

Animals in Science Committee
Minutes of the 46th Meeting: 10th March 2025
Hybrid Meeting

Welcome, Introductions and Conflicts of Interest

1. Professor David Main, Chair of the Animals in Science Committee (ASC), welcomed Members to the first plenary meeting of 2025. Apologies were received by Professor Hazel Screen. No conflicts of interest were declared. A full list of attendees can be found at Annex A.
2. The Chair welcomed Dr Sally Robinson, who joined as an observer ahead of her upcoming tenure as the next Chair of the ASC: commencing 1 June 2025.
3. The Chair welcomed officials from the Home Office Animals in Science Regulation Policy Unit (ASRPU), 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, and a new member to the ASC Secretariat.
4. The Chair updated that the minutes from September 2024 had been published and were now available on the ASC website¹. The Chair reminded the Committee that the minutes from December 2024 had been circulated for comment.
5. A Member raised a concern that delays between publishing ASC reports and receiving ASRPU responses was problematic, in part since Members of the Committee have changed and it would be difficult to judge if the response is adequate. ASRPU reflected that this was administrative oversight and reassured the Committee that the recommendations were responded to. It was agreed that future recommendations would have a 6-month written response turnaround wherever possible.

Chair's update

Lord Hanson meeting

6. The Chair updated the Committee that he had met with Lord Hanson on 27 February 2025 as an introduction to the ASC. As per an action taken at a previous plenary, Lord Hanson had been invited to the plenary meeting but was unable to attend due to scheduling conflicts. Instead, they had agreed to schedule time to meet the Committee on another date.
7. The Chair reflected that the conversation was very constructive, with Lord Hanson being engaged with a deep understanding. The key points discussed during the

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

meeting were Lord Hanson's wishes to deliver on the manifesto pledge, ways of working, improving government response times to ASC advice, the Leading Practice Subgroup, the work of the NC3Rs, and the ambition to maintain a world leading reputation in this area.

8. A Member requested elaboration on Lord Hanson's statement on alternatives being an area that could provide economic growth. The Chair clarified that Lord Hanson viewed investment in the science of alternatives as a step forward and that it could provide growth opportunities.
9. A Member raised the concern that the ASC is too remote from those that it advises and re-emphasised the need for the whole Committee to meet the Minister. The Secretariat confirmed that this was in the process of being scheduled.
10. A Member raised that the Working Protocol states that the Chair and Minister should meet every 6-months, but that this was not currently the case. The Chair suggested that it would be important for the new Chair to be proactive in this relationship.

Crustacean Compassion roundtable

11. The Chair updated that he had invited a Member to attend in his place for the roundtable discussion, "Welfare improvements for decapod crustaceans", hosted by Crustacean Compassion on 26 February 2025, and asked for their reflections.
12. The Member reflected that the roundtable had covered legal protections for decapods in science: Animals (Scientific Procedures) Act 1986 (ASPA), legal protections for decapods: Animal Welfare Act, WATOK, WATEO, and enforcement issues and that the topic on "legal protections for decapods in science" had been of most relevance to the ASC.

Action: Secretariat to circulate Crustacean Compassion roundtable readout to the Committee.

13. The Member reflected that there had been discussion at the roundtable that the decision to wait for the Department for Environment, Food and Rural Affairs (DEFRA) to decide next steps, on whether decapods should come under the Animal Welfare Act 2006, was a policy decision, rather than a legal decision.
14. The Chair noted that he had raised this issue during his meeting with Lord Hanson, who had then requested a briefing from ASRPU.
15. ASRPU continued to affirm that DEFRA needed time to work on these issues of public concern and scientific perspective, and that government departments needed to be aligned before any changes to regulation could take place. The next steps were to brief Lord Hanson further on the issue, as agreed during the meeting with the Chair, before meeting with Baroness Hayman to discuss further.
16. The Member raised that, while the ASC had received an annual commission on regulation of decapods, a detailed commission had not been received. ASRPU

confirmed that this had been initiated by the previous government but that the detailed commission would not be finalised until DEFRA had completed their consideration of the implications for the Animal Welfare Act 2006.

