

Medical Research Modernization Committee

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June 26, 2008

Michael E. Budkie, A.H.T.
PMB 280
1081-B State Route 28
Milford, Ohio 45150

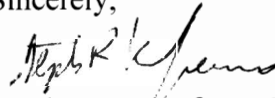
Dear Mr. Budkie,

It is my understanding that veterinarians have previously noted that procedures such as prolonged water deprivation, restraint chairs, and induced infectious diseases cause substantial pain and/or distress. This raises obvious ethical issues, and there are legitimate concerns about whether researchers are accurately reporting these procedures to the USDA as category E procedures.

I would like to comment on the scientific issues raised by procedures that cause substantial pain/or distress. It has been well-documented that stress profoundly influences the body's reaction to manipulations, and this occurs in ways that are difficult to predict or quantitate.¹ Consequently, adding to the inherent difficulties associated with applying animal data to humans, pain and distress further undermines animal experimentation's validity and value. If researchers deny the stress associated with research environments or protocols that induce pain and/or distress, they misrepresent their research in ways that can mislead those aiming to apply animal research results to humans. For example, humans who have not experienced the same pain and/or distress might react very differently to medical conditions that animal models purport to emulate.

Barnard, Neal and Susie Hou. Inherent Stress: The Tough Life in Lab Routine. *Lab Animal* September 1988, pp. 21-27.

Sincerely,



Stephen R. Kaufman, M.D.
MRMC cochair