

Submission on the Animal Welfare Amendment Bill

To the Primary Production Select Committee

Thank you for the opportunity to comment on the Animal Welfare Amendment Bill

This submission is from _____

I can be contacted at _____

I support the inclusion of Supplementary Order Paper 341 in the Animal Welfare Amendment Bill. I ask that the select committee include the amendment in that SOP in the Bill when they report back to parliament.

I believe that no animal testing of psychoactive substances should be allowed, SOP 341 will ensure that it isn't allowed. I respectfully ask that the Primary Production select committee consider the points below when deciding on the addition of SOP 341 to the Bill.

- **ANIMAL TESTS ARE UNNECESSARY; THEY ARE SCIENTIFICALLY AND ETHICALLY INAPPROPRIATE FOR THE TESTING OF THESE DRUGS.** There are multiple validated tests available that can be used to make up a suitable test battery. Recent research has shown non-animal tests are 80-97% accurate as opposed to the 40-60% accuracy of rodent trials^{1,2}. A combination of the application of the best modern science can offer in the way of non-animal tests, along with a requirement that the human trials that will occur start at microdosing levels, is a more than cautious enough approach to show the low level of risk.
- **THE ONUS TO SHOW LEGAL HIGHS ARE SAFE, WITHOUT CAUSING HARM, SHOULD BE ON THE MANUFACTURERS.** The Psychoactive Substances Act requires the manufacturers to show the drugs they want to sell are of a low enough risk to allow public consumption of them. I believe that if the manufacturers are unable to show to the body granting approvals that the drugs they want to sell are safe enough without using animals then they shouldn't be able to sell them. Not allowing the use of animals for this purpose under the Animal Welfare Act makes sure this is the case.
- **NEW ZEALAND LAWS NEED TO REFLECT WHAT THE NEW ZEALAND PUBLIC WANT.** The huge outcry and every opinion poll done on the issue has shown that the vast majority of New Zealanders do not want any animal testing of legal highs to happen. This should be reflected in our countries law.

¹ Reviews showing rodent trials like those proposed are on average 40-60% predicative of human toxicity: Olson, H. *et al.* Concordance of the toxicity of pharmaceuticals in humans and in animals. *Regulatory toxicology and pharmacology* : RTP 32, 56-67, doi:10.1006/rtp.2000.1399 (2000), and Spanhaak, S., Cook, D., Barnes, J. & Reynolds, J. *Species Concordance for Liver Injury From the Safety Intelligence Program Board*, <http://bioblog.instem.com/downloads/SIP_Board_Species_Concordance.pdf> (2008).

² Tests using cell lines give results that are 80-97% accurate in their predictions: Liver cell line tests – 80%: O'Brien, P. J. *et al.* High concordance of drug-induced human hepatotoxicity with *in vitro* cytotoxicity measured in a novel cell-based model using high content screening. *Archives of toxicology* 80, 580-604, doi:10.1007/s00204-006-0091-3 (2006); Heart cell line tests – 97%: Inoue, T., Tanaka, K., Mishima, M. & Watanabe, K. Predictive *in vitro* cardiotoxicity and hepatotoxicity screening system using neonatal rat heart cells and rat hepatocytes. *AATEX* 14, 457-462 (2007).

- **AN OUTRIGHT BAN ON ANIMAL TESTS IS CLEAR AND EASY TO ENFORCE.** Including SOP 341 will remove any debate and disagreement around what a “suitable alternative” under the Psychoactive Substances Act is. It sets a clear line for what is to be an acceptable test for use in proving ‘low risk’.
- **RESTRICTING THE TYPES OF TESTS AVAILABLE TO THE DRUG MANUFACTURERS TO GAIN APPROVALS TO SELL LEGAL HIGHS WILL NOT INCREASE THE RISK TO CONSUMERS.** The manufacturers will still have to meet the same standards of ‘low risk’ set by the government irrespective of the types of tests they are permitted to use; they will just have less tests available to them.
- **MORAL AND ETHICAL CONSIDERATIONS.** Causing pain and death to animals for the sake of approving the sale of a legal high is unethical and morally wrong. The strong public outcry has shown this to be a belief held by the over-whelming majority of New Zealand voters. The government should not condone or allow animal testing of recreational drugs.

Thank you for considering my submission on the Animal Welfare Amendment Bill.

Name: _____

Signature: _____

Date: _____