

Animals in Science Committee
Minutes of the 45th Meeting: 9th December 2024
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 2024. Apologies were received by Professor Christine Watson. 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 (ASRP) 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 updated that the minutes from June 2024 had been published and were now available on the ASC website¹. The Chair reminded Members that the minutes from September 2024 had been circulated for comment.
4. Following actions taken at the previous plenary, the Chair confirmed that a response had been issued to the Nuffield Council of Bioethics consultation on neural organoids on 23 September 2024, and to correspondence received from the RSPCA on severe suffering in fishes on 1 October 2024.

Department for Science, Innovation and Technology Update

5. The Chair welcomed a representative from DSIT, who joined the meeting to provide strategic updates on matters within their remit relevant to the ASC, including alternative methods.
6. DSIT updated the Committee that the Department was working closely with the Home Office and the Department for Environment, Food and Rural Affairs (DEFRA) on these matters at both official and Ministerial level.
7. Officials would soon be seeking Ministerial steers on how to proceed with the draft cross-government alternatives strategy. Subject to Ministerial agreement, stakeholders, including the ASC, would then be consulted on the draft strategy.
8. A Member asked whether the alternatives strategy would link into the life sciences section of the Industrial Strategy². DSIT advised that the two would be joined up where relevant.

¹ [Membership - Animals in Science Committee - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/groups/animals-in-science-committee)

² [Invest 2035: the UK's modern industrial strategy - GOV.UK](https://www.gov.uk/government/consultations/invest-2035-the-uk-s-modern-industrial-strategy)

9. Another Member asked whether funding would be attached to the alternatives strategy when published. DSIT were unable to make any commitments on funding at this stage due to the ongoing spending review.
10. DSIT sought views from the Committee on the concept of DSIT regularly publishing a list of areas of research interest for alternative methods.
11. One Member asked whether these regularly published areas of research interest would cover both academic research and regulatory testing, which DSIT confirmed. They followed up with a question on how regulatory areas of focus would join up with international regulatory landscape. DSIT responded that they were engaging with experts in the relevant forums, who would feed in where appropriate.
12. A point was raised that it would be useful to take a challenge-led approach to these potential areas of research interest, which was noted by DSIT.
13. A Member raised a question on whether it was possible to use funding for prize-based challenges. DSIT responded that it would not be appropriate to use public funds in this manner, but that they were open to exploring alternative funding routes where this might be an option.
14. DSIT additionally updated that they had facilitated the scheduling of a meeting between DEFRA and key stakeholders in the animals in science sector to discuss current trade issues post-EU exit.
15. Separately, a Member asked whether DSIT had any comment on the private members' bill, Animals in Medical Research (Prohibition) Bill, the second reading of which had been rescheduled to the 17 January 2025. DSIT was not able to comment on parliamentary business but confirmed that they would be prepared to respond to the Bill at the appropriate point.

Hazardous Substances Advisory Committee Discussion

16. The Chair welcomed the Chair of the Hazardous Substances Advisory Committee (HSAC), Professor Iseult Lynch, and colleagues from DEFRA who had been invited to discuss the recent HSAC report (opinion) on recommendations for the adoption of new approach methodologies in UK chemical regulation³.
17. The Head of the HSAC Secretariat began by introducing the role, scope and remit of HSAC. The HSAC Chair then provided additional context for their recent report: specifically, that HSAC had recommended in 2012 that new approach methodologies (NAMs) were too premature to be adopted in UK chemical regulation, and that this report was the output of re-examining this position ten years later, and providing an updated recommendation.

³ [Recommendations for the Adoption of New Approach Methodologies \(NAMs\) in UK Chemical Regulation \(publishing.service.gov.uk\)](https://publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/100000/recommendations-for-the-adoption-of-new-approach-methodologies-nams-in-uk-chemical-regulation.pdf)

18. The Chair asked the NC3Rs representative whether NC3Rs were involved in the report, to which they responded that they were not. They reflected further on the need to improve cross-government working in this space. ASRPU responded that the challenge came from different workstreams progressing at different times, with UK REACH workstreams advancing earlier, but that Departments were broadly joining up across government, which DEFRA agreed with.
19. One Member asked for further thoughts on how the recommendation to establish a UK national reference laboratory for the development and validation of NAMs might work in practice. The HSAC Chair responded that this recommendation stemmed from EU exit and the need to establish a UK alternative to the EU Reference Laboratory for alternatives to animal testing (EURL ECVAM). It was not the place of HSAC to define how recommendations might be implemented, but this might look like a hub and spoke model to encompass the breadth of organisational expertise needed. DSIT agreed that implementing this recommendation would require further planning and consultation to agree the best approach.
20. The Chair reflected that there had been slow progress on agreeing new ways of working in this space post-EU exit. ASRPU responded that there had been a large amount of time-consuming complex work involved with retained EU legislation, but that government were making progress.
21. The point was raised that cultural change in the adoption of NAMs needed to be facilitated. DEFRA agreed that they would continue to consult with HSE on this.
22. It was agreed that the ASC and HSAC should link up with each other more closely for the long-term and seek input from one another on relevant reports and case studies in the future. Additionally, the ASC would be happy to send a representative to a HSAC meeting to share more about the role and remit of the ASC. It was also raised that it might be appropriate for ASC to engage with HSE in future, such as on their guidance on minimising animal testing⁴.

