



Netherlands National Committee
for the protection of animals
used for scientific purposes

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Subject: NCad-2016-145

Dear Mr Kool,

The Netherlands National Committee for the Protection of Animals Used for Scientific Purposes (NCad) has noted with interest the Minister for Agriculture's request for advice regarding a phase-out timetable for animal procedures.

In the view of the NCad, this is a bold and ambitious request that it certainly wishes to pursue. However, the NCad believes that the time frame indicated is extremely tight for developing a detailed phase-out timetable that can count on broad support in the field through input from relevant experts and stakeholders.

In view of this short period, the NCad sees no possibility of internationally assessing and garnering support for its ideas regarding a phase-out other than in a very limited context. Such an assessment will be necessary in a later stage given the intensive international collaboration that the phasing out of animal procedures will require.

Working within these constraints, the NCad will do its utmost to be able to submit in October 2016 clear advice that sets out concrete goals and the necessary steps for phasing out animal procedures.

To that end, the NCad will explore avenues that are likely and those that are not likely to offer opportunities, and determine which steps are necessary to phase out animal procedures in specific sectors.

Given the breadth of the field in which animals are used for scientific research, and the specific objectives and approaches involved, the NCad will need to prioritise its action plan to some degree. In the view of the NCad, any elaboration of the request should therefore first identify the most promising sectors in the medium term. The objectives of current animal procedures in these sectors will be examined closely, to establish the reason for these procedures and identify any alternatives that do not involve animal procedures but which still serve these objectives considered. Animal procedures required by law may be used as a model. The quality and risk models underlying these procedures will be analysed as these may offer guideposts for a new, non-animal strategy.

The NCad will be working intensively with the National Institute of Public Health and Environmental Protection (RIVM) on the scientific and legal aspects of the strategy. Furthermore, multiple national and international scientific institutions and regulatory organisations and authorities will be consulted.

With respect to the strategy's social and policy aspects, and further to the reports and documents referred to in the request for advice, civil-society organisations and foundations in particular will also be involved, notably Stichting Proefdiervrij and 'Eurogroup for Animals': their perspectives, suggestions and opinions will be clearly reflected in the advice issued.

Discussions have since taken place with ZonMw and Stichting Proefdiervrij and these parties have indicated their willingness to act as a sounding board for the NCad and put forward suggestions. However, they view their role as relatively limited given their other priorities.

While the RIVM is certainly willing to do what it can, its available capacity is limited. I therefore ask that you request the RIVM to prioritise its efforts to assist in responding to this request for advice.

In drawing up its advice, the NCad will certainly consider the need for a transitional period. Furthermore, the NCad is aware that for radical changes to current animal procedure practices (i.e. the phasing out of animal procedures) to succeed, much will depend on the possibilities for safeguarding and/or recalibrating the original social objectives (such as health, safety and disease control) behind animal procedures.

By the autumn, the NCad expects to be able to issue an advice in outline regarding the transition process (phase-out of animal procedures in prioritised sectors in 10-15 years).

The NCad wishes to emphasise in advance that achieving a future that is free of animal procedures will require significant efforts, domestically and especially internationally, from all organisations involved. After all, previous experiences have taught us that much time is lost between technical innovations and their eventual acceptance/implementation, and that the biggest challenges are not necessarily in the scientific sphere.

I assume that you are in agreement with the strategy outlined in this letter.

Yours sincerely,

Dr H.B.W.M. Koëter

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Chair of the National Committee for the Protection of Animals Used for Scientific Purposes