

Lush Lobbying Prize 2013

Background Paper

1 Executive Summary

The Lush Prize seeks to reward excellence and innovation by organisations working to end animal testing.

The Lobbying category focuses on policy interventions promoting the use of alternatives:

Scientific innovation needs to go hand-in-hand with policy change to ensure that end-users of new testing approaches – industry and regulators – are receptive and responsive to the new methods. Such change requires a multifaceted, global approach, including science-based lobbying at the national level or supra-national level to:

- *Entrench non-animal testing methods in national, EU or OECD programmes of test guidelines*
- *Revise existing guidelines to reflect best practices, including the removal of animal tests, or*
- *Achieve a mandatory requirement for non-animal testing in legislation, regulatory policies, testing guidance, etc.*

The Lush Prize is not a 3Rs prize but a 1R prize. By this we mean it is only seeking projects working on replacements (rather than reduction and refinement) and seeks to avoid funding projects or initiatives linked to animal testing in other ways.

1.1 Key findings

Organisations opposed to animal testing are becoming increasingly skilled at lobbying at a variety of levels and are accepted by regulatory and legislative bodies as informed and reliable stakeholders.

NGOs (Non-Governmental Organisations) have formed coalitions such as the International Council on Animal Protection in OECD Programmes, which was formed to incorporate alternative methods that can replace, reduce, and refine animal use in OECD guidelines and programs.

The European Coalition to End Animal Experiments (ECEAE) has a stakeholder seat at the European Commission's committee CARACAL (the Competent Authorities for REACH and CLP, an expert group that advises the European Commission and the European Chemicals Agency) and the European Chemicals Agency's new committee, the Biocides Products Committee (BPC).

PETA India has an official seat on the Bureau of Indian Standards PCD 19 Cosmetics Sectional Committee meeting and the Soaps and other Surface Active agents committee. This has been instrumental in their lobbying to successfully ban cosmetics testing on animals.

Lobbying initiatives by NGOs covered in this report have led to animal testing bans in Europe, India and Israel in recent years.

1.2 Table of groups active in this sector

The core of this report is a table of NGOs active in the area of lobbying to end animal testing. It covers dozens of organisations in Europe, Asia, Australasia and America.

Although there are thousands of organisations working in some way to create awareness and lobby regulators and industry to end animal testing, our focus has been on those working to a larger extent on a national or international level and whose campaigns specifically include topics relevant to the Lush Prize (rather than on wider issues such as pharmaceutical research).

1.3 Conclusions and recommendations

This study analysed the lobbying work of dozens of NGOs around the world to encourage industry and regulators to replace the outdated and unscientific use of animals with 21st century, cruelty-free methods. The following organisations have been shortlisted because they are recognised for their particularly effective work on these issues. This list has been drawn up from a combination of nominations received and additional NGOs identified during research for this report.

Stop Vivisection

A European Citizens' Initiative calling for the repeal of European Directive 2010/63/EU ("on the protection of animals used for scientific purposes") and the proposal of a new directive aimed at ending animal experiments and making the use of data relevant to humans in biomedical and toxicological research compulsory, in the place of data obtained on animals.

This campaign makes use of the European Commission's Citizens' Initiative and is made up of a committee consisting of scientists, activists and politicians.

HSI (Humane Society International) – Brazil

Brazilian national guidelines still recommend a series of tests on animals for the safety evaluation of new cosmetics products and ingredients.

HSI's Science Team is working with the Brazilian authorities and companies in the cosmetics and other sectors to gain acceptance and use of proven non-animal methods and testing strategies and to update regulatory testing requirements to replace or reduce animal testing to the greatest possible extent.

European Coalition to End Animal Experiments (ECEAE)

The coalition of 18 member NGOs in 11 countries is particularly active in scientifically objecting to animal testing under EU chemicals legislation REACH.

The ECEAE:

- Has Expert Observer status at the ECHA, the body that is responsible for implementing REACH
- Has a stakeholder seat at the ECHA's new committee, the Biocides Products Committee
- Has a stakeholder seat at the European Commission's REACH committee called CARACAL

Physicians Committee for Responsible Medicine (PCRM) – USA

PCRM are lobbying on the Chemical Safety Improvement Act to make it a requirement for the use of non-animal test methods where reasonably and practicably available.

Many of the suggestions PCRM scientists provided to Congress in past hearing testimony and meetings are included in the CSIA, but it urges Congress to harmonise the bill with the European Union law, which requires that new animal tests only be conducted as a last resort, when all other methods of obtaining data have been used.

Center for Alternatives to Animal Testing

Actively lobbying for a legal implementation of 21st Century Toxicity in the US and the EU, educating legislators and politicians about the urgent need for regulatory change, and the availability of new methods.

PETA India

For its major role in the successful campaign to ban the testing of cosmetics on animals in the country.

International Council on Animal Protection in OECD Programmes (ICAPO)

Working to incorporate non-animal testing methods into the activities of the

Organisation for Economic Co-operation and Development (OECD), co-ordinating the development of chemical testing programmes and financial support for the Institute for In Vitro Sciences to attend OECD expert meetings.

Forska Utan Djurförsök / The Swedish Fund for Research Without Animal Experiments

For promoting the development and validation of replacement alternatives to animal experiments and lobbying for Sweden to establish a centre for alternatives to animal testing.

2 Introduction

A great deal of progress has been achieved over the past twenty years in helping change legislation to encourage non-animal testing methods. These changes not only meet the expectations and demands of a public concerned about animal protection but, given the unreliability of experiments on animals, provide safer methods of testing new products for the consumer market.

The biggest recent success has of course been the EU-wide ban on testing cosmetics on animals and the marketing of any animal-tested cosmetics (even if those experiments were conducted outside the EU). Similar bans have been implemented in India and Israel, whilst China and Brazil's insistence on animal testing is being firmly challenged.

The use of animals in chemicals testing remains high on the agenda for many NGOs. In Europe, toxicity tests required under REACH (Registration, Evaluation, Authorisation and Restriction of Chemicals) usually involve the poisoning of guinea pigs, rabbits, fish, birds, rats and mice.¹ Lobbying has helped to significantly reduce the number of animals used in testing for REACH, but scrutiny needs to be applied to limit animal use as much as possible.

In the USA, the Chemical Safety Improvement Act of 2013 is currently the focus of attention. Although, thanks to lobbying efforts, principles to replace and reduce animal-based test methods have been integrated into the legislation, Congress is being urged to harmonise the bill with the European Union law, which requires that new animal tests only be conducted as a last resort, when all other methods of obtaining data have been exhausted.²

3 Lobbying

“Lobbying is the process of seeking to shape the public policy agenda in order to influence government (and its institutions) and the legislative programme.”³

Public policy is dictated and influenced by a range of bodies and individuals, from local government to the media, groups which are home to Key Decision Makers and Key Opinion Formers.

3.1 What is effective lobbying?

Clearly each country has different political systems and governing operations, but some lobbying techniques are universal and just need adapting to meet conditions on the ground. Equally, “you will need to tailor your approach to accommodate the

1 [REACH](#). ECEAE. Accessed 15.8.12

2 [Physicians Committee Statement on the Chemical Safety and Improvement Act of 2013](#).

3 Lobbying: The art of political persuasion. Lionel Zetter. Harriman House, 2011

personal and political sensibilities of a wide range of politicians”, even within an individual political body.⁴

There are several key factors to making lobbying effective:

1. Be credible: the message has to be based on evidence and withstand scrutiny and criticism.
2. Understand what you want and how to achieve it: Have a short-term and long-term strategy and fully understand what your objectives are.
3. Get involved at the earliest stage: This can be as early as political parties’ policy reviews or responding to government consultations on policy proposals. Research shows that one in five MEPs believe that lobbyists do not provide information in a timely enough manner.⁵
4. Understand how policy is made at various levels (local, national, international): “it helps to ensure that you arrive with the right arguments at the right time.”⁶
5. Prepare a list of key stakeholders: keep this updated so you know who to lobby. Few people actually influence a decision, so strategic communication with them is far better than mass briefings to people with little influence.
6. Establish relationships with Key Decision Makers and Key Opinion Formers: Being on relevant consultation lists ensures that government seeks your input at an early opportunity. This is known as ‘insider campaigning’. “This status as an insider will have been established through longevity, having developed a track record of being a trusted source of policy and opinion”.⁷ (Outsider campaigning “involves attempting to influence decision-makers through the participation of the general public in lobbying action.”)⁸
7. Know your opponent’s arguments: formulate what their strategy would be and what you need to put together a stronger case than theirs.
8. Use the media to impact both political and public opinion on your issue: a change in public opinion often leads to a corresponding change in political opinion rather than the other way around.
9. Form a coalition: this shows a common cause which can have a greater impact on policy makers, who crave consensus. Managing the differing key messages and ‘rivalries’ amongst coalition organisations can be difficult, so “ad hoc and temporary issue-specific coalitions can be just as influential as

4 A Common Sense Guide to Effective Lobbying on Capitol Hill. Pete Levitas. Antitrust, Vol. 21, No. 2, Spring 2007. The American Bar Association.

