

SEE Questionnaire

Marketplace Ethics Q3



Does your company participate, directly or indirectly, in animal testing?

Question developed with the [British Union for the Abolition for Vivisection](#)

Rationale for question

Animal testing is a highly charged topic. Historically, debate about animal testing has tended to concentrate on cosmetics and toiletries. For this reason, many companies in this sector have developed more advanced policies than are usually found in other business sectors. In the EU, a ban on animal testing and the marketing of finished cosmetic products tested on animals has been in place since 2004. A ban on testing ingredients, or combinations of ingredients, has been in place since March 2009 (except for some specific aspects of repeated-dose toxicity which will come into effect in 2013). However, animal testing regularly occurs with ingredients and materials found in many other products such as paints, household goods (washing-up liquid, bathroom cleaners, floor polish, air fresheners etc), pesticides, packaging materials and even foodstuffs. As a result, animal testing is an issue that potentially is of concern to every business and all companies are in a position to actively discourage unnecessary testing.

There is extensive legislation and regulation of what should be tested and why tests should be carried out, though the level of control will vary between jurisdictions. The European Union regulation concerning the Registration, Evaluation, Authorisation and Restriction of Chemicals (REACH) came into force in June 2007.

It replaced a number of European Directives and regulations with a single system. However, as there are more than 30,000 substances trading across the European Market in quantities of one tonne or more per year, testing the safety of these substances is neither simple nor quick. One aim of the legislation is to promote the use of alternative methods to assess the safety of chemicals and thereby reduce the amount overall. Nonetheless, animal testing is still required in order to meet certain human or environmental regulatory safety requirements. A great deal of testing therefore still occurs.

A company is not obliged to use ingredients, materials or products which may require new animal testing. In many cases, it can use existing ingredients (that have a history of safe use) or those for which there are no regulatory demands, such as certain natural products. It is important to note, however, that a great deal of animal testing is carried out not because regulation demands it, but because manufacturers incorrectly assume or perceive that it is required to demonstrate the safety of their products.

The only internationally recognised schemes that enable consumers to easily identify and purchase products that have not been tested on animals are the Humane Cosmetics Standard (HCS) for cosmetics and toiletries and the Humane Household Products Standard (HHPS) for cleaning products. These use a 'Fixed Cut Off Date' (FCOD) (see 'Definitions' below) as a way of continuously reducing the amount of animal testing whilst also recognising that it has happened in the past. Approval under the HCS/HHPS is symbolised globally by the 'Leaping Bunny' logo, which compliant companies can choose to display on their packaging, website and publicity materials. The [Go Cruelty Free](#) website lists all companies approved worldwide.

Defining terms

'Direct participation' refers to a company that carries out, pays for or otherwise commissions any animal testing.

'Indirect participation' is more ambiguous and pervasive and so can be difficult to identify. For the purposes of this question, a company 'indirectly participates' in animal testing when it:

1. sources ingredients or materials for their own products and services that have been tested on animals by others e.g. using a 'rolling rule';
2. invests in a company that directly participates in animal testing; or
3. provides products or services to a company that directly participates in animal testing.

With a 'Fixed Cut-Off Date' (FCOD), a company commits to not using any ingredients, materials, formulations or products that have been animal tested after a fixed date (e.g. 2000). The company products and their ingredients may change but the fixed date may not. This rule draws a clear line under animal testing and sends a very clear message that a company is not prepared to benefit from the suffering of animals. The long-term effect is a reduction in the overall amount of animal testing as more and more companies make a commitment.

With a 'rolling rule', a company delays using ingredients, materials, formulations or products that have been animal tested within a specific period e.g. the last five years. An animal-tested ingredient may be excluded one year (because it falls within the 'last five years' bracket) but included the following year (when it falls outside this bracket) even though it is still the same animal-tested ingredient. There are very strong criticisms to be made of a rolling rule. A company may claim 'not to test on animals' while it is still using ingredients that have been animal tested elsewhere by others. Using this rule, there is no drive to reduce the amount of animal testing done. It does not encourage the development of alternative methods of non-animal testing. Supporters of the rolling rule say it allows for innovation and improvements in performance of products.

Primary and Secondary answer requirements**ANSWERING YES**

Companies that DIRECTLY PARTICIPATE must:

1. state their business sector;
2. indicate what animal testing legislation and regulation is applicable;
3. describe its practices and policies regarding animal testing;
4. describe how their practices are monitored and evaluated: and
5. say whether it is limited to the mandated requirement.

Companies that DIRECTLY PARTICIPATE may:

1. indicate what actions are being taken to replace animal tests with alternative methods;
2. state if any targets are in place to reduce the number of animals used; and
3. indicate where they publish their practices and policies, targets, data and other relevant information (including hyperlinks).

Companies that INDIRECTLY PARTICIPATE must:

1. state their business sector; and
2. describe their involvement with or connection to animal testing.

Companies that INDIRECTLY PARTICIPATE may:

1. describe any policies they have regarding animal testing; and
2. state any future intentions regarding this issue.

ANSWERING NO

Companies must:

1. state their business sector.

Companies may:

1. describe any policies they have regarding animal testing; and
2. explain how they have investigated whether they are indirectly participating in animal testing.

ANSWERING DON'T KNOW

Companies must:

1. demonstrate that they are making an effort to investigate whether they are indirectly participating in animal testing, as defined above.

Companies may:

1. provide any relevant information they have;
2. explain why they have been unable to gather further information; and
3. describe their future intentions regarding this issue.

NOT APPLICABLE is not a permissible answer to this question.

NO ANSWER YET is only permissible under extraordinary circumstances and then for only a limited period.