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# Toronto Humane Society Position Statement: Opposition to Cosmetic Testing on Animals

Toronto Humane Society strongly opposes the use of animals in cosmetic testing and the sale of cosmetic products developed through animal experimentation. Cosmetic animal testing raises serious ethical concerns and causes avoidable physical and psychological suffering to animals for products that are not medically necessary. These practices compromise animals' quality of life, restrict their ability to express natural behaviours, and expose them to pain, distress, and prolonged confinement.

As a leading voice in animal welfare, the Toronto Humane Society calls on governments to enact comprehensive legislation prohibiting cosmetic animal testing and the sale of cosmetic products developed through animal experimentation.

**Why Cosmetic Animal Testing Is Problematic**

Many cosmetic testing practices originated decades ago when scientific alternatives were limited or unavailable. Historically, animal testing was used to establish basic safety standards for cosmetic ingredients and products. However, advances in scientific research have led to the development of validated non-animal testing methods, including in vitro testing, computer modelling, and human cell-based assays. These modern approaches provide humane and effective alternatives that can assess product safety without subjecting animals to harm.

Continuing to rely on animal testing for cosmetic products reflects outdated regulatory frameworks rather than scientific necessity. Cosmetic products, unlike pharmaceuticals or medical treatments, are not essential to human health. Subjecting animals to invasive procedures and prolonged suffering for products intended primarily for aesthetic or personal care purposes raises serious ethical concerns.

**The following examples illustrate some of the most common forms of cosmetic testing performed on animals.**

- **Skin and Eye Irritation Testing** involves applying chemical substances to the skin or eyes of animals, often rabbits, to determine whether a product causes irritation or corrosion. During these tests, animals may be restrained to prevent them from removing the substance. The exposure can result in redness, swelling, ulceration, and long-term tissue damage. Because the animals cannot escape the exposure, they may experience prolonged discomfort or pain.
- **Acute Toxicity Testing** is used to determine the level of a chemical that may cause harm when ingested or absorbed. In these tests, animals are force-fed or otherwise exposed to cosmetic ingredients to measure toxic dose thresholds. The testing process can result in nausea, seizures, organ damage, and in some cases death. These procedures prioritize determining human safety limits while subjecting animals to severe physiological distress.

- **Repeated-Dose Exposure Testing** involves administering daily doses of cosmetic ingredients to animals over extended periods of time. Animals may experience chronic illness, weight loss, behavioural changes, and internal organ damage as a result of prolonged exposure. Throughout these studies, animals are typically housed in barren laboratory environments that restrict movement and prevent them from engaging in natural behaviours.

Beyond the physical consequences of testing procedures, animals used in laboratory experimentation often experience significant psychological and behavioural distress. Confinement in laboratory settings deprives animals of enrichment, social interaction, and autonomy. Frequent handling, restraint, and invasive procedures can cause fear, anxiety, and chronic stress. In these environments, animals are treated as testing tools rather than sentient beings capable of experiencing pain and emotional suffering.

**Legislative Framework in Canada and Other Jurisdictions**

Canada has taken steps in recent years to modernize its approach to cosmetic animal testing. In 2023, the Government of Canada amended the Food and Drugs Act to prohibit cosmetic testing on animals and the sale of cosmetics tested on animals within Canada. This legislative change marked an important milestone and signaled growing recognition that animal testing for cosmetic purposes is ethically unacceptable.

However, gaps remain within the current regulatory framework. Oversight of cosmetics in Canada primarily falls under Health Canada and is regulated through a human health and consumer product lens rather than through comprehensive animal welfare legislation. As a result, animals used in testing are not granted explicit protections under the framework governing cosmetic safety.

Additional limitations remain within the existing regulatory structure. Ingredients that were historically tested on animals may continue to be used indefinitely under so-called “legacy” provisions, and there is currently no requirement for companies to transition older ingredients or products to non-animal testing methods. Compliance with the law relies heavily on manufacturer self-attestation, with limited transparency regarding auditing or enforcement mechanisms.

Furthermore, products or ingredients tested on animals outside of Canada may still enter the domestic market provided companies claim compliance with Canadian regulations. This creates the risk that animal testing may simply be outsourced to other jurisdictions rather than eliminated entirely.

