

## Hazel Campbell-Crawley

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**From:** Tom Stahl <wsurf63@yahoo.com>  
**Sent:** Monday, January 22, 2024 10:03 AM  
**To:** Hazel Campbell-Crawley  
**Subject:** Michigan HB 4849

**Categories:** agriculture test.

To House Agriculture Committee members

These comments are in response to House Bill No. 4849.

This bill is interpreted as to eliminate pain and distress from dogs and cats used in research of pharmaceutical, medical device, and surgical technique development. Based on the criteria presented in HB 4849, animal death, injury, fear, or trauma caused by administration of pharmaceutical compound, surgical procedure, or implanting a medical device, dogs and cats will no longer be available as research animals in Michigan. It must be understood that pharmaceuticals, medical devices, and surgical procedures are not just limited to human use, but also used for our very own pets.

Currently, the USDA has oversight of animal welfare though developed standards for care, treatment, and transport – Animal Welfare 9 C.F.R. Parts 1 – 3. Research facilities and contract research laboratories in Michigan must adhere to Federal regulations set forth by the USDA. Most are accredited by the Association for Assessment and Accreditation of Laboratory Animal Care (AAALAC). These regulations and accreditations all require assessment of animal pain/distress and corrective actions to minimize the occurrence in the animals. Veterinarians, IACUC, and technical staff are responsible for carrying out these regulations and minimize pain and distress to the animals. It is unclear why Michigan legislation is required to go beyond Federal law.

The passage of this bill will negatively impact the development of safe and effective pharmaceuticals here in Michigan. Dogs are often used to evaluate the safety of drugs from toxicology to cardiovascular effects. This research of drug safety will continue, however not in Michigan, as pharmaceutical and medical device research will move out of state.

HB 4849 will not just impact the pharmaceutical companies' abilities, but also impact academia. Michigan State University, University of Michigan, Wayne State, and others to adequately provide cutting edge technologies and development of future generations of scientists and veterinarians. These institutions will also be limited in what they can offer the NIH, CDC, DOD, and other government agencies.

A financial impact must also be considered with HB 4849. There are many dedicated technical staff that treat and care for the dogs and cats in pharmaceutical companies, academia laboratories and contract research laboratories. This bill will reduce capabilities of private and public institutes, thus reducing the need for dedicated veterinarians, scientific, and technical staff.

As written, this bill will force research and educational opportunities out of Michigan. As stated in the bill: "invasive procedure, including, but not limited to, penetrating the body, cutting body parts, performing surgery or surgical procedures, implanting a medical device, or administering an experimental agent or drug" – includes all methods of administering drugs to the animals, from a

swallowing a tablet, injection by syringe to medical implants. This verbiage essentially states that no compounds can be given if pain or distress are observed.

Also stated in HB 4849, "The experimental purpose may cause death, injury, fear, or trauma to the dog or cat". Using "fear" as a criterion is a subjective and unscientific end point that can not be confirmed or denied.

Please do not support House Bill No. 4849. This bill will not benefit people or the animals of Michigan.  
Thank you.  
Thomas Stahl