

Animals in Science Regulation Unit
Home Office
4th Floor, South West
Seacole Building
2, Marsham Street
London
SW1P 4DF
Email: aspd-brp@homeoffice.gsi.gov.uk



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HOUSEHOLD PRODUCT TESTING

Consultation Response from OneKind

Introduction

OneKind welcomes the Government's commitment to ban the testing of household products on animals and supports its implementation by adding a condition to relevant project licences using the licensing powers provided under the Animals (Scientific Procedures) Act 1986.

OneKind believes however that if the household products ban is to offer meaningful additional protection for animals, it must be applied as widely as possible. In order to do this we believe that:

- the ban must cover ingredients and raw materials as well as finished products;
- the term "household products" must be defined broadly, comprehensively and clearly.

We assume that the Government wishes its commitment to have the maximum possible positive impact for animal welfare. The commitment therefore needs to be viewed in the context of the significant decline in household product testing on animals. Compared to a total of more than three million scientific procedures carried out on animals in the UK in 2010 - 391,000 of them for toxicology - the number of procedures for testing finished household products, at 24, is very small.

This decline was noted by the Boyd Group as long ago as 2002, when the Group commented in its discussion paper on household product testing¹ that relatively few animals were used in testing household products, and that in any case these tests were likely to be done abroad.

The Boyd Group suggested that a ban could also serve as a statement of moral principle, that it was unacceptable to use animals to test new products that were developed largely for human convenience, where products with adequate efficacy were already available; and that such a statement of principle could help to open up debate on the morality of using animals to test finished non-medical products more generally. OneKind believes that this

¹THE USE OF ANIMALS IN TESTING HOUSEHOLD PRODUCTS: A Discussion Paper and Statement of Principle THE BOYD GROUP December 2002 <http://www.boyd-group.demon.co.uk/householdproducts.pdf>

would be a useful ethical approach and would like to see the Government apply these principles to all aspects of household product testing.

Licence condition

Question 1: We would welcome views on this condition and examples of any other potentially exceptional cases.

We note that it is intended to add the following condition to relevant project licences, stipulating that testing of finished household products is not permitted:

The prior consent of the Secretary of State is required for the testing of household products, which is likely only to be forthcoming in an exceptional case.

We note also that the consultation suggests the following example of a potential exceptional case:

One exception to the prohibition might be testing to establish the properties of a product which may have given rise to an adverse reaction in users.

We assume that this means testing might be permitted in response to a specific incident or emergency, but we feel that this could give rise to an unduly wide interpretation. Given that many household products such as disinfectants, pesticides, bleaches, and agrochemicals are designed to be toxic because of the use for which they are intended, it is clear that they will have hazardous properties and that these will have been known about in advance.

OneKind therefore believes that it would be proportionate for the Government to adopt a blanket policy ban on the testing of household products on animals and that the Animals (Scientific Procedures) Act 1986 should simply state that the testing of household products and their ingredients on animals is not permitted.

Working definition of 'household product'

Question 2: We would welcome views on this definition and suggestions for other definitions bearing in mind the need for clarity, enforceability and compatibility with the requirements of UK safety testing legislation.

The proposed definition:

'Household product' means a finished product primarily intended for use in the household
appears unduly narrow to us.

We believe that the definition should cover ingredients as well as finished products. In our view, the Coalition Programme undertaking² to "end the testing of household products on animals and work to reduce the use of animals in scientific research" gives the Government scope to cover the testing of ingredients and this would greatly improve the proposal.

² *The Coalition: our programme for government*, chapter 11

http://www.cabinetoffice.gov.uk/sites/default/files/resources/coalition_programme_for_government.pdf

We are concerned also that some products could be re-designated as being for industrial or commercial use, although their purpose is broadly the same as a household product. We therefore suggest that the definition should read:

'Household product' means a finished product primarily intended for use in the household or for an analogous purpose, and the raw materials or ingredients of such a product.

Impact

Question 3: Is our assumption correct? We would welcome further and better information, including estimated costs and other details, to help refine our assessment.

We are sure that the Government is correct in its working assumption that, as the number of procedures carried out under this heading has reduced significantly in recent years, the proposed approach would have minimal financial impact on UK contract research organisations. We would however reiterate our belief that the ban should extend to the testing of ingredients and raw materials and we would urge the Government also to assess the impact of such a policy. Referring once more to the Boyd Group discussion paper of 2002, it was noted even then that:

in any case, it is rarely necessary to use animals to test finished household products because:

- there is no legal requirement to carry out tests on such products in Britain; and*
- larger companies, at least, usually have sufficient data on the chemical properties and toxicity of individual ingredients that they can predict the likely synergistic effects when the ingredients are combined in new products, and thus can avoid animal tests of finished household products; and*
- where this is not possible, in vitro alternative tests, not requiring the use of sentient animals but equally capable of predicting the likely toxic effects of the new products, are usually available; and*

(iv) where it is considered that the risks of such new products cannot be adequately assessed without the use of animals the Boyd Group's consensus view is that the new household products should be foregone and the animal tests should not be carried out.

We believe that, almost ten years on, the industry will now have even better data regarding the properties of ingredients and greater access to alternative tests. If these are not available, the imposition of a ban on the testing of all ingredients, materials and products on animals would act as an effective motivation towards further development and use of alternatives, which is both a UK and a European aim.

OneKind

10 Queensferry Street

Edinburgh EH2 4PG

0131-225 6039

policy@onekind.org