Making Alternatives a Priority (MAP)

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About Cruelty Free International

The leading organization working solely to end animal testing worldwide

Award-winning campaigning, political lobbying, pioneering undercover investigations, scientific & legal expertise

Working with governments, regulators, companies and partner organisations worldwide

Cruelty Free INTERNATIONAL

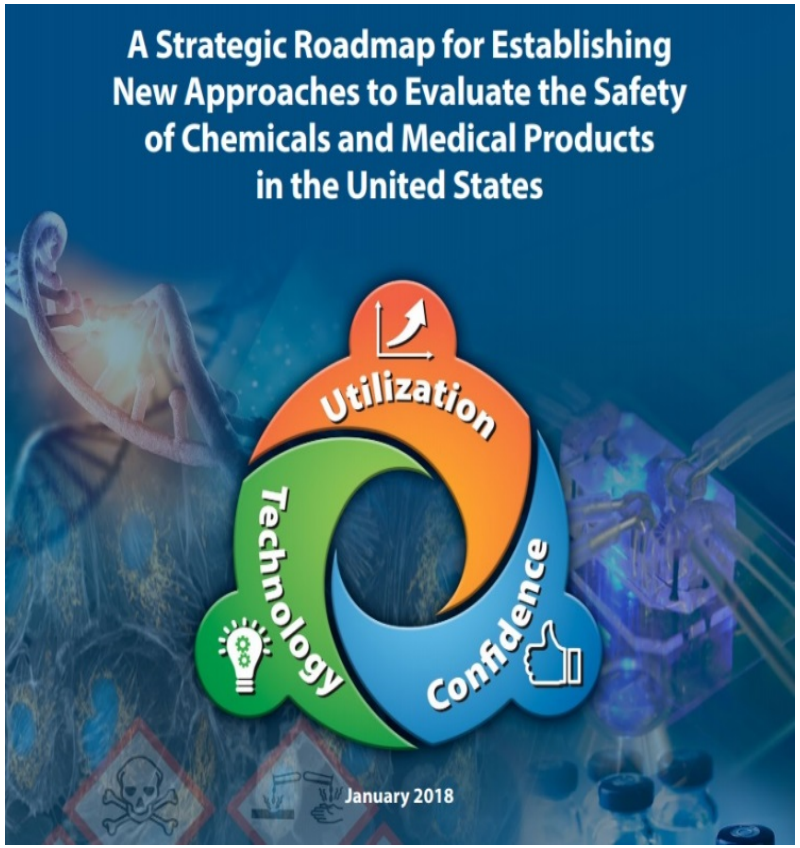
Cruelty Free EUROPE

ICAPO International Council on Animal Protection in OECD Programmes

ICAPPP pharmaceutical programmes

ICCVAM Strategic Roadmap

Multi-agency strategy for toxicity testing to improve human relevance and reduce the use of animals



Goal 3: Encourage the adoption and use of new methods and approaches by federal agencies and regulated industries.

- Provide clear language regarding the acceptance of NAMs
- Collaborate with international partners to facilitate global harmonization and regulatory acceptance
- Explore processes to incentivize and promote the use of NAMs
- Identify appropriate metrics for prioritizing activities, monitoring progress, and measuring success.

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Making Alternatives a Priority

Here are 10 animal tests that could stop now in the US due to the availability of internationally accepted non-animal methods.

