

The Honourable Robbert Dijkgraaf
Minister of Education, Culture and Science

22 March 2022

Via e-mail: r.h.dijkgraaf@minocw.nl; ministerocw@minocw.nl

Dear Minister Dijkgraaf:

We hope this letter finds you well and congratulate you on your appointment. We are writing on behalf of People for the Ethical Treatment of Animals (PETA) Netherlands and PETA UK to introduce PETA's Research Modernisation Deal (RMD). The RMD is a strategy for modernising research and ending experiments on animals – a tool that would help you accelerate the transition to animal-free innovation – and we have some specific questions for you related to research funding and education. We have also written to the minister of agriculture, nature and food quality about the RMD with specific questions relating to his role in the use of animals in experimentation.

Transition Programme for Innovation Without the Use of Animals (TPI)

In 2016, we wholeheartedly welcomed the government's ambition for the Netherlands to be a frontrunner in animal-free innovation. What an inspiring, exemplary, and timely goal! We participated in the TPI Pioneer-2-Policymaker Conference in November 2019, and we are enthusiastic about the initiatives that have started under TPI, such as Helpathons and the “virtual human for safety assessments” project.

However, we are concerned about the approach taken and the estimated time it will take to make the transition to animal-free innovation. It will take decades with this approach, as stated in TPI's self-evaluation from 2020.¹ The Netherlands Organisation for Health Research and Development (ZonMw) and the National Committee for the protection of animals used for scientific purposes (NCad) have stated that the transition to animal testing-free research is slow at the current pace.² The lack of progress is demonstrated by the number of scientific procedures conducted using animals, which has remained stagnant for the last five years. One important factor responsible for this stagnation is the approach taken by TPI, which focuses solely on developing replacement methods of animal testing and lacks appropriate scrutiny of animal testing as well as much-needed targets and deadlines to move away from it.

Increased Scrutiny – Systematic Reviews for Progressing Science

Animal tests in the Netherlands must come under increased scrutiny. In many research areas, results from pre-clinical trials, including animal experiments, do not translate to humans. This is shown by the drug failure rate for diseases such as Alzheimer's disease, cancer, and strokes, which range from 96.6% to 100%.³ In addition, it has been shown that more than 90% of basic research – the majority of which entailed the use of animals – failed to lead to any human therapies within the 20 years after the experiments were performed.³ If public

Zusterorganisaties:

- PETA Amerika
- PETA Foundation (Engeland)
- PETA Azië-Oceanië
- PETA India
- PETA Duitsland
- PETA Australië



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funds are to be used responsibly, they must fund research that leads to effective treatments for humans. Animal experiments that don't translate to humans should be eliminated immediately. Not surprisingly, the Dutch central committee on animal testing, which issues licences for animal experiments, admits its frequent struggles with translating the supposed benefits of animal studies to humans⁴ – exposing a fundamental flaw in the system. In line with the transition towards animal-free innovation, the RMD appendices list research areas in which experiments on animals can immediately be replaced and advocates the critical review of additional research areas in order to determine where animal use can be ended. Over the past two years, we have discussed the RMD with NCad and were heartened to see that NCad has initiated a project it calls “animal models we want to get rid of” and that it stated in its recent advice report “Van parallelstudie naar de acceptatie en implementatie van proefdiervrije methoden”⁵ that there is a need to identify experiments on animals that have a low predictive value for humans.

Can you confirm that the government will only fund research involving experiments on animals for which a systematic review on the relevance of animal testing has been conducted?

Replacing Animals Used in Education With Existing Animal-Free Educational Tools

Every year, thousands of mice, rats, pigs, chickens, cows, and other animals are used in veterinary and human medicine courses in higher education institutions throughout the Netherlands. However, there are now many humane methods of teaching life and health sciences covering a range of educational levels and academic disciplines, and they can be found in databases such as [InterNiche](#) and [HumaneLearning.info](#). These methods include complex computer models, plasticised specimens, ethically sourced cadavers (obtained from companion animals who have been euthanised for medical reasons or have died naturally or in an accident), high-tech models of a range of anatomical and biological processes, and supervised clinical experiences. Such techniques have proved to have at least as much educational value as methods using animals, if not more.⁶ Using non-animal methods also spares students the psychological distress caused by using animals.⁷ This is a clear example of available alternatives to animal testing that not only *can* be used but also *should* be used according to the law.

It is vital that Dutch educational institutions be encouraged to develop humane curricula and implement institution-wide plans to end their reliance on the use of animals as “educational tools”.

Can you confirm that you will develop an action plan with binding targets and deadlines to modify educational curricula to exclude the use of animals?

Train the Scientists of the Future

In order to train the scientists of the future, *every* student in medical or biological education should learn about the problems related to testing on animals and ways to conduct research in an animal-free manner. At present, there are very limited opportunities for education on this subject. Even where courses exist, for example in the case of Utrecht University, where a master's course has recently been developed, only a limited number of students can register.

Can you confirm that animal-free innovation will become an integral part of the early curriculum of life sciences and medicine courses?

