



## RESOURCE SHEET NUMBER 12 - DOGS

The Government's own commissioned Ipsos Mori survey on UK public attitudes to animal testing in 2018 showed that 86% of people find it unacceptable to test on dogs for the purpose of medical research, *even when that research is said to be for the benefit of human health.*

MBR (Marshall BioResources) Acres near Huntingdon breeds around 2,000 puppies a year to be sold to repeat dose toxicity laboratories. The same USA based company also flies in many thousands of beagle puppies to Europe including the UK. Most of these pups, with proven sentience equivalent to that of a 3-year-old child, are forced to ingest or inhale pharmaceuticals, industrial or agricultural chemicals for 28, 90 or 120 days. They are then killed by suffocation or by being bled out under terminal anesthesia. Euthanasia drugs are not often used as this could affect post-mortem results.

At a USA Toxicology conference where Marshall BioResources were an exhibitor, their representative described their unscrupulous breeding this way: "We will breed anything a lab wants. If they want a dog with 3 legs or an abnormally large heart, we can do it."

Ingesting is via a forced procedure called 'gavage', involving a flexible tube pushed manually down a dog's throat into its stomach without any pain relief for 1-3 times daily. This is considered a mild severity classification. This procedure needs two people, one to hold the terrified, struggling puppy down while the other forcibly pushes a tube into its mouth. Videos are available of this 'mild' classification procedure.

Inhalation is via a mask and the pups are trained at a young age to accept these, sometimes by use of a paper cup. A Marshall's, North Rose, USA whistleblower explained that an additional charge is made for beagles mask trained and also of course for cordectomy surgery prior to shipping to laboratories.

The use of animals, including dogs, by the BioScience sector has relied on a shroud of secrecy for decades. Ask your family, your friends; Do they know dogs are still used in laboratories here in the UK? Inevitably their reaction will be shock and horror. The majority of people believe that dog use ceased after the scandal of the 'smoking beagles' came to light in the seventies. The tobacco industry used the results that Beagles (and other animals) *do not get cancer* from smoking to perpetuate the narrative that 'smoking is safe' and to this day, people continue to die and suffer the consequences that inhaling cigarette smoke causes. Animal testing was in fact used by Politicians to *avoid taking action* against tobacco companies rather than promote public health and here we are, decades later, doing the same for pharmaceutical and chemical companies.



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Of all dogs used in research Beagles are the breed most often used in research because of their intermediate size and loving nature. Kevin J. Stafford, author of *The Welfare of Dogs*, speculated that: *“Their existence for some time as ‘the’ laboratory dog may make it easier for handlers and research scientists to use them without becoming too emotionally attached to them.”*

The total amount granted by the Medical Research Council (MRC) in grants for research involving the use of dogs licenced under ASPA 1986: 2020 - £2,911,281 (2019 - £3,691,116). For 2021 the response was ‘There were no grants involving dogs awarded in 2021.’ However as happens often this was corrected in a later FOI to: ‘In 2022 there was one grant involving the use of dogs. We would also like to update our response to FOI2022/xxxx where you asked the same question for 2021. We can now confirm that in 2021 there was also one grant that involved the use of dogs. This was added late to our grant records, so wasn’t available at the time of your previous request.’ On request of the amounts granted in 2021 and 2022 the response was: ‘Therefore, to release the amount granted for each project, when combined with information that is already available in the public domain, would make these projects identifiable and would likely risk the safety of the researchers involved. Similarly, to provide links to the research grants in question would also make these researchers identifiable.’ This is taxpayers money, let your MP know if this is not something you want public money spent on.

Vanda Pharmaceuticals filed a complaint on February 6, 2019 alleging that the USA Food and Drug Administration (FDA) insistence that Vanda perform a 9-month dog study with its drug candidate tradipitant before extending human trials beyond 90 days violates the Administrative Procedures Act (“APA”).

