NABR’s Analysis and Comments

Regarding the

Guide for the Care and Use of Laboratory Animals, Eighth Edition

June 28, 2010

General Comments

The pre-publication version of the 2010 Guide for the Care and Use of Laboratory Animals (Guide) is considerably longer than the previous version due both to the increased content and the increased number of references. The emphasis on performance based standards and the use of professional judgment in implementing the recommendations is to be commended. The overall style is more textbook (explanatory) in nature than a guidance document created by scientist and veterinarians for scientist and veterinarians to uphold the scientific rigor and integrity of biomedical research.

Chapter 1 – Key Concepts

On page two, the first sentence of the third paragraph reads, “The goal of the Guide is to promote humane care and use for laboratory animals.” This should read “The goal of the Guide is to promote humane care and use of laboratory animals.”

On page 5 in the section on “The Three R’s” the following sentence appears, “Principal Investigators are strongly discouraged from advocating animal reuse as a reduction strategy.” This is a strong statement in light of the Proposed European directive, which is recommending selective reuse of animals as a means of reducing the number of animals used.

On page 6 in the section on Key Terms, the definition of Humane Care emphasizes high ethical and scientific standards, but does not directly address the definition of humane, which is marked by compassion, sympathy or consideration.
The section on Policies, Principles and Procedures on page 8 contains very practical definitions of these terms and would be strengthened if the term “Guidelines” had been included. Many institutions have established Policies and Guidelines and having a definition of the latter would be helpful.

The section on Must, Should and May on page 8 is helpful, but the number of times that “should” appears in subsequent sections and the fact that it is often either preceded or followed by modifying phrases will make strict adherence to the definition a challenge at times.

**Chapter 3 – Environment, Housing and Management**

In the section on Environmental Enrichment the phrases “species-typical” and “species-specific” are used extensively to refer to what is in reality “species-appropriate” behavior for the species when housed in a laboratory environment. It is rarely, if ever, possible to provide an environment that allows species-typical behavior for species, such as nonhuman primates, which are only a few generations removed from their natural habitat nor does it take into account the effect of domestication for species such as rats and mice that have been generations removed from their natural habitat. The term species appropriate is used on page 89 when referring to enrichment of aquatic species.

On page 58 in the second paragraph the following statement appears, “…enrichment affects animal phenotype and may impact the experimental outcome. Thus, it should be considered an independent variable and appropriately controlled.” The use of the word “should” implies that a process be in place to assure that enrichment strategies do not represent a confounding variable before they are implemented.

**Table 3.2**

- The proposed space recommendations for Mice (female + litter) appear to be adopted from Annex II of the European Directive, but the modifying language that defines the intent of this recommendation is missing. The European standard applies to “…monogamous pair (inbred/outbred) or trio (inbred).” As written, a pair housing system would require 63-66 sq. in. and a trio would require 75 - 81 sq. in. depending upon the size of the male and/or male and additional female.

- It is unclear why the cage height for Group 6 monkeys was set at 46 inches. It would appear to be a carryover from the previous Group 6 and does not seem to be necessary for animals in this weight range.

The use of the word “should” is greatly reduced in the section on aquatic animals, but the word “needs” appears in several places where one would expect the word should to be.

**Chapter Four – Veterinary Care**
On page 126 in the first paragraph, the following statement appears, “...most procedures routinely done on an outpatient basis in veterinary clinical practice.” Changing this to read “...most procedures routinely done on an outpatient basis in veterinary/medical clinical practice.” would be more applicable to the procedures done in the research environment.

On page 128 the last sentence in the paragraph on Postoperative Care contains a reference (FBR 1987), which has not been in print for years and is no longer available.

On page 132 in the paragraph on Euthanasia, the following statement appears, “and death with no or momentary pain, distress or anxiety;” which is not consistent with the definition found in that paragraph which is “without pain and distress.”