



# Need for further research on alternative tiered testing strategies

# Animal experiments in numbers

**EU 2011:**

***11,5 m. vertebrates***

**Germany 2015:**

***Ca. 2,8 m. vertebrates (+ decapods)***

***Animals that were used for regulatory purposes:***

***630.255 vertebrates (+decapods)***

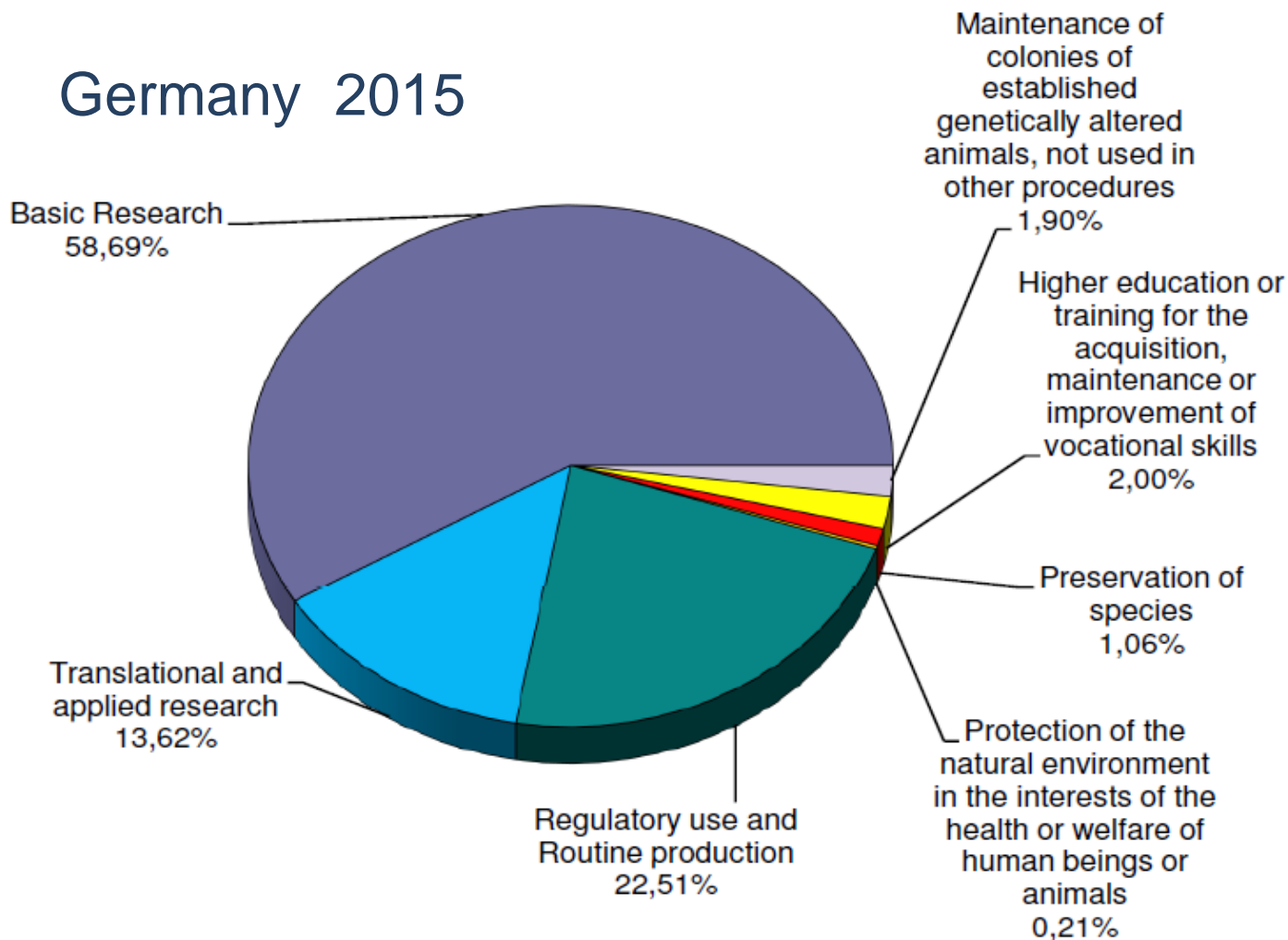
***Animals required for testing of one PPP  
substance:***

