

DR. CAROLINE LUCAS  
Green Party

for the South East of England

Commissioner Stavros Dimas  
DG Environment  
The European Commission  
B1049 Brussels  
Belgium

April 11<sup>th</sup> 2006

Dear Commissioner,

I am writing ahead of the public consultation that is scheduled for later this year in relation to the Commission's review of Directive 86/609. I am pleased that this legislation is being reviewed and very much look forward to inviting my constituents to take part in the consultation. In the meantime, I felt it would be useful to raise a number of points with the Commission as follows:

Animal experiments are cruel, outdated and inefficient. Animal tests have never been validated to modern standards, and pose scientific problems because of difficulties extrapolating results from animals to people and from laboratory doses to real life exposure. To what extent will the Commission's consultation allow for participants to comment on the validity of animal testing?

Directive 86/609 says "An experiment shall not be performed if another scientifically satisfactory method of obtaining the result sought, not entailing the use of an animal, is reasonably and practicably available". It also states "The Commission and Member States should encourage research into the development and validation of alternative techniques which could provide the same level of information as that obtained in experiments using animals but which involve fewer animals or which entail less painful procedures, and shall take such other steps as they consider appropriate to encourage research in this field." In reality, I suspect that non-animal based testing methods are not properly considered or used when they should be. European Commission data on animal experiments is not really adequate to assess whether or not animal testing is in long term decline - 2002 figures indicate an increase from 1999, and a decrease compared to 1996 figures. A clearer picture emerges in relation to the UK, with the total of 2.8 million procedures started on animals in 2004, an increase of 2% from the previous year. Given that the UK government spends a pitiful £280,000 per annum on promoting non-animal based testing, it is no surprise that greater progress has not been made. Does the Commissioner have any plans to review the way in which member states promote non-animal based testing methods and the resources they devote to it?

The Directive also says that "Stray animals of domestic species shall not be used in experiments. A general exemption made under the conditions of this paragraph may not extend to stray dogs and cats". As the Commissioner is aware from previous correspondence, there are claims that stray dogs are captured in Greece for animal experiments across the EU. Also worth noting is that in the UK there were 28 infringements of the current legislation recorded in 2004. Action

taken by the Home Office included "admonishing" licence holders, requirements to attend retraining courses or review systems of controls, and "letters of censure". There were no prosecutions. What is the Commissioner's current thinking on how to better enforce animal welfare legislation across member states?

Finally, Directive 86/609 sets out standards for the use of anaesthetics, stating that, wherever possible, experiments should take place under general or local anaesthetic. Yet in the UK in 2004 60% of all procedures were conducted without any form of anaesthesia. To what extent is the Commission monitoring the use of anaesthetics and the criteria used to determine whether or not they are necessary?

I look forward to hearing back from you.

Yours sincerely,

A handwritten signature in black ink that reads "Caroline Lucas". The signature is written in a cursive, flowing style.

Caroline Lucas - Green Party MEP for South East England.