# CONFIDENTIAL.

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[$\frac{G.}{11.}$]
—7-9-96.

# Judicial (1895) Department.

ORDINARY Mis

**G.O., No.** 1407-1408
Confidential No 102
**DATED** 5-7-95

[Despatch Abstract.]

## Vivisection

Informing the Govt. of India of the views of this Govt. on the rules proposed to be introduced to regulate — by Govt officers.

## BACK PAPERS.

| G.O. | No. | Department. | Date. | G.O. | No. | Department. | Date. |
|---|---|---|---|---|---|---|---|
|  | 65 | Con | 1895 |  |  |  |  |
|  | 545 | Jud | 1894 |  |  |  |  |
|  | 2653-4 |  | 1893 |  |  |  |  |
|  | 2047-8 |  | — |  |  |  |  |
|  | 1427 |  | — |  |  |  |  |

## FURTHER PAPERS.

| G.O. | No. | Department. | Date. | G.O. | No. | Department. | Date. |
|---|---|---|---|---|---|---|---|
| P.S. | 98-99 | Pub. | 2.2.07 |  |  |  |  |

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CURRENT No. 2581

CHEMICAL EXAMINER'S OFFICE,

No. 543

Madras, 17th May 1895.

From Surgeon Major J L Van Geyzel M.B. C.M. F.C.S. F.I.C.
CHEMICAL EXAMINER,
Madras,

To

THE Chief Secretary to Government
Judicial Department

SIR,

With reference to G.O. No. 955 dated 8th May 1895, I have the honor to state that clause a. of Rule 3., of the Draft Rules regarding Experiments on living animals, seems to me to be objectionable on the ground that it would hinder the effective teaching of Physiology in Medical & other Colleges. There are many experiments on living animals which cannot be omitted without weakening the teaching power., + ~~and~~ There is no prohibition of such experiments in the class rooms of the medical schools at home, but the clause as it stands forbids even a demonstration to a class of the circulation in the web of a frog's foot – an operation which, it would be difficult to convince an antivivisectionist, is free of serious pain or ~~resulting~~ injury.

Fundamental physiological problems relating to Circulation, Respiration, Digestion &c. cannot be effectively grasped by students, except after actual demonstrations, some of them involving experiments on living animals. No one would attempt such experiments unless he has already acquired the necessary manual skill; & Rule 4. would I think be a sufficient safeguard against unnecessary infliction of pain. The extent to which such experiments may be used for class room demonstrations might safely be left to the discretion of teachers, whose acts would be sufficiently limited by the remaining ~~portions of~~ Rules.

This opinion is advanced purely in the interests of the teaching of Physiology, of which I have had sufficient experience elsewhere to convince me that to absolutely prohibit these experiments in the class room would needlessly tie the hands of every teacher of the subject.

I do not object to any of the Rules as they stand, from the Chemical Examiner's point of view, presuming that

that he would be permitted to perform experiments on animals as hitherto in the course of his duties.

I have the honor to be,
Sir,
your most obedient servant.
H. van Geyer. M.B. F.I.C.
Surgeon Major
Chemical Examiner to Govt.

Jud^l. Dept.

CURRENT No. 2581

1895.

No. 193

From

THE CHEMICAL EXAMINER,

MADRAS,

To

THE Chief Secretary to Govt.
Judicial Dept.

CHIEF SECRETARY
24 MAY 1895
GOVERNMENT OF MADRAS

No. 543

Dated 17th May 1895
Received 24

ENCLOSURE.

—

*Subject.*

Submitting his views upon the Draft Rules for the guidance of Officers performing experiments upon living animals

Cf. 2582, 2583 [illegible]

To await report from the Surgeon [illegible]

26/5

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CURRENT No. 2582

Confidential.

CHIEF SECRETARY
20
18 MAY 1895
GOVERNMENT OF MADRAS

Office of the Sanitary
Commissioner for Madras.
15th May 1895.

From

Surgeon Lt Col. W. G. King. D. P. H.
Ag. Sanitary Commissioner to Govt.

