

**Animals in Science Committee**  
**Minutes of the 39<sup>th</sup> Meeting: 5<sup>th</sup> June 2023**  
**Hybrid Meeting**

**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 2023. No apologies were received. No conflicts of interest were declared. A full list of attendees can be found at Annex A.
2. The Chair welcomed officials from the Home Office Animals in Science Regulation Policy Unit (ASRPU) and representatives from the Department of Health, Northern Ireland (NI) who joined the meeting online. The Chair also welcomed the Chief Executive of the National Centre for the Replacement, Refinement & Reduction of Animals in Research (NC3Rs), who joined the meeting as an NC3Rs representative.
3. The Committee noted the need for another Ipsos MORI survey to be undertaken to enable a proper assessment of the public attitudes to the use of animals in science. ASRPU confirmed that the public attitudes survey was the responsibility of the Department for Science, Innovation and Technology (DSIT). The desire from a number of stakeholders to see the survey reinstated had been raised a number of times with DSIT, by ASRPU and by stakeholders directly. The Committee considered writing to DSIT to express support for the continuation of the survey.

**Animals in Science Regulation Policy Unit Update**

4. The Committee were aware that there had been some reports of delays in post-audit reports being returned to establishments and requested that ASRPU look at the current expected timelines for establishments to receive their follow-up reports.

Regulatory reform update

5. The next steps in the reform process will be broadly:
  - a. Assessing applications to select a consultancy firm to support the reform programme.
  - b. Engaging with external stakeholders
  - c. Reviewing feedback from external stakeholders and the ASC
  - d. Design phase
  - e. Options for improving the Animals in Science Regulation Unit (ASRU)
  - f. Implementation phase in 2024

**Action: ASRPU to seek feedback from the ASC on regulatory reform programme as it is developed.**

6. Following questions from the Committee and discussion, several points were raised:
  - a. Feedback from the ASC should be sought ahead of the design phase.
  - b. The Minister would be writing to ‘thought leaders’ in animals in science sector to invite them to discuss the reform programme. The Chair of the ASC would be invited to this meeting. Further information would be provided at a later date.
  - c. The consultancy firm’s work would involve a review of the ASRU and its operating model to identify areas for improvement. The Committee recommended looking for areas of inconsistency in delivery, as they felt that this was an area for improvement.
  - d. Annual reports produced by ASRU should inform on the positive impacts of the reform. ASRPU also advised that ASRU would be encouraged to consider how it could proactively engage with the public.

**Action: Chair to be invited to the meeting of ‘thought leaders’ from the animals in science sector.**

Training and continuous professional development framework

7. The Committee were provided with an update on the draft guidance framework for training and continuous professional development (CPD).
8. The intention was to publish a consolidated guidance document on training and CPD under Section 21 of the Animals (Scientific Procedures) Act 1986 (ASPA). The purpose was to provide clarity for the regulated sector and the public by consolidating in UK guidance: a new governance framework for the training system; restating the training requirement post-EU exit; and restating the detailed course learning outcomes currently in EU guidance. The guidance would be laid in Parliament in July 2023.
9. Since the last update, ASRPU had continued to engage with stakeholders including accreditation bodies and training providers to co-develop the new consolidated guidance, and with regulated sector and animal welfare stakeholders.
10. The draft guidance will set out:
  - a. Governance of the training/CPD system
  - b. Training and CPD requirement
  - c. Learning outcomes
11. The Committee were invited to provide feedback on the draft guidance.
12. Responding, the Committee noted a concern had been raised by the Institute of Animal Technology (IAT) and asked whether the proposed changes would affect the courses and training offered by the IAT. ASRPU confirmed that the IAT were engaged on the guidance and that its concerns had been addressed. ASRPU

noted that the training requirement section of the guidance was being restated with minor clarifications, rather than a wholesale review.

#### ASRU operational update

13. The Committee were also provided with a wider operational update covering:

- a. Business Performance
- b. Process and standards
- c. Stakeholder engagement
- d. Recruitment and resourcing
- e. Publications
- f. Licensing
- g. Compliance assurance

#### Wider policy update

14. ASRPU updated the Committee on the latest status regarding ongoing policy projects, including:

- a. Decapods
- b. Supply of non-human primates
- c. Forced swim test
- d. Transparency and protecting confidential information including Section 24 of ASPA
- e. Antibodies
- f. Retained EU Legislation
- g. Genetic Technologies (Precision Breeding) Bill

15. The Committee expressed concern about delays in receiving a departmental response to advice provided by the ASC. ASRPU reassured the Committee that work was being progressed but there were a variety of reasons why delivery of the Committee's advice may take time, including: resourcing, other priority workstreams, and the need for wider input and clearances. ASRPU agreed with the Committee that acknowledging receipt of any advice received would be beneficial.

### **Regulatory Testing**

16. The Committee were provided with an update on regulatory testing of chemicals used as ingredients in cosmetics.

17. In 2022, Ministers published policies they had put in place which had sought to bring policy into line with requirements under Registration, Evaluation, Authorisation and Restriction of Chemicals (REACH) regulations. These were subsequently made available to the Committee and stakeholders. The following steps had been taken:

- a. Publication of overall regulatory policy and policy on cosmetics testing.

- b. Development of an agreed cross-Whitehall paper on departmental responsibilities to ensure agreed ownership.
18. After the outcome of the recent Judicial Review, Ministers reviewed the evidence base and had decided to take further steps that included:
- a. An immediate ban on the licensing of animals for testing chemicals that were exclusively intended to be used in cosmetics.
  - b. An undertaking of a government review of the effective administration of the ban over the longer term, including the legal framework.