5 Quoted in Robert Mack 2005. Lobbying effectively in Brussels and Washington – Getting the right result. Journal of Communication Management. Vol. 9, 4, 339-347.

6 [A Guide to Effective Lobbying In Europe](#) 2009. Burson-Marsteller, 2009.

7 Lobbying: The art of political persuasion. Lionel Zetter. Harriman House, 2011

8 [A Guide to Effective Lobbying for Women’s Groups in Ireland](#). The National Women’s Council of Ireland, 2006.

longstanding partnerships.”⁹

(For further information on effective lobbying read *Lobbying: The art of political persuasion*,¹⁰ which covers UK administrations in detail as well as examining USA, Brussels, Asia, Arabian Gulf and Middle East; and The National Women’s Council of Ireland’s *A Guide to Effective Lobbying for Women’s Groups in Ireland* ¹¹ which gives very useful information for lobbying as well as covering in detail the political situation in Ireland.)

4 Key campaign issues

Key issues remain the same as those identified in 2012 research paper:

- EU cosmetics animal testing ban
- REACH
- China’s demand for animal testing
- Emerging countries – Brazil, China, India, Russia

In this updated report we look at what progress has been made on these issues and which NGOs have been particularly active and successful.

4.1 EU cosmetics animal testing ban

4.1.1 Introduction

Testing cosmetics products and their ingredients on animals has been banned in Europe since 2009. Since then, any animal testing done for products sold in Europe has been done in other countries, with around 27,000 animals being used each year outside the EU for this purpose.¹²

At the time of producing the 2012 research paper for the Lush Prize, it was still legal to sell cosmetics in the EU which had been tested on animals in non-EU countries. The European Commission had set a deadline of March 2013 for a full marketing ban to come into place but many NGOs expressed concern that this could be further delayed because of perceived difficulties with finding non-animal testing methods for three ‘toxicological endpoints’: repeated dose toxicity, reproductive toxicity and toxicokinetics.

⁹ [A Guide to Effective Lobbying In Europe](#) 2009. Burson-Marsteller, 2009.

¹⁰ *Lobbying: The art of political persuasion*. Lionel Zetter. Harriman House, 2011

¹¹ [A Guide to Effective Lobbying for Women’s Groups in Ireland](#). The National Women’s Council of Ireland, 2006.

¹² [European Commission MEMO: Questions and Answers: Animal testing and cosmetics](#). 11 March 2013.

NGOs opposed yet another extension to the marketing deadline. The BUAV (British Union for the Abolition of Vivisection) stated:¹³ “there are insufficient scientific grounds for any extension to the 2013 deadline. Extending the deadline will not significantly help the cosmetic industry. Any extension would instead remove the incentive to validate and accept the alternatives that already exist. This would be a highly retrograde step.” Eurogroup for Animals added:¹⁴ “Our interest is not in creating new deadlines for the full introduction of the marketing ban, but in ensuring that the 2013 deadline remains in place regardless of the availability of alternative methods.”

The marketing ban did finally come into force on 11 March 2013, meaning that cosmetics tested on animals can no longer be sold in Europe, even if the testing happened outside the EU.

According to the European Commission, where a ‘conclusive safety assessment’ cannot be carried out because data is missing and because new animal tests cannot be conducted for cosmetics, “the respective ingredient should not be used.” Further, it points out that companies can no longer carry out testing for cosmetic products or ingredients outside the Union and then use the data here to claim the safety of cosmetics: “consumers can therefore be sure that the cosmetic use of an ingredient in Europe cannot be the reason for any new animal testing.”¹⁵

In the light of the marketing ban there appears to be some mixed messages given to the public about what it actually means. PETA has stated:¹⁶ “The sales ban means that all new cosmetics products sold in Europe will no longer be tested on animals, nor will they contain ingredients that were tested on animals, after the 11 March deadline. You, can, therefore, buy any product in Europe, safe in the knowledge that no new animal testing has been performed for that product and that no animals will suffer and die in a laboratory for it.”

The Animal Welfare Intergroup, however, points out:¹⁷ “it should be noted that the Commission has interpreted the ban in such a way as to allow continued use of ingredients tested on animals to meet the requirements of ‘non-cosmetics related legislative frameworks’. This means that there is still a loophole that needs to be closed.”

The European Commission confirms the concerns of the Intergroup. It points out ¹⁸ that “the majority of ingredients that go into cosmetics are ingredients that are also in use in many other consumer and industrial products, such as in pharmaceuticals, detergents, food, paints etc. They may therefore be subject to animal testing requirements under these respective legal frameworks.” The Commission recognises

¹³ [Meeting the Deadline of the 2013 EU Marketing Ban: A Scientific Review of Non-Animal Tests for Cosmetics.](#)

¹⁴ [Questions Impact Assessment: 2013 Implementation Date Marketing Ban Cosmetic Directive.](#) Submission by Eurogroup for Animals.

¹⁵ [European Commission MEMO: Questions and Answers: Animal testing and cosmetics.](#) 11 March 2013.

¹⁶ PETA UK: [The New EU Cosmetics Testing Ban – Your Questions Answered](#)

¹⁷ [Entry into force of a full EU ban on animal testing for cosmetics welcomed but loophole needs to be closed](#)
Intergroup 12/03/2013

¹⁸ [European Commission MEMO: Questions and Answers: Animal testing and cosmetics.](#) 11 March 2013.

that the legislation most likely to require an ingredient also used in cosmetics to be subject to animal testing is REACH and “it therefore is for Member States to assess and decide whether such testing for compliance with other frameworks is considered to be falling in the scope of the 2013 marketing ban”¹⁹

So, despite the success of the marketing ban, the best way for compassionate consumers to be totally sure that products they buy do not contain even ingredients that continue to be animal tested for other purposes is to look for labelling such as that of the Leaping Bunny Program. Companies certified by this scheme “may not test their products or ingredients on animals regardless of any international regulatory requirements and we will not allow testing for environmental toxicity. In addition, the Leaping Bunny Program also certifies household products, which are unaffected by this new animal testing ban”.²⁰

4.1.2 Ban due to extensive lobbying

Implementation of the 2013 marketing deadline is the result of effective lobbying at Member State and EU-level. The ban applies even though non-animal testing methods are not yet available in all cases. The EC states²¹ that “this reflects a sector-specific political choice by the European Parliament and the Council” and that a ban was not “dependent on the availability of a full set of replacement methods.”

It has long been clear that setting a deadline for the marketing ban has acted as an incentive for companies to work harder towards finding and implementing non-animal methods of testing. The EC states²² that it did not delay the 2013 marketing ban as it “could seriously diminish determination to swiftly develop alternative test methods”, noting that the proposed ban has “been a key accelerator in relation to the development of alternative methods and have sent a strong signal far beyond the cosmetics sector and far beyond Europe.”

Despite the Commission’s apparent keenness to implement the marketing ban, it has also commented.²³ “considering that the non-availability of alternative test methods could have an impact on the innovation in cosmetic ingredients and products and the competitiveness of the sector, the Commission will closely monitor the situation in the coming years”. No doubt NGOs will keep a close eye on the situation to ensure the ban is not relaxed in any way in any Member State.

