

Animals in Science Committee

Minutes of the 35th Meeting: 7th June 2022

Via MS Teams

Welcome, Introductions and Conflicts of Interest

1. Professor David Main, Chair of the Animals in Science Committee (ASC), welcomed members to the second plenary meeting of 2022.
2. No conflicts of interest were declared. The primary focus of the meeting was a discussion on the development of a new policy unit in the Home Office, and ASC's role within the new structure.
3. The Chair welcomed officials from the Home Office's new Animals in Science policy unit. The Chair explained that minutes from the previous meeting were in the process of being checked.

Action: Secretariat to circulate minutes from the previous meetings for the ASC's approval

Chair's Update

4. Members heard that several letters from stakeholders had been received by the Minister. Stakeholders had written to voice concerns about the introduction by the Animals in Science Regulation Unit (ASRU) of changes to the regulation of animals in scientific procedures. Concerns focused on implementation of change, availability of guidance, consultation and transparency leading to the potential for increased regulatory burden and impact on animal welfare and, potentially, public confidence in the regulatory system. The ASC had written to the Minister with an offer of assistance regarding the regulatory reform programme and maintenance of public trust and confidence. The Minister had subsequently invited the Chair to attend a roundtable event in July 2022 with stakeholders.
5. The Chair had recently been invited by an establishment to observe the impact of the ASRU change in practice. Three broad themes had been reported:
 - *Theme 1: Perception of overall interaction with Home Office*
 - *Theme 2: Perception of transition to new ASRU procedures reported*
 - *Theme 3: Perception of consequence of regulatory change*
6. The Chair suggested that for future meetings the ASC would wish to see an operational report from ASRU with meaningful metrics on the regulator's service to the regulated community. In further discussion the Chair reiterated that it is not the role of ASC to act as an intermediary for the regulated community, neither does it have a role in the governance arrangement between the two. However, the ASC will provide a route to collate and assess an evidence base for Ministers to support policy making.
7. In discussion of the consequences around stakeholder concerns about regulatory change, the Chair proposed that when capacity allows, the ASC should self-commission

a review of institutional governance on named roles and responsibilities in establishments, so that there was a safe move away from regulatory dependence, being mindful of unintended consequences and biases.

Animals in Science Policy Unit

8. The Chair emphasised the importance of the ASC determining its ways of working in providing advice to ministers. This will include how to respond to ministerial commissions (e.g., the non-human primate supply issue) and generating self-commissioned topics (e.g., regulation under ASPA of decapod use, which was later identified as a ministerial priority).
9. The ASC's role also included sharing leading best practice, which was for further discussion, and may extend to oversight of guidance to section 3 of the code of practice.
10. Citing an example of recent advice from the NC3Rs to the Home Office, it would be important for the ASC's revised terms of reference to be clear, including its role within the current advisory landscape e.g., alongside NC3Rs.
11. Members heard that the policy unit had begun to define its responsibilities to improve governance in the delivery of the portfolio of animals in science under ASPA. Greater clarity has been given to the role of the Regulator, set apart from the role of policy and the aspiration to have a clear vision for a system and a culture that delivered positive outcomes, including benefits for science, animal protection and also holding confidence of the public.
12. Members heard that the policy unit would be working with the ASC to determine the shape of the ASC's role, including analysing the evidence base to provide advice to policy makers and ministers. Examples of new opportunities for the ASC might include horizon scanning to inform policy priorities; leadership on Section 3 of the Code of Practice (on care, accommodation and use of animals in science); and making licence reviews more strategic.
13. The new policy unit was working with other government departments (BEIS, DEFRA and DHSC) to support a coordinated approach to Government policy across different departments with responsibilities for the use of animals in science.
14. There would be an annual ministerial commission to the ASC to set out key areas on which advice was being sought. The inclusion of topics would rely on discussion between policy officials, the ASC and secretariat to identify potential upcoming policy issues, without fettering the independence of the ASC, which can select topics on its own volition. Citing the example of the NHP supply commission, each ministerial commission would now be accompanied by a detailed commissioning document from the policy unit, which would set out the issue in more detail and include questions for the committee to consider.
15. Looking to the future and the prospect of greater cross departmental working in respect of animals in science, members discussed the need for a process to manage the potential scenario of ministers receiving conflicting advice from different advisory bodies. In response, members heard that ministers are often required to take account of several

different perspectives when making decisions, and therefore, consideration was given to the strength and context of evidence.

16. Also discussed was the future format of engagement with the regulated community, where it was clarified that the policy unit would have strategic engagement with the regulated sector groups, whereas the ASC may require engagement to gather evidence on specific topics and horizon scanning.
17. The Chair explained that a new ASC Working Group was being established to begin drafting a 'Ways of Working' document. Another member queried the use of the term 'informed public via the ASC', which the Chair noted should be considered within the Ways of Working document.

Action: ASC to establish new working group to begin drafting ways of working to reflect discussion held, including consideration of ASC's role and stakeholder engagement

18. Members discussed the policy unit's draft vision on the use of animals in science, which stated the importance of holding the confidence of the UK public on policy and regulation. Members noted the benefits of the Ipsos Mori Poll, which ran between 1999 and 2018, as an evidence base on tracking public opinion on the use of animals in science. Its absence for the last four years had resulted in a loss of evidence to measure societal consent for the use of animals. The Policy Unit noted the value of the survey, explaining that responsibility for it lay with BEIS and that they would contact BEIS regarding the status of the survey and update the ASC.

