The Use of Hazardous Materials in Animal Activities

Policy Steward: Assistant Vice President for Research, Director of the Animal Care and Use Office

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PURPOSE

This policy enacts those provisions of the following federal and state requirements pertaining to the use of hazardous materials in research, teaching, and testing activities that involve vertebrate animals.

• Public Health Service Policy on Humane Care and Use of Laboratory Animals Guide for the Care and Use of Laboratory Animals, published by the Office of Lab Animal Welfare, NIH.

• Occupational Health and Safety in the Care and Use of Research Animals, published by the National Academy of Sciences, 1997.

• Guide for the Care and Use of Laboratory Animals, published by National Research Council

• Biosafety in Microbiological and Biomedical Laboratories 5th Edition, published by the Centers for Disease Control and Prevention and the National Institutes for Health.

• NIH Guidelines for Research Involving Recombinant or Synthetic Nucleic Acid Molecules (NIH Guidelines)

• Federal Select Agent Regulations (7CFR331, 9CFR121, and 42CFR73)

• Hazardous Work in Laboratories rule R325.70101 to R325.70114 of Act 154 Michigan Occupational Safety and Health Act (MIOSHA)

• Code of Federal Regulations, PART 20—Standards For Protection Against Radiation Title 10, Part 20

APPLICABILITY

This policy is applicable to all research, involving the use of hazardous materials in animals, conducted under the auspices of the U-M, and applies to field studies as well as all campus locations, including Ann Arbor, Flint and Dearborn.
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POLICY

Review and identification of appropriate control measures by OSEH through the protocol review process is required before the IACUC approves the use of hazardous materials in any research, testing or teaching animal activities. Additional approvals by University oversight committees may also be necessary (e.g., Radiation Policy Committee, Institutional Biosafety Committee) before the IACUC approves hazardous materials use.

Activities involving hazardous materials that are described in the IACUC approved protocol must be conducted in accordance with the OSEH defined engineering control practices, using the appropriate Personal Protective Equipment (PPE), and following all applicable safety SOPs and Policies.

Concerns regarding the use of hazardous materials in animal activities are to be reported to the Animal Care and Use Office (ACUO), Occupational Safety and Environmental Health (OSEH), Institutional Official, or through either the University of Michigan Animal Care and Use Hotline (1-734-763-8028) or the Compliance Hotline (1-866-990-0111). All reports of concern are resolved in a timely manner through an anonymous investigation by the IACUC, OSEH, or any other relevant unit.

DEFINITIONS

1. **Personal Protective Equipment** is a device or garment worn by the worker to protect against hazards. Examples of PPE include such items as gloves, foot and eye protection, face shields, protective hearing devices (earplugs, muffs) hard hats, respirators and full body suits.

2. **Hazardous Materials** are those materials that constitute a hazard to humans or the environment. For the purpose of this policy, the specific hazardous materials are listed below.
   a. Agents requiring handling conditions above Biosafety Level 1 (BSL-1).
   b. Agents infectious to animals requiring handling conditions above Animal Biosafety Level 1 (ABSL-1).
   c. Biological specimens (e.g., saliva, blood, and urine) collected from humans or non-human primates.
   d. Biological toxins (e.g., Botulinum toxin including cosmetic BOTOX) used in conjunction with animals.
   e. Chemicals designated by the National Institute of Occupational Safety and Health (NIOSH) as hazardous drugs, carcinogens, reproductive hazards, nanoparticles, or toxic chemicals, as well as materials that may have serious impact on the environment during release or disposal that are used in conjunction with animals.
   f. Activities involving recombinant or synthetic Nucleic Acid Molecules technology (rDNA techniques).
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- Activities involving any radiation producing equipment or materials including ionizing, non-ionizing, x-rays, and lasers.

- HHS and USDA Select Agents and Toxins, as defined in Federal Regulations 7 CFR 331, 9 CFR 121, and 42 CFR 73. The current list is available at http://www.selectagents.gov/SelectAgentsandToxinsList.html.

SUBMISSION PROCEDURE
Hazardous agent use and the information (e.g., identity of the hazard, dose, and route of administration) needed to conduct the risk assessment is provided to the IACUC and OSEH directly in the animal care and use protocol. In addition, animal users provide the required information through a submission to the IBC when animal activities involve the use of biological hazards and the RPC when animal activities involves the use of radioisotopes.

COMPLIANCE
The IACUC has delegated authority to enforce the provisions of this policy, and if necessary suspend research, or implement sanctions if policy infractions should occur. The delegation includes but is not limited to (1) monitoring activities covered by this policy; (2) enforcing the implementation of the defined requirements; and (3) implementing sanctions, penalties, and/or suspensions.

FURTHER INFORMATION
For questions, additional detail, or to request changes to this policy, please contact the Office of the Assistant Vice President for Research, Director of the Animal Care and Use Office.

CROSS REFERENCES
Other Policies should also be referenced, especially:

- Personal Hygiene Requirements when Conducting Animal Activities

Effective Date: 10/03/2016, Date Approved: 10/03/2016
October 3, 2016: New Policy.