

Animals in Science Committee
Minutes of the 41st Meeting: 4th December 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 final plenary meeting of 2023. Apologies were received by Professor Andrew Jackson and the Department of Health, Northern Ireland (NI) representatives for the full meeting, and Mrs Wendy Jarrett for the afternoon only. 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 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 Chair explained that minutes from the previous meetings would be circulated as soon as possible.
4. Following prior discussion on the need for another survey to be undertaken to enable proper assessment of the public attitudes towards the use of animals in science, the Committee provided further support for this as a source of evidence for the overall ASC work programme. The Chair agreed to write to Department for Science, Innovation and Technology (DSIT) to express support for the continuation of the survey.

Action: Chair to write to DSIT expressing support for the continuation of the public attitudes to animal research survey.

5. The Chair brought attention to those Members of the ASC who would be demitting on 31 December 2023 and thanked them for their contributions to the ASC over their tenures. The Chair raised that a meeting between the outgoing and incoming Members would be especially valuable to ensure continuity in the functioning of the ASC, which was agreed.

Review of Home Office relationships with Science Advisory Committees

6. The Chair welcomed the Director of Home Office Science, who joined the meeting to provide an update on the progress of the ongoing Home Office Science Advisory Committee (HOSAC) review on the Department's ways of working with their Science Advisory Committees.
7. The key points communicated were:

- a. The Home Office was in the process of improving their science ecosystem, including their commissioning of independent advice.
 - b. The aim of this review would be to identify potential areas of improvement for the systems and processes currently in place. It will not look at the remit or operation of Committees.
 - c. Recommendations will be presented to the Chief Scientific Adviser for implementation over the next financial year.
 - d. This will be an ongoing process for continuous improvement.
8. The Committee agreed the value of the review and provided some initial reflections. The Chair highlighted the importance of ensuring that demitting Members had the opportunity to input into this review, which was agreed.

Chair's Update

9. The Chair reminded Members that a strategic planning meeting had been proposed to take place on the 11-12 March 2024 with the objective to induct new Members, discuss ways of working and prepare to launch commissioned workstreams.

Recruitment campaign

10. The Chair updated Members on the recruitment process for new Members, who were expected to take up their posts in January. The Minister had selected his preferred candidates who would shortly be contacted with further details on the appointment process.

Regulatory reform programme

11. The Chair met with the Head of Regulatory Reform and PricewaterhouseCoopers (PwC) representatives on 29 September 2023 to discuss their findings and the key points that would underpin the operating model for the Animals in Science Regulation Unit (ASRU).
12. These included a review of:
- a. ASRU strategic centre
 - b. ASRU standards and guidance
 - c. Approach to licensing and audit

13. The Chair reminded Members that a PwC representative would be joining the meeting later in the afternoon to provide a comprehensive update to Members.

NC3Rs event

14. The Chair was unable to attend the NC3Rs event on 24 October 2023. The ASC was instead represented by a Member, who provided their reflections on the event. Nothing of direct relevance to current ASC activities was flagged.

Laboratory Animal Science Association Establishment Licence Holders meeting

15. The Chair presented at the Laboratory Animal Science Association (LASA) Establishment Licence Holders meeting on 17 October 2023 on the subject, 'Your role and engagement as a stakeholder with the ASC'. This covered:
- a. ASC's legal obligations
 - b. Protection of animals and needs of science
 - c. Need for cross-government working
 - d. What the future looked like
16. The Chair reflected that the event was primarily audit-focused and resulted in a lot of ideas for best practice of ways of working.

St. Kilda Sheep Project

17. The Chair received a letter on 9 November 2023 raising concerns about the legal and ethical issues related to a programme of work being carried out as part of the St. Kilda Sheep Project.
18. The Committee agreed that this matter did not fall under the remit of the ASC and would be considered by ASRPU. The Chair agreed to draft a response outlining this.

Action: Chair to reply to the authors of the letter about the St. Kilda Sheep Project.

Project Licence Strategic Review Subgroup

19. The Chair of the Project Licence Strategic Review (PLSR) Subgroup provided the Committee with an update on the status of their workstreams. The Subgroup's work programme this year included Review of Antibody Licences, Forced Swim Test, and Non-Human Primates in service licences, and an additional commission on Non-Human Primates bred for use in scientific purposes.
20. The latest report on Non-Human Primates used in service licences was due to be finalised by the end of December 2023. However, due to the additional commission (Non-Human Primates bred for use in scientific purposes) delaying the overall timeline, the Subgroup had extended the deadline for the final report to March 2024.
21. It was noted that several key Members of the Subgroup would be demitting on 31 December 2023. The Subgroup Chair requested that these Members be co-opted to the PLSR Subgroup until the completion of the report to provide their required expertise to finalise the report and prevent further delays. The Chair agreed to this request.