Chair's Update

New Deputy Chief Scientific Adviser

23. The Chair welcomed the new Deputy Chief Scientific Adviser (DCSA), Nicholas Moisewitsch, who had joined the meeting to introduce himself to the Committee. The DCSA provided an introduction on his background and role.

Meeting with Lord Vallance

24. The Chair updated the Committee that he had met with Lord Vallance, Minister for Science at the Department for Science, Innovation and Technology (DSIT), on 14 November 2024.

⁴ [Minimisation of animal testing - HSE](#)

25. The key topics discussed included UK leadership in the animals in science landscape, cross-government working, and public attitudes to animal research.
26. The Chair reflected that it had been a very productive discussion. Lord Vallance had agreed with a number of points brought to the meeting by the Chair, including the importance of ensuring that animal research can continue where it remains essential, and addressing barriers to this, and the importance of the public attitudes to animal research survey. It had also been agreed that the ASC should be working more closely with both DSIT and relevant science advisory committees across government. The ways of working between the ASC, Home Office and DSIT should be formally agreed.

Action: Chair to co-ordinate formalising ways of working with DSIT and ASRPU.

27. A Member asked about existing cross-government groups in this space. ASRPU noted that, in relation to earlier discussions with HSAC, the Food Standards Agency chaired a steering group on New Approaches to Chemical Risk Assessment in the Regulatory Space (NACRARS). It was then asked whether the minutes from these meetings were available, or could be made available, to which ASRPU responded that they would check.

Action: ASRPU to check whether minutes from the steering group on New Approaches to Chemical Risk Assessment in the Regulatory Space can be made available.

28. It would additionally be useful to undertake a mapping exercise of relevant bodies and groups to promote cross-government join-up.

Action: Secretariat and ASRPU to conduct mapping of relevant bodies and groups in the animals in science landscape.

NC3Rs letter of support

29. The Chair updated that he had issued a letter of support to the NC3Rs for consideration by the review panel during the quinquennial review.

Non-human primates in service licences report

30. The Chair reminded the Committee that the non-human primates used in service licences report, which had been ratified at the previous plenary, had now been submitted to Lord Hanson and published on the ASC website.

Action: ASRPU to co-ordinate response to non-human primates used in service licences report.

31. A Member asked how this report had been communicated amongst stakeholders. The Secretariat advised that the ASC did not currently hold a general stakeholder mailing list, but that the report would be communicated to the AWERB Hub network, and that Members should circulate reports within their own networks. Stakeholders were also able to sign up for alerts on the ASC website. However, the communications strategy could be improved.

Action: Secretariat to consider communications strategy for ASC reports.

House of Lords event

32. The Chair had been notified by two Committee Members of their attendance at a roundtable event on “Accelerating Human-Specific Technologies: A Global View” on 12 November 2024. This was hosted by Baroness Bennett at the House of Lords. Both Members spoke as industry representatives for their organisations, rather than representing the ASC. The Chair invited these Members to share their reflections on the event, as the topic was of interest to the Committee.
33. They reflected that a global approach was taken to the roundtable, which was positive to see. One of the benefits was that there were a number of different stakeholder groups represented, and that it was a useful event for understanding the range of perspectives held. More broadly, they reflected that they had noticed in an uptick in these types of events more recently, which demonstrated increasing interest in the topic.

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

34. The Chief Executive of the NC3Rs provided an update to the Committee on work of interest to the ASC.
35. Using the funding from DSIT, NC3Rs had announced 21 awards to the value of £4.85 million to accelerate the use of non-animal approaches in research. This included 11 awards, totalling £3.95 million, for non-animal methods infrastructure and 10 awards, totalling £905,000, for non-animal derived product validation.
36. NC3Rs had made their submission for their quinquennial review and thanked the ASC for their letter of support.
37. NC3Rs had recently achieved their target of 20,000 registered users of the Experimental Design Assistant, which was positive for fully implementing the 3Rs in experimental design.

Animals in Science Regulation Policy Unit Update

38. ASRPU provided the Committee with an update on the key areas of the policy programme, regulatory reform programme, and Animals in Science Regulation Unit (ASRU) operations.

