March 21, 2012

The Honorable Barbara Boxer
Chairman, Senate Environment and Public Works Committee
United States Senate
Washington, D.C. 20510

Dear Madame Chairman:

Last June the American Physiological Society wrote to express our opposition to the Great Ape Protection and Cost Savings Act (S. 810). This legislation would prohibit biomedical and behavioral research to benefit both humans and great apes. Since the Environment and Public Works Subcommittee on Water and Wildlife has indicated that it will hold a hearing on this legislation, I am writing to reiterate our opposition.

Great apes such as chimpanzees are intelligent and social animals so research with them poses ethical challenges. Chimpanzees are the species most similar to human beings so conducting research studies with chimpanzees requires special scrutiny. Nevertheless, a blanket prohibition on research such as the one put forward in S. 810 would be a grave mistake.

In 2011, the Institute of Medicine convened an expert panel to determine whether chimpanzee research is still necessary in view of the many other options now available to study human health problems. Its report, issued December 15, 2011, acknowledged that “the chimpanzee has been a valuable animal model in past research.” The report also pointed out that the need for research with chimpanzees has declined and will likely continue to do so. Nevertheless, it concluded that research with chimpanzees remains essential to certain areas of current research, and that we must anticipate future needs as we face new infectious disease threats. The panel therefore recommended that new criteria be implemented to ensure that chimpanzee studies are approved only when clearly necessary.

Providing excellent care and humane treatment to animals in research is an ethical, legal, and scientific imperative. In response to the IOM report, National Institutes of Health Director Francis Collins put a temporary moratorium on new research projects involving chimpanzees and appointed a
Working Group on the Use of Chimpanzees in NIH-Supported Research. (See http://dpcpsi.nih.gov/council/working_group.aspx.) This Working Group will develop a plan to implement the IOM’s guiding principles and criteria.

The problem with S. 810 is that it would indiscriminately end all medical research with chimpanzees. It would ban everything from biopsies to taking blood samples to imaging studies where sedation or anesthesia is required. These are all common procedures in human medicine, yet S. 810 would prohibit them.

Despite its backers’ claims, S. 810 would not produce cost savings for the government. NIH has addressed this issue in the context of the IOM report: “The cost of caring for the chimpanzees is not expected to decrease if animals are removed from active research.” The reason for this is that NIH is committed to providing lifetime care for the chimpanzees it owns whether or not they are involved in research studies.

Earlier this year the APS addressed other concerns about research chimpanzees in our response to the U.S. Fish and Wildlife Service’s request for information on a petition to list captive chimpanzees as endangered. As things now stand, wild chimpanzees are listed as endangered, and chimpanzees may not be taken from the wild. At the same time, chimpanzees that were in captivity in 1976, as well as their offspring, are considered threatened. However, a group of petitioners have asked F&WS to reclassify captive chimpanzees as endangered. As the APS noted in its comments, chimpanzees in biomedical research colonies are “responsibly managed, well-regulated, and offer a resource of international value that benefits the health of humans and supports wild ape conservation efforts.” If captive chimpanzees were classified as endangered, that would effectively halt their use in biomedical research.

Although the petitioners argued that the use of captive chimpanzees in entertainment, the pet trade, and biomedical research undermines conservation efforts aimed at stabilizing wild chimp populations, the APS comments demonstrated that the evidence the petitioners presented does not substantiate this claim with respect to biomedical research. To the contrary, a stable population of research chimpanzees, maintained in modernized and ethologically appropriate facilities, is very much in keeping with conservation goals. One example of this is how research involving captive chimpanzees has contributed to the development of vaccines to help wild apes. A “proof of concept” study with six chimpanzees at the New Iberia Research Center showed that a potential Ebola vaccine was safe for the animals and successfully stimulated an immune response. This opens the way for the vaccine to be used in an ongoing effort to protect wild gorillas and chimpanzees against the Ebola virus, which is estimated to have destroyed a third of the wild gorilla population. Due to ecotourism and the encroachment of human populations, chimpanzees and gorillas are being exposed to diseases to which they have no prior
immunity. This phenomenon increases the likelihood that research into more vaccines for wild apes will be needed.

S. 810 would even prohibit this kind of research to develop vaccines needed for wild ape conservation.

I urge you to oppose this legislation because it will not save money; it contradicts the recommendations of the Institute of Medicine; and it would end research to benefit human and animal health.

Respectfully submitted,

Joey P. Granger, PhD

President

*The APS is a professional society, numbering 10,000 members, dedicated to fostering research and education as well as the dissemination of scientific knowledge concerning how the organs and systems of the body work. For further information about the views of the American Physiological Society on S. 810 please contact Ms. Alice Ra’an at 301-634-7105 or araanan@the-aps.org.*