January 15, 2019

Dear Congress,

For 40 years, the National Association for Biomedical Research (NABR) has been the only national organization solely dedicated to advocating sound public policy for ethical and essential animal research. NABR members rely on humane and responsible animal research to advance global human and animal health. Our membership of more than 360 universities, medical and veterinary schools, teaching hospitals, pharmaceutical and biotechnology companies, patient groups and academic and professional societies, strongly oppose S. 3773, known as the Primate Protection and Research Modernization Act of 2018.

The findings that form the justification for this bill have no basis in scientific fact and appear to constitute talking points from organizations opposed to all use of animals in research. These findings lack data and misrepresent facts in order to support their position.

The proposed legislation constitutes a radical departure from the current rigorous peer review process for Federal funding of research with non-human primate (NHP) animal models. It would add an additional unnecessary and time-consuming level of review to the current review process; one which consists of reviewers who are recognized experts in specialized fields of research. However, the proposed standing committee, as outlined by the bill, would include individuals who not only lack the necessary expertise to determine whether a study is scientifically meritorious, but it would also include individuals opposed to the use of animals in research. The proposed standing committee has the potential to completely exclude representation from scientists who can testify to the validity and necessity of the research as well as the care of such animals in a research setting.

This legislation would add enormous cost and complexity to the many fields of research in which NHP models have been and are currently used. The stated goal of this additional review is to examine whether the research has established a history of advancing each individual field of
research in ways that resulted in meaningful clinical interventions. Such an effort would require the expertise of scientists from each field, many of whom are already experts in the current review process for federal funding. In addition, this language narrows the scope of NHP research to clinically applicable research, but alarmingly excludes all basic research, as well as any research conducted for the health, welfare, or conservation of the primates themselves.

Lastly, the bill would impose the requirement of so-called “ethologically appropriate housing,” a costly housing and management system for NHPs which only exists as a concept proposed for housing of chimpanzees. Chimpanzees are large nonhuman primates currently not in use as a research model in the U.S. This concept has not been scientifically validated by those with expertise in the care of NHPs. In fact, an article published by experts in veterinary and behavioral care proposed an alternative concept of housing and management based on years of research, which is currently in place in many American research facilities.

NABR encourages you and your colleagues to oppose the ill-conceived Primate Protection and Research Modernization Act, as well any bill or language that would further restrict non-human primate research at America’s 178 esteemed institutions involved in non-human primate research. The United States is the world’s leader in medical innovation and discovery. No other country is conducting this research as well nor as humanely as the United States. If passed, this legislation would not only grind NHP research to a halt, it would also deny many Americans suffering from diseases like Alzheimer’s, Parkinson’s, AIDS, Diabetes, organ failure, and cancer hope for a cure.