Animal Welfare Ethical Review Body Subgroup

22. The Chair of the Animal Welfare Ethical Review Body (AWERB) Subgroup provided the Committee with an update on their workstreams.

AWERB Hub Workshops

23. The report from the ninth AWERB Hub workshop was published on 10 November 2023 on the ASC website.

24. The tenth AWERB Hub workshop took place virtually on 11 October 2023 and included discussions on:

- a. NTS guidance notes for project licence applications,
- b. Forced Swim Test report published by the ASC,
- c. NC3Rs' report on the role of AWERBs in supporting implementation of the 3Rs (replacement, reduction and refinement).

25. The report from this workshop was circulated prior to the plenary for approval. Members had no further comments and approved the report for publication.

Action: Secretariat to co-ordinate publication of tenth AWERB Hub workshop report.

Non-Technical Summary report

26. During the most recent AWERB Hub workshop, there had been discussion and feedback surrounding the non-technical summary (NTS) and the existing project licence application (PLA) guidance.

27. Workshop attendees had been provided with a set of questions which focused on the current NTS guidance and application process. They were then invited to discuss their views in breakout groups during the workshop. The AWERB Subgroup had used those discussions to further inform an NTS report.

28. The Subgroup Chair advised the Committee that several Subgroup Members had yet to comment on the report and welcomed further comments from the full Committee.

29. The key points raised were:

- a. Members broadly agreed with the direction of the report in the importance of improving the NTS in promoting transparency in animal research.
- b. NTSs play a critical role in public communication and should be more transparent in providing details of the harms to the animals along with more information in the 3Rs sections. It was considered that the report did not provide sufficient detail on improving this and should be revised to provide further advice.

30. The Committee discussed the most appropriate method of publishing the report. Though further informed by the AWERB Hub workshop, the Committee agreed that publishing the revised report alongside the AWERB Hub workshop report may cause confusion. It was agreed that the report would be published separately and could be used to inform any future work on NTSs.

Action: AWERB Subgroup to incorporate workshop feedback and finalise NTS report for publication.

AWERB Hub Ways of Working

31. The Chair of the AWERB Subgroup would be demitting on 31 December 2023 and a new Subgroup Chair selected from the incoming Members. The Hub Chairs had been informed of this. The Chair of the AWERB Subgroup raised that this would be an opportune moment to review the ways of working processes between the ASC and the Hubs as set out in the Hub Support Note.

Action: Committee to consider the processes set out in the AWERB Hub Support Note.

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

32. The Chief Executive of the NC3Rs provided an update to the Committee on work of interest to the ASC. The key points were:

- a. The NC3Rs had recently published an update to their online tool, the Experimental Design Assistant, that included a new feature for sharing the output of the system as a read-only diagram. This could be incorporated into funding applications and project licences. They had also published, as a pre-print, the RIVER guidelines on reporting of in vitro experiments to improve confidence in non-animal alternatives. These guidelines would be further updated to better embed experimental design into them.
- b. The NC3Rs had reviewed the World Health Organisation's (WHO) guidelines and published their findings and recommendations to better embed the 3Rs into international guidance on batch release testing of vaccines and biologicals.
- c. The NC3Rs had increased its funding awards for public engagement activities, for which there would be four calls in 2024. They would additionally be hosting webinars on communicating the 3Rs to lay audiences.

33. The NC3Rs representative suggested that for future meetings, a written update could be provided from the NC3Rs, which was agreed.

Animals in Science Regulation Policy Unit Update

Advice commissioning and responses

34. The response to the Review of Antibody Licences was published on 10 August 2023 with all recommendations accepted. ASRPU updated the Committee on the implementation of the actions committed in the response.
35. The ASRPU had concluded stakeholder engagement to inform the response to the Non-Human Primates bred for use in scientific purposes report and advised the Committee that a response was likely to be published in early 2024.
36. The Committee noted that it would be beneficial in future to have increased transparency of progress and timelines, both for the Committee and the public. Concerns were raised about the delays resulting in advice becoming out-of-date and losing relevance. ASRPU acknowledged this and provided reassurance that stakeholder groups were updated regularly. The Committee and ASRPU agreed to review this as part of the Ways of Working revision.
37. ASRPU informed the Committee that the annual Ministerial commission was expected to be published in early 2024. The Committee and ASRPU discussed and agreed the importance of avoiding duplication in commissioned work.