***Up to 12.000 vertebrates***



# What purposes are animals used for?

Germany 2015



# What does animal testing/an experiment mean for the animal?



Many purposes of animal use, but for all is true:

Animals experience **pain, distress, fear and harm**

.....and death awaits many of them at the end of the tests/experiments or they are used in other procedures

Disregarding the actual experiment the following impairments need to be considered

- ▶ origin
- ▶ transport
- ▶ breeding and housing
- ▶ handling



considerable constraints in species-appropriate behaviour



psychic strains: fear, stress, behavioural disorders etc.



# Position of the German Animal Welfare Federation



## Ethical and scientific arguments speak against animal use

- ▶ Responsibility for animals instead of „survival of the fittest“
- ▶ High capacity for suffering, pain perception



- ▶ Lack of transferability
- ▶ Benefit questionable
- ▶ Modern alternative methods available or have to be developed



# Risk assessment: protection of consumers, animals and the environment vs. animal welfare?



Common goal:

Protect humans, animals and the environment from risks

- New substances are supposed to be safe
- Close data gaps
- Substitute dangerous substances with low-risk substances



# Risk assessment: current approach

- Animal experiments are still the **gold standard** even though a variety of validated and more modern alternative methods exist
  - **Currently, risk assessment always initiates animal testing**
- Animal testing in toxicology includes some of the **cruelest tests known**
  - Animals are poisoned though they **are fully conscious**
    - Poisoning results in e. g. cramps, internal bleeding, organ failure, respiratory paralysis, death
  - **Pregnant females and pups** are involved
  - **Unrealistically high dosing** of test substances
  - In „repeated dose studies“ **suffering for the animals accumulates**  
(Stress because of handling, repeated administration of high dosages, substance effects)



# Risk assessment: myth

„Animal testing is indispensable for protection of consumers and of the environment“

## **BUT**

- most test methods relying on animals are **outdated** (established in the 1940s)
- have **never been properly validated** to demonstrate their relevance to humans
- studies are published continuously that prove:  
→ **results from animal tests are not reliable, hard to reproduce and difficult to translate to humans**
- **superiority of intelligent testing strategies**





# Animal free test methods in risk assessment



**Tiered testing strategies: combination of all available test methods**

**Step-wise** assessment of a substance in single tests

- Results of a test
  - weight of evidence → information sufficient?
  - is follow-up testing in the next tier necessary?
- **Starts with the evaluation of all existing information:**
  - tests that were already performed
  - available **data from humans**
- Analysis of physico-chemical properties
- *in silico* tests
- *in vitro* tests
- (*in vivo* tests only as a last resort)



**Replacement or at least Reduction of animal testing**



# Example Testing strategy

## Skin sensitisation

Up to now: test on guinea pigs or mice (LLNA)

New: animal free test battery:

- (a) What happens on chem. level on skin surface?
- (b) How do skin cells react?
- (c) Is the immune system activated?

→ Stepwise insight into allergic potential of a substance





# What can we learn from other legislation/areas of risk assessment?

- Enshrine in legislation that animal testing should only be used as a last resort (REACH)
- Replace outdated animal tests with adopted animal free tests/testing strategies (BPD)
- Waiving of data requirement (REACH)
- Read-across from other substances (REACH)
- Harmonize data requirements from all areas of risk assessment ; use the most progressive approach
- Use data from risk assessment of substances for different legislations





