

Leicester
City Council

WARDS AFFECTED: ALL

REOPPS Scrutiny
Cabinet

16 March 2006
3 April 2006

**Developing an Animal Friendly Purchasing Policy and Practices at Leicester
City Council**

Report of the Town Clerk

1 Purpose of Report

- 1.1 This report introduces a report from the Member led Animal Friendly Working Group which invites the Cabinet to agree a direction of travel for a new policy framework to help Leicester City Council become a more animal friendly organisation.

2 Summary

- 2.1 The attached report is the culmination of six months of background work and research by the Councillor led Animal Friendly Working Group established by the Leader of the Council at Cabinet during the summer of 2005. The Group comprises:

- Councillor Sandringham (Chair)
- Councillor Grant
- Councillor Mugglestone
- Andy Keeling, Service Director Resources, R & C
- Geoff Organ, Resources
- Richard Downing, R&C

Advice has been co-ordinated by the Service Director (R & C Resources).

- 2.2 Leicester is the first Council to be so actively considering and developing responses to this issue. Already another Council, Sutton LBC has asked for our support to help them pursue this in a similar way. The Working Group report is not an officer report and reflects in particular points of view on the subject. Counter-arguments are difficult to find in published literature.
- 2.3 The report suggests a new policy statement, worded to reflect both the passion the Leader expressed on this issue and the pragmatic issues that the Council has to deliver to start the journey that will enable Leicester City Council to adopt a more principled position in relation to animal cruelty. It contains a proposed action plan to progress the focus of the work and officers confirm that this is realistic, should the Cabinet choose to adopt it.

3 Recommendations

The Working Group recommends:

1. That the direction of travel for a new policy set out in section 3 in the report be agreed.
2. That the action plan set out in section 4 be agreed.
3. That a piece of work be agreed to create dummy specifications for entering into a contract to purchase some goods and entering into a contract to procure a service to enable the Council to take stock of the issues presented and determine safe and legal ways to continue to pursue this policy direction in a meaningful way.
4. That the Working Group be asked to continue to lead this work under mandate from Cabinet.

4 Financial & Legal Implications

4.1 *Financial Implications*

- 4.1.1 Switching to more animal friendly products/services may result in additional costs either through increased prices or greater volume because the product/service is less effective. It is not possible to quantify this or know whether or not this will be the case until the review process on each product is completed as described in the report.

Martin Judson, Head of Finance, Regeneration and Culture

4.2 *Legal Implications*

- 4.2.1 Advice has been given to the effect that the Council can have such an Animal Friendly Policy and that there should not be any limit on the Council buying what it likes. However in saying that there are two risks that the Council is then open to:

- 4.2.1.1 The risk of non compliance with the Local Government Act 1988 which is reproduced below at 4.2.2 and,
- 4.2.1.2 The risk of creating a discriminatory Specification against Member States by specifying certain standards so that the products cannot be tested on animals or only tested in a particular way. In all other respects the products available from Suppliers represent Value for Money and are the product of a perfectly lawful activity.
- 4.2.2. "17-(1) LGA 1988 states that it is the duty of every public authority to which this section applies, in exercising, in relation to its public supply or works contracts, any proposed or any subsisting such contract, as the case may be, any function regulated by this section to exercise that function without reference to matters which are non-commercial matters for the purposes of this section.....

(5) The following matters are non-commercial matters as regards the public supply or works contracts of a public authority, any proposed or any subsisting such contract, as the case may be, that is to say:

- (f) any political, industrial or sectarian affiliations or interests of contractors or their directors, partners or employees;
- (g) financial support or lack of financial support by contractors for any institution to or from which the authority gives or withholds support;"

4.2.3 If we are exercising a function as described in section 17 LGA 1988 which is either:

- Approving contractor to go on a Select List or
- Deciding who to invite to tender or
- Accepting tenders or
- Awarding the contract or
- Approving use of subcontractors

Then in doing so the Council cannot take into account points (f) and (g) above. If you therefore are aware by virtue of having included the question within a PQQ for example, that the proposed contractor has links with an Animal testing company then that does not mean you are able to exclude them from the tender process or choose not to contract with them or their sub contractors- that would be in breach of Section 17,LGA 1988. Great care needs to be taken that decisions are not seen as political affiliation.

4.3 A due diligence exercise should be undertaken of those existing contracts such as the Building Cleaning contract with ISS Facility Services Limited and the Waste Management PFI Contract with Biffa Leicester to see how they will be affected by any such policy.