**Action: ASRPU to update the ASC on the scope and process of the review of the ban on the use of animals in testing chemicals that are exclusively intended to be in cosmetics.**

19. ASRPU advised that progress was being made with the cross-Whitehall group which had been considering the vision, next steps and strategy for animals in science. ASRPU would be providing further advice to the Minister following further meetings with the cross-Whitehall group.
20. The Committee felt that there needed to be further resource put into the area of non-animal alternatives (NAAs), including Inspector training, dissemination of potential NAAs and establishing regulatory acceptance for new and alternative methods.
21. The Committee would be updated on what potential input might be needed from the Committee in due course.
22. Going forward, it was agreed that greater transparency should be provided to the Committee in relation to timings of announcements and/or reasons for delays to advice or questions from the ASC.
23. It was also agreed that dialogue between the Committee and ASRPU should take place to clarify the scope of 'societal concern' to ensure that any licences that trigger the 'serious societal concern' category of these licences were referred to Committee to review as set out in Section 13 of the Guidance of the Operation of ASPA<sup>1</sup>.

## **Chairs Update**

### Decapod workshop

24. The Chair was unable to attend a workshop on regulating the use of decapod crustaceans, however several Members attended on behalf of the ASC. ASRPU also had representatives in attendance.
25. Members fed back their views on the event, with the key points being noted as:

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<sup>1</sup> [Guidance on the Operation of ASPA.pdf \(publishing.service.gov.uk\)](https://publishing.service.gov.uk/guidance/operating-an-aspa-licence)

- a. Sentience in decapods was discussed. There were a range of views as to whether it would be appropriate to regulate their use under ASPA.
  - b. The potential impact of regulation on higher education was one of the main points of contention. Other discussion centred around housing, and welfare standards.
  - c. The workshop provided an opportunity to discuss the scientific, ethical, and practical issues involved, which Members found to be beneficial.
26. ASRPU advised that there would be a call for evidence to scope the work and fully understand the impact on all sectors. The ASC would be invited to provide advice at a later date following the call for evidence.

#### Recruitment campaign update

27. The Chair updated the Committee on the status of the recruitment of new Committee Members. The advertisements had gone live on 12 May 2023 and were due to close on 11 June 2023. The campaign had been uploaded to the ASC website and shared via the Animal Welfare Ethical Review Body (AWERB) Network, policy networks, and the Home Office Public Appointments Team had circulated it widely via their website, Home Office and Cabinet Office LinkedIn, Cabinet Office Twitter feed, and diversity channels.
28. The Chair welcomed any further circulation by Committee Members.

### **National Centre for the Replacement, Refinement and Reduction of Animals in Research Update**

29. The Chief Executive of the NC3Rs had been invited by the Committee to provide an update on the work of the NC3Rs. This was the first plenary meeting attended by an NC3Rs representative as part of the ASC's role to provide advice to the Minister, whereby the ASC may invite external participants to be present for one or more agenda items in which they have an interest. The Committee had decided to include a standing agenda item for the NC3Rs update at ASC plenary meetings.
30. The Committee was provided with a substantial overview of the ongoing work of the NC3Rs<sup>2</sup>. Topics included:
- a. Research funding – the NC3Rs strategy was to invest 75% of its research and innovation funding budget on replacement technologies, and although the NC3Rs was also committed to funding reduction and refinement research these were primarily delivered through other areas of the NC3Rs portfolio.
  - b. Innovation funding through CRACK IT Challenges – ongoing international project focused on developing a virtual dog for chronic toxicity testing.

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<sup>2</sup> [NC3Rs](#)

- c. Services provided – peer review service for 30 funders which intended to support the community.
- d. Regional Programme – six regional managers that assist groups of establishments to embed 3Rs into practices on the ground.
- e. Training – focused on early career training such as the NC3Rs PhD studentship scheme and grants to students for 3Rs dissemination work.
- f. Staff-led projects – covering experimental design and reporting, animal welfare and safety sciences.
- g. Information provision – various web resources, online tools such as the experimental design assistant and 3Rs self-assessment tools, and workshops and public engagement activities.

### **Project Licence Strategic Review Subgroup**

- 31. The Chair of the Project Licence Strategic Review (PLSR) Subgroup provided the Committee with an update on the status of their latest report on the use of the Forced Swim Test (FST).
- 32. The Subgroup had taken into consideration the comments made on the FST report since the last plenary meeting.
- 33. The final draft had been circulated to the Committee for final comments and ratification, following which the final report would be sent to the Minister and published on the ASC website.
- 34. The next report from the Subgroup would be on the use of non-human primates in procedures with a prospective severity classification other than 'severe'. Given the primary focus on use of non-human primates in this review, the Subgroup had been joined by two additional Members with expertise in non-human primates.
- 35. The Subgroup would use a similar approach to their previous reviews which included identification of assessment criteria and obtaining further evidence from project licence holders via a questionnaire along with a public call for evidence.

## **Annex A – List of Attendees**

### Committee Members

Professor David Main (ASC Chair)  
Mrs Wendy Jarrett  
Dr Sally Robinson  
Professor Andrew Jackson  
Dr Donald Bruce  
Mr Barney Reed  
Professor Clare Stanford  
Professor Johanna Gibson  
Professor Stephen May  
Professor Christine Watson  
Dr Hannah Clarke

### Secretariat

Caroline Wheeler  
Jessica Stone

### Animals in Science Policy Regulation Unit

William Reynolds  
Gideon Winward  
Chloe Jenkins

### Department of Health, Northern Ireland (NI)

Heather Stevens (Northern Ireland)  
Lynsey Armstrong (Northern Ireland)

### National Centre for the Replacement, Refinement & Reduction of Animals in Research (NC3Rs)

Dr Vicky Robinson