



# Policy on Animal Testing

## 1. Background

At RB, the safety of our consumers is our number one priority. We believe that product safety is fundamental to the integrity of our global brands and business, to sound and ethical business practices, and to our responsibility as a producer of quality consumer products. We are therefore committed to supplying safe products to our consumers and to understanding all of the issues involving safety associated with our products. This policy outlines our approach in using animal tests as part of this process.

## 2. Policy

RB will not conduct or commission animal tests on ingredients or raw materials.

RB will not conduct or commission animal tests on finished products, apart from where:

- there is a legislative requirement for the test;
- the safety of the product cannot be assured through existing information or alternative methods (i.e. where no approved or accepted alternative testing procedure exists);
- a limited amount of testing on animals is required to establish the mechanism of action or safety prior to testing in humans.

Where possible, we will actively seek out and support the development of validated alternatives to animal testing. Where we are legally bound by regulatory authorities to conduct animal testing we will aim to minimise the number of animals used and we will also write to the authority outlining our Policy and strong preference to conduct non-animal testing.

RB has a pest control business, involving rodents, which plays a key role in public health management. As part of RB's pest control business, the use of tests on rodents may be required in order to confirm the efficacy of products.

## 3. Implementation

For the purposes of this Policy, animals are defined as all living vertebrates (other than man) and any living cephalopod. Fish and amphibia are in scope once they can feed independently and cephalopods at the point when they hatch.

Regulatory authorities may require animal test data for a wide range of product types including medicines, medical devices and pesticides. In such circumstances, where possible existing animal data are used to bridge to new formulations thereby minimising the further use of animals. In these cases where a legal imperative requires animal testing, we ensure that we use accredited and certified third party laboratories. Where there is no validated alternative test and an animal test may be required, this requirement is reviewed by our internal safety committee following a global standard operating procedure. Each instance of animal testing must be approved by RB's Global Director Consumer Safety prior to the test occurring.

As part of our commitment to minimising animal testing, we will continue to work with industry associations and government bodies to apply the industry's '3Rs' (Reduce, Refine & Replace) best practice. Through these collaborations in-vitro test methods are developed, validated and proposals are made to change regulations in various countries to enable these alternative methods to be used.



We will apply the 3Rs by using the following sources to minimise animal testing;

- consumer product use history and pharmacovigilance data
- scientific literature and available databases
- existing supplier data
- non-animal validated (in-vitro) methods
- structure activity relationship modelling
- clinical testing, human volunteer evaluations
- bridging existing animal data to new formulations (using existing data on similar formulations and products)
- analytical chemistry methods

#### 4. Responsibilities

RB's Executive Committee is responsible for distributing and monitoring this policy. All RB employees are responsible for applying it throughout their supply chain and ensuring suppliers, contractors and subcontractors are aware of this policy.

Queries regarding the implementation of this policy should be directed to [sustainability@rb.com](mailto:sustainability@rb.com)

**Effective May 2017. Policy Owner: EVP Category Development Organisation**

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## Appendices

### Pest Control Addendum

As outlined above, insects are outside of the scope of RB's policy on animal testing. This addendum refers specifically to testing on rodents for rodent-control products.

The three areas of pest control for which RB develops and markets products for are insecticides, rodenticides and insect repellents. Testing in the pest control category includes toxicological tests (which are required for registration by many government authorities) and performance testing (or efficacy tests) which are predominantly conducted on insects (such as mosquitoes and cockroaches) and rodents (rats and mice) for matters of public health concern.

For our pest control business we are committed to developing fast acting, effective and humane product solutions. Subject to approval from RB's Global Director Consumer Safety, performance testing in animals beyond the scope of registration and product safety may be permitted for:

- Research studies related to development of products with a more humane mode of action;
- New product feasibility and proof of new claims where only *in vivo* testing can provide the required efficacy data;
- Defense of authority or legal challenges where no other data will effectively support the case.

Performance testing will follow or be based on methods or protocols obtained from regulatory authorities or published in the peer-reviewed scientific literature where available. All performance testing will be conducted in controlled environments and by independent research institutions or professionally qualified independent contractors or consultants.

## RB Affiliations:

- **EPAA: The European Partnership for Alternative Approaches to Animal Testing** ([www.epaa.eu.com](http://www.epaa.eu.com)) RB is a member of The European Partnership for Alternative Approaches to Animal Testing (EPAA), a voluntary collaboration between the European Commission, European trade associations, and companies from seven industry sectors. The partners are committed to pooling knowledge and resources to accelerate the development, validation and acceptance of alternative approaches to further the replacement, reduction and refinement (3Rs) of animal use in regulatory testing.
- **FRAME: Fund for the Replacement of Animals in Medical Experiments** ([www.frame.org.uk](http://www.frame.org.uk)) FRAME is dedicated to the development of new and valid methods that will replace the need for laboratory animals in medical and scientific research, education, and testing. RB supports FRAME with an annual donation to support its activities.
- RB supports and follows the activities of:
  - **ICCVAM: Interagency Coordinating Committee on the Validation of Alternative Methods (ICCVAM)** ([www.iccvam.niehs.nih.gov](http://www.iccvam.niehs.nih.gov))
  - **ECVAM: European Centre for the Validation of Alternative Methods** ([www.ecvam.jrc.it](http://www.ecvam.jrc.it))
  - **IVTS: In vitro toxicology society** <http://www.ivts.org.uk/site/>

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