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The Council on Governmental Relations (COGR) is an association of over 190 leading research universities and affiliated academic medical centers and independent research institutes. COGR concerns itself with the impact of federal regulations, policies, and practices on the performance of research conducted at its member institutions. We appreciate the opportunity to comment on AAALAC International's proposed revision of the Position Statement on the "Definition of Laboratory Animals."

We believe the language "any other animal designated by applicable legislation" included in both the existing and proposed statement is more than adequate in ensuring that differences in international law and therefore covered species are addressed. The current definition also applies to research, testing, or teaching. We are unclear on what is gained from a change to the current position statement. We also see no need to explicitly include cephalopods which are not subject to U.S. law or regulation and may result in confusion about what is or is not subject to AAALAC oversight. If the intent is to bring cephalopods under the accreditation process domestically, AAALAC should be specific in stating that requirement and allow the community to comment on such a proposed change. We assume that this is not the intent and recommend that if the Position Statement on the "Definition of Laboratory Animals" is revised, that the revised definition read as follows:

AAALAC International defines "animal" as any live animal designated by applicable legislation used or intended for use in basic and applied scientific investigation (e.g., traditional biomedical, agricultural, wildlife, aquatic research, etc.), testing, the production of biological materials, and educational activities.

Alternatively, the definition could mention just vertebrate animals:

AAALAC International defines "animal" as any live vertebrate animal and any other animal designated by applicable legislation used or intended for use in basic and applied scientific investigation (e.g., traditional biomedical, agricultural, wildlife, aquatic research, etc.), testing, the production of biological materials, and educational activities.

Thank you again for this opportunity to comment.