



NATIONAL ANTI-VIVISECTION SOCIETY
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Dear Ms. Downey,

On behalf of the National Anti-Vivisection Society (NAVS), I am writing in response to the composition of the committee tasked with examining Nonhuman Primate Model Systems: State of Science and Future Needs. Specifically, to placate concerns of bias and to increase public support for future committee findings, we ask that the committee recruit and appoint members with a diversity of ethical and professional insight, including those with expertise in bioethics and human-based research models.

Our biggest concern is that the current composition of the committee disproportionately excludes professionals who do not have a substantial stake in maintaining nonhuman primates (NHPs) as a primary biomedical model. In fact, the two committee members who clearly do not have a strong stake in NHP research, according to their bios, are labeled as having a "conflict of interest." NAVS asserts that it is of equal conflict to have the committee populated with scientists whose careers have been bolstered largely or in part by using NHPs in their research.

For the committee to properly identify "opportunities for new approach methodologies to complement or reduce reliance on research with nonhuman primates," "status of research, development, and validation efforts into new approach methodologies," and "ways to increase coordination and collaboration between researchers who use nonhuman primates and those who use new approach methodologies to enhance the value of all methods and tools," it would benefit the committee to have increased representation of scientists who have focused their careers on the development, validation and implementation of new approach methodologies (NAMs). Similar to how the committee discussed the wide range of uses for NHPs in research during the meeting on April 5, 2022, there are a vast number of areas where NAMs have the potential to significantly impact scientific outcomes, so two committee members with expertise in NAMs seems insufficient.

Additionally, during the April 5 meeting a member of the public asked if ethics would be considered in the committee's work. In response it was stated that ethics are intertwined in all aspects of research using NHPs and will therefore be considered over the course of the committee's work. However, it is clear from the committee bios, of which only one indicates a member with extensive background in animal research ethics, that there are not enough individuals who can speak to the ethics of the use of NHPs in research. While the introduction of ethical considerations may be viewed as a distraction by some in the animal research community, inclusion of such a component on this committee would go a long way toward ameliorating concerns—by the public, as well as by members of Congress who have called for the formation of the committee—of a pre-determined bias toward maintenance of "business as usual."

Beyond committee composition, NAVS has additional recommendations to strengthen acceptance and support for the work of the committee:

- Disclosure of current and past research that committee members have conducted so we may have a clear picture of how and to what extent NHP research has boosted or supported the careers of committee members.
- Disclosure of papers authored or co-authored by committee members that discuss the ethics of the use of animals in science.
- Disclosure of conflicts of interest beyond mere commercial interests to include personal, institutional or familial conflicts associated with committee members. As is, the only committee members who have a perceived conflict of interest are two who have a stake in the development of alternative methods. While we understand that to carry out the scope of the committee it is necessary to have members who are experts in NHP research, increased transparency around possible conflicts outside of their own research would help lend credence to the committee's findings.

In the shadow of the COVID-19 pandemic, the scientific community is atop a precipice, with some maintaining the status quo while others take flight using new approaches that are all but guaranteed to produce superior outcomes over the animal models that have delivered lackluster results for decades. NAVS challenges the committee to take the leap and give this topic the thorough, perhaps uncomfortable, scrutiny that it deserves by better balancing the committee's composition.

Sincerely,



Kenneth Kandaras, J.D.
Executive Director



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