# Is the use of the new EFSA Guidance for the risk assessment of metabolites going to lead to more animal testing?

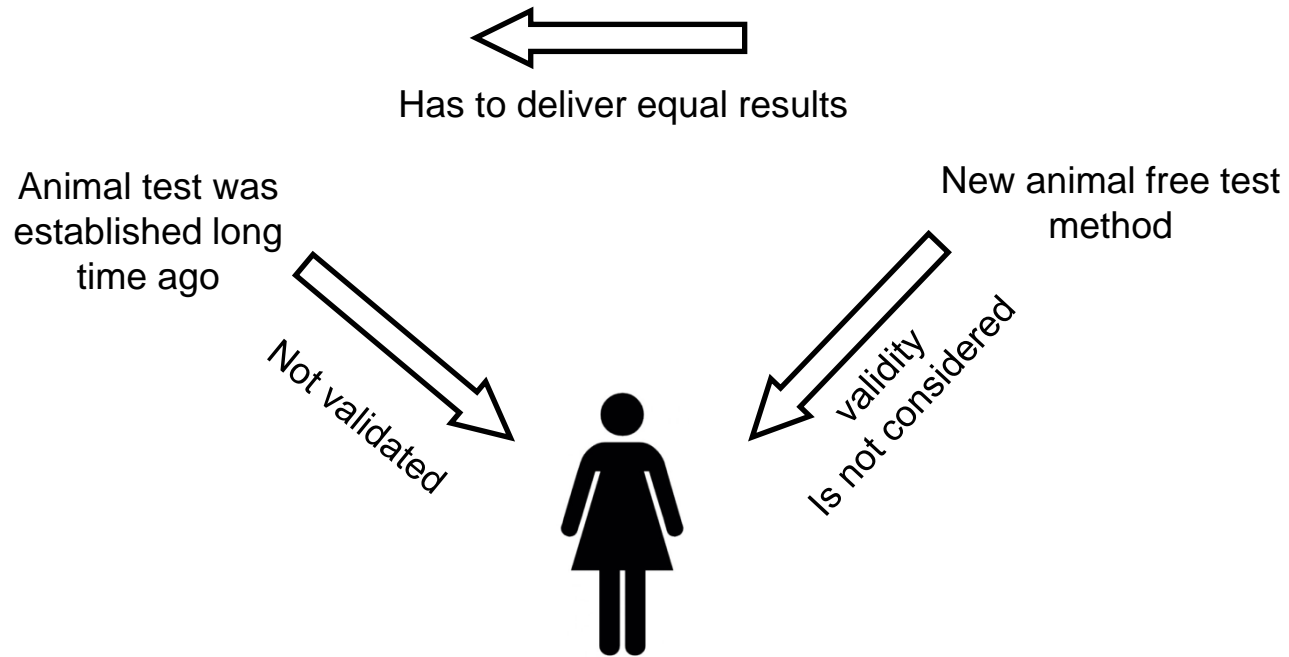
**yes!**

- Many triggers for „further actions“ by risk assessors/managers (even though decisions should be made case by case)
  - *in vivo* follow up testing in test battery for assessment of genotoxicity
  - Assessment of general toxicity:
    - enhanced 28-day study (OECD TG 407)
    - 90-day rat study (OECD TG 409)
    - reproduction/developmental toxicity screening test (OECD TG 422)
    - developmental toxicity study (OECD TG 414, 416 and 443)
    - ad hoc toxicity studies or additional toxicity studies
- testing strategy is a step in the right direction  
→ however, still too much focus on *in vivo* testing