To

The Chief Secretary to Government

Sir,

With reference to G. O No955 dated 8th May 1895, Confidential, I have the honour to state that I consider the suggested Rules would serve in an European country both the purpose of not hampering the scientist and satisfying the scruples of the Anti- Vivisectionist; but I think the fact alluded to in para 4 of the letter from the Govt of India to the Secretary of State, no 43, dated 28th Aug. 1894, cannot be evaded by means of a Ruling by Government addressed to its officers. This would become public property, and agitation for rulings in other directions might result of which -with a Hindu population - it might not be possible to foresee the limit. It would become an instrument for wreaking private spite on Government servants attempting to devote themselves to original research, or in the hands of the unscrupulous a sufficient cause for creating public excitement. Moreover, Government would be placed in a false position in respect to vaccination. The operations performed withthe cognizance of Governemtn on the calf cannot be considered free of pain, and in a large number of cases in a degree greater than likely to be brought about by the experiments of the class objected by Anti- vivisectionists. To be consistent, therefore, it would be necessary to direct that all operations upon calves should be conducted under anaesthetics, andthen by persons not only possessed of sufficient skill to do this but of the [illegible] special sanction of Government. It goes without saying that the cry of the Anti-vivisectionist is the outcome of ignorance of the object of physiological experiments, and of the modus operandi to be employed. This being so, there is no reason why Government should become directly responsible in any phase of the subject. If with its nominal sanction an officer conducted an experiment that the public might afterwards in good faith or ignorance regard as brutal, Government would unnecessarily share the responsibility in popular imagination. This result would also be undesirable in view of the fact that on any complaint being made, Government would be the final authority to determine liability to censure.

2-. To avoid these results therefore I would respectfully suggest that it should not ~~not~~ be deemed necessary to ask sanction for the making of experiments. But the Heads of Departments likely to be affected in this matter should be required to direct that officers subordinate to them should not undertake experiments upon animals, with the object of advancing physiological knowledge, or attaining manual skill, or affording instruction to pupils - without such full care as to avoidance of pain by the use of anaesthetics or otherwise, as the circumstances of the case will allow. Under this arrangement, any laxity of care would be efficiently met as a breach of discipline in the Department concerned.

I have the honour to be Sir,

Your most obedient Servant,

W G King.

Surgeon Lt Col.

Ag. Sanitary Commissioner.

[G/9]
5,000—14-7-93.

Current No. 2582

Jud^l Department.

No. 184

*From*

The Sanitary Commissioner

No. 1/20

*Dated* 15 } May 1895.
*Received* 18 }

*Enclosures*

SUBJECT.

Views on the proposed rules to regulate vivisection.

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*Rules.*

1. No officer of Government shall perform on a living animal any experiment calculated to give pain without written authority from the Secretary to the Government in which he is serving, whether in civil or military employment, to perform such experiments.

2. Such authority shall be given subject to the conditions enumerated in the following rules.

3. No experiment shall be performed—

(*a*) as an illustration of lectures in any Medical School, Hospital, College or elsewhere, or

(*b*) for the purpose of attaining manual skill, or

(*c*) except with a view to the advancement by new discovery of physiological knowledge or of knowledge which is likely to be useful for saving or prolonging life or alleviating suffering; or of testing a particular former discovery alleged to have been made for the advancement of such knowledge.

4. The animal shall, during the whole of an experiment in which serious pain may be caused, be under the influence of some anæsthetic of sufficient power to prevent it from feeling pain, except in any case in which the object of the experiment would be necessarily frustrated if insensibility were produced.

5. The animal must, if serious pain is likely to continue after the effect of the anæsthetic has ceased, or if any serious injury has been inflicted on it, be killed before it has recovered from the influence of the anæsthetic which has been administered, provided that in any case in which so to kill the animal would necessarily frustrate the object of the experiment the animal need not be killed as soon as it recovers from the influence of the anæsthetic, but must be killed immediately after such object has been attained.

Confidential.]

No. 3 Medl./164

FROM

J. P. HEWETT, Esq., C.I.E.,
*Offg. Secretary to the Government of India,*

To

Home Department.
*Medical.*

*Calcutta, the 28th March 1895.*

SIR,

WITH reference to correspondence ending with your letter No. 2048 (Judicial), dated 3d October 1893 I am directed to forward, for the information of His Excellency the Governor in Council the marginally noted despatches* which have passed between the Government of India and the Secretary of State regarding the proposal to enact a law regarding Vivisection in India.

2. I am to enclose a set of draft rules prepared with the object of carrying out the wishes of the Secretary of State as stated in paragraph 3 of his despatch of 6th December last, and to ask that the Governor General in Council may be favoured with the views of His Excellency the Governor in Council in respect of them.

