, but first will be the tabloid newspaper, which will be called "News About Animals".

Our members can help greatly in two ways:

(1) By sending us glossy prints of good, clear photographs of animals, especially if the picture has some news value. The commercial news services charge substantial amounts for the use of their illustrations which you see in the newspapers, which would run into too much money. So, please send us your own non-copyrighted photographs of cute or interesting animals. We also need both newsy and cute non-copyrighted, brief stories about animals, either fiction or non-fiction. Both stories and photos should be: who, what, where, when and why. They should be accompanied by written permission for us to reproduce without charge. Sorry, we cannot return or acknowledge unused materials; our staff already is overloaded.

(2) By distributing copies of the tabloid in churches, Sunday schools, humane meetings, scout meetings, women's organization meetings, supermarkets, drugstores, etc. And in all cases, permission and cooperation from the organization or store must be obtained -- otherwise the papers probably would be thrown in the trash can as soon as you leave.

If you want to help the animals in either or both of these ways, please let us know, telling us exactly what you can do.

No Convention-Cruise!

Somewhat to our surprise, quite a few of our members sent in the convention-cruise coupon from our Report No. 7. However, the preferred dates indicated by these coupons exhibited no concentration, and it was evident that the total number who could take the cruise at any one time would be below the minimum required by the steamship company for such attractive rates. Therefore, we have definitely cancelled the convention-cruise, at least for this year.

Three of our readers wrote in disapproval, suggesting that the money which would be required for the cruise might be used to better advantage directly in behalf of the animals. Please be assured that the convention-cruise would have cost Humane Information Services not one penny. That is one of its advantages over other types of conventions which cost some humane societies thousands of dollars. Nor would the personal expenditures by those attending the convention reduce their donations. On the contrary, when the more affluent humanitarians who could afford such a cruise had one opportunity of work being done by the society, they would be likely to increase their contributions! Those whose incomes are very limited are unlikely to attend a convention no matter where or how it is held, which is unfortunate because many of them have a great deal to contribute to the proceedings. For them, the printed word must suffice. That is one reason why Humane Information Services has emphasized in-depth reports rather than brief news items; our Reports to Humanitarians serve, in a sense, as substitutes for getting around the table together and having full and frank discussions.

Rats!

We were amazed at the favorable response to our Report No. 3, issued in March, 1968, about the humane aspects of rat eradication. We want those who offered to assist in our rat program to know that we have not overlooked them. But this is a long-term project, requiring a great deal of preliminary work. Pest control authorities who are steeped in conventional methods of rat eradication are reluctant to give up the idea that the cruel and unsafe poisons such as 1080 are necessary. We have been gathering more evidence to the contrary, and other materials which we can use in our long-term program. One of the best analyses of the rat problem, with convincing factual substantiation, is an article by Professor David E. Davis in The World Book Encyclopedia, pp. 86-99.

Bureau Cooperates

We have been active in trying to achieve modifications of some of the official handbooks and other publications read by pest control operators. We have had especially good cooperation from the Bureau of Sport Fisheries and Wildlife of the U. S. Department of the Interior. It recently published a leaflet on rat control methods which could hardly be improved upon. This leaflet is intended for general distribution, and emphasizes control methods which avoid the use of the inhumane and unsafe one-shot poisons. The leaflet, entitled "Rats -- Let's Get Rid of Them", is very well written and illustrated, and can be obtained for 5¢ a copy from the Superintendent of Documents, Washington, D. C. 20402. However, Humane Information Services has been given a limited supply, and you can obtain one or two copies by writing to us, if you have real use for them.

The Bureau also is preparing a much more complete discussion of rat control methods, to be published as a revision of its former "Urban Rat Control Handbook". They have been kind enough to send us a draft of this handbook, which we have reviewed for specific suggestions. We have received an encouraging reply to these suggestions. We believe that our members will agree that an objective, reasonable approach to government officials and others concerned with humane problems is much more effective than writing letters of denunciation. Persuasion is much more effective than attempted force. This is being demonstrated by the black student protestors who seem bent on destroying much of the good will and accomplishments of the previous civil rights movement. Humanitarians may well learn something from events of the past year.

More About Housing Development Cats

Mrs. Virginia W. Sargent, President of the Animal Protective Association, Inc., Box 172, Garrett Park, Maryland 20766, writes: "We are glad that you have shown concern (about cats made homeless by housing developments -- see item on Page 4 of Report No. 7). . . . Our Association (also) has been concerned about slum clearance and urban renewal cats, dogs and other animals, and their rescue has been one of its main activities. . . . We did most of this work in the large S. W. Washington, D. C. slum clearance back in 1958 . . . and are keeping track of present urban renewal and slum clearance areas. Two shelters and a nearby humane organization refer cases of this type to us. We have several volunteer helpers. We keep in touch with housing authorities and the Relocation Office of the Redevelopment Land Agency. . . . If any of your members are interested in receiving our next Newsletter (one may come out in June in which we hope to cite a number of sample cases) we will be glad to send such."

Humane Information Services has received other letters stating that the writers are feeding the abandoned cats, which only multiplies their troubles, and believe that Mrs. Sargent's approach, through cooperation with local shelters that will receive the animals when they are caught, is potentially more effective.

Laboratory Bill Discussion Complete?

We do not want our readers to conclude from the amount of space devoted to laboratory animal legislation in this and other recent Reports to Humanitarians that this is the only subject we consider to be important! On the contrary, we have many other highly important humane problems ready for discussion. But the laboratory animal legislation now is at a critical stage; intelligent and crucial decisions by humanitarians depend upon having up-to-date facts available. We believe the essential principles and facts have been adequately treated in Reports 6, 7 and 8; future issues will be devoted mostly to other subjects, some of which are given below:

- Why animal suffering is increasing much faster than the ability of humane societies to cope with it.
- Billions of poultry experience unnecessary suffering.
- Slaughter of dogs and cats in many animal shelters and pounds under conditions worse than in meat packing plants.
- A new approach to humane education, basic to improvement in animal welfare.
- Millions of baby chicks smothered to death.
- Are humane societies, as claimed by prominent television personality, just a racket?
- Antiquated laws affecting animals and how to improve them.
- How to obtain better enforcement of humane laws.
- Humane conditions in other countries -- why and how to improve them.
- What are the alternatives to "putting dogs and cats to sleep"?
- The use of carbon dioxide to reduce suffering of euthanasia and slaughter.