

Animals in Science Committee

Minutes of the 28th Meeting: 14th September 2020

1. Welcome, Introductions and Conflicts of Interest

- 1.1. The Chair welcomed attendees to the 28th meeting of the Animals in Science Committee (ASC), which took place via teleconference.
- 1.2. No apologies were received. No conflicts of interest were noted. The list of attendees is attached at Annex A.

2. Minutes and Actions from the previous ASC meeting.

2.1. Minutes from the previous meeting (May 2020) were delayed, these had now been circulated to members for comments and would be published following receipt of these.

2.2. Actions were complete with the following exceptions:

- 2.2.1. Secretariat to draft letter for the ASC to send to applicants whose licence applications have been referred to it, to seek access to relevant grant assessment for licence or protocol, if available.
 - i ASC members felt that it would also be pertinent and of potential value to ask Project Licence Applicants the peer reviews of their work programme as well as funding assessments.
 - ii ASC members noted there was no provision within the Animal Scientific Procedures Act to enable the Animals in Science Regulation Unit (ASRU) to make this request of applicants, hence this action fell to the Committee, and that provision of this information by the applicant was on a voluntary basis. Considering this, Members agreed to keep a record of similar issues to consider if changes to Animals (Scientific Procedures) Act (ASPAs) might be beneficial in improving efficiency and/or co-ordination of animals in science policy.

Action: Secretariat to modify letter to Project Licence applicants to ask applicants for peer reviews as well as funding assessment.

Action: ASC members to flag issues to the Secretariat where changes to ASPAs may improve co-ordination of animals in science policy.

- 2.2.2. ASRU to provide advice about use of recognised animal husbandry on animals and where this intersects with ASPAs to ensure institutions were in compliance with ASPA guidance.

2.3. ASRU to provide an update to this, and several ongoing actions, during their presentation.

3. Chair's Update

3.1. Member Appraisals

- 3.1.1. The Chair thanked members for their participation and feedback in their appraisals. The Chair advised that there were several takeaway points from the individual appraisals.
- 3.1.2. ASC members would be asked to submit any suggestions for ASC Plenary agendas ahead of each agenda setting meeting.
- 3.1.3. In order to enable the ASC to discuss specific topics in more depth, separate meetings would be arranged between ASC Plenary meetings.

Action: Secretariat to arrange topic discussion meetings between ASC Plenary meetings. Topics to include Human Ethics and Non-animal alternatives.

- 3.1.4. The Committee agreed it would be beneficial to continue to raise the profile and work of the ASC within its stakeholder groups. The Chair asked ASC members to notify him of such opportunities as they arise.
- 3.1.5. The Chair agreed a need to consider recruiting or, in the interim, co-opting another member to the Committee to fill the seat left by Dr Lopez-Salesansky, preferably someone with equal experience in animal technology.

Action: ASC to seek co-opted member with expertise in animal technology

3.2. Discussion with NC3Rs on a proposed Autumn workshop.

- 3.2.1. The Chair advised the ASC that discussions with NC3Rs Board work on a joint ASC/ASRU/NC3Rs led initiative on leadership in governance/welfare in use of animals in research had been delayed on all sides by the need to respond to Covid-19.
- 3.2.2. As all parties involved were re-establishing their work programmes and assessing their key priorities, the proposed Autumn workshop would be delayed until early 2021.
- 3.2.3. The Chair advised the Committee that he would raise this topic during his meeting with the Minister (para 3.4).
- 3.2.4. ASC members noted a potential conflict of interest for the NC3Rs which also funds research that involves animals. In structuring the project, it would be important to avoid positioning NC3Rs where they might regulate work they fund. Additionally, to note that activities to develop, progress and promote the 3Rs was carried out by a number of organisations other than NC3Rs, and these should also be included in the project.

3.3. Ministerial Commission 2020/21

- 3.3.1. The Chair introduced the new Ministerial Commission to the Committee, in particular the three priority areas:
 - i Developing an overall performance metric for ASRU.
 - ii Role of the ASC in development of Quality Management Systems for ASRU;
 - iii Leveraging ASC advice through strategic application of Project Licence Application (PLA) subgroup recommendations.

- 3.3.2. The Chair advised the ASC that the remaining workstreams requested by the Minister were already being undertaken by the ASC Subgroups.

