



## FOOD AND FEED SAFETY AND THE USE OF ANIMALS

### INTRODUCTION

1. Animal welfare concerns in life sciences have a history probably as long as that of the life sciences themselves but until the 1950s any serious consideration of animal welfare was generally judged as incompatible with progress in science and, consequently, ignored. Even today while the concept of reduction, replacement and refinement of animal studies is fashionable, politically correct and a widely accepted research consideration, it is still occasionally perceived erroneously as a nuisance, a factor that slows down progress and makes hazard and risk assessment less reliable.
2. Animal welfare considerations in the field of food and feed safety are not limited to experimental animals; they are equally applicable to the breeding, production, transport and humane killing of food producing animals.
3. The mission of the European Food Safety Authority (EFSA) as laid down in its founding Regulation (Regulation No. 178/2002, Article 22) includes the provision of “scientific and technical support for the Community’s legislation and policies in all fields which have a direct or indirect impact on food and feed safety”. This Article also states: “The Authority shall contribute to a high level of protection of human life and health, and in this respect take account of animal health and welfare...”

### CURRENT ANIMAL WELFARE CONSIDERATIONS

#### Welfare of food and feed producing animals

4. With respect to breeding, production, transport and humane killing of animals intended for human or animal consumption animal welfare considerations are an essential aspect of the work of the Scientific Expert Panel on Animal Health and Animal Welfare (AHAW). Currently, work is underway by the AHAW Panel on 7 formal questions from the Commission and on one question that is partly self-addressed and partly a question from the Commission. All these questions address animal welfare and half of the questions are focused primarily on it. Recently, the Panel adopted its first opinion on “The effects of transport on the welfare of animals”.

#### Welfare of experimental animals

5. In the area of hazard and risk assessment EFSA generally receives studies as part of dossiers provided by the entity that submitted the question(s) or by the applicant who applied for approval of the use of his molecule. Studies in the context of regulatory requirements should all be conducted in accordance with internationally accepted test methods (usually OECD Test Guidelines which are also adopted as EU Test Methods) in order to be acceptable. Consequently, where EFSA commissions safety testing involving the use of animals, it also includes as a

## **Animal Welfare**

prerequisite that studies are conducted in accordance with these internationally agreed test methods. OECD adopted in 1982 an animal welfare policy that states: “testing in animals cannot be eliminated at present but every effort will be made to discover, develop and validate alternative testing systems”. Therefore, putting emphasis on the requirement for studies to be conducted according to these accepted test methods provides assurance that no unnecessary animal studies are submitted (or conducted).

### **Investing in food science**

6. EFSA’s document AF06.04.2004-8: “Investing in food science: priority projects and cooperation with national research centers” as revised following its discussion by the Advisory Forum includes as one of the 4 work themes: “the development, promotion and application of new and harmonized scientific approaches and methodologies for hazard and risk assessment of food and feed”. The 2004 work plan lists 13 projects under this theme. Although current resources are inadequate to commence work on more than a few of these projects, animal welfare considerations will be considered in the selected projects to the extent possible.

### **ADOPTION OF A PRO-ACTIVE ANIMAL WELFARE APPROACH**

7. EFSA’s current animal welfare considerations are routinely part of its many tasks and activities. However, apart from the development of opinions on questions related to food producing animals, the approach is more reactive than proactive. In particular in the area of investment in food science a pro-active approach seems desirable and feasible. While recognizing that animal testing cannot be eliminated at present, EFSA could make every effort to stimulate, and participate in, the development of new food and feed assessment approaches that would minimize the use of experimental animals and would reduce to the extent possible the level of suffering of those animals that are still needed today. Options for such a pro-active approach could include:

- Active cooperation with other (inter)national organizations, institutions and regulatory bodies, in particular those that develop methodology for safety assessment (such as OECD and OIE), those that are involved in the validation of alternative methods (such as EC.JRC.ECVAM) and those that require (animal) tests (such as the Commission). Such cooperation would include frequent communication on data needs and requirements and providing support for and participating in projects aiming at the development of novel approaches for hazard and risk assessment;
- Adequate information sharing and dialogue with NGO’s and other organizations (e.g., Council of Europe) active in the area of animal welfare;
- Developing in-house expertise on alternative methods to animal testing. This expertise would be useful to: (i) stimulate the use of alternatives, where possible, in hazard characterization, (ii) to assist the various Expert Panels in assessing the justification for animal testing as part of risk assessment dossiers, and (iii) develop guidance document(s) on the use of experimental animals and alternative methods for consideration by Expert Panels and applicants;
- Developing and maintaining a data base of all EU legislative and guidance documents that address experimental and/or food and feed producing animals;
- Initiate activities including the organization of scientific discussions (as EFSA Science Colloquiums) as a means to stimulate new research activities in the field of risk assessment methodologies and approaches, in particular those that include alternatives to animal testing.

**MB 22.06.2004 – 5**  
**Animal Welfare**

**ACTION REQUIRED**

8. The Management Board is invited to: (i) take note of the animal welfare considerations that are already part of EFSA's current activities, (ii) adopt a pro-active animal welfare policy and approach as proposed in paragraph 7, amended in the light of their views.