4.4 The policy work would benefit from including an analysis of the environmental and social benefits of adopting such a policy and if this can be demonstrated then there will be the possibility of using similar justifications for the policy as in the Eco Purchasing policy and others.

Rebecca Jenkyn, Senior Solicitor, Commercial and General

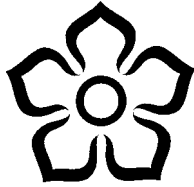
5 Report Author

Tom Stephenson, Corporate Director Resources Department, Ext. 6310

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DECISION STATUS

Key Decision	No
Reason	N/A
Appeared in Forward Plan	No
Executive or Council Decision	Executive (Cabinet)



Leicester
City Council

WARDS AFFECTED: All

**REOPPS Scrutiny
Cabinet**

**16 March 2006
3 April 2006**

**Developing an Animal Friendly Purchasing Policy and Practices at Leicester
City Council**

Report of the Animal Friendly Working Group

Report

1. Background

- 1.1 At Cabinet in June 2005 the Leader of the Council announced that he was setting up a Member led Animal Friendly Working Group to look at how Leicester City Council could help prevent cruelty to animals through experiments conducted on animals. At that meeting the Leader said:

"....in the 21st century, in a world as rich as ours there is no excuse for the continual experimentation on animals to develop household and beauty products. In the European Union alone, an animal dies in a laboratory every three seconds and hundreds of thousands of animals are kept alive in massive pain and appalling conditions each year because of these experiments. Animals are even experimented on in the development and production of pet foods.... In future we (Leicester City Council) will no longer, either by act or omission, be considered even remotely, a part of these inhumane practices supposedly done on our behalf."

- 1.2 This Working Group chaired by Councillor Carlym Sandringham set itself terms of reference giving a framework and focus to its work. The Terms of Reference are available in the Members library and cover the aims of the group, its membership, scope and focus. The Working Group still has no formal Labour Member. The Animal Friendly Working Group recognised that animal welfare and cruelty free in the context of the Leader's declaration is an issue that may have far reaching implications (see section 2, 3 and 4). In order to ensure its effectiveness the Working Group has focused on particular products and practices:

- Cleaning products, cosmetics and toiletries e.g. soaps and bleach
- Office Supplies e.g. adhesives, correction fluid, ink cartridges etc.
- Uniforms & Equipment e.g. clothes dyes, leather items.

- 1.3 In addition to focusing its work to ensure a deliverable work programme the Working Group recognises that Leicester City Council plays a vital community leadership role in the City and that as such, it has an obligation to make efforts to promote and campaign on these issues and products to the community at large. The Animal Friendly Working Group has been examining practices within the

Council, which if Cabinet agree will lead to some of our current procurement practices being challenged. The Group has also been interested in developing the Council's community leadership role to promote a better understanding and acceptance of the importance of animal welfare.

2. The Context of the Working Group

- 2.1 The Working Group have looked at this issue from the starting point provided by the Leader of the Council in his Cabinet announcement last summer. The Leaders statements support the commonly held view that it is wrong to inflict unnecessary suffering on animals. The reason this is a widely held belief (see the research findings in appendix one) is that we acknowledge that animals are sentient beings that feel distress, pain, suffering and sensation, and that it is wrong to inflict distress, pain or suffering on animals if it is unnecessary.
- 2.2 From its limited research the Working Group believes the Council could use its considerable purchasing power to positively impact on this issue in ways that are both safe and cost effective. The working group also believes that we start this process by questioning the status quo and making animal welfare part of our organisational thinking.
- 2.3 Animal experimentation is considered by some people to be towards the morally justifiable end of animal cruelty. The argument is that if animal experimentation can prevent future human suffering and death then it is a worthwhile pursuit particularly in the testing and use of human life saving procedures and drugs. The Working Group, after carrying out it's own research considers the presentation of this as a human vs. animal choice is erroneous and open to question. However, the Working Group also want to keep the Council in the safe moral territory of the three areas described in 1.2 above.
- 2.4 Almost 3 million experimental procedures are carried out on living animals in Great Britain on an annual basis. On a routine basis animals are electrocuted, deprived of food and water, surgically mutilated (more often without anaesthetic), exposed to radiation, burned and scalded, deliberately wounded, exposed to nerve gas, infected with diseases, poisoned with products as varied as household cleaners, weed killers or drugs. All kinds of animals are used, including dogs, cats, horses, monkeys, donkeys, pigs, sheep, hamsters, mice, rats and frogs. In 2003 in Great Britain the total number of animals used in this way was 2.7 million including 5,000 dogs, 17,000 rabbits and 120,000 birds. In the 21st century the number of experimental procedures has risen year on year, between 2001 to 2003, this rise was over 160 000 more procedures (all figures from the Home Office, Statistics of Scientific Procedures on Living Animals Great Britain 2003).
- 2.5 What do people get as a result of all this suffering, the reliability of using animals to test and retest different chemicals, products and their applications is increasingly questioned and labelled as bad science by a growing body of experts and scientists. The main reason that experiments on animals are being increasingly challenged as unreliable is because they tell us about animals, not people. For example, aspirin causes birth defects in rats and mice, but not in humans, while penicillin, which is a lifesaver in humans, is poisonous to guinea pigs (Sharpe R, 1988, The cruel Deception, Thorson Publishing Group). A senior executive of the leading drug company GlaxoSmithKline was recently quoted on the BBC as saying that more than 90% of drugs only work on 30-50% of people

