



May 31, 2018

The Honorable David Perdue
United States Senate
455 Russell Office Building
Washington, DC 20510

Dear Senator Purdue:

I am writing on behalf of the National Association for the Advancement of Animal Science (NAAAS) to ask for your support of an amendment to the Animal Welfare Act (AWA) to streamline inspections of research facilities while preserving the United States Department of Agriculture's (USDA's) traditional role in overseeing research involving animal models. NAAAS is comprised of animal, poultry and veterinary science departments across the United States, as well as affiliated national and state animal agriculture organizations.

Currently, the AWA requires USDA to conduct annual inspections at animal research facilities. While NAAAS supports the goals of the AWA, we believe that the current policy of annual inspections is an inefficient use of already constrained USDA resources and places unnecessary burdens on research facilities. NAAAS requests that the USDA be given the flexibility to utilize a Risk-Based Inspection System process for inspections at animal research facilities.

Our request is consistent with the findings of a workshop held to examine reforming animal research regulations with the goal of providing actionable recommendations for promoting regulatory efficiency, animal welfare, and sound science. The workshop was conducted by the Council on Governmental Relations, the Federation of American Societies for Experimental Biology, the Association of American Medical Colleges, and the National Association for Biomedical Research and resulted in a report released in October 2017. The report recommends that Congress amend §2146 of the AWA to remove the requirement for annual USDA inspection of research facilities and allow for an inspection frequency based on compliance history, as part of the agency's Risk Based Inspection System process.

NAAAS endorses this recommendation as an effective way to maintain animal welfare while increasing program efficiency and reducing the regulatory burden on research facilities. The Risk-Based Inspection System process has been effective for other regulated entities and USDA should be able to employ this approach with animal research institutions.

National Association for the Advancement of Animal Science
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202-406-0212

Thank you for your consideration of our request to improve the efficiency of AWA inspections at research facilities. NAAAS stands ready to answer any questions. Please let me know if we can be of any assistance.

Sincerely,

A handwritten signature in black ink, reading "Kenneth B. G. Ode". The signature is written in a cursive style with a large initial 'K'.

President
National Association for the Advancement of Animal Science