3.4. Meeting with the Minister

- 3.4.1. The Chair informed the Committee that he was scheduled to meet with the Minister in late September. The meeting would focus on the new commission and working with ASRU on its delivery, progress made by the ASC to date, as well as the wider topic of leadership/governance of animals in science beyond the regulation.

3.5. NTS Review

- 3.5.1. The Chair advised the ASC that the review of the corrected NTSs had been circulated to PLA members for comment.

3.6. ASC requirements of ASRU

- 3.6.1. The Chair advised that following a discussion with ASRU Head of Policy (HoP) there would be a new process for how the ASC would notify ASRU of requests for their input to ASC work programmes. This would require a forecast from each Subgroup Chair detailing their requirements from ASRU over a 3-month period. These would be collated by the Secretariat and shared with ASRU ahead of each Plenary meeting to assist ASRU in the prioritised allocation of resources.
- 3.6.2. ASC members should also submit ad-hoc requests/enquiries to the Secretariat to include in the new process.

4. Update from the Animals in Science Regulation Unit (ASRU)

- 4.1. ASRU Head of Unit (HoU) and Head of Policy (HoP) provided the committee with an update on several workstreams.

4.2. ASRU Governance and Quality Management Systems

- 4.2.1. ASRU Head of Unit (HoU) provided the committee with an update on their plan for its Quality Management System to ensure ASRU were consistently meeting their requirements as a regulator whilst providing assurance to the public. This Quality Management System (QMS) would take the form of a framework to support the implementation of ASRU's purpose and strategy.
- 4.2.2. ASRU HoU would like to gain feedback on 'critical to quality' aspects of delivery from each ASC member via a 1:1 interview, following which ASRU would host a workshop with ASC members to feedback and discuss the results of the interviews.

Action: ASRU to hold 1:1 meetings with ASC members to seek views on the 'critical to quality' aspects of QMS.

Action: ASRU to host a workshop with ASC members to present findings of 1:1 feedback.

Action: Once the QMS programme of work was underway, ASRU to provide an interim report and regular (fortnightly) progress updates to the ASC

4.3. ASRU metrics

- 4.3.1. ASRU HoU informed the Committee that this work programme would be developed once the QMS work was underway, likely in the first quarter of 2021. Initiating the QMS work was a key first step developing the required metrics to enable ASRU to accurately assess their progress in reducing harms to animals.

Action: ASRU to provide scope of work for metrics work programme, as outlined in the Minister's Commission of Work 2020/21¹

4.4. Project Licence Applications

- 4.4.1. The Chair informed the ASC that he would lead a separate discussion with members on the development of this work programme. This would comprise of a review of ASC sub-committee terms of reference, beginning with the Project Licence Application Subgroup, where the focus would be on maximising the value of ASC advice and recommendations via strategic application. This would include licences other than just for special species or those with particular societal concern.

Action: ASC Chair to liaise with Secretariat to discuss planning the review of the ASC sub-committees Terms of Reference. Further discussion to be held at the next ASC meeting.

4.5. ASRU Dashboard.

- 4.5.1. ASRU provided a summary of their current key Performance Indicators (KPIs) to ASC members.
- 4.5.2. Members welcomed this, suggesting that additional context and information for the KPIs would be useful to help understand the figures provided.
- 4.5.3. ASRU advised they would take this comment onboard for further reporting.

4.6. Actual Severity Reporting

- 4.6.1. The ASC were provided with a written response to their questions around Actual Severity Reporting and how to resolve discrepancies between applicants and Inspectors reporting of actual severity.
- 4.6.2. ASRU HoP advised that there was no current analysis of retrospective severity reporting but that this issue would be included within their QMS project. Current retrospective severity reporting was supported through a set of guidelines however discrepancies in reporting could occur through differences of opinion between applicants and Inspectors.

¹ [Ministerial Commission of Work for the Animals in Science Committee: 2020 to 2021 - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/commissions/ministerial-commission-of-work-for-the-animals-in-science-committee-2020-to-2021)

4.7. Non-human primates (NHPs) used in Regulatory/Service Licences

- 4.7.1. The ASC were provided with a written response to their previous question surrounding the number of NHPs used in regulatory/service licences.
- 4.7.2. The ASC had previously commented that the number of NHP licences reviewed by the committee was not commensurate to the number of NHPs used annually in research in the UK. It appeared that most NHPs were used in regulatory or service licences; these were not routinely referred to the ASC as they usually fall into the 'moderate' severity category. The ASC were legislatively required to review NHP licences in the 'severe' severity category.
- 4.7.3. However, Members felt that the numbers of NHPs involved could suggest these licences could fall under the category of 'societal concern' which would come under the purview of the ASC and should be further discussed.