(<http://news.bbc.co.uk/2/hi/health/3299945.stm>). All of these drugs have been passed as 'safe' and 'effective' by animal tests (BUAV, fact sheet one, updated September 2004).

- 2.5 Some tests are designed in such a way that the results are clearly dubious, long before the test is carried out such as when animals in toxicity testing (used for household products and cosmetics) are force-fed unrealistically high volumes of a substance. For example, in one poisoning test, rats were dosed with over 5,900 times the human consumption rate of hydrogen peroxide to test teeth whitener. The rats experienced breathing difficulties, inability to turn over when placed on their backs, partial eye closure, blood in their urine, and incontinence. Three of the 22 animals died within 48 hours from gastric haemorrhaging (DV Cherry et al. 1993, Acute Toxicology effects of ingested tooth whiteners in female rats. J Dent Res 72:1298 – 1303).
- 2.6 The BUAV claim that animals are usually selected on the grounds of convenience and cost, the vast majority of animals used being mice and rats, and not on the basis of their 'human similarities'.
- 2.7 Animal experiments have to be licensed under the Animals (Scientific Procedures) Act 1986 and they are referred to as "regulated procedures" and by definition may cause an animal "pain, suffering, distress or lasting harm". Over 60% of all procedures are regularly carried out without any anaesthetic (Home Office, Statistics of Scientific Procedures on Living Animals Great Britain, 2003. The Stationary Office). In reality the legislation is there to protect the researchers because it allows them to inflict pain and suffering on animals that would be considered cruel and prosecutionable outside the laboratory walls. The animals involved will either die as a result of the experiment or be deliberately killed afterwards, often for post-mortem examination.
- 2.8 As well as enduring painful experiments, animals can also suffer from their everyday existence in the unnatural conditions and surroundings of the laboratory where there may often be no natural light, confined space and limited social and/or environmental stimuli. All of these things cause the animal stress, they too can experience fear, boredom, depression and psychological stress and the totality of suffering can be immeasurable. Although animals differ from humans in important ways, there are also similarities. They can clearly feel physical pain and, in varying capacities, also experience fear, stress, pleasure and affection.
- 2.9 There are a huge range of sophisticated, advanced non-animal research techniques available today such as computer simulations, cell, tissue or organ cultures, epidemiology, QSARs (brain imaging) that utilise human biological material or data so that results are directly applicable to the human situation. BUAV research has found that these techniques are not only more humane but also often cheaper and quicker to perform as well as offering more relevant and reliable results (BUAV Fact sheet A3, August 2004).
- 2.9 The Leader focused on the animal cruelty described above and declared that the Council "will not by act or omission" participate in this in the future. The Working Group has had to focus even further as we make hundreds of purchasing decisions on a daily basis that would fall within the terms set out by the Leader. The research of the Working Group has led its Members to believe that we can do something about this if we choose to and that the sheer enormity of the task should not put us off but rather we should deal with it in manageable chunks.

