

15 April, 2016

Bjorn Hansen
European Commission
D-G Environment
Directorate A - Green Economy
ENV.A.3 - Chemicals
Head of Unit

Dear Mr Bjorn Hansen,

Thank you for your message dated 11 March 2016 regarding a scientific conference to be held in Brussels on 6-7 December 2016. However, to our great surprise, it does not seem to address the concerns nor the expectations of **1,173,131 signatories** of the European Citizens' Initiative "Stop Vivisection", as they have been expressed in all meetings and in all of the documents that we have submitted to the European Commission.

SCIENTIFIC CONCERNS.

To begin with, and to relieve a worry that we may come to the Conference not really "prepared to debate the issues from a science-based perspective", we would like to outline that :

- Five out of the seven members of Stop Vivisection Official Committee are scientists.
- All the proposals listed in our Dossier reflect scientifically founded and argued concerns.
- Stop Vivisection website – www.stopvivisection.eu - can be consulted for the many peer reviewed studies questioning the validity of animal experiments from a strictly scientific perspective.

A GROWING SCIENTIFIC CONSENSUS.

These scientific studies address different fields in medical and toxicological research, ranging from neurosciences and neurodegenerative illness, to pharmacology and cancer, and bear the signatures of distinguished medical scientists and researchers. To mention but a few, these include:

Dr Aysha Akhtar,
Dr Neal Barnard,
Dr Samuel Constant,
Dr Ray Greek,
Professor Lawrence Hansen,
Dr Thomas Hartung,
Professor Anne Keogh,
Professor Andrew Knight,
Dr Marcel Leist,

Dr Susanna Penco,
Dr John Pippin,
Dr Azra Raza,
Dr Costanza Rovida,
Dr Adrian Stallwood,
Dr Ludovic Wisziewski,

....and many more, whose names we will be happy to submit to you in the course of the preparation of the conference.

All of these experts have expressed, in their respective fields, their clear views on the limits of animal based research. In order to reflect the importance of this debate, we consider that most if not all such distinguished individuals should be invited and take the floor at the conference, together with opposing speakers, and that a number of specific topics are to be thoroughly addressed (*please see footnote below*).

A REAL SCIENTIFIC DIALOGUE.

Experiments on live animals became prominent in 1865, when Claude Bernard published « An Introduction to the Study of Experimental Medicine ». Now, 150 years later, we are beginning to recognize some of the dramatic environmental and health effects of an EU public health policy formulated on the basis of **biased information** obtained from animal tests. If, as you state in your letter, the “aim of the conference is a **real scientific dialogue**” (which is the hope and expectation of millions of European citizens), then this must be put into practice for all to see. Critical public health issues such as these cannot be addressed in the 30 minutes that you have suggested.

THE 3Rs ARE OUT OF STEP WITH EVIDENCE BASED SCIENCE.

Many scientists and non scientists are not really interested in attending yet another meeting on the supposed achievements of the Three Rs.

The Three Rs pertain to the field of ethics, not science! In nearly six decades of existence their only manifest achievement is the alarming rise in animal experiments. So, in the spirit of your message “to exploit the advances in science for the development of scientifically valid non-animal approaches and to advance towards the goal of phasing out animal testing” we expect to see all scientifically validated and regulatory approved methods made mandatory by law. Will this specific topic be presented and debated at the December Conference?

A MISUNDERSTANDING.

As the December Conference is being organized “*in response to one of our requests*” no doubt that we are happy to take part and to contribute to its success in full conformity with the spirit of Stop Vivisection ECI, and in full accordance with the expectations of millions of EU citizens who have campaigned tirelessly for four years now. However, we find it difficult to understand how you intend to deal with such a crucial topic and ask for our cooperation whilst at the same time you :

- **ask** that we “*propose one or two speakers, each speaking 15 minutes*” (Really?);
- **confine** the issue to just one session of the conference;

- **do not say a word** about the very core of the requests presented by Stop Vivisection;
- **do not provide details** about who is attending the conference and what its programmed sessions are;

We are all looking for the same precious things: truth, participatory democracy, dialogue between citizens and EU institutions, all of which were the main objective for introducing the right to Initiative of the European Citizens (and all of which have been again and again officially celebrated). If - as we perceive - there has been a misunderstanding about the request of Stop Vivisection (http://www.stopvivisection.eu/sites/default/files/dossier_-11_may_2015.pdf, page 5, point 3), no doubt that in a spirit of dialogue and participatory democracy it can be rapidly and satisfactorily amended.

Yours sincerely

Mr. Andre Menache,
Mr. Gianni Tamino
Representatives for Stop Vivisection Initiative

Footnote :

As you indicated in your message that you are still working to obtain a fair, scientific grounded conference programme, we would like to remind the following crucial topics for your consideration:

* **Legal mechanisms** to enforce the adoption by industry of scientifically validated and regulatory approved « alternatives ».

* **Funding of non animal replacement methods.** Animal researchers often point to the inadequacy of validated non animal test methods as a reason for continuing in vivo animal studies. One of the main reasons to explain the lack of development of non animal methods is the distribution of funds in biomedical research by EU member states. Based on the information that we have seen, we estimate that 98% of the budgets for biomedical research are devoted to animal experiments while 2% of the budgets are devoted to the development of non animal methods. For example, Horizon 2020 is the biggest EU Research and Innovation programme ever with nearly **€80 billion** of funding available over seven years (2014 to 2020) while EURL-ECVAM receives around **€15 million** per year.

***Validation of alternative methods.** The current validation process is highly inefficient. At the current level of EU funding of EURL-ECVAM, a new non animal test method will require 7 years on average in order to achieve validation. Considering the current rate of technological progress, such a test method will

already be out of date before it has achieved validation. There is therefore an urgent need to discuss alternatives to the standard validation process, for example using a weight of evidence approach. In addition, since its inception in 1992, EURL-ECVAM has validated about 40 alternatives, which is fewer than two per year. In addition, the majority (80%) of these alternatives are reduction and refinement alternatives and not full replacement alternatives. Last but not least, validation cannot be made with the gold standard of animal experiments, a methodology that has never been validated

* **The composition of animal research ethics committees.** Most animal research ethics committees (AWERBs) do not contain public representatives, nor experts on the use of non animal methods. A more balanced composition would provide greater public accountability and transparency.

*Last but not least: **the term « alternative » is a source of great confusion.** To the animal research community, the term « alternative » refers to the 3Rs of reduction, refinement, replacement. To the general public, the term « alternative » is understood to mean an « absolute replacement ». There is also a lack of consensus within the animal research community itself of what constitutes a « relative replacement » versus an « absolute replacement ». **We deem it urgent, to support everybody's work in the months and years to come, to fully clarify this point.**