I have the honour to be,
SIR,
Your most obedient Servant,
J. P. HEWETT,
*Offg. Secretary to the Govt. of India.*

* To the Secretary of State, No. 43 (Public/Medical), dated 28th August 1894.
From the Secretary of State, No. 167 (Revenue), dated 6th December 1894.

Judicial Department

Order dated 8 May 1895, No. 955.

Communicated to the Director of Public Instruction, the Surgeon General, the Sanitary Commissioner, and the Chemical Examiner, who will be requested to favour the Government with their views on the proposed rules.

(True Extract)

Lionel Davidson
3/5
Ag. Under Secretary
for Chief Secretary

G. I. C. P. O.—No. 1645 H. D.—28-3-95.—300.—R. N. B.

Director of Public Instruction ✓
Surgeon General
Sanitary Commissioner
Chemical Examiner

189 5
Jud. Dept.
1
No.
2583

6th December 1894.

ajesty's Secretary of State for

or General of India in Council.

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1 India.

iological investigations of the
for the public good by officers
*tific officers would, in such*
ther ways, take precautions
rtheless, it would be well that
of your officers who may have

I have, etc.

HENRY H. FOWLER,

5
Jud.
2
2583

4-95.-300.—R. N. B.

5
Polᶫ
3
2583

*Confidential.*

CURRENT No. 2583

OFFICE OF THE DIRECTOR OF
PUBLIC INSTRUCTION,
Coonoor ~~Madras~~, 21st May 1895.

No. C/2.

From
THE HONORABLE MR. D. DUNCAN, M.A., D.Sc.,
DIRECTOR OF PUBLIC INSTRUCTION,
*Madras*,

To
THE HONORABLE THE CHIEF SECRETARY TO GOVERNMENT,
FORT ST. GEORGE.

SIR,

With reference to G.O. dated 8th May 1895 No. 955, I have the honour to return the papers with the following remarks.

2. I have consulted Surgeon-Captain Elliot, Professor of Biology in the Presidency College, with reference to the proposed rules to regulate Vivisection in India.

Rule 1. Surgeon-Captain Elliot is of opinion that this rule will only be free from objection provided that the necessary permission can be obtained by any bona fide experimenter without needless delay or difficulty. If the proviso cannot be counted on, he considers the rule objectionable. I fully concur with Surgeon-Capt. Elliot in this opinion. I have always thought it a pity that research should be trammelled at home by the acts of Anti-vivisectionists. In this country there is not much research of this kind carried on, and it is a mistake to place additional obstacles in the way of what little there is. If the impulse towards original research were strong, men would be prepared to wait for the permission contemplated in rule 1; but where, as in India, the love of research is comparatively weak, delay in obtaining the necessary permission will tend to nip the scientific interest in the bud. The rule seems to contemplate that written permission must be obtained for each experiment. If this be so, I hold that it will be utterly impossible to carry on scientific enquiry under such conditions.

Rule 3. Surgeon-Capt. Elliot thinks that Rule 3(2) is decidedly a mistake, and I agree with him. Manual skill is absolutely essential for successful operations on the living organism, and nothing can give it xcept repeated operations either on the lower animals r on man. Whatever tends to limit the number of experiences must tend to check the acquisition of that skill and dexterity which mark the first class surgeon.

I have no remarks to offer on the other rules.

I have the honour to be,
Sir,
Your most obedient Servant,

D Duncan

Director of Public Instruction

mistake to place additional [illegible]

Confidential

Ed. Cor. 17. 2,000—29-3-94. Judicial Department

1895. 2583

Educational Department.

No. 192

From

THE DIRECTOR OF PUBLIC INSTRUCTION,
*Madras,*

To

THE HONORABLE THE CHIEF SECRETARY
TO GOVERNMENT,
*Fort St. George.*

CHIEF SECRETARY
No. 9/2 22 MAY. 1895
GOVERNMENT OF MADRAS

*Dated* 21st
*Despatched* 21st } May 1895.
*Received* 22
Reg. 24

No.

ENCLOSURES. 3.

*Subject.*

Offering his remarks with reference to the proposed rules to regulate Vivisection in India.

Desp'd 21-5-95

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CURRENT No. 2702

OFFICE OF SURGEON-GENERAL
WITH THE GOVERNMENT OF MADRAS,

No. Four
Encl. 229

Ootacamund ~~Madras~~, 1st June 1895.