3. Leicester City Council's current policy framework

- 3.1 At present the Council has no separate and specific policy regarding its use of animals, animal products or products that involve animal experimentation in the various and multi supply chains. The Leicester City Council, Guide to Environment Friendly Purchasing references animal welfare as follows:
- *“The City Council will not buy products that have been tested on animals where alternatives are available that are of an equal quality and are comparable in price.*
 - *The City Council will consider Animal Welfare when making food purchases and, where it is available and the price is competitive, seek to purchase food that guarantees the welfare of the animals in the way they are kept, transported and slaughtered. Cultural and religious needs of society will also be considered.*
 - *The City Council will work internally and externally with its suppliers and contractors to increase awareness of the ethical issues involved in purchasing decisions.”*
- 3.2 The Animal Friendly Working Group has been testing out whether the Council has been working within the parameters of these statements. Unfortunately no corporate or departmental procurement information has been collected by the Council to enable monitoring of any of these provisions. This in itself demonstrates that the Council does not monitor its purchasing in anyway with regard to these conventions. However, not monitoring activity does not prove that an activity is or is not taking place. To check this, the Working Group selected a couple of products that the Council use a lot of in a product market in which we know from other research whether alternatives of comparable quality and price exist (dispensing soap and some work wear clothing). Our findings in this regard is that the Council makes no effort at all to either source or buy goods that have not involved animal cruelty.
- 3.3 Even if the Council were to attempt to work within these parameters, the reality is it would be virtually impossible. All but a handful of products are made from basic ingredients, usually manufactured chemical substances or processed substances derived from natural sources. Most of these manufactured chemical substances have been tested on animals at some point in their existence and many substances of natural origin will also have been tested. Sometimes this testing will have been conducted for regulatory purposes (i.e. because the law demands it) but more often because a manufacturer has considered that animal testing will supply information that will help to demonstrate that the company has taken all reasonable steps to ensure the safety of their product. The basic chemical ingredients of most products are therefore likely to have been tested at some point.
- 3.4 Many ingredients of cleaning and other products have been in use for decades, however, and may have been tested many years ago. Many cleaning products also contain ingredients which are used in other products or processes and which may have been tested (perhaps due to a legal requirement) for use in those other ways. Finally, *new* “products” may be simply reformulations of old products or new combinations of existing ingredients. Depending on a number of considerations, (the nature of the product and its ingredients, existing information on risk, legal requirements etc) manufacturers may test these new formulations or mixtures on animals but will not always do so. For reasons of commercial confidentiality, among others, information on the testing of substances and products may,

however, never enter the public domain or, if it does so, it may be very difficult to access.

- 3.5 When companies do provide information on their animal testing policies, their claims must be examined closely. If they test only ingredients, they may truthfully claim that their *products* are not tested while in reality they conduct animal tests. Secondly, they may claim that they do not test on animals because they either commission other companies to test for them or because their ingredient suppliers perform the testing. This means that although their products and/or their ingredients may be extensively tested on animals, technically they can claim their *products* are not tested on animals.
- 3.6 For all these reasons, the objective of buying products that have *never* been tested on animals (either as a finished product or ingredients) is very difficult to meet: firstly because so many substances have been animal tested at some point and secondly because establishing whether a product or its ingredients have ever been tested on animals can be time-consuming and very difficult.
- 3.7 The recommendation of the Working Group to put right this situation is for the Council to adopt the following policy statement and monitoring arrangements to strengthen both our performance and our resolve to not simply accept the status quo.

“The City Council will ensure that its purchasing precludes any future animal testing by suppliers and therefore contributes to the end of animal testing”.

- 3.8 At first sight this might appear to be weakening our position on animal testing but in reality it provides a practical framework for the Council to work from, which will produce better results than the current policy. It will mean that products tested on animals or containing ingredients tested on animals *may* be used but it ensures that suppliers know that any further involvement in animal testing will result in the withdrawal of custom. This policy is concerned with producing practical results rather than establishing a rigid principle; because it is aimed exclusively at preventing future testing it will be more workable and achievable, while ensuring that the Council is honouring the spirit of the existing policy, which is to ensure that it is not supporting animal suffering.

