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11 April 2022

Joint Appeal

More progress without animal testing – focus on promoting the use of alternative methods

Animal testing is required by law for the registration of chemicals and the approval of pesticides (so-called regulatory animal testing). Politics, science, industry and society are faced with a difficult balancing act: On one hand, the need for animal testing is increasing due to increasing testing requirements for chemicals and the continuous search for better and more sustainable products. On the other hand, society's desire for safe products that have not been tested on animals is growing. Further, the current system of risk assessment is based on animal experiments, which are of very limited relevance to human health.

One way out of the dilemma are non-animal alternative methods based on human cells, tissues or computer models. However, these alternative methods make it far too rarely into regulatory application even though they have the potential to make animal testing redundant and are available in large numbers. The three main reasons for that are the lack of political prioritization of the topic in the past, the lack of institutional coordination, and the insufficiently targeted research funding for the (further) development of testing strategies and bringing them to regulatory acceptance. This endangers Germany's innovative strength and competitiveness and results in avoidable animal testing.

The herein signing organizations therefore appeal to the German government to be more proactive in reducing animal testing. The use of existing and future alternative methods should be promoted in particular through the following measures:

- The Federal Government should present, with high priority and in a timely manner, an action plan with the goal of making animal experiments redundant altogether, by defining concrete short- and medium-term interim goals. This action plan can only be successful in an interdepartmental manner and with the significant participation of the Federal Ministry of Education and Research (BMBF), the Federal Ministry of Food and Agriculture (BMEL) and the Federal Ministry for the Environment, Nature Conservation, Nuclear Safety and Consumer Protection (BMUV).
- The validation of alternative methods must be an objective of research funding. This is the only way to create an incentive for researchers to standardize and validated developed methods or to participate in corresponding validation procedures. This is a necessary step in order to make the developed methods consistently usable for regulatory purposes.
- In addition to the funding of method development by the BMBF and the introduction of validated methods into the OECD by the Federal Institute for Risk Assessment (BfR)



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and the Federal Environment Agency (UBA), Germany needs a coordinating authority or institute that closes the gap between by

- a) developing testing strategies;
- b) prioritizing, coordinating and funding of the development of new (regulatory) methods accordingly;
- c) validating the newly developed methods.

Background:

Germany used to be a leader in the development and validation of new methods until the 2000s, but is now falling behind. This is due to the lack of funding for validation as well as a lack of strategic prioritization and coordination of the topic by the relevant ministries and authorities.

The federal ministries are funding the development of individual alternative methods and the BfR and UBA are submitting developed and validated methods to the OECD. However, neither is sufficient to exploit the great potential of non-animal alternative methods and to make animal experiments redundant.

Between development and submission to OECD is the process of standardization, validation and merging of several methods into one testing strategy, which requires a lot of time and a considerable budget. In recent years, no funding and decreasing scientific and organizational support was provided – even from the EU (e.g., the EURL ECVAM [European Union Reference Laboratory for alternatives to animal testing]). Therefore in addition to a committed and coordinated approach at EU level, the contributions of the individual Member States are essential.

In addition to this described "gap" between development and application of alternative methods, the lack of coordination is another hurdle: The uncoordinated funding and development of individual methods leads to a patchwork in which individual methods rarely complement each other. In order to be able to map more complex processes, such as the hormone system, a testing strategy is needed - a combination of several alternative methods. These testing strategies and suitable alternative methods must be developed, standardised and validated in a coordinated manner.

In areas where animal testing has already been replaced (e.g. skin sensitization), there is a clear gain for science, industry and the protection of consumers and animals.