



Royal Society for the Prevention of Cruelty to Animals

Ministerin Barbara Otte-Kinast
Ministry of Food, Agriculture and Consumer Protection of Lower Saxony
Calenberger Straße 2
30169 Hannover
Deutschland

4 November 2019

Dear Ministerin Otte-Kinast,

Undercover exposé at Laboratory of Pharmacology and Toxicology GmbH & Co. KG

The RSPCA is one of Europe's oldest and largest animal welfare organisations, and is dedicated to preventing cruelty and promoting kindness to animals. We are a science-based organisation and are active in all areas of human-animal interaction, including the use of animals in research and testing. The Society's principal goal is the total replacement of animal experiments, and we work to reduce laboratory animal numbers and suffering, and improve welfare, for as long as animal use continues.

Our expert Research Animals Department welfare scientists have a high level of liaison with researchers, animal technologists, attending veterinarians and regulators worldwide, regularly visit research and testing establishments, and have represented Eurogroup for Animals as members of several European Commission Expert Working Groups producing working documents on implementing Directive 2010/63/EU.

The RSPCA was horrified to see the undercover video film which was made at LPT earlier this year. The Research Animals Department has watched this carefully and was deeply shocked to see the extremely low standards it depicts of housing, husbandry and care, experimental conduct and animal monitoring. The lack of human compassion, and apparent acts of deliberate cruelty, as shown in the video were totally unacceptable. We are staggered to see evidence of such an appalling culture within an establishment in a country that is a major economy, with an advanced science sector, and in which animal use is regulated by the Directive.

We were particularly upset to see people apparently untroubled by the terrible animal distress and suffering occurring right in front of them. Quite aside from the fundamental animal welfare concerns, any scientific data from these poor animals is likely to be worthless due to the pain and distress they are experiencing – so their lives will have been completely wasted.

On the basis of the video film, the RSPCA believes that the establishment authorisation for LPT should be withdrawn, the person responsible for ensuring compliance with Directive 2010/63/EU should be held accountable, and charges should be brought under the German Animal Welfare Act if there is evidence of cruelty by individuals. In our view the exposé should prompt an urgent review of the system for formal inspection and enforcement in Germany. It should also lead to a review of education and training for staff carrying out procedures and caring for animals in Germany, particularly with respect to ensuring that the elements on ethics, intrinsic value of life, animal behaviour and recognition of pain, suffering and distress are adequately covered, and that trainees are properly assessed and competent.

I am sure that you, and your colleagues at the Ministry, also shocked and concerned by the video. I would be very grateful if you could reassure the RSPCA that all appropriate

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steps will be taken to minimise the risk of the culture at establishments within your jurisdiction deteriorating to anything like this extent in the future.

Yours sincerely,

A handwritten signature in black ink that reads "Julia Wrathall". The signature is written in a cursive style with a period at the end.

Dr Julia Wrathall
Chief Scientific Officer
RSPCA