Establishing Purchasing Standards

- 3.9 The BUAV’s Humane Products Standard and Humane Cosmetics Standard enshrine the objective of preventing animal suffering. These standards are applied to companies who sell or manufacture cosmetics, toiletries and cleaning products and are thus aimed at producers rather than purchasers. The BUAV also approves companies as a whole, rather than individual products; the Council’s purchasing policy as stated is concerned with individual products. Nevertheless, the criteria set by the standards provide the basis for a meaningful and effective definition of “not animal tested” and we recommend that they form the basis of the Council’s policy and that these are tested by the Corporate Procurement Team. An abbreviated version of the BUAV criteria is found in Appendix 2, and their list of definitions in Appendix 3.
- 3.10 Establishing that products are compliant with the criteria set by the standards can be challenging. Nevertheless, large companies with many suppliers such as the Body Shop (for cosmetics and toiletries) and the Co-op and formerly Safeway (for cosmetics, toiletries and household products) are able to meet these standards. This illustrates that establishing an effective policy is achievable. The BUAV’s

criteria include both products and ingredients, as new ingredients are far more likely to be tested than new products.

- 3.11 The basic requirement of both standards is that companies adopt a “fixed cut-off date” (FCOD). This means that they confirm that they have not conducted or commissioned testing of products after this date and that they will not use any ingredients that have been animal tested after this date. The date may be set at any time in the past but is never set in the future and it cannot be subsequently changed. This means that neither the company nor anyone who supplies ingredients to it will ever be able to test again if they wish to retain approval.
- 3.12 In contrast to the FCOD, some manufacturers employ a “rolling rule”, ie that they will not use any ingredient tested within, for instance, the last five years. Clearly, however, this rule does not preclude future animal testing as an ingredient may be tested today or tomorrow and then be used in five years’ time.
- 3.13 A decision is made by the company on the basis of examining their own supply chain and considering the implications of different dates. Generally, more recent dates are easier for companies to comply with as it allows them a greater range of possible ingredients but this varies considerably. Consequently, FCODs vary from one company to another.
- 3.14 If the Council wishes to approve individual products rather than a company’s range of products as a whole, there is scope for even more variation and the Working Group recommends a similarly flexible approach. If the objective is to prevent future testing, nothing is gained by fixing a specific date.
- 3.15 The BUAV standards recognise that some substances used in cosmetics, toiletries and household products are used in other products and processes. For the purposes of the standards (which are confined to certain kinds of products), if those substances have been tested for those other reasons, approval may still be given, so long as certain criteria are met (see Appendix 2).
- 3.16 The BUAV expects companies approved by its standards to actively ensure that they are meeting the set criteria. Approved companies must both monitor the compliance of their suppliers and be willing to submit to external audit to ensure that both they and their suppliers are compliant with the standards. We will need to work in partnership with BUAV to consider how we could effectively implement and audit such policies.

4 The Product Descriptions

- 4.1 It is important that the definitions we are working to are clear and unambiguous and for each of the product descriptions given in paragraph 1.2 the following should apply:

- *Animal friendly cleaning, cosmetics, toiletries & office supplies*

In our purchasing chosen product manufacturers must:

- i) not conduct or commission any animal tests

- ii) not use in its products ingredients that have been animal tested by any of its suppliers.
- iii) must monitor its product/ingredient suppliers and must allow the system it uses to monitor its suppliers to be open to an independent audit.

- Uniforms & Equipment

In our purchasing chosen product manufacturers must:

- i) not conduct or commission any animal tests
- ii) not use in its products ingredients that have been animal tested by any of its suppliers.
- iii) must monitor its product/ingredient suppliers and must allow the system it uses to monitor its suppliers to be open to an independent audit.

5 The Action Plan

5.1 The Working Group members know that this is a complex area and that activities such as the researching of supply chains can be time consuming. They also know from their own research on the subject that manufacturers and suppliers can and do make unsupported claims regarding the status of their products within this area of policy. This is why the Working Group has opted for a focused but thorough approach to the issue. The Key Actions it is recommending to Cabinet are outlined below:

Key Action	Lead Person	Resource Issues	Deadline
Suppliers /& Products – LCC to draw up and provide to BUAV a schematic of the suppliers they work with and the types of products they use. This will help inform further discussions about the issues that need to be dealt with by LCC in terms of communication with suppliers and selecting initial product categories.	RD	RD	End of Feb 06
The starting point will be the different suppliers of and types of soaps and soap dispensers used by Leics City Council throughout all of its buildings, to establish whether all types of soaps and soap dispensers used therein conform to BUAV standards. Get the Corporate Procurement Team to test this approach on Soap.	GO		First week of March 2006
To obtain a list of all LCC buildings where soaps and soap dispensers are supplied by ISS. To use that list to establish whether all types of soaps and soap dispensers used therein conform to the new policy and standards set out in this report.	RD	RD	End of March 06
Successful audit of all suppliers of cleaning products and cosmetics and office supplies (e.g. adhesives, correction fluid, ink cartridges etc). BUAV to support LCC with information and materials on the cosmetics and products campaigns and animal testing relating to these two particular industries.	RD	RD/GO	End of Dec 06

