

15 October 2008

President,
Medical Council of India,
Pocket – 14, Sector 8,
Dwarka,
New Delhi – 110077

Dear Sir,

I am writing to you from People for the Ethical Treatment of Animals (PETA), India regarding the use of animals in medical schools in India.

Many medical colleges across India have expressed that they are unable to end the use of animals in their curricula because of the Medical College of India's (MCI) regulatory requirements. We are in receipt of an response received from MCI under Right to Information Act, 2005 dated 19 August 2008 clarifying the phrase "observe experiment". According MCI's response, the phrase includes both "active doing of the experiments by the learner and also he/she observing 'demonstration experiment' carried out by the assigned teacher". The response also states that the "regulatory requirement of maintaining of an animal house by a medical college is to cater to the experimental requirements with reference to students observing animal experiments actively and passively alike". A copy of the RTI response is attached for your ready reference (Annexure A).

We respectfully ask your office to re-evaluate its position on this issue and to amend the Graduate Medical Education Regulations, 1997, to allow medical colleges to prohibit the use of animals in their curricula.

Numerous medical colleges around the world prohibit the use of animals in their curricula.

The overwhelming majority of medical schools in the US, Canada and the UK – including the highly regarded US institutions Harvard, Yale, Columbia, the University of Pennsylvania and Duke University – have ended the use animals in their curricula.

In May 2008, the scientific journal *Nature* described the significant shift away from the use of animals in medical school curricula across the US, stating, "This month sees the shutdown of the live-animal laboratory at Case Western Reserve University School of Medicine in Cleveland, Ohio. ... It is the latest closure in a phase-out of animal labs across the United



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People for the Ethical
Treatment of Animals India

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States: in 1994, live-animal experiments were on the curriculum in 77 of 125 medical schools; now it is thought that just eight use them”. Two months later, officials at Eastern Carolina University’s medical school stated that “effective July 1, 2008, the Brody School of Medicine will discontinue use of live animals in its medical student courses”. Moreover, all nine new medical schools that have opened or are scheduled to open in the US in 2007 and 2008 have adopted policies prohibiting the use of animals in their curricula, confirming that this is the current medical education standard of practice.

Prominent medical associations now encourage medical schools to replace the use of animals in curricula with non-animal teaching methods.

Dr. David Leach, the executive director of the Accreditation Council for Graduate Medical Education (ACGME) – the organisation that sets medical curriculum standards and accredits medical schools in the US – wrote to PETA US on 10 August 2006, “ACGME supports the use of simulators and other non-animal training methods to replace the use of animals in the laboratory. We will continue to support your efforts ...”.

Also, the American Medical Student Association (AMSA) – the oldest and largest independent association of physicians-in-training in the US, comprising more than 68,000 medical students, premedical students, interns, residents and practising physicians from across the country – passed a formal resolution in 2007, stating, “AMSA strongly encourages the replacement of animal laboratories with non-animal alternatives in undergraduate medical education”.

Leading medical professors and researchers in India support ending the use of animals for medical education.

Dr K Sri Nageswari –formerly a professor and the head of the department of physiology at a prestigious government medical school in India and currently a professor and head of the department of physiology at Medicity Institute of Medical Sciences in India – wrote to the dean of National Taiwan University College of Medicine (NTUCM) on 14 July 2008 about his computer-simulation programme, stating, “The idea was to convert all the 1st year MBBS (undergraduate, medical) animal experiments in the subject of Physiology (as per the syllabus prescribed by the University and Medical Council of India) to computer-based experiments using algorithms and simulations and make the CD-ROM available to medical students. This is virtual reality of the non-immersive type, a 2D one. The CD-ROM is inserted into the main computer (server)



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and all the medical students can perform the same experiment in the laboratory at the same time. The students can also perform the experiments by themselves at home”. Dr Nageswari concludes, “Considering the fact that many of the medical institutes world over have now shifted to e-learning and computer-based methodologies, I request you to consider reducing the animal use and switching over to these computer-based experiments”.