19 Communication from the Commission to the European Parliament and the Council on the animal testing and marketing ban and on the state of play in relation to alternative methods in the field of cosmetics. Brussels, 11.3.2013

20 The Coalition for Consumers Information on Cosmetics. [FAQ about the EU Cosmetics Testing Ban. What does the new European Union \(EU\) Cosmetics Regulation say about animal testing?](#)

21 Communication from the Commission to the European Parliament and the Council on the animal testing and marketing ban and on the state of play in relation to alternative methods in the field of cosmetics. Brussels, 11.3.2013

22 Communication from the Commission to the European Parliament and the Council on the animal testing and marketing ban and on the state of play in relation to alternative methods in the field of cosmetics. Brussels, 11.3.2013

23 Communication from the Commission to the European Parliament and the Council on the animal testing and marketing ban and on the state of play in relation to alternative methods in the field of cosmetics. Brussels, 11.3.2013

4.1.3 Taking the EU ban to a global level

The EU ban on testing cosmetics on animals and marketing those products within Europe is a hugely successful outcome of a 20 year campaign by numerous NGOs and cosmetics companies across Europe. The European Cosmetics and Toiletries industry is worth more than €70 billion and represents almost half of the global market for cosmetics²⁴ so the importance of this achievement cannot be overstated. The next step now is to take this success global.

The EC considers the ban can be used as an opportunity for the EU “to set an example of responsible innovation in cosmetics with positive impact beyond Europe. Impacts go beyond the cosmetics sector – the objective is to develop strategies that will lead to better and more predictive, faster and cheaper tools to assess consumer safety of chemical substances.” It is eager to ensure that its new requirements are adopted by other countries around the world, being “convinced that the overall long-term objective to replace animal testing wherever possible and to move to new ways of improved safety assessment will eventually be shared by many of the Union’s trading partners, even though different regions may be at different steps of the process and the approaches to achieve the objective may differ.” It is “convinced that the issue of alternative test methods for cosmetics merits a prominent place on the EU’s trade and international cooperation agenda. It will endeavour to put these issues on the agenda of all relevant multi and bilateral meetings in the cosmetics field in 2013, notably with the United States and China, but also in contacts with Brazil and India. The Commission will in this effort look for synergies with the international initiatives of industry and animal welfare organisations”²⁵.

Two comparative initiatives by NGOs aim to take the cruelty-free cosmetics message and the success of the EU-level lobbying to audiences, industry and governments around the world:

Humane Society International’s (HSI) Be Cruelty-Free campaign:

Launched in 2012, Be Cruelty-Free has been rolled out across the United States, Canada, Australia, New Zealand, Brazil, India, South Korea, Russia and Taiwan.

HSI offices work in partnership with local organisations in these key regions, as well as cruelty-free companies, national cosmetics regulators and supportive policy-makers.

Cruelty Free International, an initiative of the BUAV:

Also launched in 2012, CFI has partner organisations in 22 countries.

During 2013, CFI have:

²⁴ [European Commission MEMO: Questions and Answers: Animal testing and cosmetics](#). 11 March 2013.

²⁵ Communication from the Commission to the European Parliament and the Council on the animal testing and marketing ban and on the state of play in relation to alternative methods in the field of cosmetics. Brussels, 11.3.2013

- Met with regulatory authorities in China with the aim of gaining acceptance there for alternatives to testing on animals.
- Given a keynote speech at Asia's premier cosmetics industry event attended by the region's leading cosmetics industry regulators.
- Given a keynote speech to the North American Sustainable Cosmetics Summit in New York, highlighting the global trends in ending animal testing for cosmetics.
- Given a presentation to Food and Drug Administration's hearings on US policy in cosmetics regulation, urging it to follow Europe's lead.
- Funded non-animal alternatives in Vietnam, the only country of the 10 members of the Association of South East Asian Nations to actively test cosmetics on animals. CFI has provided a grant for a detailed scoping study by alternatives experts The Institute for In Vitro Sciences.
- Met with the Ministry of Health, the Food and Drug Administration and the Cosmetics Association in South Korea.

4.2 REACH

REACH (Registration, Evaluation, Authorisation and Restriction of Chemicals) is the European Community Regulation on chemicals and their safe use (EC 1907/2006) which entered into force in 2007. Its aim is "to improve the protection of human health and the environment through the better and earlier identification of the intrinsic properties of chemical substances".²⁶

REACH requires manufacturers and importers to collate information on the properties of all chemicals sold in the EU in annual quantities of more than one tonne, and to register the information, along with toxicity data, in a central database run by the European Chemicals Agency (ECHA) by 2018. The required test methods are described in OECD (Organisation for Economic Cooperation and Development) guidelines.²⁷

The first phase of REACH envisaged the registration of 30,000 chemical substances, but the total number of substances submitted by the 2008 deadline for registration was 143,000.²⁸

Many of the testing methods specified by REACH use animals. Toxicity tests usually involve the poisoning of guinea pigs, rabbits, fish, birds, rats and mice.²⁹

²⁶ [REACH](#). European Commission 6.6.12 (last updated). Accessed 15.8.12

²⁷ [OECD Guidelines for the Testing of Chemicals](#). OECD. Accessed 16.8.12

²⁸ [REACH, animal testing, and the precautionary principle](#). Andre Menache & Candida Nastrucci. *Medicolegal and Bioethics*, August 2012, Volume 2012:2 Pages 13 – 29. Accessed 16.8.12

²⁹ [REACH](#). ECEAE. Accessed 15.8.12

The use of animals in testing to meet REACH requirements is huge. The Health and Safety Executive, the UK's Competent Authority for REACH, estimates that "for a single substance, with no pre-existing data, and no attempt to minimise animal testing, registration and subsequent fulfilment of the information gaps could require over 5,000 animals, assuming little or no avian testing."³⁰

The total numbers of animals who could be used in testing have been estimated to be as high as 54 million and to cost €9.5 billion.³¹

Lobbying conducted by NGOs helped to significantly reduce the number of animals used in testing for REACH. Non-animal testing methods were not even mentioned in the 2001 White Paper, but due to lobbying this became a major issue high up on the agenda of the EU³² and a number of changes were made:³³

1. Mandatory sharing of animal test data: companies registering the same chemical are obliged to share their data and, if animal testing is required by REACH, the tests will only be done by one of the registrants. Duplicate animal testing should thus be prevented.
2. For some chemicals approval must be given by the ECHA before new animal tests can be performed. The public and NGOs have 45 days during which to comment, challenge the need for the tests, or suggest alternatives.
3. Alternatives to animal testing are strongly promoted throughout the REACH text which stresses that animal testing must only be undertaken as a last resort.

The ECEAE is one NGO coalition that has been particularly active on REACH. Further details of its campaign are listed in section 6.3 below, but this includes having Expert Observer status at the ECHA, the body that is responsible for implementing REACH, and being a member of the International Council on Animal Protection in OECD Programmes, commenting on testing guidelines.³⁴

4.3 Emerging countries – Brazil, China, India, Russia

Whilst Europe leads the world's market for perfumery and cosmetics, followed by the US and Japan, a number of other markets are in continuous expansion. In particular, China, Brazil and Russia, "motivated by the gradual access of their population to fragrances and personal care products".³⁵

³⁰ [REACH - Minimisation of Animal Testing](#). Health and Safety Executive, January 2010. Accessed 15.8.12

³¹ [Opinion: Chemical regulators have overreached](#). Thomas Hartung & Costanza Rovida. Nature 460, 1080-1081.

³² [REACH - cruel and unscientific mass animal testing](#). Ärzte gegen Tierversuche. Accessed 29.8.12

³³ [REACH – the new EU chemicals law: An RSPCA information paper](#). Accessed 15.8.12

³⁴ What We're Doing. ECEAE. <http://www.eceae.org/en/what-we-do/campaigns/reach/what-were-doing-reach>. Accessed 15.8.12

³⁵ [Revision of European Ecolabel Criteria for Soaps, Shampoos and Hair Conditioners](#). Market Analysis. Albert Ferrer et al. JRC, European Commission. January 2012

4.3.1 Brazil

The Brazilian cosmetics market is the fastest growing in the world.³⁶

Brazilian national guidelines still recommend a series of tests on animals for the safety evaluation of new cosmetics products and ingredients. The National Agency for Sanitary Surveillance (ANVISA) continues to rely heavily on toxicity tests using rabbits, guinea pigs and other animals to assess the safety of ingredients and even some finished products.³⁷

However, NGOs are confident that, according to HSI, “Brazil will advance the use of alternative methods through the National Network of Alternative Methods (RENAMA). The National Council for Scientific and Technological Development is investing \$1.1 million in RENAMA for alternatives to animal testing”.³⁸

HSI has been working with scientists there to establish non-animal testing methods.³⁹ “HSI’s Science Team is working with Brazilian authorities and companies in the cosmetics and other sectors to gain acceptance and use of proven non-animal methods and testing strategies and to update regulatory testing requirements to replace or reduce animal testing to the greatest possible extent.”

