

The **A S C**

Animals in Science Committee

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Lord Sharpe of Epsom

Parliamentary Secretary of State for the Home Department

Hon George Freeman MP

Minister of State for the Science, Research and Innovation

Hon Rebecca Pow MP

Minister for Environment Quality and Resilience

Strategic direction of Animals in Science

As an independent advisory committee to government on the use of animals in science, the Animals in Science Committee (ASC) takes a keen interest in developments in the field. Recent events now give me urgent cause to write to you as I believe the UK is at a significant juncture in the required use of animals in science and the drive to accelerate the development and uptake of new non-animal technologies (NATs) and new approach methodologies (NAMs), including those relevant to regulatory testing. There are significant potential scientific and economic opportunities associated with these innovations. The recent interest in cosmetic ingredient testing highlights the wider societal concern for the suitable justification for the use of animals in science and its benefits to society. Other countries are now making plans and progress for promoting non-animal alternatives. I believe the time for the UK to take the initiative is now.

However, our approach must also recognise that not all animal testing can be replaced in the foreseeable future: there is still a requirement to use animals in science where no validated alternative methods are available. The reconciliation is that we determinedly pursue the development and implementation of NATs and NAMs in tandem with a continuation of the delivery of our robust and rigorous UK framework for protecting animals in science where they are used. This twin track approach, coupled with openness and transparency, will support the aim of maintaining public confidence in what is both a dynamic but contentious policy area with the UK promoting the highest ethical standards,

at the same time as supporting the safety of future generations, animals and also our environment.

I propose there are three key areas that would create the necessary strategic shifts to allow progress towards a new and exciting era of scientific innovation that uses fewer animals. These are:

- 1. Government seizing the immediate opportunity for the UK to take a lead on the development of NATs and NAMs.** We need not ground the discussion in trade-offs between animal testing and non-animal alternatives. Fundamentally, the UK needs a strategy to deliver necessary advances and protections for people, animals and the environment through new, pioneering and validated approaches. I am aware that a number of industry leads and the NC3Rs are championing NATs and NAMs – this is surely the time for the Department of Science, Innovation and Technology (DSIT) to provide leadership and exploit the opportunities to advance and adopt the new methods that other countries are already looking to take advantage of, and put the UK at the forefront of new science.
- 2. Fully supporting reforms of the GB Regulator that have positive impact on the protections to animals and facilitation of science.** In those instances where animal use is required, it is imperative that the public remains assured that the provisions of ASPA are being fully applied - including a robust assessment of the justification for animal use in each case and ensuring the fullest implementation of the 3Rs. It is positive that under your leadership, Lord Sharpe, there are plans for continuous improvement of the regulator. This should enable the Regulator to adapt and keep pace with scientific developments in the field. Reform should provide assurance of compliance with animal protection regulation and facilitate high quality science while helping to position the UK at the forefront of global scientific innovation. As your independent advisory body on matters related to ASPA, we anticipate providing a supporting role, including key aspects of the reform programme such as better underpinning of Harm Benefit Analysis in regulation and animal use.
- 3. Consider re-locating the animals in science policy function from the Home Office to DSIT.** The use of animals in science is an issue that spans several government Departments. The commitment to advancing NAMs in the recent written statement from the Home Secretary brings much expectation from the community and public for setting a clear and ambitious Vision and Strategy for achieving this. However, it is recognised that the Home Office does not own many of the levers for delivery of such an outcome and I therefore question how this will be best achieved. My observation is that effective governance in this area could better be delivered by co-locating this endeavour with the life sciences strategy work. This would give opportunity to place strategy and delivery where the policy levers are and give opportunity under one Department to best deliver what are often seen as competing interests. Co-location with the Office for Life Sciences will enable the commitment to accelerating progress with replacing the use of animals in science to be best pursued and would also remove inefficiencies of interdepartmental working to the benefit of working at pace.

I have addressed this letter to your Departmental colleagues to encourage the necessary interdepartmental collaboration. I am available at your earliest opportunity for discussion.

Yours sincerely

A handwritten signature in blue ink, appearing to read 'D. Main', is positioned above a horizontal line.

Professor David Main
Chair of the Animals in Science Committee

Cc:

Rt Hon Suella Braverman MP, Secretary of State for the Home Department

R Hon Chloe Smith, Secretary of State for the Department of Science, Innovation and Technology

Rt Hon Thérèse Coffey MP, Secretary of State for Environment, Food and Rural Affairs