International engagement

39. ASRPU updated on progress with engagement between the UK (Home Office and the Department for Business and Trade, DBT) and China on unblocking trade barriers for general cosmetics, which was moving in the right direction.
40. The Head of ASRPU attended the World Life Sciences Forum in China and co-chaired a session on animal welfare and ethics. He reflected that the conference

had good representation from across the sector and served as a positive opportunity for the UK to leverage its support of the development and understanding of animal welfare and ethics within experimental methodologies.

41. The Head of ASRPU was additionally vice chair of another conference on animal welfare and ethics in China, which was the ninth in a symposium series which had originated as a UK/China seminar, but had since grown in size.

Decapods

42. ASRPU were continuing to engage with the Department for Environment, Food and Rural Affairs (DEFRA) on the inclusion of decapods in the Animal Welfare (Sentience) Act 2022. ASRPU would not be progressing this further until DEFRA had fully considered the implications. The Committee would be kept updated.

Non-Human Primates bred for use in scientific purposes report

43. ASRPU were reviewing the policy approach internally in response to the recommendations of the ASC report. They planned to advise the Minister on this in due course.

Forced Swim Test report

44. The Home Office were engaging with relevant licence holders to ensure that the ASC recommendations were implemented in full for these licences. ASRPU planned to further develop next steps in early 2025.

Licence duration review

45. ASRPU were preparing to seek Lord Hanson's steer on how to proceed with this proposed review.

Retained EU legislation

46. ASRPU were preparing to lay a statutory instrument and revised Code of Practice to clarify UK law by mid-2025. ASRPU reminded the Committee that they intended to publish Section 3 of the Code of Practice separately to enable more streamlined updating of leading practice.

Precision breeding

47. The evidence gathering research project commissioned by DEFRA was due to be completed at the end of 2024. ASRPU expected to receive an update from DEFRA on this workstream in early 2025.

ASC commissions

48. The detailed ASC commissions on strengthening leading practice⁵ and on reviewing non-technical summaries and retrospective assessments⁶ had been submitted to Lord Hanson for approval.
49. The detailed ASC commission on reviewing named roles and AWERBs would be submitted to Lord Hanson shortly.

⁵ [Commission on leading practice in the animals in science sector - GOV.UK](#)

⁶ [Commission on non-technical summaries and retrospective assessments - GOV.UK](#)

Regulatory reform programme

50. ASRPU updated the Committee on the progress and next steps of the regulatory reform programme.

51. An improved risk profiling scorecard had been drafted to assess establishment risk levels and prioritise establishment audits. This was in the process of being tested with inspectors for feedback. Points made during this discussion included:

- a. A Member asked whether the new risk profiling approach differed from the previous approach of meeting with establishment licence holders annually. ASRPU responded that the model and methodology had changed, and that the new system would have improved consensus and transparency within ASRU. The Chair expressed the importance of maintaining the culture of honest and compliant self-evaluation, which ASRPU agreed.
- b. A Member asked about the timescales for setting a benchmark for risk profiling. ASRPU responded that the risk profiles would initially take an approach relative to other establishments before moving towards an absolute benchmark in future, when more data had been gathered. ASRPU also assured the Committee that the framework would not favour some types of establishments over others. ASRPU also highlighted that there was existing data that could be used to inform the risk profiling.
- c. A Member asked whether different types of risk would be considered differently. They raised the point that compiling these into one metric may be misleading when comparing, for example, establishments that conduct higher severity research in a compliant manner versus establishments that are considered high risk due to a history of non-compliance. ASRPU advised that they did not intend to publish the results of the risk scorecard, but noted the point for further consideration and communications. They also assured that risk profiling should not be understood as a performance scorecard, given that would not be fair to establishments who conduct higher severity procedures which are judged to be higher risk.

52. ASRU's proposed new organisational design to deliver its new operating model was announced to ASRU staff on 14 October 2024, and an associated Written Ministerial Statement was published on the same date⁷. Following this, consultation with unions had been taking place, which ended on 13 November. The Home Office had responded to consultation feedback with actions taken and planned in w/c 2 December. Recruitment for roles within the new organisational design was scheduled to begin this month. Points made during this discussion included:

- a. A Member asked whether there would be any changes to how inspectors were deployed. ASRPU responded that the changes would lead to a

⁷ [Written statements - Written questions, answers and statements - UK Parliament](#)

strengthened audit programme with more capacity to conduct a great variety of audits.

- b. A Member asked whether ASRPU expected to be able to fill their vacancies with the ongoing shortage of veterinary expertise. ASRPU confirmed that they have considered this and, from the information they have, they do not expect to have difficulty filling the positions available.
- c. A Member asked about how the grading of inspector roles had been assessed. ASRPU explained the principles of the Home Office grading guidance and the comparison of responsibilities with similar roles across government.