<https://vandapharmaceuticalsinc.gcs-web.com/news-releases/news-release-details/vanda-pharmaceuticals-takes-stand-against-unnecessary-animal>

In addition to the lawsuit, Vanda issued an open letter

[https://mma.prnewswire.com/media/818251/Open\\_Letter.pdf](https://mma.prnewswire.com/media/818251/Open_Letter.pdf)

This urges other pharmaceutical companies to demand that the FDA “review and revise its outdated policy.” They stated that these longer-term studies resulting in the deaths of young beagles, pigs, monkeys, or other animals are unnecessary, unethical, and inhumane. Vanda argues that these types of studies should be the exception rather than the rule and reserved for instances with a strong, science-based rationale for conducting them. Vanda points to a large body of published scientific evidence concluding that 9-month dog studies rarely identify toxicities that were not already identified in 3-month studies or other information that is important to understanding a drug’s impact on humans. In its letter, Vanda asks for other companies to stand with Vanda in lobbying FDA to abolish its “one-



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size-fits-all approach to animal research, including nine-month, non-rodent toxicity studies, which results in the unnecessary sacrifice of too many dogs and other animals.”

The FDA won the case.

### Understanding Animal Research (UAR)

This organisation are the propaganda tool of the bioscience sector. **They are a lobby group that are fully funded by their membership, including Marshall BioResources (MBR), Envigo and the MRC.**

<https://www.understandinganimalresearch.org.uk/about-us/membership-and-funding>

When there are media stories, anything anti-vivisection, certainly for MBR Acres, it is UAR that rush to make a statement on behalf of their members. When you write to a laboratory and ask questions, for instance Sequani, they respond with a reply written by Chris Magee of UAR. It seems the laboratories can't justify themselves what they are doing.

Let us take a look at their team:

<https://www.understandinganimalresearch.org.uk/about-us/staff-at-uar>

Wendy Jarrett, Chief Executive, appeared as a witness at the Camp Beagle injunction April 23 High Court Trial. She is not a scientist, her background is in communications. It is mentioned she is Vice President of the IAT (Institute of Animal Technology), a very nasty organisation that train and give qualifications to laboratory animal 'care' staff.

On 27<sup>th</sup> April 23 she stated in trial that:

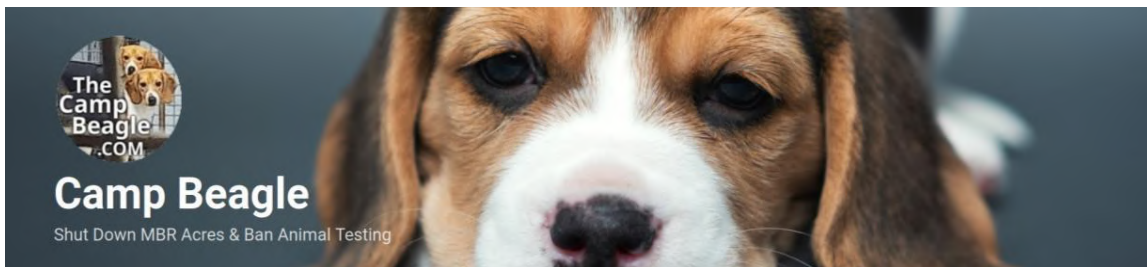
1.Marshalls contributed.....I did my sums on this.....2.26% of our income last year.

[file:///C:/Users/Debbie.000/Downloads/UAR Annual Report and Accounts 2022.pdf](file:///C:/Users/Debbie.000/Downloads/UAR%20Annual%20Report%20and%20Accounts%202022.pdf)

the 2022 accounts show income of £721,135 and so Marshalls contributed about £16,300.

Her First Witness statement in March 22 says:

1. 'Of the huge numbers of potential new medicines, only a very few will reach the final stages of development. It is at this point that animal testing is required in order to show that the medicine is unlikely to cause harm to human volunteers in clinical trials. This is known as regulatory toxicology testing: **it is required by law** and is designed to test whether there is any toxic effect. **The law requires** that two species of mammal are used, firstly rodents; and then dogs or nonhuman primates. Researchers will be hoping that the dogs used in this safety testing do not show any symptoms of being harmed by the potential medicine, as this would indicate that



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the medicine will not be safe enough for human use.'

2. 'Firstly, from a practical perspective, **under UK law**, all potential medicines intended for human use must be tested on two species of mammal before being tested on human volunteers in clinical trials.'

It is not Law, never has been and this was admitted by the Government in October 2023. As for regulatory toxicology testing this fails both ways as something toxic to dogs may not continue to human trials, there is no available data of human life saving treatments that may have been lost.

Chris Magee, Head of Policy and Media, [cmagee@uar.org.uk](mailto:cmagee@uar.org.uk)

Not a scientist but instead another person with a communications background. Some messages from him have included:

1. 'Some dogs can be used to give blood, much as humans give blood for other humans. They are not completely drained of blood like a vampire though. Most of this is used for dog medicines purchased by dog lovers, such as Ricky Gervais, Peter Egan and Will Young.'

