

duction agricultural purposes are exempt from coverage by the AWA. Traditional production agricultural purposes includes use as food and fiber, for improvement of animal nutrition, breeding, management, or production efficiency, or for improvement of the quality of food or fiber.”

The wet lab subjects are agricultural species, and the wet lab itself is on medical management of these species (*i.e.*, rather than using them as models, the wet lab’s goal is to teach the proper methods of anesthetizing a farm animal). Consequently, this usage is ‘agricultural’ and thus exempt from the regulations that would require IACUC approval.

Was it appropriate in previous years, when the wet lab was held at the veterinary school, for the conference not to have been licensed as an exhibitor? In that case, because the activity was not open to the public I think it did not qualify as an exhibit. At a large teaching institution with an associated agricultural or veterinary school, there could be two IACUCs—one for biomedical research, constituted as outlined in the *Guide*, and one for agricultural research, constituted as outlined in the *Ag Guide*. If that was the case, then the latter should have reviewed this protocol.

I believe that the Eastern Veterinary Conference does not require an IACUC but does require an exhibitor’s license, held either by the conference or by the person(s) owning the animals and providing the wet lab. Other licenses may also be necessary; for example, if there is to be use of controlled substances it is important that they be handled by or under the direction of a veterinarian licensed by both the Drug Enforcement Administration (DEA) and the state equivalent. This might be a problem if the planned instructor is from out of state.

The conference would definitely need IACUC approval to conduct wet labs in non-agricultural species such as dogs, cats, and pocket pets. If they plan to conduct future meetings in the same geographic location and would like to expand their wet lab repertoire, it would be possible (but difficult) to form their own IACUC. An easier path would be to try to find an institutional partner (such as the veterinary school) to sponsor the event (off-site at the convention center if necessary) and provide IACUC oversight and review.

1. USDA. Licensing and Registration Under the Animal Welfare Act: Guidelines for Dealers, Exhibitors,

Transporters, and Researchers.
2. USDA APHIS AC. Animal Care Policy #26. Regulation of Agricultural Animals (17 November 1998).

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RESPONSE

Convene a committee

Tamara Goodman-Kuhel, RVT, RLATG

One can assume that Great Eastern ceased sponsoring the Eastern Veterinary Conference. Therefore, the PHS *Policy* would not apply to this situation, because the funds most likely come from registration fees and private donations. One can also assume that the wet lab trainees are veterinary technicians who have graduated from an accredited college.

The AWA does regulate the use of ruminant species for teaching and research, and the use of regulated live animals for teaching beyond a secondary-school level qualifies as teaching or research. Therefore, the conference center must register with the USDA as a ‘research facility’, and the Institutional Official (IO) must appoint an IACUC to oversee the use of regulated species in the wet labs. Ideally, the Great Eastern IACUC could serve as their IACUC of record. If the school would rather avoid this choice because of the scrutiny of the animal rights activists, the IO must appoint another IACUC. The AWA regulations require only three members: a Chair and two additional members. Of the three members, one must be a veterinarian with training or experience in laboratory animal medicine and responsibility for the animal activities. Another member must be unaffiliated with the conference center or organizers of the conference. Henry could serve as the third member and Chair. Educating the IACUC to ensure compliance with AWA regulations could be a challenge, so Henry would be wise to find a well-experienced laboratory animal medicine veterinarian. Using an experienced consultant from the Great Eastern’s IACUC would be beneficial as well.

Once the Committee members have been appointed, they should inspect the areas in which live ruminants will be held or used,

and submit their report to the IO. Henry may encounter great difficulties identifying appropriate and compliant facilities in a conference center. He would have more flexibility with facility requirements if the animals are not housed and major survival surgery is not performed, both of which can be avoided in an anesthesia and analgesia wet lab.

Those conducting the wet lab should identify a Principal Investigator (PI) to complete a study proposal. The IACUC would then need to approve the proposal before animal use and also verify all wet lab staff are appropriately trained. The PI will hopefully be a veterinarian with a DEA license for the anesthetics and analgesics used in the wet lab.

Time may be the greatest hurdle for Henry and the IACUC. This entire process is new for him and the other organizers. He will have greater difficulties if he cannot use Great Eastern’s IACUC or find an experienced veterinarian and consultant. He must also allow time to research his state’s regulations, because there may be specific requirements for this scenario. Beginning the process as soon as possible is critical to compliant implementation.

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RESPONSE

Satellite situation

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Whether the Eastern Veterinary Conference should form an IACUC for the sole purpose of the wet labs or should depend on the Great Eastern IACUC to provide oversight is negotiable. However, the Eastern Veterinary Conference does need an IACUC and subsequent IACUC approval to hold its live animal wet lab at the convention center.

The AWA defines an animal as any live or dead dog, cat, nonhuman primate, guinea pig, hamster, rabbit, or any other warm-blooded animal, which is used, or is intended for use for research, teaching, testing, or exhibition purposes, or as a pet¹. The AWA definition excludes birds; rats of the genus *Rattus* and mice of the genus *Mus* bred for use in research; horses not used for research