1 Skin irritation

2 Eye irritation

3 Skin sensitisation

4 Pyrogenicity

5 Botulinum toxin test

6 Antibody production

7 Leptospira vaccine potency test

8 Veterinary vaccines batch test

9 Abnormal toxicity

10 Shellfish toxins

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	Test	Progress in EU	No. of EU tests	Progress in US
1	Skin irritation	Since 2016 EU REACH legislation no longer requires the animal test.	4,120	FDA no longer recommends stand-alone skin irritation studies. Waivers accepted by EPA since 2012.
2	Eye irritation	Since 2016 EU REACH legislation no longer requires the animal test.	814	CDER recommends alternatives for reformulated topical drug products and accepts waivers for other products. Waivers accepted by EPA since 2012.
3	Skin sensitization	Since 2016 EU REACH legislation no longer requires the animal test.	47,341	Since 2020 FDA accepts alternatives for screening purposes but prefers guinea pig tests over LLNA. Since 2018 EPA accepts alternatives for single chemicals, not mixtures.
4	Pyrogenicity	MAT introduced in Ph. Eur in 2009 and strongly encouraged as a replacement in 2016. rFC method introduced in 2016 and given its own chapter in 2020.	35,172	FDA issued guidance in 2012 stating that the MAT or rFC can be used after product-specific validation.
5	Botulinum toxin batch potency test	Cell-based method included in Ph. Eur since 2012 and three major manufacturers received EU-wide approval between 2011 and 2018.	400,000	Between 2011 and 2019 three major manufacturers have had the cell-based method approved by the FDA.
6	Antibody production	In 2020, ECVAM recommended that companies switch to the ‘phage display’ alternative method.	200,000	Events have been held by NICEATM and ICCVAM to discuss the advantages of moving away from animal-based antibodies.
7	Leptospira vaccine batch potency	Ph. Eur updated in 2015 to include option to waive hamster test based on ‘consistency of production’.	3,826	In 2013 USDA published guidance for obtaining exemption to hamster test. 60% of companies thought to have transitioned to the ELISA.
8	Target and laboratory safety of vet vaccines	LABST deleted from the Ph. Eur in 1997 and TABST deleted in 2012, except for 3 vet vaccines.	5,000	TABST and LABST waivers have been accepted in US as per VICH guidelines since 2013 and 2019, respectively.
9	Abnormal toxicity batch test	Test completely deleted from the Ph. Eur in 2017.	25,000	No longer required since 2015 but companies have to proactively request for test to be removed from their product licences.
10	Shellfish toxin batch safety	In 2019, mouse test was removed from EU regulation as the reference method for detecting PSP toxins.	41,515	In 2014, Maine became the first state in the US to receive FDA approval to use the HPLC method.

Barriers to Replacement

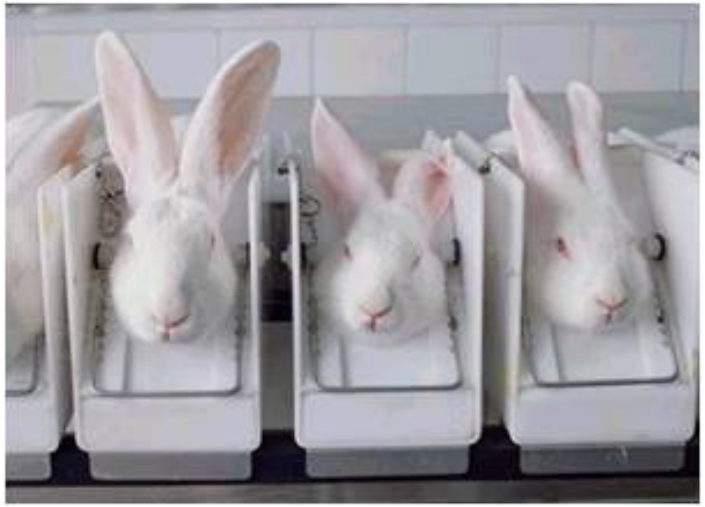
Lack of global harmonization (e.g. skin sensitization)

Lack of regulatory enforcement (e.g. botox batch potency)

Need for a defined approach (e.g. eye irritation)

Product specific validation required (e.g. pyrogenicity, botox)

Availability of the alternative (e.g. antibody production)



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The ADAPT principles for regulatory authorities

A Assessment - WHO assesses if the method appropriate for that sector?

D Decision - WHEN is a decision made on acceptability?

A Acceptance - WHERE is the decision published?

P Policing - WHY might animal tests still be done?

T Transparency - WHAT is done to educate potential users?

Suggested actions for regulators

Lack of regulatory enforcement is one of the main barriers to complete replacement for all 10 of these animal tests.
We strongly encourage regulators to apply the ADAPT principles and to actively pursue the action items set out in 'goal 3' of ICCVAM's strategic roadmap:

- **Investigate which of these animal tests are still being conducted, at what scale, and why (e.g. through workshops, dedicated working groups, surveys etc.)**
- **Issue clear guidance on the acceptance and use of alternatives**
- **Prioritize and incentivize use of alternatives**
- **Reject submissions for new products where animal tests are still used**

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