



January 24, 2024

Rep. Reggie Miller
Chair, Michigan House of Representatives Agriculture Committee
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Submitted via Email

Dear Chair Miller,

I am writing to express Charles River's opposition to HB 4849, an agenda topic of an upcoming Agriculture Committee meeting.

This legislation would have a drastic negative impact on the pharmaceutical industry in Michigan without having any impact on the number of animals used in research. Enactment of HB 4849 would effectively end pharmaceutical or physiology research in Michigan using dogs and cats. However, this legislation will not have the intended effect on decreasing the use of dogs and cats in medical research but will shift this work to be done out of state as it is necessary for pharmaceutical development. Additionally, enacting this legislation will delay the development of new pharmaceuticals for humans and pets as companies in the state involved in research and development of pharmaceuticals will be forced to delay research projects as they are moved out of state.

This proposed legislation would have a huge negative impact on the Michigan economy; forcing some pharmaceutical research and development companies to scale back operations, leave Michigan or to not consider the state as a place to establish pharmaceutical research and development operations. Biomedical research and pharmaceutical development are significant economic contributors in Michigan in both the public and private sectors. MEDC reports that there are currently more than 275 pharmaceutical research and development companies in Michigan. This is a fast-growing sector in the state, with a high concentration of these companies in southwest Michigan. Charles River has the largest nonclinical toxicology site in the world located in Mattawan, MI. We are the largest private employer in Van Buren County with a payroll of >\$125 million and an economic impact to the area of >\$200 million. Pharmaceutical research using animals in research in Michigan has been extremely productive to improve human and animal health. At Charles River Mattawan we have worked on nearly 30 of the about 175 new pharmaceutical agents that have been approved by the FDA since 2020. If this legislation were enacted, Charles River would immediately reduce investment in the Michigan site and would decrease operations, impacting hundreds of jobs in Michigan and the economy of Van Buren and Kalamazoo counties. Additionally, enactment of this legislation would be seen by prospective pharmaceutical research and development companies looking to base operations in Michigan as unfavorable to the industry.



This legislation will have no impact on the number of dogs or cats used in research but will just shift the work to other geographies. Research in animals is still required by the federal regulations in place for drug development as there are currently no validated and acceptable in vitro or in silico alternatives to the use of animals to determine the preclinical safety of a new pharmaceutical material prior to clinical trials in humans or pets. In the case of developing pharmaceutical agents for dogs and cats as pets, determination of the nonclinical safety in these animals is a requirement of the FDA to get the drug to clinical trials in these companion animals. For human pharmaceutical development, dogs are often the most applicable model for the determination of safety or efficacy of the pharmaceutical material to determine the risk/benefit for human trials. In many cases, dogs are the lowest order species for determining cardiovascular safety for a pharmaceutical agent and are the most appropriate research tool for cardiovascular physiology in making new discoveries about how the cardiovascular system functions. Legislation in Michigan will not change these scientific facts.

The answer to reducing the number of animals used in the development of new pharmaceuticals is not trying to restrict their use through legislation, but to invest in and support the development of alternatives to animal research. Tax incentives for research, development and validation of alternative in vitro or in silico models to animal research is one of the ways state governments could help scientists move forward in this area.

Kind regards,

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