Stronger and more comprehensive regulation in this area would also help accelerate the transition toward humane product development across the marketplace. When governments establish clear and consistent standards prohibiting cosmetic animal testing, they create a level playing field that encourages industry-wide adoption of non-animal testing methods. Over time, this regulatory clarity supports innovation, competition, and scale in the development of cruelty-free products. As more companies shift toward humane testing practices, the availability of ethically produced cosmetics increases and costs can decline, making cruelty-free options more accessible and affordable for consumers and organizations alike.

In contrast, many international jurisdictions have already demonstrated that stronger restrictions on cosmetic animal testing are both practical and enforceable. The European Union prohibits both cosmetic testing on animals and the sale of cosmetic products tested on animals. The United Kingdom maintains similar protections, while Australia and New Zealand have implemented significant restrictions on cosmetic animal testing practices.

These jurisdictions have successfully transitioned toward alternative testing methods without compromising consumer safety. The Toronto Humane Society urges Canadian governments to align with international standards by strengthening the current framework through closing regulatory loopholes, improving transparency and enforcement, and integrating explicit animal welfare protections into federal legislation.

**The Changing Tide of Public Opinion**

Advances in animal welfare science and growing recognition of animal sentience have significantly reshaped public attitudes toward animal testing. A growing majority of people now believe that animals should not be subjected to suffering for non-essential purposes.

Toronto Humane Society supports internationally recognized animal welfare frameworks, including the Five Domains Model of Animal Welfare, which provide a widely accepted foundation for assessing and protecting the wellbeing of animals. These frameworks emphasize the importance of safeguarding both the physical and psychological welfare of animals by ensuring appropriate nutrition, environment, health, and the ability to express natural behaviours, while also protecting animals from pain, fear, distress, and other negative experiences. These principles recognize that animals are sentient beings whose wellbeing must be considered in any human activity that affects them.

Cosmetic animal testing conflicts directly with these principles. Testing procedures can inflict physical harm, restrict natural behaviours through confinement, and create negative emotional states such as fear and chronic stress. With humane scientific alternatives now widely available, the continued use of animals in cosmetic testing can no longer be justified as necessary or responsible.

**Call to Action**

Given the availability of effective non-animal testing methods, evolving public sentiment, and the growing number of jurisdictions implementing comprehensive bans, Toronto Humane Society strongly encourages governments to prohibit cosmetic animal testing and the sale of cosmetic products developed through animal experimentation.

Animals should not be made to suffer for the sake of beauty or personal care products. Legislative action is essential to ensure animals are protected from unnecessary harm and to reflect society's commitment to ethical and humane practices.

**Supporting Resources**

Canadian Legislative Framework

- Amendments to the Food and Drugs Act prohibiting cosmetic animal testing and sale of animal-tested cosmetics - Government of Canada

- Cosmetics Regulations and compliance guidance - Health Canada
- Bill S-5: Strengthening Environmental Protection for a Healthier Canada Act
- Health Canada: Cosmetic ingredient safety and notification requirements

International Bans and Regulatory Precedent

- EU Cosmetics Regulation (EC) No 1223/2009 - European Commission
- UK cosmetics animal testing ban - UK Government
- Australia cosmetic testing restrictions - Australian Government
- New Zealand animal testing prohibition - New Zealand Government

Scientific Consensus & Alternatives to Animal Testing

- Validation of non-animal methods for cosmetic safety assessment - Organisation for Economic Co-operation and Development
- Non-animal testing frameworks and regulatory acceptance - European Union Reference Laboratory for Alternatives to Animal Testing
- Advancing human-relevant testing methods - Physicians Committee for Responsible Medicine
- Overview of modern in vitro and computational toxicology - National Center for Advancing Translational Sciences

Animal Welfare Impacts of Cosmetic Testing

- Laboratory animal welfare and psychological impacts - Canadian Council on Animal Care
- Humane Society International: cosmetic animal testing practices
- World Organisation for Animal Health (WOAH): animal welfare principles - World Organisation for Animal Health

Public Opinion & Ethical Frameworks

- Five Domains Model of Animal Welfare - World Animal Protection
- Canadian public attitudes toward animal testing - Canadian Council on Animal Care (CCAC)
- Ethical considerations in animal experimentation - Canadian Veterinary Medical Association

Supporting Media / Public Policy Context

- CBC News coverage of Canada's cosmetic animal testing ban - CBC News
- Global News reporting on international cosmetic testing bans - Global News

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