

Written Testimony of Elizabeth Baker, Esq.

Director of Research Policy, Physicians Committee for Responsible Medicine

House Oversight and Government Reform Subcommittee on Cybersecurity, Information Technology, and Government Innovation

February 6, 2025

Dear Chair Mace, Ranking Member Brown, and Members of the Subcommittee:

Thank you so much for the opportunity to testify. My name is Elizabeth Baker. At the Physicians Committee for Responsible Medicine, I work with a team of scientists, physicians, lawyers, and other professionals to move medical research, product testing, and medical training away from using animals. There are many good reasons to do this work, and I appreciate the Subcommittee's attention to this crucial subject.

Ending federally funded animal experiments is long overdue. For generations, tax dollars have paid scientists to conduct acts that would shock the conscience of most Americans. Dogs, cats, monkeys, rabbits, pigs, and other animals are used in experiments that are painful, stressful, and often lethal.

Increasingly, it is recognized across research and testing sectors that animals are not good surrogates for humans. Over 85% of Americans recently polled agreed that animal-based research should be phased out in support of methods that do not use animals.¹ Both Congress and the Administration must take action to ensure that government funding and requests for animal experiments are stopped, and that instead a portion of the funding is reinvested into more effective human-based approaches.

Our first overarching recommendation is to end federal support for wasteful and ineffective animal research and testing. Our organization can provide many individual examples, but it is important to also look at the bigger picture. Animal research often does not translate to humans because there are insurmountable species differences in anatomy, physiology, lifespan, disease characteristics, and more.² It is known that for new drugs, nine out of 10 treatments that appear successful in animals later fail in humans.³ Paying for those failures is partially why a single drug can take over a decade and cost over \$1

¹ Morning Consult, Physicians Committee for Responsible Medicine. U.S. Gen Pop Beliefs on Animal Testing; 2024. Accessed October 22, 2024. <https://pcrm.widen.net/s/qzfxth7bw/animal-testing-survey>.

² Pound P, Ritskes-Hoitinga M. Is it possible to overcome issues of external validity in preclinical animal research? Why most animal models are bound to fail. *J Transl Med*. 2018;16(1):304. <https://doi.org/10.1186/s12967-018-1678-1>.

³ David Thomas, Daniel Chancellor, Amanda Micklus, et al. Clinical Development Success Rates and Contributing Factors 2011-2020. Published online 2021. https://go.bio.org/rs/490-EHZ-999/images/ClinicalDevelopmentSuccessRates2011_2020.pdf.

billion to develop.⁴ Worse, reliance on animal experiments is partially why many human diseases have no treatments and even fewer have cures.

Despite this knowledge, the federal government continues to promote animal research. The National Institutes of Health (NIH) funds seven National Primate Research Centers that house, breed, and experiment on nonhuman primates with little regard to human translation. One obvious policy change that should be made is ending federal funding of these Centers. There are myriad of biological species differences that make primates poor models for humans.⁵ While we share many genes with primates, there are countless functional differences between every organ and body system, which confound the extrapolation of primate data to human biology.⁶ Clinical research and human-based approaches involving the use of human tissues, cell cultures, and data demonstrably contribute to clinical success and human benefit⁷ and should be supported by the NIH to facilitate phasing out primate research and the National Primate Research Centers.

While there are countless examples of cruel government-funded research, consider this: since 1991, the NIH has given \$15 million to a single experimenter at Wayne State University in Detroit who subjects dogs to multiple major surgeries, stabs wires into their hearts, and forces them to run on treadmills until they die or a device malfunctions.⁸ Despite 34 years of this work and hundreds of dead dogs, there has been no benefit to patients. This is just one example of an NIH-funded project that should be stopped. Another “low-hanging fruit” to end cruel animal experiments would be for Congress to pass the Cease Animal Research Grants Overseas (CARGO) Act. This bill, introduced in the 118th Congress by Reps. Dina Titus (D-NV) and Troy Nehls (R-TX), would prohibit the NIH from funding any animal experiments outside the United States.⁹ Every year, the NIH gives millions of dollars in grants to foreign laboratories to conduct experiments on animals with extremely limited oversight, lacking even inspections of these overseas facilities.¹⁰ Relying on a self-reported animal welfare violation process, the NIH has awarded funds to foreign laboratories within countries with weak animal protection laws—even weaker than the still inadequate laws and regulations in the U.S.

