



## Florida State University Laboratory Animal Resources

### Applicability of the Animal Welfare Act and PHS Policy to Dead Animals and Shared Tissues

While both the Animal Welfare Act (AWA) and PHS Policy require ACUC review and approval for the use of live vertebrate animals in teaching, research and testing, federal regulations do not apply to dead animals in the research facility setting. Confusion has arisen as the AWA defines an 'animal' as any live or dead warmblooded animal intended for use in research, teaching, testing, or experimentation. However, the definition of a 'research facility' is one that 'uses or intends to use live animals.' In addition, PHS policy would not normally extend to anything other than a live animal with the exception of the intent for ultimate use of any live animal.

Although not required by federal regulations to review and approve the use of animal tissue, Florida State University's Animal Care and Use Committee has determined that it is in the best interest of the University to require review for all activities involving both living and dead vertebrate animals. This is done not only for the purpose of compliance with international (CITES) guidelines, federal guidelines and regulations but also for the reasons of personnel safety, liability and public relations. This policy has been instituted to avoid misunderstandings and possible regulatory compliance problems. The ACUC highly recommends submission of the Animal By-Products Review Form for any research utilizing tissues that are obtained from a freshly euthanized animal.

It is important to recognize that tissue sharing and the use of tissues from slaughterhouses is an effective implementation of Russell and Burch's "3 Rs" (reduction, refinement, replacement). The use of tissue sharing by multiple PIs or obtainment of tissue from animals euthanized for human consumption helps to reduce and replace the overall number of animals used in the course of research. This approach is encouraged where it is scientifically and practically appropriate.

It should be noted that both OLAW and USDA/Animal Care have gone on record that a proposal involving animals to be killed for the purpose of using their tissues, or one that involves project-specific manipulation prior to euthanasia is not exempt from protocol review. Therefore, if an animal is acquired and euthanized specifically for tissue collection, a full animal use description protocol must be submitted and approved by the FSU ACUC. It is also important to note that PHS grant applications which propose the use of either shared tissues or tissues from a slaughterhouse must be clear as to the origin of the tissue. Failure to do so may result in questions by reviewers regarding ACUC approval and contribute to a delay (or worse, dismissal) in the peer review process of the proposal.

The FSU Animal Care and Use Committee has determined that the use of tissues obtained from a slaughterhouse or following euthanasia of animals in other projects requires review and approval through completion of the Animal By-Products Review Form. Individuals obtaining tissues via these methods must also enroll in the FSU [Medical Monitoring Program for Vertebrate Animal Exposure](#).

Points to consider when determining if an Animal By-Products Review Form should be filed for approval versus a full ACUC Animal Use Description Form. An Animal By-Products Form should be filed when:

- The use of tissue does not result in an increase in the number of animals to be used in any otherwise approved ACUC protocol.
- Tissues are obtained following euthanasia of animals in the course of otherwise approved ACUC protocols.
- Tissues are obtained from a slaughterhouse or other non-experimental source.

If the above conditions cannot be met, then a full ACUC Animal Use Description Form should be filed for ACUC review and approval.

Investigators, staff and students should be aware that:

- Animals for tissue collection may not undergo any procedure or manipulation that is not already approved in the ACUC protocol to which the animals have been assigned. NO animal may undergo an unapproved procedure, particularly with regard to rendering the tissue(s) suitable for use by an investigator not on the protocol to which the animal is assigned.
- Live animals may not be transferred to any individual (faculty, staff or student) who does not already have ACUC approval for the animal's use. This includes, but is not limited to, euthanasia for the sole purpose of tissue collection.
- Researchers having an approved ACUC protocol cannot euthanize animals for the sole purpose of providing tissues to another researcher.

Individuals having questions about the above policy should contact the ACUC Secretary at 644-4262 or [ACUCSecretary@mailers.fsu.edu](mailto:ACUCSecretary@mailers.fsu.edu) for further guidance.