

Briefing Note

EU chemical testing on animals

How to regulate the chemicals industry without the need for more animal testing

Summary

- Both humans and wild animals are exposed to thousands of man-made chemicals that contaminate their environment. Friends of the Earth wants tough new regulations to dramatically reduce this contamination.
- Chemicals policy in the European Union (EU) is currently under review, and a White Paper is being discussed. It has been suggested that Friends of the Earth supports an EU programme of massively increased animal testing. This is untrue.
- Friends of the Earth does want safety assessments for all chemicals in use. We do not, however, support an extension of the current testing system, which relies on animal experiments, to all existing chemicals. Instead we are campaigning for a new open and precautionary regulatory system. This would provide greater protection to consumers and wildlife, and if introduced, together with new non-animal testing methods, would also reduce animal testing.
- There is a huge potential to develop non-animal safety tests for chemicals. Increased funding of research and validation of alternative methods must be urgently pursued by the UK Government.

Introduction

We are exposed to industrial chemicals in our homes all the time, whether we like it or not. In recent years it has become clear that we know little about the safety of most of these chemicals. We continue to be exposed to chemicals that accumulate in and contaminate our bodies, and there are a range of health problems which may be associated with chemical exposures. The current regulatory system is a failure, and does not protect either our health or the health of the environment.

Wildlife is also exposed to thousands of chemicals from consumer products, industrial processes, sewage effluents and waste disposal. Most chemicals used in high volumes in the EU have no safety data publicly available. Persistent chemicals (which do not biodegrade easily), bioaccumulative chemicals (which build up in body fat) and those that disrupt the hormone system are of particular concern.

Friends of the Earth believes that human health and animal protection can be ensured, through an approach based on total openness, precautionary regulation and substantial investment in alternative, non-animal methods of establishing the hazards posed by chemicals.

Chemicals and wildlife

Chemical pollution is damaging a wide range of wildlife, including whales, dolphins, otters, polar bears, birds, fish and other sea life. Research has shown that brominated flame retardants (widely used in electronic equipment and textiles) contaminate the blubber of sperm whales in the remote deep waters of the Atlantic, whilst fluorinated organic compounds (used as pesticides and refrigerants) break down to produce a highly persistent acid which accumulates in lakes and wetlands and threatens wildlife. Numerous organisms have been shown to be affected by chemicals which disrupt hormones (known as endocrine disruptors), from breeding problems in alligators to eggshell thinning in birds. The most extreme example so far is the massive impact of the marine anti-fouling chemical tributyltin, which has reduced populations of dog-whelk and other molluscs across the world, from the UK to Malaysia.

Better regulation is needed

In the light of the serious threat to wildlife and to humans from chemical pollution, Friends of the Earth believes that the current system of chemical regulation is inadequate and must be reviewed. Only 14 per cent of the chemicals used in high volumes in the EU today (over 1,000 tonnes per year) have got a basic set of safety data publicly available. The EU review is looking at how to address this, but chemical safety testing has traditionally been heavily dependant on animal testing. Friends of the Earth is disappointed with several key aspects of the proposals in the EU's White Paper, and considers that additional elements must be incorporated. These measures will ensure a high level of protection for human health and the environment but will also avoid the use of thousands of animals for chemical safety testing.

A new, precautionary system for the regulation of chemicals

Friends of the Earth, WWF, the RSPCA and other environment and consumer groups across Europe have agreed on the following the policies in the Copenhagen Charter:

1. A full right to know, including what chemicals are present in products.
2. A deadline by which all chemicals on the market must have had their safety independently assessed. All uses of a chemical should be approved and should be demonstrated to be safe beyond reasonable doubt.
3. A phase out of persistent or bioaccumulative chemicals.
4. A requirement to substitute less safe chemicals with safer alternatives.
5. A commitment to stop all releases to the environment of hazardous substances by 2020.

Development and adoption of new non-animal tests

There is a huge potential to develop non-animal safety tests for chemicals, and it is essential that there is a substantial increase in funding of both research and validation of alternative methods. The current resourcing of such work is grossly inadequate. There are particular problems with the development of alternative tests in the UK, due to a complex distribution of responsibilities for this issue between DEFRA (Department of the Environment, Food and Rural Affairs), the Home Office and the DTI (Department of Trade and Industry). The UK should be launching a major, integrated research programme into the development of alternative methods for the safety assessment of chemicals, and should not just leave this to European research bodies.

The role of the Copenhagen Charter principles in reducing animal testing

- A phase-out of all persistent or bioaccumulative chemicals. Persistence can be established without animal experiments; bioaccumulation can be determined by simple chemical tests and environmental sampling. Such chemicals will then not have to go through toxicity testing on animals.
- The requirement for all uses of a chemical to be 'safe beyond reasonable doubt' reduces the amount of evidence required to phase-out a chemical. This should prevent more and more animal experiments being done by industry to rescue a chemical from a ban, and could allow 'reasonable doubt' to be created by *in vitro* tests (test-tube based experiments).

- The provision of a deadline for safety assessment will remove many chemicals from the market without further testing. We also believe that industry must pay the full costs of any tests and for an independent assessment of the safety of their chemicals.
- The substitution principle should lead to the phase-out of a less tested chemical if:
 - a) low-toxicity alternatives are available
 - b) it can be replaced by a non-chemical technique, without any further toxicity testing.

In addition Friends of the Earth wants much more rapid development and use of *in vitro* tests, computer-based (QSAR) methods, the grouping of chemicals to reduce animal testing and the use of new techniques such as expression profiling. (See the Crisis in Chemical update below for more details). In addition, measures must be taken to speed up the acceptance procedure for alternative methods and the international harmonisation of chemical testing guidelines. According to the British Union for the Abolition of Vivisection (BUAV), new animal tests are accepted without validation, in contrast to new non-animal tests, creating an uneven playing field in favour of animal tests.

The chemical industry makes a lot of noise claiming that more strictly regulated system will lead to an increase in animal testing, but in reality the industry is the biggest block to widespread adoption of non-animal methods. (See the Safety testing of chemicals report below for more details.) The challenge for regulators is to introduce new regulations which protect consumers and wildlife as well as reduce the number of animal tests across Europe. The use of new technologies and ensuring that non-animal tests are not discriminated against are critical to achieving this objective.

Friends of the Earth considers that the continued use of chemicals which have had little or no safety testing is a threat to humans and to wildlife. This approach is not acceptable. Friends of the Earth believes that a precautionary regulatory system, incorporating the principles of the Copenhagen Charter, would avoid thousands of animal tests, yet ensure a high level of protection for human health, wildlife and the environment.

Further reading:

Friends of the Earth Safer Chemicals Campaign

www.foe.co.uk/campaigns/safer_chemicals/

Safety testing of chemicals and the new EU chemicals policy May 2002 (Report)

www.foe.co.uk/resource/reports/safety_test_new_eu_chems.pdf

Crisis in Chemicals Update March 2002 (report)

www.foe.co.uk/resource/reports/crisis_chemicals_update.pdf

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