Action: Policy unit to contact BEIS regarding the status of the Mori Poll and provide an update to the ASC as soon as information is available.

AWERB Subgroup Update

19. Members heard that a suggestion from the South-East AWERB hub was for information from retrospective assessments to be posted alongside non-technical summaries on the ASRU website. Although the approach had been discussed at the AWERB subgroup, the suggestion would need full discussion at the next ASC plenary meeting, considering the benefits and risks.
20. The AWERB subgroup agreed to discuss the technical possibilities of publishing retrospective assessments, which may provide potential benefits and learnings on the 3Rs to other users.
21. Members received an update on progress with the non-technical summary (NTS) document. Previously as a single document, this had now been separated into two, with one document aimed at the role of AWERBs and a second providing advice to applicants on drafting clear non-technical- summaries.
22. The Chair suggested that the covering letter for the Minister should explain the purpose of the document, which is to share good practice with the regulated community, as is the ASC legislative requirement, and that it is not intended to replace existing regulatory guidance.

Action: AWERB SG to draft covering letter to Minister

23. Members heard that it would be helpful to have further discussion with the policy unit about making the NTS documents as impactful as they can be. The policy unit explained that they needed to provide clear direction to the regulator and welcomed further discussion. The Chair stressed the importance of ensuring that institutional governance for AWERBs was working optimally in context of the shift in ASRU's way of working.

Action: AWERB standing group lead to discuss (with the policy unit) (a) the mechanics of publishing retrospective review learnings, and (b) making the NTS documents as impactful as possible.

Project Licence Strategic Review (PLSR) Subgroup

24. Members received an update on the final draft report into licences for creating antibodies using animals. This was cited as a report aimed at the regulated community, on how to demonstrate the assessment and implementation of the 3Rs.

25. The Chair noted that the covering letter for the minister should set out that the intended audience was for the AWERBs and the regulated community. The next steps would involve formally sending the report to the policy unit, followed by publication. Members heard it would also be helpful to make NC3Rs aware of the report to help with dissemination and awareness.

Action: ASC to approach NC3Rs to raise awareness of the report

26. Members heard that the new policy unit would advise the minister on responding to the ASC committee in line with the joint working protocol. Members heard the PLSR SG would next review licences involving the forced swim test, noting this would also be included as part of the ministerial commission for advice. Access from the regulator and further guidance on useful outputs would be helpful to ensure relevant questions were included as part of the review assessment criteria.

Action: PLSR SG Chair and policy unit to liaise on the purpose of the commission for the Forced Swim Test, to guide the ASC to include relevant questions in the assessment criteria.

Task and Finish Groups

Futures Capability Working Group (FWG)

27. Members heard that an advanced draft report would be circulated after the next Futures Working Group meeting, ahead of the next plenary meeting.

28. The Futures Working Group was discussing how stakeholders who have interest in the futures area might be able to provide regular evidence on ongoing horizon scanning, including use of a public portal. Use of gathering evidence for horizon scanning would need to be embedded in the ASC's ways of working.

Brain Organoids, Reanimation and Sentience Group (BORSG)

29. Members heard that there was emerging evidence in this area, including potential policy implications of organoids and at what point legislation might need to be changed. However, there had been difficulty arranging stakeholder meetings, though members

heard that the next steps involved working with the London School of Economics (LSE) group on policy questions relevant to organoids.

Committee Matters and AOB

Animals in Sentience Committee

30. The Chair commented that it would be useful to establish a working relationship between the ASC and DEFRA's recently formed Animals in Sentience Committee.

Action: ASC Chair / Secretariat to establish working relationship and coordinated approach with the sentience committee via DEFRA

Recruitment exercise

31. Members heard that a recruitment exercise would be planned shortly to equip the ASC with expertise and specialist knowledge to support the new animals in science policy requirements. Policy officials also valued expertise in synthesising evidence to inform objective advice to ministers. It was suggested that the Committee should seek to ensure its membership appropriately reflects the range of perspectives held on the use of animals in science (though notes that members do not 'represent' any particular stakeholder group or organisation), and recommended incorporation of expertise in areas such as:

- Non-animal technologies (NATs) and new approach methods (NAMs)
- Social science as it pertains to how science is currently done (governance, incentives, drivers etc) and the impacts of this on animal use in research and testing
- Public communication of science
- Non-human primates - use and welfare
- The use of animals in regulatory testing.

32. Members agreed that co-option process needed to be included in the Ways of Working document. A pre-populated pool of experts could help with specific projects.

Other matters raised by members

33. The Chair explained that most items on the action log had been completed but queried whether the definition of scientific purpose (in agricultural research) had been clarified.

Action: Policy unit to check whether the definition of scientific purpose had been resolved.

34. In response to a question on expansion of the policy team, members heard that the policy team was unable to be specific on expansion of the policy team in the context of recent government announcements.

Annex A

Committee Members

Dr David Main (ASC Chair)

Mrs Wendy Jarrett

Dr Donald Bruce

Dr Sally Robinson

Mr Barney Reed

Professor Clare Stanford

Professor Andrew Jackson

Professor Johanna Gibson

Professor Stephen May

Linda Horan

Secretariat

Caroline Wheeler

Zahi Sulaiman

Animals in Science Policy and Co-ordination Function

William Reynolds

Gideon Winward

Apologies:

Dr Hannah Clarke

Prof Christine Watson