In November 2011, HSI co-sponsored a [training course](#) “to better familiarise government authorities and industry scientists with internationally recognized non-animal tests. The event was very successful as it gathered broad participation of Brazilian regulators, industry and university scientists. The cosmetics sector was particularly well-represented, and expressed its willingness to further explore regulatory aspects of cosmetics testing in Brazil.”

4.3.2 China

China is the world’s fourth largest beauty market, worth an estimated US \$22 billion globally.⁴⁰

China’s State Food and Drug Administration (SFDA) require animal toxicology test reports to be provided prior to licensing a new cosmetic ingredient.⁴¹ Due to these requirements, some multi-national cosmetic companies which had not tested on animals for two decades, such as Avon, Estée Lauder and Mary Kay, dropped this policy in order to sell in China.⁴²

36 [HSI asks the Brazilian government ban on animal testing for cosmetics](#). 11.3.13.

37 [Rabbits and rodents of HSI and ProAnima visit the Ministry of Health to ask that the government put an end to animal testing for cosmetics in Brazil](#). 13.3.13.

38 [HSI asks the Brazilian government ban on animal testing for cosmetics](#). 11.3.13.

39 [HSI’s Work in Brazil to Promote Non-Animal Testing](#). HSI, 15.12.11.

40 [Be Cruelty-Free Campaign to End Cosmetics Animal Testing in China Launches with Pop Singer Wang Feifei, NGOs and Industry](#). 28.6.13.

41 [Registration of New Cosmetic Ingredient with SFDA in China](#). Yunbo Shi, March 2012. Chemical Inspection and Regulation Service (CIRS). Accessed 14.8.12

42 [Avon, Mary Kay, Estée Lauder Paying for Tests on Animals](#). Michelle Kretzer, 16.2.12.

In 2012, Urban Decay, long known for its strong stance against animal testing, was lambasted for initially planning to submit to China's testing regime. Following pressure from various NGOs and customers, it quickly performed a U-turn and decided not to market in the country.⁴³

Due to pressure not only from NGOs but also companies which have avoided animal testing for other markets, China has started recognising test results that use alternatives to animal testing.

March 2011 saw the first congress on alternatives to animal testing for cosmetics in China, supported by major cosmetics companies.⁴⁴ PETA says that its funding allowed scientists at the Institute for In Vitro Sciences to travel to China to offer expertise and guidance in replacing animal-based tests. In 2013, HSI announced an \$80,000 partnership with the Institute for In Vitro Sciences to provide Chinese scientists with hands-on training using advanced non-animal methods.⁴⁵ The Institute says China is making efforts and "has been receptive to investigating the use of well-developed and validated non-animal methods such as the 3T3 Neutral Red Uptake test for phototoxicity. And this assay should be expected by the Food and Drug Administration, sometime later this year or next year".⁴⁶ The 3T3 Neutral Red Uptake test is the only non-animal test to achieve official acceptance in China.

The BUAV-led Cruelty Free International has established the 'China Task Force' with leading companies, the cosmetics industry and regulators to gain acceptance in China for non-animal testing methods. In June 2013 it also gave a keynote speech at the Asia Cosmetics Innovation Summit 2013 in Shanghai titled 'Will Asian Markets Follow the European Ban on Animal Tests for Cosmetics?'.⁴⁷

Also in 2013, HSI's Be Cruelty Free campaign launched in China in conjunction with Capital Animal Welfare Association, Lush and Chinese pop singer Wang Feifei.⁴⁸

The EU ban on marketing animal-tested cosmetics provides an example of how policy change in one country affects policy in others. In June 2013, the EU Health Commissioner Tonio Borg urged the Chinese government to follow the EU's example and end animal testing for cosmetic products. During a four-day visit to China, Borg said "I have encouraged the Chinese authorities to avoid unnecessary testing for cosmetics." He added:⁴⁹ "I see first signs of acceptance of alternative methods in China which I welcome very much. Acceptance of validated alternative methods, starting with those that are OECD accepted, is clearly key to limit animal testing for cosmetics internationally".

43 [PETA Protest Leads Urban Decay to Boycott China, Win PETA Award](#). Abe Sauer. Brand Channel, 10.7.12.

44 [First congress on alternatives to animal testing in China](#). 8 March 2011.

45 [Be Cruelty-Free Campaign to End Cosmetics Animal Testing in China Launches with Pop Singer Wang Feifei, NGOs and Industry](#). 28.6.13.

46 [Animal Protectionists Call for Ending Cosmetics Animal Testing in China](#). Liu Yuanhui, 29.6.13.

47 [Cruelty Free International in China](#). 05.06.13.

48 [Be Cruelty-Free Campaign to End Cosmetics Animal Testing in China Launches with Pop Singer Wang Feifei, NGOs and Industry](#). 28.6.13.

49 Andrew McDougall. 26.6.13. [Health Commissioner urges China to follow EU's animal testing ban for cosmetics](#).

China is the EU's second biggest trading partner behind the USA and the EU is China's biggest trading partner.⁵⁰

The EC is promoting the EU-wide ban on animal testing of cosmetics and marketing of such products for adoption by other countries. It is "convinced that the issue of alternative test methods for cosmetics merits a prominent place on the EU's trade and international cooperation agenda. It will endeavour to put these issues on the agenda of all relevant multi and bilateral meetings in the cosmetics field in 2013, notably with the United States and China, but also in contacts with Brazil and India. The Commission will, in this effort, look for synergies with the international initiatives of industry and animal welfare organisations".⁵¹

4.3.3 India

An "emerging urban elite" and "increasing female workforce" is said to be behind a forecast that India's cosmetics market is set to double in value by 2014, from a 2011 estimate of INR 100bn.⁵²

Following campaigns by a number of NGOs, the Drug Controller General of India announced in June 2013 that the testing of cosmetics and their ingredients on animals will no longer be permitted in India. The announcement was made during the Bureau of Indian Standards PCD 19 Cosmetics Sectional Committee meeting, on which PETA India has an official seat (it is also an official member of the Soaps and other Surface Active agents committee, which has enabled it to submit evidence in support of an animal testing ban). PETA India was one of the winners of the Lobbying awards in the 2012 Lush Prize for this work, along with the Federation of Indian Animal Protection Organisations (FIAPO).

PETA India had obtained wide support from international cosmetics companies, worldwide NGOs and Indian politicians for its call for a ban on animal testing.

In 2012, the BUAV-led Cruelty Free International launched in India to add to the campaign, partnering with People for Animals, which is run by Indian MP Maneka Gandhi.⁵³

PETA India say they are now campaigning to urge the Drugs Consultative Committee to amend the Drugs and Cosmetic rules (1945) to ban the marketing of cosmetics or their ingredients tested on animals.⁵⁴

4.3.4 Russia

In 2013 the Moscow-based VITA Animal Rights Centre partnered with the Humane Society International to launch the Russian arm of HSI's Be Cruelty-Free campaign.

50 Andrew McDougall. 26.6.13. [Health Commissioner urges China to follow EU's animal testing ban for cosmetics](#).

51 Communication from the Commission to the European Parliament and the Council on the animal testing and marketing ban and on the state of play in relation to alternative methods in the field of cosmetics. Brussels, 11.3.2013

52 [India market for cosmetics could double in value by 2014](#). Simon Pitman, 7.12.11. At 2013 exchange rates INR 100bn is €1.2bn.

53 [BUAV welcomes India's move towards a cosmetics testing ban](#). 4.1.13.

54 Personal Communication. 3.7.13

Animal testing for cosmetics is still commonplace in Russia, so VITA and HSI will work with companies, policymakers and regulators to end to these tests. The two NGOs launched Be Cruelty-Free Week with an eye-catching poster campaign on the Moscow Metro.

HSI recently joined forces with the Institute for In Vitro Sciences to co-fund a workshop for 11 selected scientists from Russia, in order to provide them with hands-on laboratory training in non-animal tests. The delegates gained first-hand knowledge of how non-animal test methods can be used to assess the safety of cosmetic and personal care products and improve the quality of their research.⁵⁵

4.4 USA: Safe Cosmetics Act

The Safe Cosmetics and Personal Care Products Act (2013) was introduced early in March 2013 and is a repeat of attempts to introduce similar legislation in 2010 and 2011. The law gives the Food and Drug Administration authority to ensure that all personal care products are free of harmful ingredients.⁵⁶

The Coalition for Consumer Information on Cosmetics (CCIC), a coalition of anti-vivisection organisations, has raised concerns about the Safe Cosmetics Act. Although the legislation is intended to ensure that cosmetic and personal care products are safe, they say it “will likely require a significant number of animals to test and retest finished products and ingredients for safety”.⁵⁷

The Act does support the development and use of non-animal test methods, but animal protection NGOs are instead calling for US law to harmonise with that of the EU in relation to a ban on the use of animals to test cosmetics and their component ingredients while ensuring consumer safety.

