

THE WILDLIFE SOCIETY

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8 July 2010

Warren Muir, Ph.D.
Executive Director, Division on Earth and Life Studies
National Research Council
500 Fifth St. N.W.
Washington, D.C. 20001

Dear Dr. Muir:

I am writing to echo concerns previously voiced by the Ornithological Council and the American Society of Mammalogists regarding statements made in the Institute for Laboratory Animal Research's newly revised *Guide to the Care and Use of Laboratory Animals*.

The Ornithological Council reviewed the pre-publication version closely and submitted a list of thirteen items of concern, including three issues regarding citations and two misstatements of federal and state law regarding the regulation of activities by other federal agencies (USFWS, APHIS, and CDC). In addition, their comments raised serious concerns about statements pertaining to field investigations. Of particular concern to The Wildlife Society is the addition of a statement that "veterinary input is needed for any project involving capture and marking." This statement is not scientifically warranted, and could have serious unintended effects on field research of wildlife.

This new statement is of major concern to wildlife professionals, as it is unsupported by any scientific evidence and involves long-standing research methods recognized as common practice by the field research community. In the past, the Office of Laboratory Animal Welfare has officially adopted the *Guide* as its policy, and it thus applies to all research funding from the National Institutes of Health (NIH) and other Public Health Service (PHS) Agencies. The NIH has indicated its intent to do the same with this revision, if after review, they determine that it is consistent with PHS policy. Institutional Animal Care and Use Committees also use the *Guide* in assessing protocols for wildlife research. Therefore, inclusion of this new requirement in the *Guide* would have far-reaching consequences on the wildlife profession.

The statement is unaccompanied by any citation, source, or supporting evidence. Furthermore, based on the information posted on the ILAR website, no one on the committee has appropriate expertise in this field. We are also concerned about the burden such a requirement would place on researchers and veterinarians, as there are very few veterinarians with relevant expertise.

Had we been aware that such a statement was being considered for inclusion, we could have provided this input at that time. However, these statements concerned new issues not previously

addressed in the two short paragraphs in the 1996 edition. The statement of scope of the current project states:

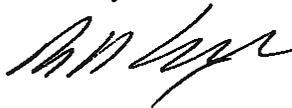
Specifically, the committee will review the scientific literature published since the release of the 1996 Guide and determine whether the information currently in the Guide concurs with current scientific evidence. The committee will also review the literature related to new technologies related to laboratory animal care and use and determine where new guidance is necessary to ensure the best scientific outcomes and optimal animal welfare.

The wildlife profession could not have predicted that the committee would chose to add a statement saying that veterinary input is needed for any project involving capture and marking. If we had been aware of such discussion, we would not only have provided useful information, but would have registered serious concerns at that time.

We encourage the National Academy to hold itself to the highest possible standard and immediately correct these errors. Failure to do so would result in a document that not only has the potential to be embarrassing to the National Academy, but also one that is likely to cause real ongoing problems for the wildlife research community. The Wildlife Society asks that you delay publication of the *Guide* until these concerns can be resolved.

Thank you for considering the views of wildlife professionals.

Sincerely,

A handwritten signature in black ink, appearing to read "B. Leopold", written in a cursive style.

Bruce D. Leopold, Ph.D.
TWS President