Successful audit of all suppliers of uniforms and equipment ensuring BUAV approval	RD	RD/GO	End of Dec 06
Research whole life costs of applicable products to be carried out to ensure a full analysis to be regarded.	GO	RD	Ongoing from April 06
To draw up a Communications Strategy, to encompass the following as part of a LCC internal campaign (Winning hearts and minds) as well as external publicity. BUAV to support LCC with information and materials and continue to share media statements where appropriate	MB	Corp Comms. Unit/RD	End of March 06
To include proposed new "animal friendly" policies and procedures as part of induction process	IMcB	RD	To be fully incorporated by April 2006
Prepare a subsequent report for Cabinet for the formal adoption of this policy, describing its impact from the audit and testing work carried out. In the event of suppliers not able / willing to conform, need to find alternative providers. If agreed by Cabinet a monitoring system needs to be introduced.	AK	GO/RD	End of March 07

GO = Geoff Organ
RD = Richard Downing
AK = Andy Keeling
MB = Mark Bentley
IMcB = Ian McBride

6. Resourcing the Action Plan

- 6.1 This project at this stage is budget neutral. However officer time will be required for the above actions. At present a Project manager from Regeneration and Culture has been assigned; Time will also need to be committed in the work-plan of the Corporate Procurement Team. The BUAV will also support the Council with some research and auditing work.

7 Other Implications

OTHER IMPLICATIONS	YES/NO	PARAGRAPH REFERENCES WITHIN SUPPORTING PAPERS
Equal Opportunities	No	
Policy	Yes	Corporate Procurement Strategy Environmental Policy / EMAS
Sustainable and Environmental	Yes	Adoption of this policy will have environmental benefits as well.
Crime and Disorder	No	
Human Rights Act	No	
Older People on Low Income	No	

8 Risk Assessment Matrix

	Risk	Likelihood L/M/H	Severity Impact L/M/H	Control Actions (if necessary/or appropriate)
1	Insufficient supply of goods.	L	H	Firm contracts with new and existing suppliers. Robust research to ensure capability of suppliers to meet projected demands.
2	Unable to source suitable replacement products for industrial use.	M	H	research to confirm suitability of proposed replacements and partnership working with appropriate interest groups to ensure relevance and appropriateness of products.
3	Inferior product quality	L	M	As above with specific regard to testing for quality in advance to negotiating final contracts and inserting appropriate clauses if products deemed unacceptable.
4	Products could be dangerous	L	H	As above need for robust testing [non animal testing]
5	Organisational apathy to this project	H	M	Strong visible leadership, achievable outcomes, superior product quality and organisational savings achieved. All of these plus a robust communication strategy will help to overcome organisational apathy.
6	Public apathy or disagreement (especially if additional costs are incurred) to this project.	H	L	As above but also key messages showing LCC as community leader and pioneering the way for other Local Authorities.

L - Low
M - Medium
H - High

L - Low
M - Medium
H - High

9 Background Papers – Local Government Act 1972

Transcript of the Leaders Announcements at Cabinet June 2005
Animal Friendly Working Group Terms of Reference – August 2005

10 Consultations

Consultee	Date Consulted
CS&NR Head of Finance Geoff Organ	December 2005 October/December/January 2005
Rebecca Jenkyns Leader of the Council	October and December 2005 July/August and December 2005
ESPO Leicester Animal Aid	October/November 2005 October to December 2005
BUAV Member Working Group	Throughout Throughout

BUAV Household Survey 2004

Appendix One

BUAV commissioned ORB (an independent research company) to conduct a survey into the public's view on animal testing regarding household cleaning products.

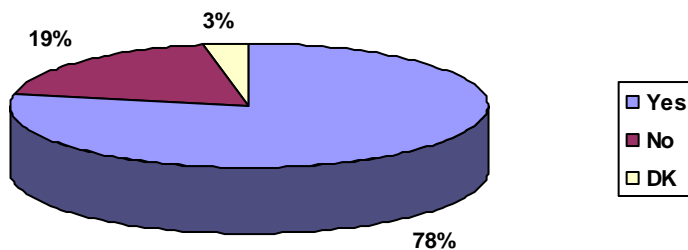
The research was conducted from June 4th-6th 2004 as an omnibus survey.