From

SURGEON MAJOR-GENERAL C. SIBTHORPE, F.R.C.P.I.,
SURGEON-GENERAL WITH THE
GOVERNMENT OF MADRAS,
~~Madras~~,

To

THE Hon'ble the Chief Secretary to Government.
Judicial Department.

SIR,

With reference to G. O. No. 955 Judicial dated 8th May 1895 forwarding the draft rules proposed for regulating experiments on animals for my views, the rules appear to me to be likely to meet the requirements of the case and to be desirable but I would wish to offer the following suggestions.

2. With reference to rule I as it now stands, if a Medical Officer was required to obtain the sanction of Government before performing any such experiments it would lead to such delay and inconvenience that the already overworked Officers would not be at all likely to make such applications and the effect would be that no such experiments would be made. For example, recent ~~years~~ experience has shown that in gun-shot wounds of the abdomen it is advisable and necessary to open the abdomen and deal

with the wounded bowels individually – No one would for a moment suggest that Surgeons should obtain the necessary dexterity and confidence in performing such operations on their human patients and if they are to be restricted in acquiring such dexterity it is the human sufferers who will be the losers. I consider the wishes of Government would be met by requiring all Officers of Government who perform such operations to submit it within a fortnight of any such experiment being completed – a report in the following form to the Secretary to Government Judicial Department through the Surgeon-General or other local head of the Medical Department.

Civil Medical Form No

Statement of Experiments performed on living animals.

| 1 | 2 | 3 | 4 | 5 | 6 | 7 |
|---|---|---|---|---|---|---|
| Number of Experiment | Date | with or without anaesthetics | Description of operation or dissection if any is required | Medicinal, poisonous, injections or other agents and the mode of administration if any are employed | Remarks of Experimenter | Remarks of forwarding Officer |
|  |  |  |  |  |  |  |

I certify that all the rules printed on the back of this have been observed

Rank
Place Name
Date Designation

Forwarded to the Chief Secretary to Government Judicial Department

Date Surgeon-General

The rules when issued should be printed on the back of the form – After a years experience of such reports it would be possible for Government to see whether any further restrictions should be adopted – Para 2 of the draft rules would not be necessary and the rules 3, 4 and 5 would be sufficient

I have the honor to be
Sir
Your Most Obdt. Servant

C. Sibthorpe
Surgeon-Major-General
Surgeon-General with the Govt. of Madras

CURRENT NO. 2702

Judicial (1895) DEPARTMENT.

From

SURGN. MAJOR-GENL. C. SIBTHORPE, F.R.C.P.I.,
SURGEON-GENERAL WITH THE
GOVERNMENT OF MADRAS,
~~Madras~~,

To

No. Genl / 229

ENCLOSURES.

Dated 1st } June 1895.
Recd.

Regd 5.6.95
Enc: "

CHIEF SECRETARY
No.
1 JUN. 1895
GOVERNMENT OF MADRAS

*Subject.*

Offers suggestions in connection with the rules regulating experiments on animals

13 S. G.—500—18-4-94.

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[G. 25.]
600—8-3-95.

Judl. DEPARTMENT.

C. Nos. 2581, 2582, 2583 & 2702.

FOR ORDERS.

San: opposed to the rules proposed by India — They would needlessly hamper scientific research & teaching & would actually in some cases prevent the Chemcl. Examr. from doing his necessary duty. They would throw a great deal of work on Govt. which Govt. has not the necessary knowledge properly to perform; & they would not improbably expose Govt. to undeserved odium. I think it will quite suffice, for the present, if not for good, if the course recommended in para 2 of the San: Commr's letter is adopted

x G.O. 1427 / 13.7.93

x Des. 43 / 20.8.94 (in G.O. 955 / 8.5.95)

BS
21/6/95

I quite agree
JG
22/6

And I. do
24 June

In 1893 the Govt of India acting on a suggestion from the Secy. of State resolved[x] to undertake legislation with a view to the prevention of cruelty to animals in experiments for scientific purposes. On consulting Local Governments however ~~on~~ as to the Bill prepared by it, India decided to abandon legislation for the following reasons. viz

(1) that the proposed legislation was not necessary, experiments conducted on living animals in this country being very few in number & not likely to increase

(2) that the Bill would tend to popularize vivisection instead of checking it.