Dr Jigneshkumar L Patel – formerly an assistant professor in the department of pharmacology for B.Pharm and M.Pharm classes at S K Patel College of Pharmaceutical Education and Research in India and currently the assistant manager of research and development at Sun Pharma Advanced Research Centre in India – wrote to the dean at NTUCM on 8 July 2008 in support of ending animal experiments. Dr Patel stated: “In context of animal use in physiology and pharmacology teaching, I would like to share herewith my views and some of excellent ideas to you all which can reduce the animal use as well as ... increase the teaching quality and interest of teacher as well as the student. . . . The simulation software should be useful to reduce the animal usage without altering the teaching aspects and quality. A very sincere, systematic and whole-hearted effort from physiology and pharmacology teacher[s] is require[d] to achieve increased quality teaching with reduced animal experiments. ... It is my request to all physiology and pharmacology teachers to make all sincere possible efforts in the welfare of the animals”.

Prominent government agencies are now urging a “paradigm shift” to using cutting-edge, non-animal research methodologies because numerous recent studies have shown that animal experiments often waste lives – both animal and human – and precious resources by trying to infect animals with diseases that they would never normally contract.

In August 2004, the chief of the US Food and Drug Administration (FDA) announced in that only 8 per cent of drugs that pass animal tests make it into the human marketplace. In other words, of all drugs that are found to be safe and effective in animals, 92 per cent are found to be either unsafe or ineffective.

The National Research Council (NRC) of the US National Science Foundation stated in 2007 that “[c]urrent [animal toxicity] tests also provide little information on modes and mechanisms of action ... and little or no information for assessing variability in human susceptibility”. The NRC concluded that “a transformative paradigm shift [towards non-animal test methods] is needed to achieve the design criteria set out in the committee’s interim report: ... (2) to reduce the cost and time of testing, (3) to use fewer animals and cause minimal suffering in the animals used,



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and (4) to develop a more robust scientific basis for assessing health effects ...”.

Whether they are used in experiments at medical colleges or research institutes, animals in laboratories suffer tremendously,

Animals in laboratories are harmed by housing, social, environmental, husbandry, procedural and experimental stressors – all of which have been studied thoroughly and defined in the scientific literature and shown to cause physical, biochemical, physiological, epidemiological, behavioral, social, psychological and cognitive detrimental or traumatic effects.

Scientists have even shown that animals suffer and endure harm in laboratories as a result of *routine* procedures such as handling and blood-acquisition techniques. Published studies document the potential stress associated with routine laboratory procedures commonly performed on animals. When 80 such studies were examined by a committee of physicians, the physicians concluded in a 2004 article published in the scientific journal *Contemporary Topics in Laboratory Animal Science* that “significant fear, stress, and possibly distress are predictable consequences of routine laboratory procedures ...”.

Laboratories frequently disregard animal welfare regulations, which causes animal to suffer.

In the US, laboratory facilities are required to abide by the federal Animal Welfare Act (AWA), yet these laws are often violated, even by members of the Institutional Animal Care and Use Committee (IACUC) who are charged with ensuring compliance. In its September 2005 audit, the US Department of Agriculture’s (USDA) Office of the Inspector General (OIG) stated that “33 of the top 50 (66 percent) research facility violators in the nation were educational institutions, suggesting that IACUCs at universities are less effective [Some] facilities were resistant to change, showing a general disregard for APHIS [Animal and Plant Health Inspection Service] regulations. VMOs [Veterinary Medical Officers] informed [the OIG] that some institutional officials were not supportive of IACUC activities and APHIS regulations, resulting in significant issues with animal care at the facilities”.

The scenario is typically no different in laboratories in India. For example, some years back, the CPCSEA ordered the confiscation of 37 monkeys from the National Institute of Virology, Pune, who had been horribly abused for years. The animals lived in substandard conditions without proper food and/or water, and many were unable to stand. Some suffered



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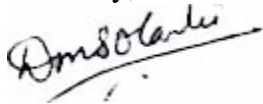
from serious injuries (including missing fingers and anal bleeding) and others had gone mad inside their cages. Similarly, there have been several incidences across India in which animals have been confiscated from colleges and research institutes that violated various guidelines of the CPCSEA's Prevention of Cruelty to Animals Act 1960. Enclosed are few photographs showing some of the inhumane conditions at few of the medical institutes in Mumbai (Annexure B).

