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PLAYING GOD!

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Beauty Without Cruelty

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An International Educational Charitable Trust for Animal Rights
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Beauty Without Cruelty is a way of life which causes no creature of land, sea or air, terror, torture or death.

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2nd World Congress on Alternatives and Animal Uses in the Life Sciences

October 20-24, 1996 Utrecht, The Netherlands

Jenny Sawyer

I was fortunate enough to represent **BWC** India at this important World Congress, which provided a useful forum for dialogue, exchange of information, problem resolution and debate between animal protectionists, scientists, industry, regulators, educationalists and others. **BWC** India was one of the active participants and provided an abstract and poster presentation for the occassion.

The basic premise of the Congress was the policy of 'Refinement, Reduction and Replacement" of animal experiments. Known as the policy of the 3 R's it was originally promoted by scientists Russell and Burch in a lecture in 1959. They saw this approach as a dynamic process by which one could achieve the ultimate goal of an end to animal experiments, working within the scientific community. Some poster displays by participants highlighted the positive achievements of such a policy and home companies committed to the cause could achieve remarkable results. For instance, Immuno AG, an Austrian biomedical research company, spent 2 years developing an 'alternative' *in-vitro* vaccine quality control test, saving 26,000 mice a year!

However, some participants showed a clear lack of understanding and commitment to the 3 R's concept promoted by the Congress. For instance, the Laboratory of Genetic Toxicology and Wildlife Genetics, at the Department of Zoology, Utkal University, Orissa, described new research methods using chicks. The abstract paper cites the 'chick' as an 'alternative' to other mammals for testing the genotoxicity of environmental toxicants. The reasons given include: 'easy to manage, less expensive, permits large scale tests and a wide selection of strains and genotypes; moreover results are obtained rapidly.' Ironically this poster was positioned opposite our own poster with its quote by Mahatma Gandhi that 'vivisection is the blackest crime of humanity'.

Lectures also reflected this diversity. For instance, one scientist highlighted his million dollar work developing virtual reality programs to train doctors in surgery techniques, instead of using animals; while another promoted genetic engineering of animals, admitting it will increase animal experiments and yet another asked why he should talk to animal protectionists when they were trying to end his job. Dr Michael Balls of ECVAM (The European Centre for the Validation of Alternatives to Animal Experiments) used the forum as an opportunity to directly challenge representatives from OECD about their lack of support for European validation initiatives. He claimed that certain individuals within OECD felt comfortable with traditional animal experiments as against new,

scientifically validated, *in-vitro* experiments which, he felt, was not an acceptable excuse.

The next World Congress will be held in 1999 by ECVAM, and will undoubtedly continue to provide a valuable forum for the exchange of information, debate and problem resolution, which made this World Congress a success. However, problems such as those highlighted by the Utkal University poster and the lack of representation by countries outside the Industrial West will need firm resolve by the organisers.

Presentation

"It is the fate of every truth to be an object of ridicule when it is first acclaimed."
Albert Schweitzer

History can close our minds or open them. We can use it to entrench our ideas and re-enforce conservatism, or it can teach us lessons and point the way forward. Events throughout **BWC's** *lifetime have shown us that despite political conservatism and economic vested interests, the animal rights movement can hope to create a moral and more productive future for science.*

1959 **Beauty Without Cruelty** (**BWC**) founded as a charity by Lady Dowding, with the support of her husband Lord Dowding.

Russell & Burch recommend that efforts should be made to 'replace' animals with non-sentient models, 'reduce' numbers of experiments and numbers of animals used, and 'refine' procedures to cause less suffering.

1961 Lawson Tait Trust, the first humane research organisation, founded.

1963 **BWC** Ltd formed as a company to manufacture and sell cosmetics using well established ingredients of non-animal origin and without testing on animals.