17. The Member suggested that the Committee might like to self-commission a workstream on this as groundwork for any policy or amendments that came of the DEFRA decision. The Chair responded that this decision would fall to the new Chair.

Animal Sentience Committee meeting

18. The Chair updated that he had met with Michael Seals, Chair of the Animal Sentience Committee, on 3 February 2025. The key points for discussion were the cross-government alternatives strategy and the decapods workstream. The most recent Animal Sentience Committee report², on due regard to animal welfare, had been shared with the Committee for information.
19. The Chair flagged that the role of the Animal Sentience Committee was to look across government to determine whether policy considers animal sentience. The Chair continued to summarise the key points discussed: cross-government alternatives strategy, and the decapods workstream. It was described that a watching brief was needed to monitor the legal obligation to use alternatives as this is not mirrored in strategy. The Chair highlighted the need for cross-government and cross-advisory body join-up and opened the discussion to the Committee to provide thoughts.
20. The Chair raised the issues of conflicting acronyms between the ASC and the Animal Sentience Committee and raised that the name of the Animal Sentience Committee is defined in legislation, whilst the ASC is defined as The Committee for the Protection of Animals Used for Scientific Purposes. It would be for the new Chair to decide whether the ASC would change its name or acronym.
21. A Member was surprised by the omission of the Veterinary Surgeons Act 1966 in the report from the Animal Sentience Committee. It was generally agreed that it would be useful for advisory bodies to be further joined up and to consult one another on issues of cross-cutting relevance.

UK Bioscience Sector Coalition (UKBSC) meeting

22. The Chair updated the Committee that he had met with the UKBSC co-chairs on 14 February 2025. Key topics discussed included the cross-government alternatives strategy, the Non-Human Primates (NHPs) used in service licences report, ASC commissions and the Genetic Technology (Precision Breeding) Act 2023.
23. UKBSC had raised that they had received feedback from some of their members that the language used in the NHPs used in service licences report could be considered to be inflammatory. The Chair had explained that the language had

² [Animal Sentience Committee: report on the due regard to animal welfare – legislative compliance and enforcement - GOV.UK](#)

been carefully considered, and that the key finding of the report was that establishments were doing all of the right things, but that this did not always come across in the written licence.

24. On the Genetic Technology (Precision Breeding) Act 2023, UKBSC raised concerns that this would create additional regulatory burden, to which the Chair had responded that he was not aware that it would. The Chair had agreed to check DEFRA's progress on this workstream. A Member proposed that this is an area where the ASC could consider self-commissioning advice.

Forced Swim Test advice meeting

25. A Member raised the concern that they had received feedback from multiple establishments that the Home Office had been citing the ASC Forced Swim Test (FST) advice on licences proposing the use of the Morris water maze. The Member went on to explain that the FST advice explicitly excluded water mazes from its scope and had met with ASRPU and the Home Office Animals in Science Regulation Unit (ASRU) to clarify how the advice should be applied.

26. ASRPU thanked the Member for raising this issue and agreed that there had been some miscommunication on how the advice had been applied. ASRPU recognised that the advice only applied to the FST and not to other tests. ASRPU agreed to speak to the Regulator on this matter.

UK Health Security Agency (UKHSA) visit update

27. The Chair mentioned that a group of the Committee were attending a Porton Down UKHSA site visit on 18 March 2025.
28. A Member asked whether the Committee would be viewing both the animal house and the *in vitro* capabilities. The Secretariat updated that they were still waiting to hear from UKHSA regarding the *in vitro* methods group, but that this would be included if possible.

Animal Welfare Ethical Review Body (AWERB) Subgroup

AWERB-UK Meeting

29. ASRPU raised that the Home Office would be supporting the AWERB-UK meeting, 18 June 2025, as there would be synergy with the ASC's AWERBs and Named Information Officer commission³.

Non-technical summaries and retrospective assessments workstream

30. The AWERB Subgroup Chair confirmed that the detailed commission for advice on "Non-technical summaries and retrospective assessments" was published on 18 December 2024⁴ and confirmed the deadline for the workstream is 30 September 2025.