(3) that native opinion was opposed to legislation as ~~sanctioning~~ giving legal sanction to cruelty

On a reference to the Secretary of

State, India now proposes, instead, to lay down (with the same object in view) standing Orders for the guidance of Government Officers. These rules having been ~~referred~~ forwarded to this Govt. for opinion were referred in G.O. 455/8.5.95 to the Chemical Examiner, the Sanitary Commissioner, the ~~Surgeon General~~ Director of Public Instruction and the Surgeon General whose replies are contained in the Currents quoted above.

FOR ORDERS.

The Chemical Examiner considers that the Rules will not affect him as Chemical Exr., as he expects he will be granted the necessary permission to continue his experiments,✱ ~~under Rule 1~~, but from the ~~standing~~ point of view of a teacher, he offers the opinion that Rule 3 (a) should be struck out on the ground that it would hinder the effective teaching of Physiology. This rule prohibits the conducting of experiments as illustrations of lectures in Hospitals, Colleges &c unless under 3 (c) the object of the experiment is to discover new physiological or medical facts or to test a former discovery of such facts.

The Sanitary Commissioner is opposed to the rules proposed on the grounds (1) that they would not satisfy the demands of native anti-vivisectionists and would necessitate further concessions to native feeling in other matters; (2) they would hamper the experiments which it is necessary to perform on calves in connection with vaccination. — He suggests that previous sanction of Government should not be required to conduct experiments of the kind and that the desired object could be sufficiently attained by requiring Heads of Departments to issue general instructi to Officers subordinate to them prohibiting the performance of such experiments without due safeguards against the causing of pain. Under this arrangement any want of care would be dealt with departmentally as a breach of discipline

The Director of Public Instruction is strongly opposed to rule (1) if as, it seems to him, it contemplates the necessity of obtaining permission for the conducting of each experiment proposed to be performed, as he considers that such a restriction would make scientific research well nigh impossible. He also objects to Rule 3 which purports to prohibit experim conducted merely for the purpose of

✱ In this he seems to be mistaken; experiments such as he must conduct, e.g. an injection of suspected poison into a mouse, may cause pain to animals, & do not fall under any of the classes of experiment permitted, as their object may be merely to ascertain for the purposes of a criminal investigation whether a certain substance is poisonous.

6

attaining manual skill (i.e. which are not at the same time covered by clause (c) of the same Rule as stated above)

The Surgeon General is the only officer among those consulted who at all approves of the rules. But even he considers that the previous sanction of Govt. should not be required and that it would be sufficient to require officers to submit reports of experiments performed by them to Government with full particulars. After a year's experience of such reports Govt. would be in a position to decide whether further restrictions were necessary.

The rules, if issued, are open to the objection that they will throw additional work on Govt. especially if ~~individual~~ separate licenses have to be issued for every experiment, & it is not shown that there is any necessity to impose these restrictions. Admitting the necessity of issuing rules, it appears highly desirable that the power of granting licenses should be delegated to departmental heads say the Principal Medical Officer, military or civil; it is by the advice of these officers that Govt. would ordinarily be guided, & if in any case it is brought to

W.D.
5.6

Proposed rules to regulate vivisection

H.M. & vivi.

(For Orders)

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[G./25.]
600—8-3-95.

DEPARTMENT.

C. No.

FOR ORDERS.

notice that they have exercised a wrong discretion, it will be possible to restrict their powers. It is much better that the responsibility should be cast upon them; if it is vested in Govt., sanction may inadvertently be given to the performance of an unnecessarily cruel experiment, the nature of which has not been fully explained by the applicant; in such a case Govt. would incur undeserved odium. Apart from this consideration, to impose additional duties on Govt. is directly opposed to the Secretary of State's constant directions that Govt. should lose no opportunity of delegating its powers. This, it is submitted, is emphatically a case in which delegation to an expert like the Principal Medical Officer is desirable. Graver objections to the proposed rules are to be found in the fact that they constitute a serious bar to medical teaching, & ~~to~~ to the performance of the Chemical Examiner's duties. – The wording of the rules is very defective, & in stringency they go far beyond the English statute & the draft bill which has been abandoned

HH 18/6/95 D 14.6.95

This is a matter which it would have been wiser to have left alone. It will probably be the cause of trouble later on. HS

HH 18/6/95.

Vivisection

FOR ORDERS.

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[G./24.]
500—21-5-95.

Jud^l. DEPARTMENT.