53. ASRPU updated that work on cultural pathways had been progressed, including activities such as risk management training and change management training. However, this had been temporarily paused to enable prioritisation of resources during organisational design changes, and that this workstream would recommence in 2025. Points made during this discussion included:

- a. The Chair asked for further detail on the nature of the cultural pathways workstream and the reasons for pausing it. ASRPU clarified that this was related to the aspirational cultural traits agreed with the help of PwC in the initial phase of this work, and that change champions had been identified within ASRU to take forward initiatives related to these. This had been paused to alleviate resource pressure during the changes taking place within ASRU.
- b. A Member suggested implementing harm-benefit analysis training for all ASRU staff as part of disseminating vision and mission, which ASRPU noted.

Operational update

54. ASRPU provided an update on the operations of ASRU, including business performance, stakeholder engagement and publications. ASRPU then gave an overview of the licensing and compliance data for the previous quarter.

55. The Chair highlighted the importance of identifying metrics for a performance framework for ASRU. ASRPU agreed and confirmed that this would be progressing in 2025 as part of the regulatory reform programme.

56. The Chair asked for further detail on how many enforcement cases were self-reported. ASRPU responded that this was approximately 85% and remained reasonably consistent year-on-year.

57. A Member asked whether Standard Condition 18 reports frequently became non-compliance cases. ASRPU responded that this would occur in approximately 5-10% of cases, and that a full breakdown of figures could be found in ASRU annual report.

Leading Practice Subgroup

58. Two Members of the Leading Practice (LP) Subgroup provided the Committee with a summary of the issues on leading practice which had been discussed by the Subgroup to date. Their talk covered:
- a. The commission⁸
 - b. Definitions
 - c. Current state of leading practice in the animals in science sector
 - d. Learning from other disciplines
 - e. Expert witnesses
59. The ensuing discussion included points on the importance of using specific historic examples where possible, the importance of not being overly prescriptive in how organisations might be “leading”, and that both academia and industry should be considered and represented in the project and terminology. It was suggested to keep the number of recommendations low to maximise impact.
60. The Subgroup Chair further updated that the Subgroup were now considering formal stakeholder engagement.

Animal Welfare Ethical Review Body Subgroup

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

AWERB Hub workshop (October 2024)

62. The eleventh biannual AWERB Hub workshop was held on 16 October 2024. More than 200 individuals attended the workshop, which was chaired by the AWERB Subgroup Chair. The Subgroup Chair fed back some reflections and lessons learned.
63. The workshop report would be published on the ASC website shortly⁹.

AWERB Subgroup newsletter

64. The next AWERB Subgroup newsletter was due to be sent in January 2025.
65. This would likely include:
- a. Date and topics for the next AWERB Hub workshop (TBC)
 - b. Link to the published AWERB Hub workshop report
 - c. Description of the paired ASC Member with AWERB Hubs

Committee Matters and AOB

66. The Chair was still in the process of scheduling a meeting with Lord Hanson as the responsible Home Office Minister. It was also suggested that there should be

⁸ [Commission on leading practice in the animals in science sector - GOV.UK](#)

⁹ [ASC and AWERB Hub workshop report: October 2024 - GOV.UK](#)

time for the Committee to meet the Minister, such as an agenda item at one of the ASC plenary meetings.

Action: Secretariat to invite Lord Hanson to the March 2025 plenary meeting.

67. The Chair would be scheduling a meeting with the Chair of the Animal Sentience Committee before the end of his tenure.

Action: Secretariat to schedule meeting between ASC Chair and Animal Sentience Committee Chair.

Annex A – List of Attendees

Committee Members

Professor David Main (ASC Chair)
Professor Jonathan Birch
Mrs Caroline Chadwick
Professor Johanna Gibson
Dr Stuart Greenhill
Professor Andrew Jackson
Mrs Wendy Jarrett
Professor Martin Knight
Mrs Tina O'Mahony
Professor Stephen May
Professor Hazel Screen
Dr Dharaminder Singh
Dr Carl Westmoreland
Dr Lucy Whitfield

Secretariat

Emily Townley

Animals in Science Regulation Policy Unit (ASRPU)

William Reynolds
Chloe Jenkins
Alex Allenby Mckeown

Home Office Science

Nicholas Moiseiwitsch

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

Dr Vicky Robinson

Department for Science, Innovation and Technology (DSIT)

Colin Wilson

Department for Environment, Food and Rural Affairs (DEFRA)

Professor Iseult Lynch (Hazardous Substances Advisory Committee Chair)
Julia Sussams
Keegan Schroeder

Apologies

Christine Henderson (NI)
Karen Somerville (NI)
Professor Christine J Watson