

MANTELL MEDICAL CLINIC

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Judiciary Committee
State Legislature
Harrisburg, PA.

TESTIMONY

I am writing this testimony in support of Pennsylvania House Bill #873 introduced by State Representative, Tom Murphy - a bill to regulate animal research, prevent animal abuse and provide alternatives for students who do not want to take part in animal experimentation or vivisection experiments.

I would like to focus my attention on the dreaded "Draize Test" - an eye irritancy procedure performed on rabbits. This test is used as a pre-market assesment of new cosmetics and household products. This procedure involves applying substances such as polish removers, toothpastes, detergents, bleaches, mascara, etc. to the eyes of live, unanesthetized rabbits and observing the resultant damage.

ANIMAL TESTS DO NOT ASSURE PRODUCT SAFETY

These tests do not keep unsafe products off the market. The American Association of Poison Control Center National Data Collection System recorded for 1986, 104,546 human poison exposures to cleaning products, 80,214 human poison exposures to cosmetic/personal care products; and 7,293 human poison exposures to deodorizers such as air fresheners. Instead of keeping dangerous products out of consumer's hands, these tests are part of a "rubber stamping" process by which companies can introduce potentially toxic products into the market.

ANIMAL TESTS DO NOT HELP IN THE TREATMENT OF ACCIDENTAL POISONINGS

Animal test results are not transferable to humans, and as a result, are rarely used by emergency room physicians to treat poisonings. Instead, physicians rely on case reports, clinical experience and experimental data from clinical trials in humans to determine the optimal course of treatment.

ANIMAL TESTS ARE INACCURATE

Because different types of animals differ physiologically, intraspecies variation in test result is common. Variation in results has even been recorded among different strains of the same species. A reaction in a rat or dog, therefore is no guarantee of the same reaction in a human. In addition, the results of eye irritancy tests are determined through observation, making interpretation subjective and causing results to vary from laboratory to laboratory.

WHAT ARE THE ALTERNATIVES TO ANIMAL TESTS?

The most obvious, logical alternative is to encourage companies to rely on ingredients known to be safe or at least which have an established history of use. The Food and Drug Administration recognizes thousands of such ingredients, and more than one hundred companies develop products in this manner. Products that were not tested on animals include such widely available brands as Nexus and Paul Mitchell hair care products and Elizabeth Taylor's "Passion Perfume".

If companies continue to market previously unknown ingredients, a variety of alternative tests are available. These include cell culture methods, developed at Rockefeller University, the chorioallantoic membrane (CAM) test, developed by Dr. Joseph Leighton of the Medical College of Pennsylvania; and mathematical models which predict toxicity.

COMPANIES ARE RELUCTANT TO ABANDON THESE TESTS FOR LEGAL NOT SAFETY REASONS

Animal tests are not required by law, but they have become standard industry procedure. The tests are used by companies to provide legal protection from liability for injuries caused by dangerous products.

WHY LEGISLATION PROHIBITING ANIMAL TESTS IS NECESSARY

The commercial products industry has delayed final validation studies of alternative tests for nearly two years. In addition, federal regulatory agencies, although they do not specifically require animal tests, have provided little guidance to companies for the implementation of alternative tests.

When federal and state legislation is enacted, a clear message will be sent to consumer corporations and to the federal agencies - the public cares about consumer safety and the humane treatment of animals and will no longer tolerate cruel, outdated and unreliable product safety testing procedures.

LEGISLATION DOES NOT RESTRICT MEDICAL RESEARCH

Legislation prohibiting the use of animals in product testing has no impact on the use of medical research or in the testing of pharmaceuticals.

STUDENT RIGHTS

Is there any possibility that a high school, college or medical student exposed to cruel and unnecessary animal testing in his laboratory class will later become cold, dehumanized and unfeeling because of this wanton disregard for animal life? Students should be exempt from classes using animal testing on the basis of moral, ethical or religious reasons.

In conclusion, animal testing done for commercial household and cosmetic products is grossly unethical and unscientific. It is done for the most part for economic and bureaucratic reasons. As legislators you have the opportunity to change unethical and unjust laws into a new framework which will benefit the whole of society.

Please consider the merits of House Bill #873.

Thank You for your attention,



Donald Mantell, M.D.

ADDENDUM: Dr. Mantell is a medical doctor and a member of the "Who's Who in Biobehavioral Sciences". Curriculum Vitae is available upon request.