Funding for Animal-Free Innovation

NCad and ZonMw stated that a significant investment in science for a period of at least 10 years is required to accelerate the transition to animal-free innovation, and they developed a draft plan⁸ for a programme of research and innovation. It is unacceptable that promising initiatives developed under the framework of TPI, such as VitalTissue and the Beyond Animal Testing Index (BATI), are struggling to secure the financial means to develop further and move towards implementation. Nor is

it acceptable that the SYstematic Review Center for Laboratory animal Experimentation (SYRCLE) will cease to exist due to lack of funding. Consistent and structural application of systematic reviews contributes to better research, better medicines, and better investment of research funding. It can result in less animal testing, which makes it an excellent fit for government policy regarding the transition to animal-free innovation. Specific funding needs to be allocated to the validation and promotion of the uptake and acceptance of non-animal methods. As envisaged by ZonMw and NCad, TIP could be the avenue through which promising initiatives such as VitalTissue, BATI, and SYRCLE are accommodated with secure, long-term funding so that they can be further developed and employed.

Many superior animal-free methods and tools are already available, but projects in which they are used compete for funding with experiments on animals. Given the substantial economic, societal, and animal welfare benefits, the RMD recommends redirecting government funds from experiments on animals to research using non-animal methods. We urge you to coordinate this transition.

Can you confirm that you will work with the minister of agriculture, nature and food quality to increase long-term funding for animal-free innovation and redirect funding from experiments on animals to animal-free science?

Phasing Out Experiments on Monkeys in the Netherlands

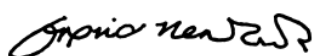
For many years, it has been the wish of Parliament and the public to phase out experiments on primates in the Netherlands. The previous minister, Ingrid van Engelshoven, made a good first step by asking the Biomedical Primate Research Centre (BPRC) to reduce both the breeding colony and the number of experiments on monkeys by 40% by 2025. But that means that by 2025, still more than 100 experiments on monkeys will continue to be conducted annually and around 1,000 monkeys will still be kept in captivity at the BPRC. Furthermore, there are no plans for after 2025, which means that the desire to phase out the use of primates in experiments is being ignored. Two petitions that PETA entities and Animal Rights submitted together in December 2020, representing more than 200,000 citizens, called for a phase-out plan for experiments on monkeys not only at the BPRC but also at the Netherlands Institute for Neuroscience and Erasmus University Medical Center.

Can you confirm that a concrete action plan will be developed with goals and milestones to phase out experiments on monkeys in the Netherlands?

The RMD details actions that are particularly well suited to addressing some of the current obstacles in the transition to animal-free innovation in the Netherlands, and we hope you will find it a useful resource. Please find attached the report's executive summary, which provides a brief overview, as well as a copy of the full roadmap (also accessible [here](#)).

We would appreciate having the opportunity to meet with you to discuss how the Netherlands can accelerate the transition to animal-free innovation. Thank you for your time and your consideration of this important issue. We look forward to hearing from you.

Sincerely,



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Managing Director
PETA Netherlands



Janneke Hogervorst
Science Advisor – the Netherlands
PETA UK

cc: Vaste commissie voor Onderwijs, Cultuur en Wetenschap (cieocw@tweedekamer.nl)

Attachments

Research Modernisation Deal Executive Summary
Research Modernisation Deal

References

- ¹TPI, 'Terugblik op TPI 2018- 2020', (2020), <<https://www.transitieproefdiervrijeinnovatie.nl/documenten/rapporten/20/11/11/tpi-evaluatierapport>> [accessed 20 March 2022].
- ²NCad, 'NCad en ZonMw bieden verkenning proefdiervrije innovaties aan', (2021), <<https://www.ncadierproevenbeleid.nl/actueel/nieuws/2021/5/21/ncad-en-zonmw-bieden-verkenning-proefdiervrije-innovaties-aan>> [accessed 21 March 2022].
- ³PETA Netherlands, 'The Research Modernisation Deal: A Strategy to Ending Animal Experiments', 1.31 (2021), <https://www.peta.nl/wp-content/uploads/2022/02/RMD-NL-V1.31_2.pdf> [accessed 21 March 2022].
- ⁴NCad, 'Verslag NCad-CCD overleg 16 April 2021', (2021), <<https://www.ncadierproevenbeleid.nl/over-het-ncad/documenten/vergaderstuk/2021/6/1/verslag-ncad-ccd-overleg-16-04-2021>> [accessed 21 March 2022].
- ⁵NCad, 'Parallelstudie-advies: Investeer in alternatieven', (2021), <<https://www.ncadierproevenbeleid.nl/actueel/nieuws/2021/12/parallelstudie-advies/parallelstudie-advies-investeer-in-alternatieven>> [accessed 21 March 2022].
- ⁶Zemanova MA, Knight A, 'The Educational Efficacy of Humane Teaching Methods: A Systematic Review of the Evidence'. *Animals (Basel)*, 11 (2021), 114, <<https://doi.org/10.3390/ani11010114>>.
- ⁷Capaldo T, 'The Psychological Effects on Students of Using Animals in Ways That They See as Ethically, Morally or Religiously Wrong'. *Alternatives to Laboratory Animals*, 32 (2004), Suppl 1B, 525-31, <<https://doi.org/10.1177/026119290403201s85>>.
- ⁸ZonMw, 'Verkenning naar de wenselijkheid en haalbaarheid van een Nederlands onderzoeksconsortium ter bevordering van dierproefvrije innovaties', (2021), <<https://www.zonmw.nl/fileadmin/zonmw/documenten/Fundamenteel/MKMD/verkenningMKMDNCad2021versiedef.pdf>> [accessed 21 March 2022].