A nationally representative sample of 1004 adults were interviewed by telephone. The results have been weighted to match the UK population.

The margin of error on a sample of 1004 is +/- 3%.

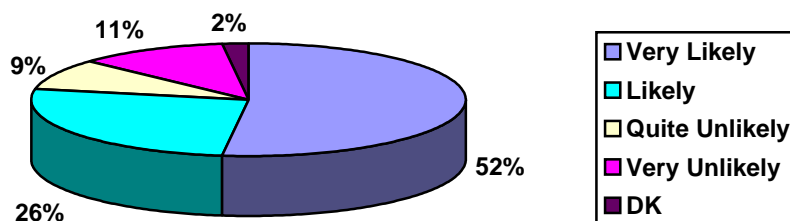
Findings

Q1. It is still legal in the UK to test household cleaning products like washing up liquid or carpet shampoo on animals. Would you support a ban on such animal testing?



Over three quarters of the British public would support a ban on the testing of household cleaning products on animals. Women are significantly more likely to support such a ban, than men (82% Vs 75%). There are no significant regional differences.

Q2. If you discovered your existing brand of household cleaning product was animal tested, how likely would you actually be to swap to a brand that was not animal tested, assuming other factors such as price were equal?



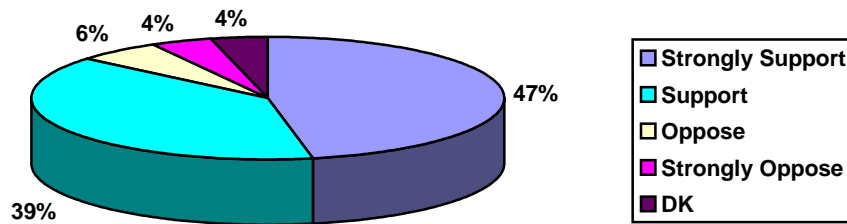
Almost four in five (79%) British adults say they would be likely to swap to a brand that was not animal tested, if they discovered their existing brand was tested on animals. Over half (52%) say they would be very likely.

Women are more likely to swap brands than men (83% Vs 74%).

The likelihood of swapping to a different brand decreases with age, however it remains high regardless of this factor. 85% of respondents aged 25-34 say they would swap, whereas 72% of respondents aged 65+ would change brands.

UK adults that support a ban on animal testing (Q1) are significantly more likely to change brands than those that do not (90% Vs 40%).

Q3 How strongly would you support your main grocery shopping store introducing its own product range that is not tested on animals?



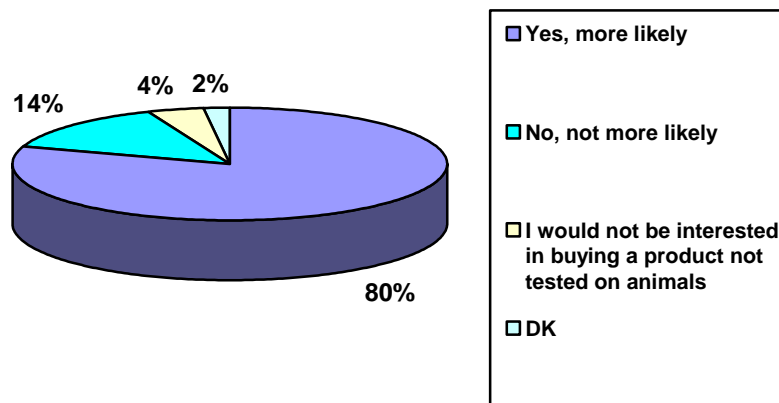
Grocery stores introducing a range of products not tested on animals will be strongly supported by the British public (86% support).

Women are more likely to strongly support this than men (55% Vs 39%).

Support is strongest amongst British adults aged 25-54. Older respondents are less likely to be interested in this idea.

Support is found across all regions, however is greatest in the South West (91%) and Scotland (90%).

Q4. The British Union for the Abolition of Vivisection is the worlds leading organisation campaigning to end animal testing. If you wanted a household product that was not tested on animals, would you be more likely to buy it if it was approved of by the BUAV as cruelty free?



Approval of a product by the BUAV would increase the likelihood of buying the product for four in five British adults (80%).

Women are more likely to respond positively to this approval than men (85% Vs 75%).