Action: Secretariat to arrange a meeting with member of the ASC to discuss societal concerns regarding procedures in NHPs other than those categorised as 'severe'.

4.8. Animal Husbandry and ASPA Compliance

- 4.8.1. The ASC were advised by ASRU that this workstream had been delayed. A response would be provided at the next ASC Plenary meeting.

4.9. Review of ASPeL

- 4.9.1. It had been previously agreed by ASRU to invite an ASC delegate to the panel for the ASPeL review, which was due to take place in 2021.
- 4.9.2. The Chair advised ASRU that he would invite an ASC member to join the review panel following the receipt of the formal ASRU request.

4.10. Covid-19

- 4.10.1. ASRU HoP updated the ASC that face to face Inspections at establishments had restarted, each visit was preceded by a risk assessment at each establishment. Once 20 inspections had been completed, the process would be reviewed to assess areas for improvement.
- 4.10.2. Members commented on problems encountered by establishment staff during the lockdown when animal technicians had not been given 'Key worker status'. ASRU HoP advised the categorisation of 'Key Workers' was a matter for Government. ASRU was monitoring the situation and would provide advice to establishments as requested.

5. AWERB Subgroup Update

5.1. Hub Chair Workshop

- 5.1.1. The Subgroup Chair updated the ASC on the status of the next Hub Chair Workshop. Delayed from March due to Covid-19 restrictions, the Hub Chair workshop would now be taking place on 21st October. This

would be in the form of a half day virtual event, limiting the agenda to 3 priority topics.

- i 'Culture of Care (CoC): Role of the AWERB'
- ii Non-Technical Summary (NTS) Guidance
- iii Harm Benefit Assessment (HBA): Recommendations for AWERBs.

5.2. ASC members were provided with a written update ahead of the meeting on the following AWERB workstreams.

5.3. Support Note

- 5.3.1. The first draft of the updated support note had been circulated to Subgroup members for comment. Originally scheduled for discussion at the March Workshop, preliminary feedback received from Hub Chairs earlier this year had been used to inform the redraft.

5.4. NTS Guidance

- 5.4.1. The purpose of this would be to provide AWERBs with the tools to assess the quality of the NTSs and their appropriateness for a lay readership. Members had continued their preparation, specifically the adaptation of the presentation material for a virtual setting rather than a face to face workshop.

5.5. HBA Recommendations for AWERBs

- 5.5.1. Following feedback from a regional Hub, the Subgroup had revised the HBA Recommendations for AWERBs. A copy of which had been circulated for ratification by the ASC.

5.6. Animal Technician representation on AWERBs

- 5.6.1. The feedback responses received from the AWERBs on their animal technician membership had been collated and would form part of the 'Culture of Care' topic at the Hub Chair workshop. An Institute of Animal Technology representative would also be attending the virtual Hub Chair workshop in October.

5.7. Effectiveness of the AWERB Hub Network

- 5.7.1. The Subgroup had begun developing a mechanism to assess the effectiveness of, and challenges/barriers encountered by, Hubs in a Regional Network structure. The feedback initially received from the Hub Chairs had been collated into a table and would be circulated to the Hub Chairs for further comments and views on possible solutions to the challenges/barriers encountered.

5.8. The SG Chair advised that the final output from the workshop would be in the form of a report that would be shared with the ASC, throughout the AWERB Hub Network and published on the ASC Website.

6. Task and Finish Groups

6.1. Futures Capability Group

- 6.1.1. The Subgroup Chair updated the ASC that the subgroup has agreed on an initial evidence gathering process involving using the Future Tools

of horizon scanning, 7 questions interviews², and literature review. This would enable the Subgroup to identify trends for further review.

