



Rep. Reggie Miller
Chair, Committee on Agriculture
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Dear Chair Miller,

I am writing in opposition to House Bill No. 4849. Act 378, which Bill 4849 proposes to amend, opens with numerous stated purposes, notably "protecting and promoting public health" and "providing for the prevention and control of diseases and disabilities." Bill No. 4849, if enacted, would impede the achievement of these objectives within the state of Michigan and would fail to enhance the welfare of animals contributing to vital research.

I currently serve as the attending veterinarian for Northern Biomedical Research, Inc., a small contract research organization in West Michigan. The welfare of the public, and the welfare of pets, research animals, and other animals, is my highest priority and my professional oath, and I understand the desire to take action to minimize the potential for pain and distress in dogs and cats. My role within my institution – like the role of every other attending veterinarian at public and private institutions across Michigan – is to ensure exactly this outcome for animals under my care.

Like other research facilities, both public and private, Northern Biomedical works with dogs bred for research purposes and other animals accustomed to our enriched environments and highly trained caretakers. All proposed research programs at facilities working with dogs and cats are rigorously evaluated by institutional animal care and use committees, which include a veterinarian. The evaluation process is undertaken to ensure studies are conducted with consideration of societal benefit, scientific justification, and measures to minimize the potential for pain and distress. The use of animals is avoided whenever alternatives are viable; unfortunately, non-animal alternatives do not always suffice for assessing drug safety and efficacy, or for developing requisite scientific understanding of physiology and disease. Prior to Food and Drug Administration (FDA) approval of treatments for humans or animals, they are tested for safety and efficacy in appropriate animal models within a controlled laboratory environment, a necessary step to provide for the protection of public health. As new technologies lead to the development of novel, more effective and safer treatments for diseases and disabilities, research in dogs and cats, including research that would be prohibited by Bill 4849, continues to be necessary.

At Northern Biomedical and other research institutions, including public institutions in Michigan, the operations of the institutional animal care and use committee, the attending veterinarian's oversight of animal wellbeing, and the overall program are subject to comprehensive regulatory oversight; At Northern Biomedical, we adhere to USDA Animal Welfare Regulations, Public Health Service Policy on Humane Care and Use of Laboratory Animals, the Institute for Laboratory Animal Research (National Research Council) *Guide for the Care and Use of Laboratory Animals*, and the FDA Good Laboratory Practice Regulations.

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Bill 4849 declares that routine surgical procedures, administration of experimental agents, or implantation of medical devices conducted in accordance with gold-standard veterinary practices will cause pain or distress to dogs and cats. This misrepresents the reality of these procedures when performed with appropriate anesthesia, pain medications, nursing care, and monitoring, just as they are in veterinary hospitals, under guidance and oversight of a veterinarian.

Bill 4849 focuses – without apparent scientific basis – specifically on dogs and cats. Working with species other than dogs or cats, when a dog or a cat is most appropriate based on scientific evidence, would not only be ethically unacceptable but also conflict with federal principles, regulations, and guidelines governing drug development and animal research in general. The U.S. Government Principles for the Utilization and Care of Vertebrate Animals Used in Testing, Research, and Training state, “The animals selected for a procedure should be of an appropriate species and quality and the minimum number required to obtain valid results.” The Animal Welfare Regulations (9 CFR 2.31) state, “A proposal to conduct an activity involving animals... must contain... [a] rationale for involving animals, and for the appropriateness of the species...” FDA guidelines require testing of veterinary therapeutics in the species for which they are intended to benefit. Therefore, this research would remain necessary, but would move elsewhere, impairing the ability of our public institutions to attract and retain scientific experts and to remain competitive both nationally and internationally.

Conducted under the vigilant oversight of institutional and external experts, research involving dogs and cats is often a necessary step in advancing science and medicine, and is performed with animal welfare as a top priority. This proposition to prevent essential animal studies runs counter to the legislature’s interest in promoting public health. I urge members of this committee to oppose House Bill No. 4849.

Thank you for your consideration,

A handwritten signature in cursive script that reads 'Rachel Cooper'.

Rachel Cooper, DVM, MS, DACLAM
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