Following concerns raised during previous versions of the legislation, the Campaign for Safe Cosmetics, which is behind the law, has stated that it “supports uses of non-animal testing methods where available and effective, and fully supports initiatives to fund research on alternative, non-animal health and safety testing”.⁵⁸ It apparently works “to minimise animal testing”.

The CCIC told us that no major campaigns had been launched against the Safe Cosmetics Act as it is unlikely the legislation will pass⁵⁹ despite having large support: the Campaign for Safe Cosmetics has ten founding NGO members and is endorsed by more than 150 others (mostly environmental and health organisations).

⁵⁵ [Be Cruelty-Free Campaign to End Animal Testing for Cosmetics Launches in Russia with Moscow Metro Poster](#), 11.3.13.

⁵⁶ Campaign for Safe Cosmetics Press Release, 21.3.13. Toxic Chemicals in Cosmetics, Shampoos, Targeted by Congress

⁵⁷ [Press Release](#), 14.5.13.

⁵⁸ [How does the bill address animal testing?](#)

⁵⁹ Personal Communication 22.7.13

4.5 Israel

In 2007, the Israeli government banned using animals to test personal care and household products. 2,000-3,000 animals were used in such experiments annually.⁶⁰

This was followed by legislation passed in 2010, which came into effect in January 2013, blocking the marketing of animal-tested products.⁶¹ Israel's laws are now the same as those for the EU.

In 2012, the Israeli Ministry of Health banned the use of the leaping bunny logo on cruelty-free cosmetic products on the grounds that animal testing of cosmetics was already banned in the country and a ban was soon to come into effect banning the sale of products animal tested elsewhere.

Two NGOs, Let the Animals Live and the Israeli Society for the Abolition of Vivisection, submitted a petition to the Supreme Court against the Ministry's ruling, arguing that the instruction made by the Ministry "harms the freedom of choice and consciences of the conscious consumer as well as the public's right for information".⁶² The bunny logo would allow consumers to further ensure that products they buy were not recently tested on animals.

The animal organisations were successful in their petition and the Court ruled in May 2013 that the bunny logo could be used on cruelty-free products.⁶³

60 [Ministerial committee approves bill banning animal testing for cosmetics](#). Tamara Traubmann. 28.1.07.

61 [Import ban on animal-tested products goes into effect](#). Gabe Fisher, 1.1.13.

62 Press release: Animal protection organization appealed to the Supreme Court against the Ministry of Health.

Let the Animals Live and the Israeli Society for the Abolition of Vivisection. 6.12.12

63 [High Court victory - Rabbit label back!](#)

5 Who is active in the sector? NGOs active in lobbying to end animal testing

The table below lists groups across the world currently active in the area of lobbying against animal testing. The list is certainly not comprehensive. Attempts have been made to include a range of organisations, from grass-roots volunteer-led groups to international, well-funded NGOs. Attention has also been paid to NGOs in ‘emerging’ countries where the demand for consumer products is increasing. This research has been largely web-based and although effort has been put into researching websites in many different languages, we are aware that not all NGOs will have websites, that information available on websites will in some cases be limited and that there will be other effective NGOs which have been missed during our research.

Organisation
 Campaign
 Phone
 Email / web

Australia

1

Choose Cruelty Free

“An independent, non-profit organisation which actively promotes a cruelty-free lifestyle.” Surveys and accredits companies not testing on animals

+61 39328 1377

admin@choosecrueltyfree.org.au / www.choosecrueltyfree.org.au

2

Replace Animals in Australian Testing

Based at University of Wollongong. Aims to "create a network of researchers and other individuals or groups interested in advocating non-animal based research and in strengthening the Australian Government/NHMRC guidelines and their enforcement"

+61 24221 3387

Dr Denise Russell: deniser@uow.edu.au / www.uow.edu.au/arts/research/raat/index.html

3

Humane Research Australia

“Challenges the use of animals in research and promotes the use of more humane and scientifically valid non-animal methodologies”

+61 38823 5704

info@humanerresearch.org.au / www.humanerresearch.org.au

Austria

1

Internationaler Bund der Tierversuchsgegner / Ein Recht für Tiere (Rights for Animals)

Animal testing. Long term lobbying on issues such as REACH

+43 1713 08230

tierversuchsgegner@chello.at / www.tierversuchsgegner.at

Belgium

1

Eurogroup for Animals

Various animal protection: animal testing, farmed animals, wildlife,; companion animals, animal welfare in EU legislation

+32 2740 08 20

info@eurogroupforanimals.org / www.eurogroupforanimals.org

Brazil

1

Humane Society International

Be Cruelty Free campaign

+55 (21) 8342-4163

Helder Constantino:

hconstantino@hsi.org / www.hsi.org/world/brazil

China

1

Humane Society International

2013 launched Be Cruelty Free campaign in China with Chinese NGOs and academic scientists.

HSI launched an \$80,000 partnership with the Institute for In Vitro Sciences to provide Chinese scientists with hands-on training using advanced non-animal methods.

China mobile: + 86 13718914649

Peter Li, China Policies Specialist: pli@hsi.org

Europe

1

Stop Vivisection

A Citizens Initiative to end animal experiments. Committee includes scientists, activists and politicians. June 2013: Arranged presentations in the European Parliament as part of the campaign.

representative.stopvivisection@gmail.com / www.stopvivisection.eu

France

1

The Anti-Vivisection Coalition France (CAV)

International Toxicology Centre switch to non-animal testing; Stop Huntingdon Animal Cruelty; air transport of animals for labs

info@cav.asso.fr / www.cav.asso.fr/en

Germany

1

Deutscher Tierschutzbund e.V. (German Animal Welfare Association)

Various animal protection: animal testing, animal circuses,; factory farming, hunting.

ECEAE member.

Lobbied actively to end animal testing under REACH.

www.tierschutzbund.de

2

Animal2000

Various animal protection: animal testing, rodeos, bullfighting, hunting.

Pays the salary of a toxicologist who works on behalf of ECEAE to oppose animal testing under REACH.

+49 89-5 46 90 50

www.animal2000.de

3

Ärzte gegen Tierversuche e.V. (Doctors Against Animal Experiments)

“We are a charitable organisation of several hundred doctors and scientists who work in the medical field. We support the immediate abolition of all animal experiments on ethical and scientific grounds.” ECEAE member. The NGO’s toxicologist works to prevent animal testing under REACH by submitting scientific evidence.

+ 49 89 - 35 99 349

info@aerzte-gegen-tierversuche.de / www.aerzte-gegen-tierversuche.de

India

1

Humane Society International

Be Cruelty-Free campaign for marketing ban on animal-tested cosmetics in India.

+91 9849094113

Alokparna Sengupta: asengupta@hsi.org

www.hsi.org/world/india/work/end_animal_testing/be_cruelty_free/be_cruelty_free.html

2

People For Animals

Cruelty Free International partner.

PFA members are board members of every Laboratory Ethics Committee.

+91 - 11 - 23357088

www.peopleforanimalsindia.org

3

PETA India

Lobbying and public awareness to help achieve ban on animal testing of cosmetics. Now working to prevent products animal tested elsewhere from being marketed in India.

+91 22-4072 7382

Info@petaindia.org

www.petaindia.com

Israel

1

Israeli Society for the Abolition of Vivisection Society (ISAV)

General anti-vivisection campaigns. Successfully lobbied against Ministry of Health's ban on cruelty-free products using 'bunny' logo (2012)

+972 76-5403257

isav@isav.org.il / www.isav.org.il

2

Behind Closed Doors

Campaigns against animal experiments and breeding animals for labs in Israel.

Undercover investigations of Israeli laboratories in cooperation with Let the Animals Live and Animal Log.