Cosmetics regulatory testing

38. ASRPU confirmed that no work was now taking place under licences on chemicals used exclusively in cosmetics, and reiterated the existing position that no further licences would be issued. Longer term measures were in development in collaboration with the relevant government departments.
39. ASRPU flagged to the Committee that the next hearing for Cruelty Free International's judicial review of cosmetics regulatory testing would take place by the end of April 2024. This would focus on issues under the remit of the Department for Environment, Food and Rural Affairs (DEFRA) and DSIT.
40. ASRPU flagged to the Committee that the EU Court of Justice had ruled against a German chemical company (Symrise AG) who challenged a European Chemicals Agency (ECHA) request to perform animal testing on two chemicals, used as cosmetic ingredients, for the purposes of fulfilling the REACH regulations.

Correspondence

41. ASRPU provided an update on the correspondence received since the last plenary.

42. The Committee noted a response to a Parliamentary Question from the Department for Health and Social Care (DHSC) that had relevance to the remit of the ASC and expressed some concerns with the published response. ASRPU confirmed that DHSC were aware of the concerns but that this decision was outside of the remit of the Home Office.

Operational update and regulatory reform programme

43. The Committee requested an update on the backlog of Standard Condition 18 cases. ASRPU provided reassurance that cases are triaged to mitigate risks, and committed to report back on how case numbers were being managed down.

44. The Chair welcomed a representative from PwC who joined the meeting to provide an update on the design phase of the regulatory reform programme and to receive feedback from the Committee.

45. ASRPU updated the Committee on the progress and next steps of the regulatory reform programme. This included the endorsement of the four recommended strategic priorities by the Minister, the conclusion of the design phase of the programme on 8 December 2023, and the planning for the implementation phase following this.

46. PwC then updated the Committee on the findings of the design phase of the programme. The key topics were:

- a. Methodology used to carry out the design phase
- b. The as-is assessment of ASRU and how this compared to the target operating model
- c. Identification of eight focus areas of the conceptual operating model
- d. Introduction of a tiering approach for licensing and audit

47. The Committee then provided its thoughts and questions on the programme. The key points of discussion were:

- a. The programme should ensure that the conceptual operating model does not overlook cultural aspects of the organisation, and that each of the eight focus areas should clearly link back to the underpinning ASRU purpose of protecting animals in science.
- b. The plans for implementation of operational and strategic changes following the departure of PwC from the project were discussed, and the responsibility for driving the reform programme was clarified to be the ASRPU at present with a view to transition to ASRU as this becomes business-as-usual.
- c. The concept of the “modern” regulator should be cautious not to discount previous ways of operating that worked well.

Committee Matters and AOB

Research of decision-making

48. A Member brought to the attention of the Committee the potential risks of the future of neuroscience research into decision-making and its applications. Following discussion, the Committee agreed that high-risk applications of this research were unlikely to be realised in the near future, but that this matter could potentially be picked up by the Committee following assessment of Ministerial priorities.

Action: Committee to discuss research of decision-making at March plenary.

Ways of Working

49. Following the action at the September plenary to amalgamate the Code of Practice and Ways of Working documents into one cohesive document, the updates were reviewed and discussed.

50. The missing information regarding the ways of working between the ASC and ASRPU was noted. The Secretariat clarified that this would be drafted in due course and circulated with the Committee for agreement via email.

51. It was noted that the ways of working across government departments had not yet been discussed and would be incorporated at a later date.

52. The Chair raised the issue of remunerating Committee Members following feedback throughout the recruitment process that the lack of remuneration was off-putting for early career candidates. Following discussion, the Committee raised the following points:

- a. There was no consistent approach to remuneration in government Science Advisory Committees. However, fees paid were generally nominal and were unlikely to be equivalent to time missed from full-time employment.
- b. Remuneration would not necessarily promote better applicants but it was acknowledged that the lack of it would likely put off some excellent applicants.
- c. There would be a risk of negative public perception. It could be perceived as a conflict of interest and call independence of advice into question if advice was paid for by the recipient.

53. On the topic of inducting new Members, it was raised that one helpful activity that current Members undertook during their time on the Committee was attending an ASRU inspector training session, and that this should be extended to new Members.

Action: Secretariat to arrange attendance of an ASRU inspector training session as part of the new Member induction.

54. The Committee agreed to provide more detailed comments on the updated Ways of Working document via email.

Action: Committee to provide comments on the updated Ways of Working document via email.

Annex A – List of Attendees

Committee Members

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

Secretariat

Caroline Wheeler
Jessica Stone
Emily Townley

Animals in Science Policy Regulation Unit

William Reynolds
Gideon Winward
Mamataj Begum
Rebecca Newman
Lucy Duncan

Home Office Science

Jason Dewhurst

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

Dr Vicky Robinson

Price Waterhouse Cooper

Annie Dalton

Apologies

Professor Andrew Jackson
Ms Wendy Jarrett (P.M.)
Heather Stevens (NI)
Karen Somerville (NI)
Lynsey Armstrong (NI)