June 16, 2011

The Honorable Roscoe Bartlett  
U.S. House of Representatives  
Washington, DC 20515

Dear Representative Bartlett:

On behalf of The American Physiological Society (APS), I urge you to withdraw your support from H.R. 1513. This bill, also known as the Great Ape Protection and Cost Savings Act, would end biomedical and behavioral research with great apes including chimpanzees. Such a ban is ill-advised because it would prohibit current and future research that will benefit both humans and the great apes themselves.

Research with great apes presents ethically challenging choices. For that reason, it requires particularly careful consideration. However, it would be a grave error to implement a blanket prohibition such as the one put forward in H.R. 1513. This legislation would ban many activities widely considered to be non-invasive, such as drawing blood and recording observations using MRI technology. It would prohibit research involving common diagnostic procedures such as liver biopsies and even forbid temporarily removing animals from their social groups. In addition, the bill’s promise that transferring chimpanzees permanently to sanctuaries would produce cost savings for the government does not comport with data supplied by the NIH.

Providing excellent care and humane treatment to animals in research is an ethical, legal, and scientific imperative. Before any research with great apes is allowed to begin, an animal care and use committee must approve the study design proposal. This committee ascertains whether animals are in fact needed to answer the research question and whether the proposed number of subjects will provide meaningful answers without using an excessive number of animals. The committee evaluates research procedures, giving extra scrutiny to anything that might cause more than momentary pain or distress to the animals. Along with reviewing the proposed science, the committee evaluates the animals’ housing arrangements and makes sure appropriate veterinary care will be provided.

Since most research requires that scientists obtain external funding, the proposal must then be submitted to a funding agency where it will be evaluated for scientific merit by experts in the field. If the scientific question is important and the study design is sound, then the proposal will compete with other meritorious proposals for scarce agency resources.
Ethical and scientific reviews such as the process described above are required for all federally supported research involving vertebrate animals from fish and amphibians through nonhuman primates and great apes. The scientific community takes the ethical implications of all animal research seriously, but the level of scrutiny is particularly high when the research involves chimpanzees. Nevertheless, most scientists concur that research with animals including chimpanzees remains a crucial part of our efforts to understand, prevent, treat, and cure disease. Chimpanzee research has contributed to important medical advances, notably vaccines against hepatitis A and B as well as the development of monoclonal antibody therapies that boost the body’s ability to fight disease. The immune system of chimpanzees has important similarities to the human immune system, which makes them important for research on diseases such as malaria, human cytomegalovirus, and respiratory syncytial virus.

Other research with chimpanzees is intended to help apes themselves. For example, in February of this year, chimpanzee safety and efficacy tests for an Ebola virus vaccine were begun in the hopes of finding a way to protect wild chimpanzee and gorilla populations from this devastating disease. Studies in captive chimpanzees are also planned for vaccines and treatments against measles, simian immunodeficiency virus (SIV), and influenza, which also threaten wild apes. These efforts are taking place under the auspices of the VaccinApe project (www.VaccinApe.org). However, H.R. 1513 would even prevent the development of vaccines needed for wild ape conservation.

In response to a Congressional request, the National Academy of Sciences (NAS) is currently conducting “an in-depth analysis of the current and future need for chimpanzee use in biomedical research.” The Institute of Medicine (IOM), which is part of the NAS, has assembled a blue ribbon panel that should complete its review by the end of 2011.

As part of this review, on June 9, 2011 NIH published data showing that the average cost to maintain chimpanzees at the federally-supported New Iberia, Keeling, and Southwest National Primate research facilities is $34 per day. This cost is $10 less than the $44 per day that NIH pays to support animals at the Chimp Haven Sanctuary. The Alamogordo Primate Facility has a higher daily cost, $69 per day, which is one reason why NIH would like to move that colony. Nevertheless, even with the higher cost at Alamogordo, the current average cost across all research facilities is $44 per day, which is the same as for Chimp Haven Sanctuary.

These cost issues are significant because H.R. 1513 claims that the government would realize cost savings by moving chimpanzees to sanctuaries. However, the data do not support this claim. In fact, if the objective is to reduce costs, then the Alamogordo research reserve colony should be moved to San Antonio, as NIH sought to do last year.
In conclusion, the APS asks you to withdraw your support from H.R. 1513 because it is based on false assertions about the care and treatment of chimpanzees in research settings. It also contains an overly broad definition of what constitutes invasive research. Moreover, it fails to take into account scientific needs for chimpanzee studies of human and animal diseases, and its claims of cost-savings are unsubstantiated. The APS therefore urges Congress to wait for the IOM findings before addressing questions related to great apes in research.

I would be happy to arrange for a representative of the American Physiological Society to meet with you or your staff to discuss further our reasons for asking you to withdraw your support from this legislation.

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 H.R. 1513 please contact Ms. Alice Ra’anan at 301-634-7105 or araanan@the-aps.org.