+972 54-6462170

anat@invitro.org.il / www.invitro.org.il

Italy

1

Coordinamento Fermare Green Hill (Co-ordinate to Close Green Hill)

Campaign to close Green Hill beagle breeders. Protests with up to 10,000 people and rescue of dogs led (in 2012) to 2,700 beagles being seized by authorities and re-homed. Green Hill to be closed down.

Public support for the campaign led to some cities banning construction of labs and legislation being passed to ban the breeding of dogs, cats and primates for animal testing (a law specifically designed to close down Green Hill).

+39 339-2144345

info@fermaregreenhill.net / www.fermaregreenhill.net

Japan

1

Japan Anti-Vivisection Association (JAVA)

Lobbies for end of animal testing as Asian representative member of ICAPO (International Council on Animal Protection in OEC programmes); Publishes guide to cruelty-free cosmetics; Campaign partner of Cruelty Free International

+81 (3) 5456-9311

java@java-animal.org / www.java-animal.org/english

Korea, Republic of

1

Korean Society for Animal Freedom / Korean Animal Welfare Association

Various animal protection: animal testing, pets, farmed animals, illegal animal slaughter programme; animal use in sports and entertainment.

benicetobunnies.org website educates public on animal testing and gathers signatures for their campaign 'No to cosmetics testing on animals'. Signatures will be used in persuading government organisations to ban animal testing and dissuade companies from testing on animals in producing cosmetic products.

+82 2-2292-6337

admin@animals.or.kr / hjl@animals.or.kr / www.animals.or.kr

Campaign website: www.benicetobunnies.org

New Zealand

1

Save Animals From Exploitation (SAFE)

Various animal protection: animal testing, factory farming, rodeos, poisoning.

Produces guide to cruelty-free cosmetics; organising Cruelty Free Cosmetics week; is part of the Be Cruelty Free campaign.

+64 3 379 9711

info@safe.org.nz / www.safe.org.nz / www.safeshopper.org.nz

Spain

1

Igualdad Animal (Animal Equality)

Various animal protection: animal testing, zoos, animal circuses, fur, bullfighting/fiestas, veganism.

Conducts undercover investigations and animal rescues.

June 2013: Animal Equality gave a presentation in the European Parliament on the campaign 'Stop Vivisection'.

+34 915 222 218

info@igualdadanimal.org / www.igualdadanimal.org

2

Animanaturalis

Various animal protection: animal testing, zoos, animal circuses, fur, bullfighting/fiestas, vegetarianism.

June 2013: Animanaturalis gave a presentation in the European Parliament on the campaign 'Stop Vivisection'.

www.animanaturalis.org/home/es

Sweden

1

Forska Utan Djurförsök / The Swedish Fund for Research Without Animal Experiments

Promotes the development and validation of replacement alternatives to animal experiments. Grants are awarded annually to research, validation and information projects.

+46 8749 03 40

info@forskautandjurforsok.se / www.forskautandjurforsok.se/in-english

Switzerland

1

Ligue suisse contre la vivisection (LSCV) (Swiss League Against Vivisection)

Supports development of non-animal testing methods and takes legal action to prevent animal tests. Publishes list of cruelty-free cosmetics.

+41 (0)22 349 73 37

admin@lscv.ch / www.lscv.ch

2

Zurcher Tierschutz Association (Zurich Animal Protection Association)

Various animal protection: animal testing; fur; farm animal welfare.

Funds non-animal testing; has a representative on the Zurich Animal Experiments Committee and the Federal Animal Experiments Committee.

+41 44 261 97 14

info@zuerchertierschutz.ch / www.zuerchertierschutz.ch

UK

1

British Union for the Abolition of Vivisection (BUAV)

Key issues include: primates in research; cruelty-free cosmetics; animal testing of household products in UK; REACH; Freedom of information. Conducts undercover investigations.

Co-ordinates the European Coalition to End Animal Experiments and Cruelty Free International (global campaign to end animal testing for cosmetics).

+44(0)20 7700 4888

info@buav.org / www.buav.org / www.crueltyfreeinternational.org

2

National Anti-Vivisection Society (NAVS)

Part of Animal Defenders International (ADI).

Animals in space research; freedom of information; World Day for Laboratory Animals; Good Charities Guide (charities funding non-animal medical research).

+44 (0)20 7630 3340

www.navs.org.uk

3

InterNICHE (International Network for Humane Education)

Network of students, teachers and campaigners working for fully humane education and training in medicine, veterinary medicine and biological science. Produced award-winning video on alternatives available in nearly 20 languages; book describing over 500 products designed for progressive life science education; offers a global Alternatives Loan Systems - libraries of products available for free loan, as well as literature, support and advice for teachers and students. Conferences, seminars and training.

+44 (0) 116 210 9652

coordinator@interniche.org / www.interniche.org

USA

1

Coalition for Consumer Information on Cosmetics (CCIC)

Coalition of 8 national animal protection groups. The CCIC “promotes a single comprehensive standard and an internationally recognised Leaping Bunny Logo”.

+1 888546-CCIC

info@LeapingBunny.org www.leapingbunny.org

2

The American Anti-Vivisection Society (AAVS)

Key issues include: Ban Pound Seizure; End Animal Cloning; Compassionate Shopping.

In 2006, AAVS assumed the leadership role as Chair of the Coalition for Consumer Information on Cosmetics (CCIC).

Free phone app with guide to over 200 cruelty-free cosmetics companies.

+1 800-729-2287

aavs@aavs.org / www.aavs.org

3

Humane Society International (HSI)

Launched ‘Be Cruelty Free’, a global campaign in partnership with NGOs worldwide. Active in key emerging countries such as Brazil, India, China.

+1 202-452-1100

info@hsi.org / www.hsi.org

4

Physicians Committee for Responsible Medicine (PCRM)

PCRM is Secretariat of the International Council on Animal Protection at OECD (ICAPO), which was formed to incorporate alternative methods that can replace, reduce, and refine animal use in OECD guidelines and programs.

+1 202-686-2210

pcrm@pcrm.org / www.pcrm.org

5

Center for Alternatives to Animal Testing (CAAT)

Promote humane science by supporting the creation, development, validation, and use of alternatives to animals in research, product safety testing, and education. Seek to effect change by working with scientists in industry, government, and academia.

+1 410-614-4990

caat@jhsph.edu / <http://caat.jhsph.edu>

6

International Council on Animal Protection in OECD Programmes (ICAPO)

ICAPO works to incorporate non-animal testing methods into the activities of the Organisation for Economic Co-operation and Development (OECD), an influential international organisation that develops guidelines and programmes for the testing of chemicals.

+1 202-686-2210

icapo@pcrm.org / www.icapo.org

7

Beagle Freedom Project

The Project negotiates with labs to hand over animals for re-homing to suitable private homes. In its lobbying work, BFP put forward the Beagle Freedom Bill in November 2012, to mandate that research facilities that receive tax-dollar support would have to offer dogs and cats to non-profit rescue organisations for public adoption. From January to May 2013 BFP ran this legislative campaign in the State of Minnesota. The bill passed the committee with unanimous support but did not pass into law. For the next legislative session BFP will be advancing this same bill again in Minnesota, California and Michigan.

+ 1818-330-4040

shannon@beaglefreedomproject.org / www.beaglefreedomproject.org

6 Lobbying Prize Winners 2012

In the inaugural Lush Prize in 2012, three winners shared £50,000 of prize money for their outstanding lobbying work:

- Humane Society International, USA (£40,000): For their work on removing animal tests from the EU's non-food pesticide regulations. <http://www.hsi.org>
- Federation of Indian Animal Protection Organisations (FIAPO), India (£5,000): For their research and lobbying on animal testing in India. <http://www.fiapo.org>
- People for the Ethical Treatment of Animals (PETA) India (£5,000): For their work with Indian regulators on a cosmetics testing ban. <http://www.petaindia.com>

Also short-listed:

- Center for Alternatives to Animal Testing, USA: For their work in Washington on informing regulators about 21st Century Toxicology. <http://caat.jhsph.edu>
- Stop Vivisection (European Citizens' Initiative), Italy: For their project to attract 1,000,000 signatures on a stop vivisection petition in Europe. <http://www.stopvivisection.eu>
- Doctors Against Animal Experiments, Germany.: For their lobbying against primate experiments and botox animal testing. <http://www.aerzte-gegen-tierversuche.de>
- Physicians Committee for Responsible Medicine, USA.: For their lobbying around changes to the Toxic Substances Control Act. <http://www.pcrm.org>
- The Swedish Fund for Research Without Animal Experiments, Sweden.: For their lobbying to enforce to the European 2013 cosmetics testing ban. <http://www.forskautandjurforsok.se>

7 Shortlist of potential winners for the Lobbying category of the 2013 Lush Prize

7.1 Stop Vivisection

Organising committee STOP VIVISECTION

c/o Secretariat Sonia Alfano, Viale Strasburgo, 382 - 90146 Palermo, Italy

E-mail: representative.stopvivisection@gmail.com

Website: www.stopvivisection.eu

A European Citizens Initiative calling for the repeal of European Directive 2010/63/EU ("on the protection of animals used for scientific purposes") and the proposal of a new Directive aimed at ending animal experiments and making the use of data relevant to humans in biomedical and toxicological research compulsory, in the place of data obtained on animals.

