

May 2012 Update of Position Statements

#	Section	Description of change	Relevant text
1	1) Cost	Revised sentence	Cost cannot be the overriding factor in decisions related to animal welfare in PHS-funded research. Animal welfare and the integrity of research findings, rather than cost alone, should be the primary factors in decisions related to assuring compliance with the recommendations in the <i>Guide</i> in PHS-funded research.
2	1) Cost	Added sentence	OLAW does not discourage or encourage institutions from exceeding the standards.
3	2) Housing	Revised sentence	While the <i>Guide's</i> space recommendations are a starting point accepted reference points for addressing space needs, performance standards allow flexibility to improve animal welfare and scientific research.
4	2a) Nonhuman Primate Housing	Revised sentence	Behaviorally compatible animals must should be used whenever possible in socialization attempts.
5	2a) Nonhuman Primate Housing	Revised paragraph	Institutions are encouraged to consult the Animal Welfare Act and Regulations on primate housing requirements. Compliance with the USDA regulations is an absolute requirement of this [PHS] Policy. (See PHS Policy footnote 2 .) Housing of nonhuman primates in social settings (pairs or groups) is the requirement of the USDA regulations (9 CFR Ch. 1, Part 3, Subpart D) and single housing is the exception. The Animal Welfare Act, 7 USC Section 2143, requires regulated facilities to provide an environment adequate to promote the psychological well-being of primates. The Animal Welfare Regulations (AWR), 9 CFR 3.81, require regulated facilities to document and follow an appropriate plan for environmental enhancement adequate to promote the psychological well-being of nonhuman primates. The plan must be in accordance with currently accepted professional standards as cited in appropriate professional journals or reference guides, and as directed by the attending veterinarian. It must address, at a minimum, the areas of Social Grouping, Environmental Enrichment, Special Considerations, Restraint Devices, and Exemptions. In regards to Social Grouping, 9 CFR 3.81(a) requires that regulated facilities meet the social needs of nonhuman primates that are known to exist in social groups in nature. This requirement has only three specified exceptions, allowing separate, individual housing for animals that are overly aggressive or debilitated, that require isolation

			because they have contagious diseases, or that are incompatible with all other animals. Exemptions to all or part of the overall plan to promote psychological well-being are also allowed, under 9 CFR 3.81 (e)(1) and (2), for specific veterinary reasons, as directed by the attending veterinarian, or for strong scientific reasons, as outlined in a research proposal approved by the IACUC. In most cases, based on currently accepted professional standards, such as the <i>Guide</i> , group housing is the most appropriate method of ensuring that the animals' social needs are met. Protected tactile contact is considered single housing by the USDA, with rare exceptions. Exemptions to the social housing requirement must be based on strong scientific justification approved by the IACUC or for a specific veterinary medical or behavioral reason. Lack of appropriate caging does not constitute an acceptable justification for exemption.
6	2a) Nonhuman Primate Housing	Revised paragraph	OLAW and USDA concur on this Position Statement and on OLAW FAQ F14 : "Is social housing required for nonhuman primates when housed in a research setting?" A revised version of FAQ F14 has been posted on the OLAW website. OLAW and USDA positions are further defined at the Nonhuman Primate Enrichment and Social Housing resource on the OLAW website.
7	2c) Rodent Housing	Revised sentence	OLAW supports the <i>Guide's</i> approach to applying performance standards to achieve specified outcomes and expects institutions to use the <i>Guide's</i> space recommendations as a starting point. OLAW concurs with the <i>Guide</i> that performance standards are to be applied to rodent housing issues. (See <i>Guide</i> pages 56-58.) While the <i>Guide's</i> space recommendations are accepted reference points for addressing space needs, performance standards allow flexibility to improve animal welfare and scientific research.
8	3) Non-Pharmaceutical-Grade Substances	Added sentence	On March 1, 2012, OLAW, with USDA and AAALAC, offered additional guidance through a webinar on the " Use of Non-Pharmaceutical-Grade Chemicals and Other Compounds in Research with Animals ".
9	3) Non-Pharmaceutical-Grade Substances	Added reference	² A listing of pharmaceutical-grade drugs and biologics is available through the FDA database . The Orange Book is the reference for FDA-approved human drugs. The Green Book is the reference for FDA-approved veterinary drugs.