Between 2011 and 2021, the NIH funded \$2.2 billion in foreign animal experiments.¹¹ These funds financed animal experiments in 45 different countries. Entities receiving less than \$750,000 a year—or

⁴ Wouters OJ, McKee M, Luyten J. Estimated Research and Development Investment Needed to Bring a New Medicine to Market, 2009-2018. *JAMA*. 2020;323(9):844-853. <https://doi.org/10.1001/jama.2020.1166>.

⁵ Bailey J. Arguments Against Using Nonhuman Primates in Research. In: Robinson LM, Weiss A, eds. *Nonhuman Primate Welfare: From History, Science, and Ethics to Practice*. Springer International Publishing; 2023:559-588. https://doi.org/10.1007/978-3-030-82708-3_23.

⁶ Bailey J. Arguments Against Using Nonhuman Primates in Research. In: Robinson LM, Weiss A, eds. *Nonhuman Primate Welfare: From History, Science, and Ethics to Practice*. Springer International Publishing; 2023:559-588. https://doi.org/10.1007/978-3-030-82708-3_23; Bailey J. Monkey-based research on human disease: the implications of genetic differences. *Alternatives to Laboratory Animals: ATLA*. 2014;42(5):287-317. <https://doi.org/10.1177/026119291404200504>.

⁷ Ingber DE. Human organs-on-chips for disease modelling, drug development and personalized medicine. *Nat Rev Genet*. 2022;23(8):467-491. <https://doi.org/10.1038/s41576-022-00466-9>; Ewart L, Apostolou A, Briggs SA, et al. Performance assessment and economic analysis of a human Liver-Chip for predictive toxicology. *Commun Med*. 2022;2(1):1-16. <https://doi.org/10.1038/s43856-022-00209-1>.

⁸ Experimental protocols and veterinary records obtained from Wayne State University via the Michigan Freedom of Information Act.

⁹ CARGO Act of 2023, H.R. 4757, 118th Cong. (2023). <https://www.congress.gov/bill/118th-congress/house-bill/4757/text>.

¹⁰ Government Accountability Office. Animal Use in Research: NIH Should Strengthen Oversight of Projects It Funds at Foreign Facilities. GAO-23-105736. March 30, 2023. Accessed February 5, 2025. <https://www.gao.gov/products/gao-23-105736>.

¹¹ *Ibid*.

roughly 90% of the grants awarded in the last five years—are entirely exempt from NIH audits and escape any accountability. These loopholes in NIH’s oversight of foreign animal experiments result in failures to ensure compliance with U.S. or local animal welfare standards and regulations.

Agencies across the federal government continue to fund animal experiments even when objectives have already been demonstrated in humans or could be studied using human-based approaches, such as animal experiments for human nutrition. For example, the United States Department of Agriculture (USDA) Agricultural Research Service (ARS) Human Nutrition Research Centers frequently fund animal experiments for research objectives that could be safely conducted using human-based nonanimal methods.¹² By continuing to fund and conduct animal experiments, the ARS wastes federal research spending, needlessly uses animals, and misguides critical nutritional research.

The public is largely in the dark about the amount of animal research funded by the NIH, muddling the issue of where experiments are failing and what to cut. The agency does not accurately and comprehensively report which projects involve animals or the number of animals used by the institutions it funds.

Estimates suggest more than 100 million animals are used in U.S. labs each year, and the vast majority of those animals are used in federally funded facilities.¹³ The Physicians Committee has proposed legislation—the Federal Animal Research Accountability Act—that would simply ask recipients of NIH funding to complete a one-page form each year that includes the total number of animals bred, housed, and used in the previous year, sorted by species and pain and distress categories. This form would then be posted to the NIH’s website for the public to access. In other countries, this kind of recordkeeping is common. One of the reasons animal research has continued when more effective approaches exist is that it is conducted out of public view without proper transparency or accountability.

