

25<sup>th</sup> September 2006

The Editor  
Forum Page  
Straits Times Press

Dear Sir,

I refer to Professor Bernard Tan's letter "Animal tests governed by rules on care and use" (ST Sept. 23), in response to Mr. Dudley Au's letter, "Cancer research: Is there an alternative to mice?" (ST, Sept.22).

Prior to the issuance of the set of Guidelines on the Care and Use of Animals for Scientific Purposes by the National Advisory Committee for Laboratory Animal Research (Naclar), the SPCA had written to Professor Tan giving its comments along with the comments from the RSPCA U.K.'s Research Animals Department. The latter's comments, which we agreed with, stated that the standards of husbandry and care stated in the document, were grossly inadequate, and would lead to serious animal welfare problems if implemented as they stood; the cage sizes being extremely small and not permitting adequate exercise, normal social behavior, or the provision of appropriate environmental enrichment. This was completely out of step with the very good welfare principles outlined within the rest of the Naclar guidelines.

Following the issuance of the guidelines by Naclar in 2004, the Singapore SPCA and the RSPCA U.K. expressed deep concern that no improvement had been made to the space allowances. A further request was made by SPCA to Naclar in March 2005 stating that "as long as animals are going to be used in experimentation, their welfare must be considered of the utmost importance. Subjecting them to outdated and inhumane standards by depriving them of adequate living space would certainly be breaching Naclar's intentions: i.e. to promote humane and responsible care of laboratory animals." The RSPCA asked Naclar to reconsider its cage sizes making reference to the revision of guidelines for animal care in the European Convention ETS123 and Directive 86/609, which includes larger space allowances and guidance on environmental enrichment. Naclar responded that it would continue to monitor international best practices and keep in view the experiences of the European union member states in the implementation of the revised European Convention ETS123 Directive for its future consideration. RSPCA's Director of Science, Arthur Lindley had also appealed to the Agri-food & Veterinary Authority expressing RSPCA's concerns and asking for a revision of space allowances in Naclar's guidelines.

The SPCA strongly objects to the use of animals in experimentation and also looks forward to the day when the use of animals can be completely eliminated from biomedical research, because there can be no doubt that animals in research experience extreme pain and suffering.

We also look forward to any updates from Naclar as to the improvement in its standards of husbandry and care for animals used in laboratory research.

With increased awareness among Singaporeans on animal welfare issues, it is timely that there should be more transparency in relation to animal experimentation in practice. The SPCA has made requests to inspect various institutes here that carry out animal experimentation, but has been turned down consistently.

Yours sincerely,

Deirdre Moss (Ms.)  
Executive Officer  
SPCA