Infact some dogs are completely drained of blood exactly like a vampire.

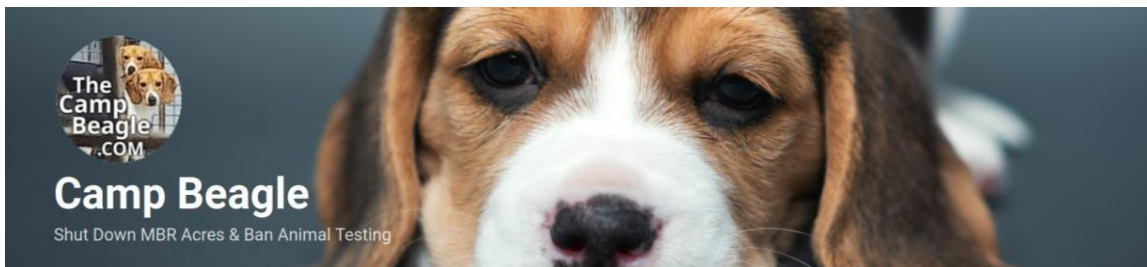
2. 'The claim that most 'animal-tested medicines' fail to become drugs is like saying '99% of cars that fail their MOT have working headlights. SO WHAT'S THE POINT OF HEADLIGHTS?!' It's not the 'gotcha' moment that many activists seem to think it is.'

What!!

3. 'ASRU meets regularly with several stakeholder groups to scrutinise and improve how the legislation is working, including animal rights groups like PETA. Cruelty free international, vets, academics, industry – absolutely everybody with an interest'.

We have an interest, we have asked again and again to meet with ASRU – some replies:

- The Home Office is reviewing its stakeholder engagement framework and will provide more information to stakeholder groups in due course.
- The Home Office meets regularly with a range of stakeholders. There is no 'ASRU Committee' or application process.
- The Home Office meets regularly with a range of stakeholders. A FOIA request is not an appropriate way to request a meeting with Home Office ministers or officials. The



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Home Office can be contacted at [public.enquiries@homeoffice.gov.uk](mailto:public.enquiries@homeoffice.gov.uk). We cannot comment on the availability of Ministers or ASRU to meet with stakeholders.

4. In a tweet in February 22 “if you mean gavage then almost no dogs undergo that. If you’re testing a drug then it goes in the same as the intended mode of delivery to the human or animal patient- i.e. almost always as a tablet, or caplet for liquids. That’s not ‘force feeding’ as most ppl would see it.”

[https://assets.publishing.service.gov.uk/media/5e8368ecd3bf7f13450e4e92/20200323\\_NTS\\_2018\\_Vol\\_1\\_Jan\\_June\\_GOV.UK.pdf](https://assets.publishing.service.gov.uk/media/5e8368ecd3bf7f13450e4e92/20200323_NTS_2018_Vol_1_Jan_June_GOV.UK.pdf) Published Non-Technical Summary

Project 92, Page 416, Safety Testing of Medicinal Products Using Dogs and Minipigs

Over the 5 year life of this Project Licence, it is estimated that 4,800 dogs and 2,300 minipigs will be used. These numbers include a small proportion of re-use of the same animals.

The animals used under this licence will be given the test substances in a similar way to that in which they are expected to be given to humans. As most medicines are taken orally **the majority of animals will receive the test material directly by insertion of a flexible rubber catheter into the stomach via the mouth.** Most animals are treated in this way once per day daily, although studies may occasionally require two or three doses within 24 hours.

This is the most common wording in non-technical summaries for safety/toxicity testing.

### Spot the difference

UAR video of dogs thriving in MBR Acres – why are they mopping out clean sawdust. Why does the breeding bitch appear to be frozen in fear?