The Citizens' Initiative is a request to the European Commission to legislate on matters in which the EU is the competent authority. An Initiative must be supported by at least one million EU citizens, representing a minimum of 7 out of the 27 member states. In addition, there is a requirement for a minimum number of signatories for each of the 7 member states.

Its committee consists of scientists, activists and politicians, including: André Ménache, veterinary surgeon and director of Antidote Europe; Gianni Tamino, Professor of biology at the University of Padua, Italy; Sonia Alfano, Italian Member of the European Parliament.

June 2013: Arranged presentations in the European Parliament as part of the campaign.

7.2 HSI (Humane Society International) – Brazil

Helder Constantino (Campaign Manager)

Telephone: +55 (21) 8342-4163

E-mail: hconstantino@hsi.org

Website: www.hsi.org/world/brazil

Brazilian national guidelines still recommend a series of tests on animals for the safety evaluation of new cosmetics products and ingredients.

HSI has been working with scientists there to establish non-animal testing methods.⁶⁴ "HSI's Science Team is working with Brazilian authorities and companies in the cosmetics and other sectors to gain acceptance and use of proven non-animal methods and testing strategies and to update regulatory testing requirements to replace or reduce animal testing to the greatest possible extent."

In November 2011, HSI co-sponsored a [training course](#) "to better familiarise government authorities and industry scientists with internationally recognised non-animal tests. The event was very successful as it gathered broad participation of Brazilian regulators, industry and university scientists. The cosmetics sector was

⁶⁴ [HSI's Work in Brazil to Promote Non-Animal Testing](#). HSI, 15.12.11.

particularly well-represented, and expressed its willingness to further explore regulatory aspects of cosmetics testing in Brazil.”

The launch of HSI’s ‘Be Cruelty Free’ campaign in Brazil has increased calls for an end to animal testing. In March 2013, to mark the implementation of the EU marketing ban, HSI and ProAnima held a protest outside the Ministry of Health. HSI is also working with another NGO, ARCA Brazil, on the issue.

7.3 European Coalition to End Animal Experiments (ECEAE)

16a Crane Grove, London N7 8NN, UK

Telephone: +44 (0) 20 7700 4888

Email: info@eceae.org

Web: <http://www.eceae.org/>

The ECEAE is co-ordinated by the BUAV; therefore, some of the activities and achievements of both the ECEAE and BUAV overlap.

The coalition has 18 members in 11 countries and its website is available in 17 European languages.

As a member of ICAPO (the International Council on Animal Protection in OECD Programmes), scientists at the ECEAE comment on testing guidelines that will be used by chemical companies wanting to register their substances under REACH.

REACH campaign (ECEAE activities in 2013 and 2012)

2013

With an estimated 700 testing proposals under REACH to be published between June 2013 and June 2015, the ECEAE is contributing more funds to support its scientific team to comment on the proposals (assisted by independent toxicologists and TSGE LLP, an independent European regulatory consultancy company based in the UK).

The experiments are likely to include tests for reproductive and repeated dose toxicity which involve force feeding high doses of the substance to rats and rabbits and long term toxicity tests in which fish are forced to swim in water polluted with the substance. The ECEAE estimate a further half a million animals could be involved in tests like this if all proposed tests go ahead.⁶⁵

The ECHA (European Chemicals Agency) rarely rejects testing proposals. Companies only receive third party comments with the draft decision asking for the animal test to be conducted. The ECEAE is asking the ECHA to change this process

⁶⁵ [BUAV urges ECHA to revise process for testing proposals for second REACH deadline as the fate of half a million animals will be decided](#). 4.6.13

so that companies have longer to consider alternatives to testing on animals before the decision becomes binding.⁶⁶

The ECEAE has been granted a stakeholder seat at the ECHA's new committee called the Biocides Products Committee (BPC). The BPC was established in March 2013 and will have an important role in the approval of biocidal products under the new Biocidal Products Regulation, which will come into force on the 1st of September 2013.

Biocides are substances that can destroy or control the effect of any harmful organism and are widely used in medicine, agriculture and industry. Animal tests are often used to assess these risks and to establish the safety of biocidal products for human users.

The ECEAE will attend BPC meetings to verify that animal tests are used only as a last resort and that existing data (where products have already been tested) is shared in order to avoid the need for new animal tests.⁶⁷

ECEAE assisted chemical company Honeywell's appeal against an ECHA decision for a 90-day inhalation experiment to be conducted on rabbits for a refrigerant for its car air conditioner system.⁶⁸

2012

The ECEAE has been granted a stakeholder seat at the European Commission's REACH committee called CARACAL. The Competent Authorities for REACH and CLP (CARACAL) committee is an expert group that advises the European Commission and the European Chemicals Agency. It meets three times a year and is an important forum for political and regulatory issues related to the EU chemical testing legislations REACH and CLP. The ECEAE seat will be shared with Eurogroup for Animals.⁶⁹

Following submissions by the ECEAE, animal tests for four substances have been either rejected by the European Chemicals Agency (ECHA) or withdrawn by the company involved. ECEAE estimate this has saved up to 7,000 animals who would otherwise have suffered and died in a total of five toxicity (poisoning) tests.

With two of the substances the ECHA rejected the test in line with suggestions made by ECEAE experts. The substances were industrial chemicals used to make rubber and adhesives. In both instances the company had proposed to do a test that was not strictly required by the legislation. The ECHA rejected the testing proposal. The comments submitted by the ECEAE were noted in its final decision.

The tests were primarily two generation reproductive toxicity tests that use up to 2,000 animals each. This is because the test involves force-feeding the substance to

⁶⁶ [BUAV urges ECHA to revise process for testing proposals for second REACH deadline as the fate of half a million animals will be decided.](#) 4.6.13

⁶⁷ [BUAV attends first Biocides Products Committee meeting in Helsinki.](#) 31.5.13

⁶⁸ [BUAV welcomes ruling in landmark rabbits testing case.](#) 29.4.13

⁶⁹ [ECEAE gains seat at CARACAL, the EU REACH advisory group.](#) 12.11.12

female rats who are then made pregnant, with the substance fed to the resulting offspring until they also have offspring.⁷⁰

Although the ECEAE is led by the UK-based BUAV, other members have had a role in moving forward the coalition's campaign on REACH. For example, German NGO Animal 2000 pays the salary for a toxicologist to work for the ECEAE and provide evidence to reduce the number of animals that are used due to the REACH Directive.⁷¹

7.4 Physicians Committee for Responsible Medicine

5100 Wisconsin Ave., N.W., Ste.400, Washington DC, 20016
Telephone: 202-686-2210

Email: pcrm@pcrm.org

Web: <http://pcrm.org/>

PCRM is the Secretariat of the International Council on Animal Protection in OECD Programmes - www.icao.org

PCRM lobbied for a Senate bill, the Chemical Safety Improvement Act of 2013, introduced in May 2013, to make it a requirement for the use of non-animal test methods where reasonably and practicably available. "Such a requirement is crucial to the rapid development and uptake of new methods and the continued improvements in toxicity testing policy that offer superior protection for public health and the environment".⁷²

The CSIA contains many provisions that are consistent with this goal and the recommendations made by the National Academies' report Toxicity Testing in the 21st Century: A Vision and a Strategy. Importantly, it requires the EPA to fund research and validation studies to replace, reduce, and refine the use of animals.

However, PCRM says "faster progress could be made by requiring, rather than encouraging, new methods to be used in place of animals wherever possible".⁷³

Many of the suggestions PCRM scientists provided to Congress in past hearing testimony and meetings are included in the CSIA. Principles to replace and reduce animal-based test methods and to increase the use of information from human-based and mechanistic tools are integrated into the heart of the legislation.