- 6.1.2. The SG Chair advised that at this stage they would not co-opt any external members but would appreciate contributions from the whole of the ASC through:
- i Ad hoc identification of useful press articles, recent research, or other resources and sharing these with the Secretariat for compilation in a repository to be circulated regularly to FWG.
 - ii The preparation of horizon scans.
 - iii Suggestions of suitable entities/organisations (not individuals) to contact for their participation in evidence-gathering (7 questions, horizon scans, later workshops).

Action: Secretariat to send out futures horizon scan template with guidance and invite ASC members to complete a horizon scan

- 6.1.3. Though progress on this workstream had been delayed due to Covid-19, the group aimed to follow up the initial evidence gathering phase with workshops with the aim of producing meaningful recommendations and scenarios that would benefit ASRU.

6.2. Brain Organoids, Reanimation and Sentience Group (BORSG)

- 6.2.1. The Subgroup Chair updated the Committee on the progress of the BORSG Subgroup. The group had had two initial teleconference meetings covering the following topics:
- i post-mortem brain reanimation;
 - ii human brain organoids transplanted into mouse (or other animal) brain;
 - iii and sentience and its definition (or description).
- 6.2.2. The group decided the next step would be a virtual workshop in order to gather expert opinion on these subjects. The SG Chair requested the ASC contribute suggestions for workshop attendees and views on the proposed workshop format.

Action: Secretariat to circulate the BORSG update paper requesting comments on the BORSG focus questions and workshop format

- 6.2.3. The SG Chair noted that the Department for Environment, Food & Rural Affairs (DEFRA) was commissioning a review of the evidence for sentience in decapod crustaceans and cephalopod molluscs. ASRU HoU advised he would feedback the outcome of that work to the Subgroup.

- 6.2.4. It was suggested that the Subgroup also consider developing a working definition of 'suffering' as this was also a complex topic.

Action: BORSG Group to add a question on the definition of Suffering to the focus questions

6.3. The Licence Analysis (LA) Subgroup Update

- 6.3.1. The SG Chair thanked members for their work on this report and advised that it was now ready for publication subject to a small edit which had previously been agreed. Following the meeting this report would be published on the ASC website.
- 6.3.2. Members discussed possible methods of dissemination of this report and suggested publication on the AWERB Knowledge Hub and circulation via the AWERB Hub Network.

7. AOB

7.1. An ASC member requested a response from ASRU on the potential UK policy implications of the recent announcement by the Board of Appeal of the European Chemicals Agency (ECHA) that some chemical ingredients used exclusively in cosmetics products should be subjected to animal testing, under legislation such as REACH; and also an ASRU view on the recent EURL ECVAM recommendations concerning the use of non-animal methods for replacing animal-derived antibodies.

7.1.1. ASRU HOU advised in line with both the Cosmetics Regulations and REACH Regulations that although animal testing of cosmetics ingredients does not occur to meet the licensing requirements for cosmetic products these ingredients, especially when multi-use, may undergo testing to meet other regulations, particularly under REACH for worker safety testing.

7.1.2. ASRU HoP advised that ASRU already requires appropriate and necessary justification for the use of animals when non-animal alternatives were available. ASRU promotes the use of non-animal alternatives and works closely with NC3Rs to support this.

7.1.3. ASRU HoU added that as these were both complex topics they would respond to the ASC's questions of concern with written answers.

7.1.4. The AWERB SG Chair suggested an ad-hoc meeting to discuss non-animal alternatives, including the ECVAM report.

7.2. The AWERB SG Chair presented a document 'AWERB Review of Lessons Learned from Covid-19 Experience'. Commenting on its usefulness as a guide to establishments on their response to situations such as Covid-19, she suggested the ASC to write to ASRU to commend the document and to encourage its use within establishments.

Action: ASC to write to ASRU in support of AWERBs using the 'Lessons learned from Covid-19' document

Annex A

Animals in Science Committee Members

Dr David Main (Chair)

Mrs Wendy Jarrett

Professor Stephen May

Dr Donald Bruce

Dr Virginia Warren

Professor Christine Watson

Dr Sally Robinson

Mr Barney Reed

Professor Clare Stanford

Mrs Susan Sparrow

Professor Andrew Jackson

Professor Johanna Gibson

ASRU

Mr William Reynolds (Head of Unit, ASRU)

Dr Giles Paiba (Head of Policy, ASRU)

Science Secretariat

Mrs Caroline Wheeler (ASC Secretary)

Ms Jessica Daly (ASC Secretariat)