Sample

Sex		Region	
Male	49%	North	34%
Female	51%	Midlands	31%
		South	35%

Age		Working status	
18-24	11%	Full-time	46%
25-34	19%	Part time	11%
35-44	19%	Not working	8%
45-54	17%	but seeking	
55-64	13%	Not working/ not seeking/ retired	8%
65+	20%		

Social Class		Tenure	
AB	24%	Own outright	28%
C1	28%	Own with mortgage	42%
C2	21%	Council	17%
DE	28%	Rented	10%
		Rent free	1%

Appendix 2

Basic criteria for approval on BUAV Humane Household Product Standard

1. A **Company** must not (now or in the future) conduct, **Commission**³, or be a party to **Animal Testing**⁴ of any **Household Product** including, without limitation, formulations and **Ingredients**⁵ of such products.

- 2 A **Company** must not purchase any formulation, **Ingredient** or product from any **Third Party Manufacturer**⁶ or **Supplier**⁷ that has conducted, **Commissioned** or been party to **Animal Testing for Household Purposes**⁸ on them after the **Company's Fixed Cut-off Date**⁹. If a formulation, **Ingredient** or product is found not to comply with the Standard, the **Company** will replace it with an alternative that complies with the Standard's criteria or remove it from the product range.
- 3 A **Company** must implement a **Supplier Monitoring System**¹⁰.
- 4 A **Company** must obtain **Declarations of Product and Raw Material Compliance**¹¹ (or equivalent documents), from each of its **Third Party Manufacturers** and **Suppliers**. This information will be kept as part of the **Company's Supplier Monitoring System**.
- 5 (a) The BUAV may require a **Company's Supplier Monitoring System** to be submitted to an **Independent Audit**¹²

Definitions used by the BUAV.

Ref no	Terminology	Definition under the Standard
1	Household Product	Disinfectant Bleach Dishwasher products Floor & furniture polish Cleanser & cleaner Toilet products And any other product of a similar nature Washing up liquid Air freshener Washing powder Laundry tablet Liquid detergent Fabric conditioner
2	Company	Legal entity (Limited liability company/Sole Trader/Partnership/Other entity recognised by the law) involved in selling Household Products under its own name.
3	Commission	Where a Company requests a Third Party Manufacturer and /or Ingredient Supplier , another Company in the group or a contract testing laboratory to conduct Animal Testing .
4	Animal Testing	An experiment as defined in European Community Directive 86/609 (any use of an animal for experimental or other scientific purposes which may cause pain, suffering, distress or lasting harm...")
5	Ingredient	A single substance or mixture of substances, systems or compounds intended for use in Household Products , as listed on the product label.
6	Third Party Manufacturer	A manufacturer that produces Household Products on behalf of the Company seeking approval under the Standard.
7	Supplier	Any manufacturer that supplies, directly, through an agent or Third Party Manufacturer , any Ingredient or Ingredient mixture used in the formulation of a Company's own-label Household Products . This includes the original manufacturer of the Ingredient .
8	Animal Testing for Household Purposes	1. Animal Testing within your supply chain of an Ingredient for use in a Household Product (irrespective of whether the Household Product is the Company's or a third party's). 2. Animal Testing within your supply chain of an Ingredient where the testing was not specifically carried out for use in a Household Product but where the Ingredient is in practice used more in Household Products than otherwise (50% or more used)
9	Fixed Cut-off Date	A date after which a Company , its Third Party Manufacturers and/or Suppliers must not have conducted or Commissioned Animal Testing for the Company's own-label Household Products and/or Ingredients supplied for use in the Company's products. The Fixed Cut-off Date must be before the date of the Company's application to join the Standard. The Fixed Cut-off Date must be applied across the Company's entire Household Product range, now and

		in the future.
10	Supplier Monitoring System	A system by which a Company monitors its Third Party Manufacturers and Suppliers at least once a year to ensure that they have not conducted or commissioned Animal Testing . Suppliers to be monitored must include the original manufacturer of the Ingredient .
11	Declaration of Product/Raw Material Compliance	Written confirmation obtained by a Company once a year from all of its Third Party Manufacturers and Suppliers that they have not been involved with Animal Testing . These documents form part of the Company's Supplier Monitoring System . Equivalent documents may be used on the condition that they provide at least the information requested on the Declarations .
12	Independent Audit	An assessment of a Company's Supplier Monitoring System .