<https://www.youtube.com/watch?v=lvpY28AF7FA>

Camp Beagle and whistleblower footage and testimony inside MBR Acres. NB not all footage in the below is inside MBR Acres, any procedures including gavage are undercover footage from laboratories and some is over ten years ago. All our videos are on our utube page @TheCampBeagleOfficial

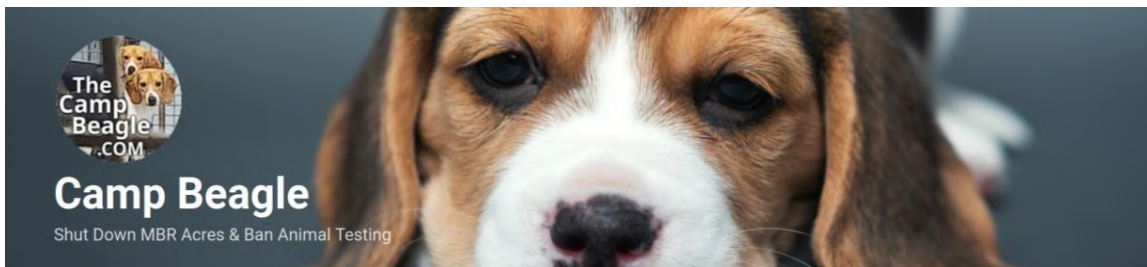
<https://youtu.be/ScMVxhH0paU?feature=shared>

<https://www.youtube.com/watch?v=S1b20u3p-wk>

[https://www.youtube.com/watch?v=4WL6i\\_uk2rA](https://www.youtube.com/watch?v=4WL6i_uk2rA)

<https://www.youtube.com/watch?v=GaclRLs5zn4>

<https://www.youtube.com/watch?v=aHT3APgQF4M>



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Animal Rising footage

<https://www.youtube.com/watch?v=AU4rY0yEfmI>

<https://www.understandinganimalresearch.org.uk/using-animals-in-scientific-research/animal-research-species/dog>

Below we address their false narrative:

In the UK, dogs are primarily used to find out how new drugs act within a whole, living body and whether new medicines are safe enough to test in humans. They predict this safety very well, with up to 96% accuracy.

This cherry picked figure comes from the Monticello paper; Current nonclinical testing paradigm enables safe entry to First-In-Human clinical trials: The IQ consortium nonclinical to clinical translational database, published in 2017.

UAR link is to <https://pubmed.ncbi.nlm.nih.gov/28893587/> which is only to an abstract of the paper. We have a more detailed copy of the paper but it is not a final version and we cannot even publish what we have as the final full paper is now only available to subscribing institutions.

UAR say UP TO 96% accuracy so that is 0 - 96%. As anyone with a dog in a family knows it is pretty much 0% for paracetamol, chocolate, onions, grapes.

The sample size in this study was just 182.

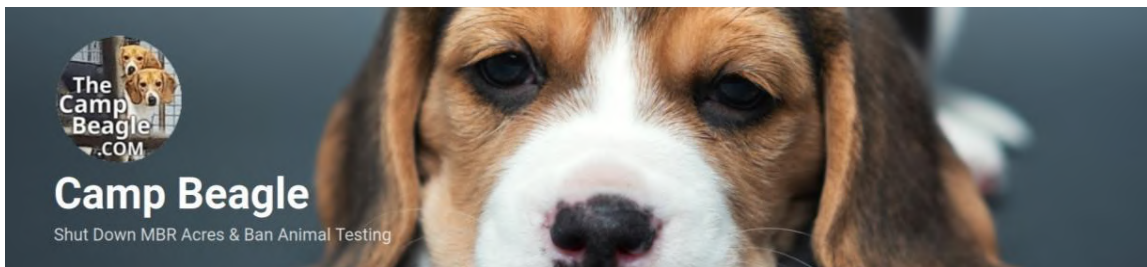
Most human toxicity occurs in the liver and this paper admits that out of 40 false positives for the liver 16 (40%) were in the dog.

This paper focuses on NPV (Negative Predictive Values) which are both deliberately and desperately, incorrect. For this paper they actually had all the data they needed but ignored most of it to reach a false conclusion that is not supported by the data. Most of what was ignored was the best data (using LR<sub>s</sub>). The conclusions reached are not even well supported by the statistical metrics selected.

<https://www.biorxiv.org/content/10.1101/2021.12.14.472674v4>

Yet liver on a chip technology, available right now has a proven 87% human relevant accuracy.

All claims in the Monticello paper are fully rebutted in Bailey/Balls: Recent efforts to elucidate the scientific validity of animal-based drug tests by the pharmaceutical industry, pro-testing lobby groups, and animal welfare organisations.



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<https://bmcmedethics.biomedcentral.com/articles/10.1186/s12910-019-0352-3>

This paper includes an analysis of 3000 drugs (much higher than the 182 in Monticello). Infact a dogs suffering and death leads to only 2% predicative value to the human model and Non-Human Primates are even worse at 0.4%. Likelihood Ratios (LR's) are the correct, best, and most appropriate metric and eminent European statisticians citations support this.