Papers to be read in proceedings :—

Again G.O., dated 8 May 1895 ~~189~~, No. 955
Again G.O., dated 189 , No.
Current No. of 189 , dated from File of replies
" " " 189 , " , "
" " " 189 , " , "

ORDER. d/ 5 July 1895, No. 1407

Note for C.S.

It is thought unnecessary to print this or to enclose copies of the currents. D

The following letter will be despatched to the Gov^t. of India.

D 2.7.95

Letter No. 1408

Desp^d 9/7

To the Sec^y to the Gov^t. of India
Home Dep^t.

Sir,

I am directed to acknowledge the receipt of Mr. Hewett's letter d/ 25 March 1895, No. 314/164 enclosing a set of draft rules designed to regulate the practice of vivisection in India and requesting to be favoured with the views of H.E. the G. in C. in respect of them.

2. In reply I am to state that after consulting the local Surgeon Genl., Sanitary Commr., Chemical Ex^r. & D.P.I. H.E. in C. has ~~formed~~ arrived at the conclus

that for the following reasons it would be most undesirable to give effect to the proposed rules.

3. The first of these ~~draft rules~~ appears open to ~~the following objections~~. It imposes upon Govt. additional duties which Govt. has not the necessary knowledge properly to perform, and in the performance of which it is not improbable that Govt. would incur undeserved odium. In the grant of licenses the Govt. would naturally be guided by the opinion of its scientific advisers, but in the event of sanction being accorded to the performance of an unnecessarily cruel experiment owing to a mistake on their part it is the Govt. which would be saddled with the major share of the blame. The necessity for requiring licenses in this country has not been demonstrated, but, if the necessity be conceded, the Govt. is emphatically of opinion that the power of granting such licenses should be vested in Officers possessing special scientific qualifications fitting them him to exercise it ~~and not in Govt. which possesses no such qualifications and has already quite as many duties as it can properly perform.~~

objection on the ground that the power of granting licenses is vested in a Secretary to the Local Govt. With refce to this, I am to say, that H.E. the G. in C. is of opinion that it would be for many reasons preferable ~~that~~ ~~that~~ this power ~~is~~ should be with an officer such as the P.M.O. of the province.

A second objection to this rule is that it apparently contemplates the grant of a separate license in respect of each experiment, a provision which would constitute a very serious restriction upon scientific research. Few officers would be likely to enter upon scientific ~~researches~~ investigations involving vivisection in any shape, if they knew that they might be interrupted at any stage of their inquiries by having to go through the lengthy process of obtaining sanction from Govt. before performing some trivial but essential experiment causing little or no pain to the animal operated upon.

4. The second of the draft rules is so worded as entirely to prohibit the performance of experiments upon living animals as an illustration of medical lectures. It has been pointed out that ~~this~~ would ~~constitute a serious~~ prove a bar to the effective teaching of the fundamental physiological principles relating to circulation, digestion, respiration &c. For this reason H.E. in C. considers the rule to require modification.

5. Moreover, apart from the consideration that the rules would

~~and lastly~~ hamper scientific research and teaching. It may be remarked that They would actually in some cases ~~prevent~~ interfere with the duties of the Chemical Ex.r ~~from performing~~ ~~his duty~~ as he would be prohibited from ~~performing~~ ~~carrying~~ performing experiments upon living animals which ~~may~~ might be required in order to ascertain facts to be proved for the purposes of a criminal investigation.

5. Further, it has been pointed out that the rules, if literally interpreted, absolutely forbid prohibit the performance of the ordinary operation requisite in order to obtain vaccine lymph from a calf, unless the animal is under the influence of an anaesthetic and the special sanction of Govt. has been obtained.

6. For these reasons, H.E. the G. in C. is entirely opposed to the introduction of the draft rules. He considers that it will certainly suffice for the present, if not as a permanent measure, to issue instructions to the heads of departments likely to be affected requiring them to direct their subordinates not to undertake experiments upon animals with the object of advancing physiological knowledge, attaining manual skill or affording instruction to pupils without taking such care to avoid pain by the use of anaesthetics or otherwise as the circumstances of the case allow. If this suggestion which emanates from the Sanitary Commr., Surgeon Lt. Col. W. G. King, be adopted, any want of care or needless cruelty could be effectually dealt with as a breach of discipline ~~in~~ by the Dept. concerned.

I have

D/24.5.95

3/7/95

Vivisection

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CS/

(Fr. Orders)

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STATEMENT WITH DITTO

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