Ms Helen Skinner Planning Inspectorate

Temple Quay House 2

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Re: Appeal against refusal of planning permission (DC/13/03245/STLBC and DC/13/03244/STPLF) B&K Universal, The Field Station, Grimston Lane HU114Q

June 16, 2014

Dear Ms Skinner

I understand this planning appeal by B&K Universal has been 'called in' by the Secretary of State to determine under his jurisdiction and that the appeal will follow the written representations procedure. However, as President of Europeans and Americans For Medical Advancement (EFMA/AFMA) I write to request that the appeal is procedurally dealt with via a Public Inquiry in accordance with the criteria for determining the procedure for planning in Annexe J of the Planning Inspectorate – Procedural Guidance - Planning Appeals and called-in planning applications – England – 6 March 2014.

Criteria for determining the procedure for planning, enforcement, advertisement and discontinuance notice appeals.

Inquiry - an inquiry would be appropriate if:

1. There is a clearly explained need for the evidence to be tested through formal questioning by an advocate

Or

2. The issues are complex

Current opposition to animal experimentation dates back to mid 19th century Europe. Initial opposition consisted almost entirely of the ethical argument against using animals in labs. Shortly however, antivivisectionists began opposing animal experimentation on scientific grounds. Because medical science was only in its infancy, these science-based challenges proved invalid. One can learn scientific facts, in the form of morphology and gross function,
about humans by studying animals. Almost 200 years later however, the questions that science are asking are very different.

B&K Universal, along with essentially all others who use animals in biomedical research, claim these animals are essential to advancing human medicine. Such a claim was spurious even in the 19th century as even then the knowledge gained from animal experimentation was more along the lines of *so this is what that organ does* as opposed to *this is how to cure that disease*. When animal experimenters claim that animals are essential they are really claiming that animal models have predictive value for human response to drugs and disease. This is well documented in my books and articles. Our current scientific understanding of evolutionary biology and complexity science unequivocally proves that trying to apply results from animal experiments, in the hope that they will be able to 'predict' the responses of human patients, is not now nor will it ever be possible. Decades of practical, empirical evidence supports this position and thus I have proposed Trans-Species Modeling Theory (TSMT) to explain the facts that confront society at this time. Theories in science are more than hypotheses and include Darwin's Theory of Evolution, Einstein's Theory of Relativity, and The Germ Theory of Disease.

I am not alone in making these observations regarding the failure of the animal model. The pharmaceutical industry is leading the way in publicly stating that animals lack predictive value for drug development and have cost both lives and jobs in addition to profits.

The B&K Universal proposal has implications for public health. But the proposal can only be adequately assessed in light of our best science. The medical research for which B&K Universal supplies animals is scientifically invalid and hence the need for B&K Universal to expand or even continue its current business is invalid. As science welcomes a chance to prove its assertions I feel that B&K Universal’s claims should be the subject of a Public Inquiry.

A similar planning appeal was submitted in 2003, involving Cambridge University's planning application to build a new non-human primate lab on Green Belt land which required evidence that the lab was 'medically and scientifically in the national interest'. The application was appropriately scrutinised in a public inquiry in which Europeans for Medical Advancement (EFMA), gave written and oral scientific testimony demonstrating that primate experiments would actually mislead and harm the effective progress of potential cures for human illnesses. On the basis of this science evidence the planning inspectorate ruled that the new primates lab was not in the national interest on “medical and scientific grounds”, thereby defeating Cambridge University's planning application. This ruling set a precedent and places B&K Universal's appeal within its context.

Yours sincerely

Ray Greek, MD

President

Americans For Medical Advancement and
Europeans For Medical Advancement
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Curriculum Vitae

Personal
Born, April 30, 1959 Birmingham, AL
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Education
University of Alabama-Birmingham School of Medicine 1985
University of Wisconsin Anesthesiology residency 1989

Qualifications
Board certified Anesthesiology 1990
Sub-specialty certification Pain Management 1993

Medical practice
University of Wisconsin 1989-1990
Private practice Johnson City, TN 1990-1991
Thomas Jefferson University, Philadelphia, PA 1991-1993
Private practice Kansas City, MO 1993-1996

1996-current
President, Americans For Medical Advancement (www.AFMA-curedisease.org), based in California and Europeans For Medical Advancement, based in London.

Medical License
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Publications
Journals


27. Greek, R and Jean Greek. Lancet 2001 Jun 2;357(9270):1805 Animal tests after the genome.

28. Greek and Greek: Animal Research and Human Disease in JAMA (Feb. 9) 2000;283:743
29. Greek and Greek: Is xenotransplant worth the risk, Letter to the Editor. JAVMA (Oct. 1) 1998;213:950

30. Waldman, S. D., Greek, C. R., & Greenfield, M. A. The caudal epidural administration of steroids in combination with local anesthetics in the palliation of pain secondary to radiographically documented lumbar herniated disc - A prospective outcome study with 6-months follow-up. Pain Clinic. 1998;11(1), 43-49.


34. Waldman and Greek: Compression Fractures: Consider epidural nerve blocks for pain relief. Letter to the editor, Geriatrics Vol. 49 No.7 July 1994


Book Chapters


Books


5. Greek and Greek: *Sacred Cows and Golden Geese: The Human Cost of Experiments on Animals* (Continuum 2000).

**Miscellaneous**

Blog at [http://www.opposingviews.com/user/14921/track](http://www.opposingviews.com/user/14921/track)


Greek, R and Shanks, N. Poster. Society for Molecular Biology and Evolution meeting in Tempe, AZ, May 24-28, 2005


Greek: The Role of Nerve Blocks in Tension-type Headache: *National Headache Foundation*, Spring 1996


Greek R, Mauer P, Torjman M, Schieren H, Finke J, Lessin J, Marr A, Fenlin J, and


Greek, Janke, and Schroeder: The safety of continuous epidural opioid infusions for acute pain management in the non ICU environment. VI World Congress on Pain. Adelaide, Australia, April 1990. (Abstract)

**Reviewer for journals**

*Medical Hypothesis*

*Philosophy, Ethics, and Humanities in Medicine*

*SpringerPlus*

*Biological Systems: Open Access!*

*Journal of the Royal Society of Medicine*

*Expert Opinion on Drug Metabolism & Toxicology*

*Current Diabetes Reviews*