1964 *"It has not been possible for us to use the results of rabbit (eye) studies to predict accurately the actual irritation that might occur in humans after accidental exposure."* Buehler & Newmann

".... animal skin is entirely different from human skin..... there may be no correlation between the mildness of a raw material on a rabbit's back and its safety during use on a human face." M M Rieger & G W Battista

1971 *"... the tests which have been used for over 20 years to decide the degree of skin irritation produce quite variable results among the various laboratories as within certain labs. To use these tests, or minor variations of them, to obtain consistency in classifying a material as an eye or skin irritant or non-irritant, therefore, is not deemed practical."*

Weil & Scala

1972 **BWC** USA formed, and soon publishes 'cruelty-free' cosmetic company guide.

1973 The Lord Dowding Fund, for alternatives to animal research, is established.

1974 **BWC** India formed.

1975 **BWC** produces ***More than Skin Deep,*** a booklet which includes an article by Lord Dowding: ***Humane alternatives to animal experiments,*** and a cruelty-free cosmetic companies guide.

1976 Europe introduces new legislation which effectively makes animal testing for cosmetic purposes compulsory. **BWC** Ltd refuses to use any new ingredients developed after this date.

BWC India produces ***List of Honour***, detailing companies which do not test on animals.

1977 Lady Dowding and **BWC** USA help found the American Fund for Alternatives to Animal Research (AFAAR), to finance the development of non-animal tests.

1979 **BWC** India wins *Readers Digest Pegasus Award* for an advertising campaign it undertook in 1978.

1980 407 organisations coalesce in order to campaign against the Draize Eye Irritancy Tests conducted on rabbits by cosmetic companies. Co-ordinated by Henry Spira in the USA, the campaign focused firstly on industry leader Revlon, and then Avon.

Full-page advertisements appear in the New York Times and other national newspapers featuring a picture of a white rabbit with sticking plaster over its eyes, captioned :

How many rabbits does Revlon blind for beauty's sake?

"There is a basis for an in-vitro *system for the screening of severe eye irritants as an alternative to the Draize Eye Test."* P J Simons

"The suggestion by the authors of the viewpoint that cell cultures have any utility in assessing the safety of chemicals in the human eye is without any redeeming merit, it clearly indicated the naiveté of these students about matters biological" Dr T M Brody, Chairman of the Michigan State University Department of Pharmacology and Toxicology, responding to a student article criticising the Draize Test.

The Cosmetic, Toiletry and Fragrance Association (CTFA) announces a fund for the creation of a national centre for the study of alternatives to animal testing. Avon donates $250,000 to this, £200,000 to the John Hopkins University research into alternatives to animal tests, and £60,000 to the Fund for the Replacement of Animals in Medical Experiments, UK. Revlon donates $250,000 a year for 3 years to the Centre for Alternatives to Animal Tests at Rockefeller University, USA.

"The results of ophthalmic tests on rabbits may bear little relation to human responses" A N Rowan

Ethical organisations around the world focus campaigning against the LD50 test.

"For the recognition of the symptomatology of acute poisoning in man, and for the determination of the human lethal dose, the LD50 in animals is of very little value." Professor G Zbinden

1982 **BWC** Ltd becomes a member of the Council of the Cosmetic, Toiletry and Perfumery Association.

1983 *"... the lifetime feeding study in mice and rats appears to have less than a 50% probability of finding known human carcinogens. On the basis of the probability theory, we would have been better off to toss a coin."* D Salsburg

1984 Number of experiments on living animals :

Cosmetics/Toiletries 17,512 Household Items 12,804.

BWC Ltd expands into high street chemists and lists 9 exporting countries.

1989 Number of experiments on living animals :

Cosmetics/Toiletries 12,090 Household Items 4,017.

60 *in-vitro* tests to replace the Draize Eye Irritancy Test are either in use or under development.

1990 Cosmetic, Toiletry and Perfumery Association successfully resists proposals to test well established ingredients on animals for classification purposes in Europe.

1991 **BWC** India represented on Ministry of Environment and Forests re-activated Committee for Purpose of Controlling & Supervising Experiments on Animals.

The EC Commission founds Centre for the Validation of Alternatives, based in Italy.

The Co-operative Bank, a major UK high street bank, publicises its refusal to have business accounts from customers involved in cosmetic testing on animals.

Number of UK experiments on living animals :

Cosmetics/Toiletries 3,520 Household Items 1,352.