The Physicians Committee urges Congress to harmonise the bill with the European Union law, which requires that new animal tests only be conducted as a last resort, when all other methods of obtaining data have been exhausted. A "last resort" clause is crucial to the rapid development and uptake of new methods as it allows flexibility

⁷⁰ [BUAV helps save animals from chemical testing under REACH](#). 13.8.12

⁷¹ [REACH - Toxicologist saves lives](#). Focus, Winter 2011/2012.

⁷² [Physicians Committee for Responsible Medicine](#)

⁷³ [Physicians Committee Statement on the Chemical Safety and Improvement Act of 2013](#).

to incorporate continued improvements in toxicity testing that offer superior protection for public health and the environment.

7.5 Center for Alternatives to Animal Testing

Bloomberg School of Public Health, Department of Environmental Health Sciences,
615 N. Wolfe St., W7032, Baltimore, MD 21205

Telephone: 410-614-4990

Email: caat@jhsph.edu

Web: <http://caat.jhsph.edu>

The Johns Hopkins University Center for Alternatives to Animal Testing promotes humane science by supporting the creation, development, validation, and use of alternatives to animals in research, product safety testing, and education. CAAT-Europe is a joint venture with the University of Konstanz in Germany.

CAAT has been actively lobbying for a legal implementation of Tox-21c in the US and the EU, educating legislators and politicians about the NAS report: Toxicity Testing and Assessment in the Twenty-first Century: A Vision and a Strategy (Tox-21c), the urgent need for regulatory change, and the availability of new methods.

A reach-out to lay audiences, journalists and policy makers is provided by a series of workshops, information days and white papers commissioned through CAAT's transatlantic think tank for toxicology (t4). Our dissemination channels Altweb and ALTEX as well as social networks form a knowledge base helping to create a path for a successful paradigm shift away from animal toxicity testing. The activities are focused on developing a roadmap to implement the Tox-21c vision.

CAAT believes that only an integrated approach is the answer to advancing Tox-21c. The integration of humane science into legislation and policy is essential, and the integration of legislation and policy approaches on both sides of the Atlantic, and indeed globally, is mandatory. CAAT is ideally suited to promote this approach, as it combines high-level research into alternatives in its own laboratories with forming its teams of professionals in communications and policy in Europe and the US. Through this unique integrated policy approach, CAAT is striving to move us toward a world in which animal testing is replaced by humane science.

- CAAT's EU policy program has involved: Attendance and involvement with Committees on Environment, Public Health and Food Safety (ENVI), Industry, Research and Energy (ITRE), Internal Market and Consumer Protection (IMCO) and European Parliament's Intergroup on the Welfare and Conservation of Animals. Close following of and contribution to various MEPs' work at the Committee level and at Plenary Sessions at the EP in Brussels and Strasbourg.

CAAT-EU has made policy input on several key legislative files. CAAT has made clear the need for support within Horizon 2020 for EU research on alternative test methods rather than the traditional and antiquated animal models. CAAT is supporting the use of human-based models for better predictive outcomes through the Protection of Public Health on Endocrine Disrupters. Regulation on Medical Devices normally involves animal testing, and CAAT is pushing for this to move to human-based models.

In March 2013, CAAT-EU applied to STOA of the EP for two specific lots: 'Life Sciences for Human Well-Being' and 'Safety and Security Technologies'. If successful, CAAT will be then listed as an official expert contact point for a period of 4 years for the EP. The results are expected at the end of 2013.

7.6 PETA India

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PETA India played a major part in the successful campaign to ban the testing of cosmetics on animals in the country.

In June 2013, the Drug Controller General of India announced that the testing of cosmetics and their ingredients on animals will no longer be permitted. The announcement was made during the Bureau of Indian Standards PCD 19 Cosmetics Sectional Committee meeting, on which PETA India has an official seat.

In 2012, PETA India prompted discussion in the Cosmetic Sectional Committee over replacing the existing tests on animals; the panel agreed to replace the Skin Sensitisation test on guinea pigs with the Human Repeat Insult Patch Test.

PETA brought in companies, research groups, high-level government officials, Members of Parliament and individuals to support this ethical ban. It submitted supporting letters from multinational companies The Body Shop and LUSH as well as Indian companies such as Omved Lifestyle, Shahnaz Husain and others who had also written to the Ministry of Health & Family Welfare in full support of a ban after hearing from PETA. They also submitted letters from officials from the Indian Council of Medical Research, the Mahatma Gandhi–Doerenkamp Center for Alternatives to Use of Animals in Life Science Education and the Animal Welfare Board of India.

Through its official membership of the Soaps and other Surface Active agents committee, PETA India is working for a complete ban on testing of household products and their ingredients on animals. It has submitted data on several alternatives tests that can be carried out and the working group is presently reviewing the comments.

After hearing from PETA, the Galaxy Surfactants and Association for Consumer Action on Safety and Health (ACASH), which also has seats on the committee, supports the ban on testing household products on animals. Prominent current and former ministers also sent strong appeals to the Ministry of Health & Family Welfare and the Ministry of Consumer Affairs in favour of a total ban on the testing of household products and their ingredients on animals.

7.7 International Council on Animal Protection in OECD Programmes (ICAPO)

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ICAPO is a coalition of 11 NGOs from North America, Europe and Japan and has held official status as 'invited experts' at certain OECD programmes since 2002.

It works to incorporate non-animal testing methods into the activities of the

Organisation for Economic Co-operation and Development (OECD), an economic alliance of the world's industrialised countries. The OECD co-ordinates the development of standardised chemical testing guidelines which are then adopted by the member countries. It also co-ordinates the development of chemical testing programmes, such as its current programme on endocrine disruptors.

ICAPO has financially supported the attendance of IIVS (the Institute for In Vitro Sciences) and other experts to numerous OECD expert meetings, including those focused on the adoption of *in vitro* methods for skin irritation, eye irritation, carcinogenicity, genetic toxicity, and for (Q)SAR methods. Their internal experts also attend other expert meetings related to endocrine disruption, inhalation toxicity, and nanomaterials, for example.

ICAPO contributes to a majority of test guidelines and guidance documents, ensuring that those that involve animals use the minimum number of animals and are written to ameliorate some of the most cruel laboratory procedures.

OECD work is often long-term, collaborative, and confidential, making it difficult to outline specific successes for 2012. Even so, over the past few years an unprecedented number of *in vitro* tests have been adopted by the OECD, including Reconstructed Human Epidermis methods for skin irritation and *in vitro* methods for genotoxicity, eye irritation, and endocrine disruption. Another recent move was the adoption of the Extended One-Generation Reproductive Toxicity Study, which cuts significantly the number of animals used in each test.

7.8 Forska Utan Djurförsök / The Swedish Fund for Research Without Animal Experiments

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The Swedish Fund for Research Without Animal Experiments promotes the development and validation of replacement alternatives to animal experiments. Grants are awarded annually to research projects. In 2013 grants were awarded to 11 research projects, 9 of which were in the field of toxicology.

The NGO has been lobbying for Sweden to establish a centre for alternatives to animal testing. This proposal received important support from a government inquiry report submitted to the Government in June 2012, with several important proposals based on the Fund's action plan. Proposals in the report argue strongly for a knowledge centre for 3R alternatives to animal use.

After several meetings with relevant government bodies, 21st century testing methods have found their way into several government reports during the last 18 months, including the very important "Strategy for Sweden's work for a non-toxic environment", from the Environmental Advisory Council. This forms the base for Sweden's position in the negotiations to amend REACH in the coming years.

During 2013, the Fund were also involved in the process of drafting a proposal to set up a Swedish Institute of Toxicology, with an aim to ensure that, if such an institute is being established, it will focus on toxicology from a 3R perspective. This is also included in the final proposal to set up Swetox, www.swetox.se. Although Swetox will use animals, it will have a strong 3Rs commitment. Developing and validating new, non-animal tests will be a major part of Swetox's mission.

From January 2013 the Fund has been represented on the Board of Agriculture's National Committee for the protection of animals used in experiments and was appointed by the government as member of the newly formed Central Animal Research Ethical Review Board. The Central board serves as the appeal board in respect to the local ethics committees that approves or rejects applications to use animals in research. It will also be responsible for retrospective assessments of animal experiments, as required in the EU Directive (2010/63/EU) on the protection of animals used for scientific purposes.