

Dr. José Mauro Granjeiro
Conselho Nacional de Controle de Experimentação Animal (CONCEA)
SPO - Setor Policial, Área 5, Quadra 3
Bloco A, 1º andar
Brasília DF

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Dear Pr. José Mauro Granjeiro,

The members of the Conselho Nacional de Controle de Experimentação Animal (CONCEA), which you chair, will soon have to decide on the acceptability of testing cosmetic products and ingredients on animals in Brazil. We would like to respectfully add our voices to this important discussion.

Animal-based toxicity testing inflicts substantial pain and suffering on sentient creatures, and as such raises ethical concerns. As scientists, we share these concerns, and believe that the scientific community must recognize and be responsive to them. We also call your attention to the following scientific issues.

Worldwide, there is growing frustration with animal-based testing methods for safety assessment. Many such approaches date back to the 1930s, are costly and time-consuming, provide little understanding of how chemicals behave in the human body, and often fail to correctly predict real-world human reactions. These factors present a major challenge to regulatory authorities responsible for evaluating products and chemicals for consumer safety.

Eminent scientific bodies in North America, Europe and beyond, have clearly recognized that animal models are not the “gold standard” for assessing human risk, and that a paradigm shift is essential to bring the science of toxicology into the 21st century. For example, the US National Academy of Sciences articulated its vision of “a not-so-distant future in which virtually all routine toxicity testing would be conducted in human cells or cell lines.”

The superiority of validated alternative methods over the animal model is unquestionable. In order to be validated, the efficiency of an alternative method is assessed with dozens of compounds by several laboratories. It is questionable whether any animal test method in use today would pass such rigorous scientific scrutiny. This is the reason why we support a swift transition toward superior, non-animal approaches for testing and assessment.

The European Union ban on cosmetics tests on animals implemented since in 2009 represents a stepping stone in this direction. It inspired unprecedented investments by corporations and government in research to develop and validate a host of innovative, non-animal test methods. And it has delivered methods capable of fully or partially replacing the use of animals in testing for skin and eye corrosion and irritation, photoirritation, acute oral toxicity, aspects of genetic toxicity and non-genotoxic carcinogenicity, and endocrine disruptor screening. In the near future, we anticipate validation endorsements for non-animal test methods/strategies for skin sensitization and other complex health endpoints.

As a growing global scientific power, Brazil can also make a significant contribution toward accelerated development and use of modern, human biology-based testing approaches. The creation of the National Network for Alternative Methods (RENAMA) is a positive step, and CONCEA has an opportunity to enable Brazil to enhance its participation in the development of a new 21st century toxicology by banning cosmetics tests on animals. Such a ban would without a doubt raise scientific interest and investment for alternative methods in Brazil, as it did in the EU, and represent a clear signal that it is time to move beyond animal testing.

We recognize that there are not yet validated non-animal replacement methods for certain long-term, systemic toxicity endpoints. However, we are also mindful that these tests are only rarely carried out in the cosmetics sector, and that they would not be required in any case if companies relied on the more than 5,000 existing cosmetic ingredients with established histories of safe use, rather than introducing new and unproven chemical ingredients to their product formulations. The EU has termed this approach “responsible innovation,” and we believe it is a model that would be a good fit for Brazil — a win-win for consumer safety, animal welfare, and unrestricted trade to the EU and other key markets that have prohibited the sale of newly animal-tested cosmetics. Responsible innovation provides for the introduction of new ingredients as soon as their safety can be fully assessed using non-animal testing approaches.

We look forward to the day when humane and human-relevant approaches to toxicity testing will be the global standard. There is still a lot of work to be done, but CONCEA has the opportunity to make a key contribution by prohibiting cosmetics tests on animals — a move that is widely supported by the Brazilian people, by scientists, and by an ever-growing number of progressive countries and key trading partners.

With our best regards,

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