Fortunately, more and more medical colleges around the world are now replacing the use of animals in their curricula with modern alternatives. There are many sophisticated non-animal alternatives currently available, including high- and low-fidelity programmable human-patient simulators, physical bench models, perfused human cadavers and sophisticated computer simulations. PETA India would be happy to assist MCI in identifying humane teaching methods that can be used in place of animals for medical training.

As the world moves forward with newer and safer technologies, India should take a lead – not lag behind. Therefore, we respectfully ask your office to look into this important matter and amend the Graduate Medical Education Regulations, 1997, to allow medical colleges to prohibit the use of animals in their curricula.

We would be pleased to discuss this matter with you further. I can be contacted on 020 26058102 or at DharmeshS@petaindia.org. Thank you very much for your time and consideration.

Sincerely,



Dharmesh Solanki
Senior Vivisection Campaign Coordinator

CC: Chairman, CPCSEA, New Delhi – with a request to take up this matter urgently for banning animal usage for Undergraduate Medical Courses as this not at all required world over.



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भारतीय आयुर्विज्ञान परिषद्
MEDICAL COUNCIL OF INDIA

पॉकेट - 14, सेक्टर - 8, द्वारका, नई दिल्ली - 110 077
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No.MCI-34 (1)/RTI/2008-Med./२०८१९

Date:- १९/०८/०८

Mr. Dharmesh Solanki,
Lakshadeep Bldg., 2nd Floor,
5th Gulmohar Cross Road,
Behind Club Millennium,
J.V.P.D. Scheme, Juhu, Mumbai - 110049.

ANNEXURE - A

Sub:- Information sought under RTI Act, 2005- regarding.

Sir,

In further continuation to this office letter No. MCI-34(1)/RTI/2008-Med./-16375/76, dated 04.07.2008 and in reference to your application dated 28.05.2008, this is to inform you that a meeting of the Sub-Committee was held in the Council office on 05.08.2008. The Sub-Committee considered your question/query in depth and the operative part of the considered opinion of the Sub-Committee is as under:-

" that the incorporation in the Graduate Medical Education Regulations, 1997 to the effect with reference to curriculum in Pharmacology, wherein it is stated that "at the end of the course, the student should be able to observe experiments designed for study of effects of drugs, bioassay and interpretation of the experimental data is appropriate. The remark "observe experiments" in the opinion of the Committee includes both "active doing of the experiments by the learner" and also he/she observing 'demonstration experiments' carried out by the assigned teacher. The Council has not made any recommendation pertaining to use of computer models in lieu of the animal experiments. Likewise, there are no guidelines which have been explicitly notified in regard to frequency of the experiments and also the nature and species of the animals involved. However, the regulatory requirement of maintaining of an animal house by a medical college is to cater to the experimental requirements with reference to students observing animal experiments actively and passively alike.

The Council did not specify these minute details because, the same have been left to the concerned affiliating/examining universities to prescribe for the concerned affiliated medical institution (s) under their respective jurisdiction.."

Name and Address of the Appellate Authority:- Lt. Col.(Retd.) Dr. A.R.N. Setalvad,
Secretary,
Medical Council of India,
Pocket - 14, Sector - 8, Dwarka,
New Delhi-110077.

Yours faithfully,

(Dr. Davinder Kumar)
Deputy Secretary &
Public Information Officer (PIO)

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ANNEXURE - B



GUINEA PIGS KEPT IN FILTHY CONDITION WITH SEVERE SKIN PROBLEMS, WHICH WERE UNATTENDED, NO PROPER HOUSING CONDITION OR ANY ENRICHMENT.





MICE & RATS KEPT OVERCROWDED IN CAGES
WITH NO ENRICHMENTS AND WITHOUT
PROPER HOUSING FACILITIES.





RABBITS KEPT IN NON-STANDARD ALUMINIUM
CAGES WITH SCRAP MATERIALS KEPT
OVER THE CAGES.