As for the whole biological system, a dog nor any other species has human biology. Even identical twins may experience different efficacy or side effects to the same drug. On any drug leaflet there a listed side effects often split into common/rare etc. what is happening by using animals is a different biological system is used to predict human reactions which vary anyway.

This is done to satisfy safety regulations which came about after the drug Thalidomide maimed and killed children while they were still in the womb. It is known as toxicology testing but normally seeks to confirm the absence of toxic effects.

Infact Using animals to predict toxicity safety of human pharmaceuticals can:

- 1) Falsely identify a toxic drug as "safe"
- 2) Falsely label a potentially useful therapeutic agent as toxic.

When animal tests falsely identify a safe chemical as "toxic," the almost certain outcome is abandonment of further development. Undoubtedly many potentially beneficial drugs have failed animal testing and been lost to patients, even though they would have been both safe and effective, the magnitude of this type of "error" is unknown. Many highly beneficial drugs would have failed animal testing and never been brought to market except that they were developed before animal testing was required E.g. penicillin (fatal to guinea pigs), paracetamol (toxic in dogs and cats), and aspirin (embryo toxicity in rats and rhesus monkeys).

Thalidomide caused devastating phocomelia in an estimated 20,000 to 30,000 infants before it was withdrawn. However, animal tests failed to reveal significant teratogenicity (any agent that causes an abnormality following fetal exposure during pregnancy) in 10 strains of rats; 11 breeds of rabbit; 2 breeds of dog; 3 strains of hamsters; 8 species of primates; and various cats, armadillos, guinea pigs, swine, and ferrets.

Schardein J. Drugs as Teratogens. Cleveland,OH: CRC Press, 1976:49.

The effect of thalidomide on human embryos that caused loss of proximal structures does not occur in standard experimental animals.



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Niall Shanks, C. Ray Greek Animal Models in the Light of Evolution 2009

An excellent paper that we advise people to read is: Swaters D, van Veen A, van Meurs W, Turner JE, Ritskes-Hoitinga M. A History of Regulatory Animal Testing: What Can We Learn? Alternatives to Laboratory Animals. 2022;50(5):322-329.

doi: <https://journals.sagepub.com/doi/10.1177/02611929221118001>

This paper also discusses the Vanda Pharmaceuticals case where the company refused to perform 9 month toxicology testing on beagles.

The tests can tell us lots of information all at once, like the safety of a drug across lots of different internal organs, how the drug travels around the body and other information that helps us to design much safer human trials.

But a different biological system is being used to predict human biology. We have available right now Non-Animal Methods (NAMs) that give human relevant results with high accuracy.

Dogs are also used to test the safety and efficacy of veterinary medicines, and also in nutrition studies to ensure that pet dogs eat healthily, particularly when they are prescribed specialist diets by their vets.

In 2022 - 206 (5.1%) procedures out of the 4014 on dogs were regulatory for veterinary pharmaceuticals. This was an increase to 2021 where comparative figures were 146 (3.6%) of 4016.

Mars Petcare have a facility in Waltham on the Wolds, Leicestershire, which holds around 200 dogs and 200 cats. Pharmaceutical companies will also hold dogs for the development of veterinary medicines and vaccines.

[https://assets.publishing.service.gov.uk/media/5e8368ecd3bf7f13450e4e92/20200323\\_NTS\\_2018\\_Vol\\_1\\_Jan\\_June\\_GOV.UK.pdf](https://assets.publishing.service.gov.uk/media/5e8368ecd3bf7f13450e4e92/20200323_NTS_2018_Vol_1_Jan_June_GOV.UK.pdf)

Nutritional Requirements of cats and dogs across lifespan. Project 27 Pages 122 – 125

Some extracts:

This project will involve the regulated study of both cats and dogs for five years. Approximately 540 cats and 350 dogs will be involved in total.

We are specifically interested in understanding the impact of nutrition in cats and dogs; therefore the use of these species is necessary.

[https://assets.publishing.service.gov.uk/media/66278b17838212a903a7e58f/Non-technical\\_summaries\\_for\\_project\\_licences\\_granted\\_July\\_-\\_December\\_2022\\_that\\_require\\_a\\_retrospective\\_assessment.pdf](https://assets.publishing.service.gov.uk/media/66278b17838212a903a7e58f/Non-technical_summaries_for_project_licences_granted_July_-_December_2022_that_require_a_retrospective_assessment.pdf)





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Companion animal vaccine development, Project 4, Pages 40-48

Some extracts:

2 years, 225 beagles, 100 cats will be Killed, rehomed or kept alive

Cats and dogs (juveniles, adults and pregnant bitches) are vaccine target animals. Therefore, these types of animals have to be used to test any newly developed and improved vaccines for safety and efficacy.