Beyond funding of animal experiments, Congress and the Administration must address regulatory agencies’ requirements for animal testing. Take for example the Food and Drug Administration (FDA). Although Congress, with the passage of the FDA Modernization Act 2.0, clarified that nonanimal tests could be used to bring new drugs to the market, the agency has been slow to accept these tests and has not changed regulations requiring animal tests, resulting in the continued use of animals in drug testing. Through either passage of further legislation or regulatory action, FDA’s regulations and guidance must be updated to ensure these more effective nonanimal tests are accepted.

Our second overarching recommendation is to reinvest a portion of the savings from animal research towards evaluation, acceptance, and use of innovative and more informative human-based approaches. These methods, like organs on chips, reconstructed human tissues, and sophisticated computer models have existed for some time, but only receive a fraction of the funding that goes towards animal studies. While an exact count of NIH funds spent on animal research is not publicly available, in 2016, the NIH Office of Portfolio Analysis indicated that about 47% of new extramural research grants awarded in FY 2015 used mice, a trend that held true for many prior years.¹⁴ Meanwhile, only about 8%

¹² Agricultural Research Service, U.S. Department of Agriculture Diet, Genomics and Immunology Laboratory. USDA. Published 2023. Accessed January 30, 2025. <https://www.ars.usda.gov/research/project/?accnNo=443596>; Agricultural Research Service, U.S. Department of Agriculture. Diet, Microbiome, and Immunity Research. USDA. Published 2023. Accessed February 4, 2025. <https://www.ars.usda.gov/research/project/?accnNo=446030>.

¹³ Carbone L. Estimating mouse and rat use in American laboratories by extrapolation from Animal Welfare Act-regulated species. *Sci Rep.* 2021;11(1):493. <https://doi.org/10.1038/s41598-020-79961-0>.

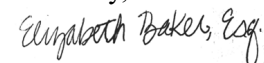
¹⁴ Lauer M. A Look at NIH Support for Model Organisms, Part Two. Open Mike. August 3, 2016. Accessed September 26, 2023. <https://nexus.od.nih.gov/all/2016/08/03/model-organisms-part-two/>.

of non-clinical research projects used nonanimal methods in 2021, suggesting a heavy reliance on unproductive animal experiments.¹⁵

Some federal efforts have already begun accelerating innovative human-based methods. The NIH has a national center, the National Toxicology Program's Interagency Center for the Evaluation of Alternative Toxicological Methods (NICEATM), that leads work to evaluate and advance nonanimal approaches across federal agencies through the congressionally mandated committee, the Interagency Coordinating Committee on the Validation of Alternative Methods (ICCVAM). If provided with more investment and an expanded purview, NICEATM could accelerate this work and address the reproducibility crisis in research. A center at the NIH, the National Center for Advancing Translational Sciences (NCATS), prioritizes innovative human-based approaches to improve translational research. Recently, the NIH adopted important advisory committee recommendations on nonanimal approaches and launched the Complement-ARIE program to speed the development and use of these methods.¹⁶ Each of these are great examples of steps in the right direction, but current resource investments pale in comparison to the stronghold that animal experiments have held for decades. Greater support for these efforts will more quickly advance better science that leads to improved outcomes for people while avoiding animal use.

Thank you again for this opportunity to provide testimony about this important subject. My colleagues and I look forward to being a resource to you and the Subcommittee on ways Congress and the Administration can end federally funded animal research and testing.

Sincerely,



Elizabeth Baker, Esq.
Director of Research Policy
Physicians Committee for Responsible Medicine



¹⁵ NIH Advisory Committee to the Director Working Group. Catalyzing the Development and Use of Novel Alternative Methods (NAMs) to Advance Biomedical Research (Slide 4). Published online December 14, 2023. Accessed June 11, 2024. https://acd.od.nih.gov/documents/presentations/12142023_Update_Chang_Jorgenson.pdf.

¹⁶ Statement on catalyzing the development of novel alternative methods. National Institutes of Health. February 1, 2024. Accessed January 2, 2025. <https://www.nih.gov/about-nih/who-we-are/nih-director/statements/statement-catalyzing-development-novel-alternatives-methods>.