1996 *"We are going to miss out on animals altogether... If you have information on human genes, what's the point of going back to animals?"* Gordon Baxter, Joint Founder of Pharmagene, on establishing the first pharmaceutical company to test drugs exclusively on human tissue.

Results of the MEIC validation trial, initiated in 1989, are gradually being published and show the promising role of *in-vitro* toxicity tests.

The campaign against testing on animals for cosmetic purposes was to catch the public imagination. The concept that such experiments were unnecessary, combined with the dichotomy of an industry devoted to beauty being so deeply involved with the suffering and torture of animals produced an effective stimulus for change.

Economic vested interests unwilling to give up new ingredients, which created the need for animal testing set about solving the problem by funding research into 'alternative' testing methods; a solution already initiated by pro-animal groups. Within a decade, the release of resources helped create 60 *in-vitro* tests for eye irritancy alone, affecting not only tests for cosmetic purposes, but also pesticides, weedkillers, ophthalmic solutions, household detergents and even riot control gases.

With such achievements in the field of cosmetic testing, the potential is considerable for achievements in other fields, if given the impetus and funding. Certainly the formation this year (1996) of a new pharmaceutical company relying solely on human tissue, provides a link between past success and future capabilities. And this at a time when we see the development of major technological processes with techniques such as computer mathematical modelling, which allow the simulation of biological systems without the use of animals.

As we approach the next millenium, it is important to remember that the scientific community cannot divorce itself from questions of morality. And with a little innovation and allocated resources it can create and implement the ethical changes that organisations like **BWC** aspire, with the direct consequence of refining science and increasing its value to humans.

"The greatness of a nation and its moral progress can be measured by the way its animals are treated. Vivisection is the blackest of all the black crimes that man is at present committing against God and his fair creation" Mahatma Gandhi.

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BWC *India is grateful for the assistance of Animal Aid, notably Dr Robert Sharpe, Scientific Advisor and Gillian Egan, and to Andy for designing the poster.*

Testing of Cosmetics on Animals

Dr Iqbal Malik

As Members of the Committee for the Purpose of Controlling & Supervising Experiments on Animals, Diana Ratnagar (Chairperson, BWC) and I visited several laboratories. Although this was a couple of years back, the Government had not acted on our findings and recommendations.

The reconstituted Committee under its new Chairperson, Maneka Gandhi, invited BWC to make a presentation on 2nd August 1996, on the prevailing use of animals for testing cosmetics and toiletries. As a life member of BWC, I represented the society and recommended that the Government make it mandatory that the Committee check all labs and that testing of cosmetics on animals be totally banned.

Simultaneously, I sent off letters to the Hon'ble Ministers of Health and Environment & Forests (Government of India) with copies to the Secretaries of these Ministries, on the letterhead of my voluntary organisation called Vatavaran.

Manufacturers of cosmetics and toilet preparations as per the law are required to funtion under The Drugs & Cosmetics Rules, 1945.

For obtaining the ISI mark, Schedule 'S' lays down certain standards for cosmetics in finished form which need to conform to the Bureau of Indian Standards (BIS) specifications which are revised from time to time by the Cosmetics Sectional Committee (CSC). The CSC functions under the chairmanship of the Drugs

TESTS TO BE CARRIED OUT ON PARTICULAR TYPES OF COSMETICS

No	Test	Type of Products
1	Primary skin irritation test	Skin and hair products
2	Skin sensitization test	Skin, hair products, dentifrice, mouth wash
3	Oral toxicity limit test	Dentifrice, mouth wash
4	Mucous membrane irritancy test	
	a) Eye irritancy test	Shampoos and eye area cosmetics
	b) Oral mucous irritancy test	Dentifrice, lipstick and mouth wash
5	Systemic dermal toxicity test	Skin cream

Additional test for novel speciality chemicals:

A. Phototoxicity (Photo-irritancy, photo-allergy) tests

B. Mutagenicity tests

C. Teratogenecity tests

Tests B & C (carcininogenicity test) may not be necessary.

Human carcinogens identified by IARC monograph 1992 must be strictly kept out of all cosmetic formulations.

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Much research falls into this category - 'frivolous or dispensable'
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