# Challenges

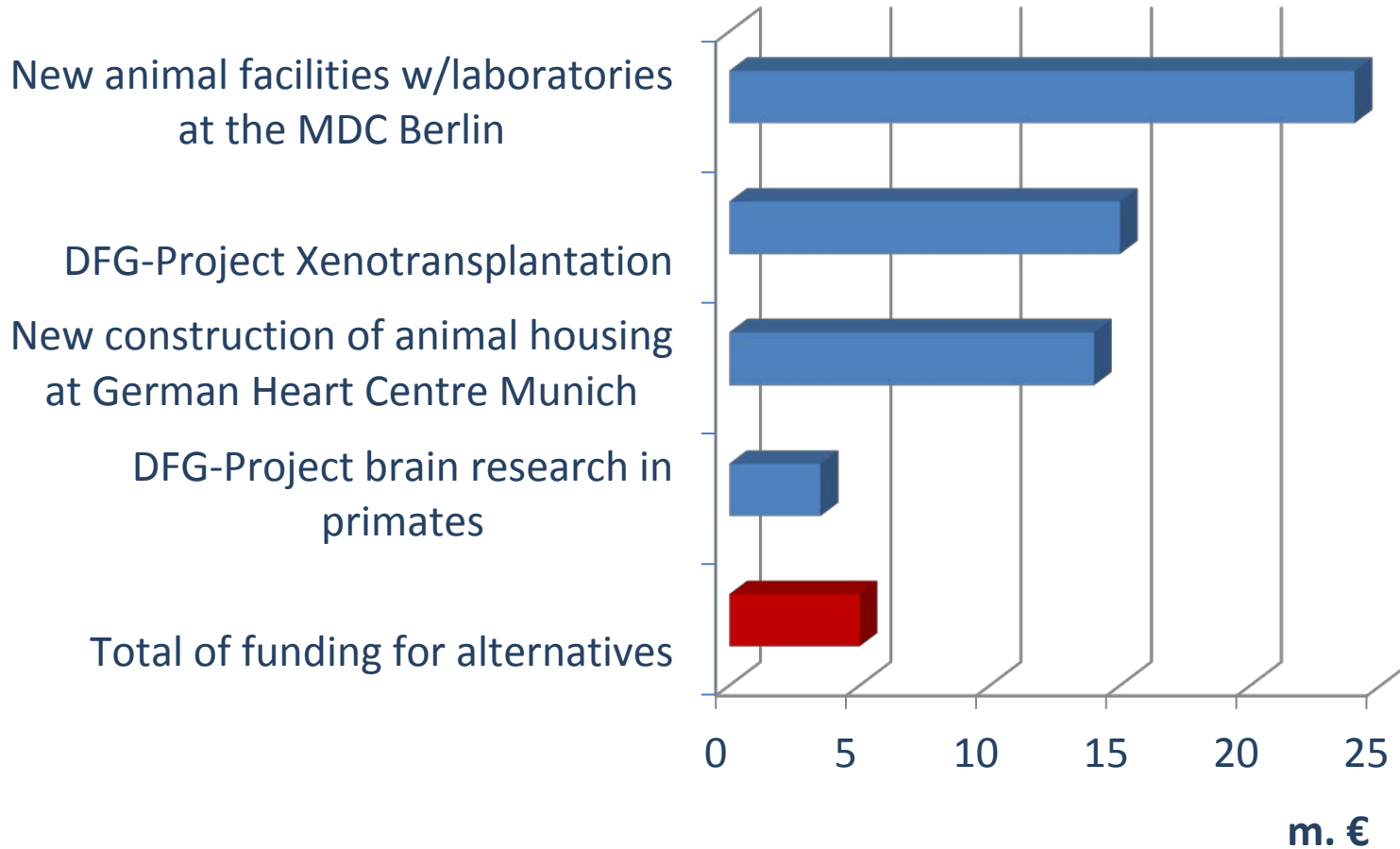
Most of the time unrealistically high demands for alternative test methods



# Challenges



**No shortness of ideas – but of funding!**



# Our demands

Full replacement of animal testing/experimentation – animal-free testing strategies for risk assessment

Politics:

- Adaption of legislation and data requirements to encourage animal-free test methods and testing strategies
- Development of a strategy with measures to replace animal use for science, testing and education with clearly set goals
- Increase of funding for development of animal free methods and testing strategies for research, testing and education;

Authorities:

- ethical evaluation, also for regulatory testing (needs to be clarified by legislative organ)
- stricter evaluation and also rejection of applications
- support and strengthen use of alternative methods

Science

and industry :

- push for use of alternative methods
- invest in development of animal free test methods and testing strategies





# Thank you for your attention!

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