

- 1. It is legal to leave without care 1000+ dogs, mostly puppies, mothers giving birth, runts that need special care etc. for 16 hours a day weekdays, 20 hours at weekends. Even if a vet on call 24/7 there is no-one to call them.
- The Home Office, specifically the Animals in Science Regulatory Unit (ASRU), renewed in October 23, for another 5 years, the Marshall BioResources (MBR) bleeding licence so that ex breeding bitches/studs, grade B pups etc can be legally bled out (by cardiac puncture under terminal anaesthesia) so their blood and organs can be sold.
- 3. It is proven that dogs have the sentience of a 3-year-old child, yet the MBR beagles are literally bred to be dead. They suffer from birth to death and the data gathered from their short lives is of no or insignificant value. How can this be justified?
- 4. There is NO mandate in UK Law to use animals. Infact ASPA 1986 says animals can only be used if no scientifically satisfactory alternative. Throughout the project application process not once are Non-Animal Methods (NAMs) considered. Animal use is thus decided at the outset.
- 5. Since 2011 the Home Office has rejected just one project licence application.
- 6. At human clinical trial stage, 92-96% of pharmaceuticals fail to progress due almost all to toxicity and efficacy reasons not identified in non-predicative animal models. Around one half of the failures are due to unanticipated human toxicity. Adverse drug reactions kill thousands of people in the UK and costs NHS England billions each year. Tests on human cells and tissues can predict dangerous drug side effects where animal tests and even human trials fail.
- 7. A NAMs alternative 'Liver on a chip' has 87% human relevant accuracy.
- 8. One problem with validating NAMs is they must match results from animals. NAMs will never do this as results are human relevant, using non predicative animal models are not. Use of animals has never been validated or approved.
- 9. Universities teach maybe 1 hour of NAMs a term. Needs a complete educational paradigm shift.



- 10. We do not have cures; we do not have effective medication for human neurological conditions or cancers. This is not about a choice of testing on an animal or a child this is about using NAMs where no species is harmed and results are superior, cheaper, better, human relevant science. We must move to use cutting-edge new approaches that are relevant to humans, not animals.
- 11. 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. It fails both ways.
- 12. Financing for NAMs development is significantly less than 1% compared to that for animal research. We are campaigning for the government to redirect funding to the development of human relevant science; for instance, organs on a chip. Also, we want existing methods to be used, that harm no species such as for toxicity liver on a chip. We do not accept that testing translates from one species to another, we also highlight the non reproducibility of tests. We are not in the same position as a hundred years ago, we need change right now. To show their commitment to human health we look to the new Government to fund urgently the development and use of NAMs by £1 billion.
- 13. For repeat dose toxicity testing 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 to be mild severity classification. At the end of the test period of 28, 90 or over 120 days the dogs are normally killed by suffocation or bled out under terminal anaesthesia, this is because euthanasia drugs may affect post mortem results.
- 14. Of all dogs used in research Beagles are the breed most often used in research because of their intermediate size and loving and forgiving nature.
- 15. Reproducibility of animal studies within species, even when carried out under rigorous protocols, is questionable and averages 70%. Change of lighting, diet, housing all can make a difference to results.
- 16. Global Regulator expectation is that two animal species, rodent and non-rodent, be used for safety/toxicity testing, before progression to human clinical trials. Use of dogs and non-human primates (NHPs) have been shown to add just 2% and 0.4% respectively to the weight of evidence of existing probabilities that new drugs might be safe. This negligible contribution is statistically



insignificant to safety assurances, and causes massive needless animal suffering and death, increased monetary costs and also time delays to product development.

- 17. Impex Services International Limited are the private family-owned couriers who ship dogs, monkeys, mice, fish etc. from breeding centres or Manchester Airport to laboratories. When the vans take audibly distressed puppies from MBR Acres we refer to them as 'death vans' as they are literally transporting animals to their death. We refer to Impex as the couriers of cruelty.
- 18. NAMs have been proven on many occasions to be safer for understanding human disease and assessing the safety and effectiveness of potential new drugs. Meanwhile, time, money and animal lives are still being wasted, with few breakthroughs and a huge amount of suffering.
- 19. The Animals (Scientific Procedures) Act 1986, (ASPA), is the UK law to 'protect' laboratory animals, this enshrines the principles of the 3Rs (replacement, reduction and refinement). These principles were launched by a book published in 1959. The assumption is that animal testing translates to humans yet the book itself acknowledged the considerable impact of species differences and the 'high fidelity fallacy' of assuming that animal data will reliably translate to human biology due to relatively superficial anatomical, physiological and genetic similarities. Camp Beagle do not endorse the 3Rs. For a detailed critique of the 3Rs we suggest:

https://journals.sagepub.com/doi/10.1177/02611929241241187

20. Laboratory animals are excluded from animal welfare and sentience Acts. This is why animal welfare organisations like the RSPCA cannot intervene. It is only the regulators, the Animals in Science Regulatory Unit (ASRU), part of the Home Office, that have a right of access to MBR Acres. ASRU on average has around 20 Inspectors to oversee 2.76 (Home Office published statistics for 2022) million procedures a year along with another 1.81 million animals killed without use in regulated procedures (published figure for 2017).



## 21. The Home Office publishes:

- Guidance on the operation of ASPA <u>https://www.gov.uk/guidance/guidance-on-the-operation-of-the-animals-scientific-procedures-act-1986</u>
- A Code Of Practice for the Housing And Care of Animals bred, supplied and used for scientific purposes <u>https://www.gov.uk/government/publications/code-of-practice-for-the-housing-and-care-of-animals-bred-supplied-or-used-for-scientific-purposes</u>
- Advice Notes including <u>https://assets.publishing.service.gov.uk/media/5a82e2ab40f0b6230269d373/Advice\_Note\_</u> <u>Rehoming\_setting\_free.pdf</u>

## 2023

2456 dogs were used of which 2371 were beagles. There were 3749 procedures on these dogs. 2275 procedures were toxicity for human pharmaceutical, 205 for agrichemicals and 111 for veterinary products.

## 2022

2683 dogs were used of which 2655 were beagles. There were 4122 procedures on these dogs. 2483 procedures were toxicity for human pharmaceutical, 195 for agrichemicals and 206 for veterinary products.