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TO:

Animals Scientific Procedures Division,
Home Office,
4th Floor, South-West,
Seacole Building,
2 Marsham Street,
London SW1P 4DF.

MY RESPONSE TO THE CONSULTATION ON OPTIONS FOR THE TRANSPOSITION OF EUROPEAN DIRECTIVE 2010/63/EU ON THE PROTECTION OF ANIMALS USED FOR SCIENTIFIC PURPOSES

The NAVS recommends you tick "Yes" to all questions below including NAVS responses. You can agree or disagree.

Name: _____

Address: _____

_____ **Postcode:** _____

Here are my responses to some key questions in the UK Government consultation on bringing Directive 2010/63/EU into law:

Q1: Should the UK continue to protect mammals from half way through gestation? YES ❑ NO ❑

Q5: Should the UK retain its current special protection for dogs, cats and equids? YES ❑ NO ❑

Q8: Are there any further issues to consider regarding the use of non-human primates? Response: where the UK allows primate use for 'debilitating' diseases a comprehensive, exclusive list must be compiled. YES ❑ NO ❑

Q13: Is there a case for retaining the UK requirement that quail and ferrets should be purpose bred? [NAVS: 'no' to de-regulation] YES ❑ NO ❑

Q20: Should UK restrictions on neuromuscular blocking agents in mammals be retained?* [*drugs paralyze, but the animal can still feel pain] YES ❑ NO ❑

Q21: Are there any further issues relating to re-use we should consider? Response: I believe that accepting the EU Directive on re-use of animals as it stands, would *increase* animal suffering. YES ❑ NO ❑

Q28: Are there any further issues relating to avoidance of duplication of procedures? Response: the UK should take steps such as data sharing and strict rules on alternatives to avoid duplication. YES ❑ NO ❑

Q29: Are there any issues we should consider for alternatives? Response: the UK should use thematic reviews to select animal experiments for replacement, review with **all stakeholders**, and set targets for replacement. YES ❑ NO ❑

Q31: Are there any additional examples of severity that might be included in guidance? Response: a list of "severe and prolonged" **prohibited** procedures **must** be compiled and ahered to without safeguard clauses. YES ❑ NO ❑

Q41: Should the UK retain its current system of personal licensing or adopt a simplified version of the licensing system? Response: the UK should retain its full licensing system. YES ❑ NO ❑

Q45: Should information be placed in the public domain about the project evaluation process to ensure transparency of the process? Response: all project licence information (technical not personal) should be public to ensure public accountability and scientific scrutiny. YES ❑ NO ❑

Q.46 Should the UK extend the requirement for retrospective assessment to some or all projects classified as "mild" or "non-recovery"? Response: **all** animal experiments must be assessed retrospectively to establish what **actually occurred** during the procedure. YES ❑ NO ❑

Q49: Should the UK adopt a simplified administrative procedure for relevant categories of project? Response: I do not think that the UK should simplify the current administrative procedures. YES ❑ NO ❑

Q50: Should the UK aim to publish non-technical summaries for all authorised projects? Response: Yes, and *all* technical information should be made public, for reasons of accountability and transparency. YES ❑ NO ❑

Q54: Should all aspects of the current UK inspection system be retained? How might it be improved? Response: the proportion of **unannounced** visits and **frequency** of visits needs to increase. YES ❑ NO ❑

Q55: Should the UK continue to publish a full range of statistics as in the current annual statistics report? YES ❑ NO ❑

Q58A: The UK will introduce thematic review – would you like to see the thematic review process include all stakeholders and allow them to submit at least five animal experiments a year for review? YES ❑ NO ❑

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