Once the scientific objective has been obtained any sick animal may be treated to ease any suffering experienced or humanely euthanized to prevent unnecessary suffering. The moderate severity may last up to 5 days.

As studies in the animal are the only sure way of showing that a vaccine is safe and works well, it is not possible to use an alternative animal (e.g. mice, rats) or computer model. The use of cats and dogs is therefore the most refined choice to fulfil the objective of this licence.

The ultimate test of safety for any vaccine is to administer the material to the target animal, which is the animal species for which the vaccine is intended.

So although dogs and cats are specially protected species their use is necessary as the study is the impact of nutrition or efficacy of vaccines specifically in those species. Yet when developing human pharmaceuticals then animals, including those specially protected, are used as predicative models for a different species. This seems to be very conflicting.

**Although animal and non-animal methods are used alongside each other, there are currently no alternatives to using dogs. They nevertheless have special protections under UK law. For instance, they cannot be used if another animal species could be used.**

Assuming that this refers to regulatory testing, we would question the use of any animal to predict reactions in another species. Results simply are not consistently translatable; we must abandon the idea that animals are 'gold standard' and instead use non-animal methods that are already available for instance liver on a chip and microdosing. As for the current situation there is an expectation that rodents and non rodents are used for safety/toxicity prior to human trials. The second species on non-technical summaries almost always says dogs, pigs/mini pigs and sometimes non-human primates . Out of the choice of the three species dogs are often chosen because of cost, availability and that they can most easily be kept in a laboratory. The 'special protections' are just meaningless words applied to dogs, cats, NHPs and horses.

[https://assets.publishing.service.gov.uk/media/6620da0077a30aa0c4757d4f/Non-technical\\_summaries\\_for\\_project\\_licences\\_granted\\_July\\_-\\_December\\_2020\\_that\\_require\\_a\\_retrospective\\_assessment.pdf](https://assets.publishing.service.gov.uk/media/6620da0077a30aa0c4757d4f/Non-technical_summaries_for_project_licences_granted_July_-_December_2020_that_require_a_retrospective_assessment.pdf)

Project 36 Toxicology of Pharmaceuticals pages 311 – 318 is fairly typical



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Species and numbers of animals expected to be used • Mice: 20000 • Rats: 45000 • Rabbits: 4000 • Beagles: 4000 • Cynomolgus macaques: 3500 • Minipigs: 900 • Pigs: 30

Recently retrospective assessments have started to be published, these compare the project licence application to the actual project data in terms of number of animals used per species and severity classifications. For project licences granted from January 2013 a retrospective assessment is legally required for any project using specially protected species or on any species if procedures have been classified as severe. To date the first retrospective assessments due in 2018 have not been published. 2019 has had non-technical summaries requiring retrospective assessments split out but most are not due yet. Project licences are almost always for 5 years.

We are not aware of NAMs being used in repeat dose toxicity testing which has been used unchanged for 70 years.

There is a project that hopes to create a “Virtual Dog” that could significantly reduce the number of dogs needed by using computers to mine historical dog data. It is being run by the UK’s national centre for developing animal replacements the NC3Rs, but is of international interest.

The UAR link does not work but we believe it should be to:

<https://nc3rs.org.uk/crackit/virtual-second-species>

Whilst there is a huge amount of data on dogs we know is not reliable to translate to humans. Already explained above is when animal tests falsely identify a safe chemical as “toxic,” the almost certain outcome is abandonment of further development. The magnitude of this type of “error” is unknown. A virtual dog is however being created to predict human toxicity but the historical data being used we already know is not human relevant. When you hear of the development of a virtual dog it is likely most people would assume it was for veterinary products, it is not.

The physiological similarities between humans and dogs mean that they are useful in various types of research. Their genome has been sequenced and because of our genetic similarities, they are often used in genetic studies.

It is no good being similar, the slightest difference matters hugely. Even the human species vary – some drugs may work on some and not others – some people may have side effects, others may not. The other important thing to understand is that animals often have induced rather than naturally occurring disease, it's simply not the same.



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TO BE CONTINUED