³ [Commission on AWERBs and Named Information Officer - GOV.UK](#)

⁴ [Commission on non-technical summaries and retrospective assessments - GOV.UK](#)

31. The Subgroup Chair reported that the Subgroup had met to consider the available evidence. They had additionally met with a member of the National Centre for the Replacement Refinement and Reduction of Animals in Research (NC3Rs) who were conducting a review of the 3Rs questions for the project licence application, to ensure join-up and avoid duplication. The Subgroup Chair informed the Committee that these meetings would continue on a regular basis.

AWERB Hub workshops and newsletter

32. The Subgroup Chair updated that the October 2024 AWERB Hub workshop report was now published on the ASC website⁵.
33. The AWERB Subgroup Chair reported that preparations were ongoing for the upcoming workshop with the theme “AWERBs and the thorny issue of replacement”, scheduled for 2 April 2025.
34. They went on to confirm that the ASC AWERB Hub newsletter was circulated with the AWERB Chairs mailing list on 31 January 2025. The next newsletter was due to be circulated in July 2025.
35. The AWERB Subgroup Chair continued to report that the previously shut down East Anglia AWERB Hub was reactivating due to a new volunteer chair, but the Home Counties North West and Middlesex Hub was deactivating due to the chair stepping down.

Leading Practice Subgroup

Work programme update

36. The Chair updated that Dr Lucy Whitfield had assumed the role of Leading Practice Subgroup Chair as of 21 January 2025.
37. The Subgroup Chair confirmed that the detailed commission for advice on “Leading practice in the animals in science sector” was published on 18 December 2024⁶ and confirmed the deadline for the workstream is 30 September 2025.
38. As part of this workstream, the Subgroup Chair updated that an open stakeholder engagement call for evidence had been published on the ASC website⁷, with a deadline of 6pm on 23 March 2025.
39. The Secretariat added that targeted advertising had been circulated to key stakeholder groups via email. This included, but was not limited to, organisations from the regulated sector, funders, regulators, learned societies, veterinary professionals and animal welfare groups.

⁵ [ASC and AWERB Hub workshop report: October 2024 - GOV.UK](#)

⁶ [Commission on leading practice in the animals in science sector - GOV.UK](#)

⁷ [Strengthening leading practice in the animals in science sector - GOV.UK](#)

40. A Member raised that they had received feedback that some organisations were struggling to complete the call for evidence because it was not targeted at any specific stakeholder group. The Subgroup Chair noted this feedback.

Project Licence Application (PLA) replacement discussion

41. The Chair updated that recent project licence application review meetings had raised questions on the roles of ASC and ASRU in promoting opportunities for both full and partial replacement during the licence review process. The key points raised were:

- a) Referral of licences to the ASC is the final stage of the review process, and replacement should be addressed at an earlier stage.
- b) There may be opportunities to improve the project licence application form. ASRPU reassured the Committee that the NC3Rs were currently reviewing the project licence application to suggest changes.
- c) Developing models requires specific expertise depending on the type of model (whether animal or non-animal), a large amount of time, and significant funding. Regulation does not require applicants to develop alternatives alongside permissible tests.

Department for Science, Innovation and Technology (DSIT) Update

42. The Chair welcomed a representative from DSIT and invited them to update on progress on alternative strategies, including the alternative methods plan and any other activity in this space.

43. DSIT acknowledged that they were developing a strategy on development, validation, and uptake of alternatives. They went on to outline that the initial draft was created through consultation with regulators, industry users, and trade and academic associations, the FDA, and some European organisations.

44. DSIT described two key areas they wanted to flag: data and international engagement that have previously been discussed by the Committee. DSIT explained that they were adding a more general public-facing section to the strategy plan, and the full report would begin internal review shortly. The Chair replied that the ASC should have some scrutiny over the strategy to provide advice as soon as possible. DSIT responded that they would discuss internally and respond at a later date on how this could proceed.

45. DSIT described a key section of the strategy of non-animal models in which regulators, academics, and industry would all benefit from validation but currently there was no system to incentivise this.

46. A Member was concerned that the United Kingdom (UK) market would need to align with the American Food and Drug Administration (FDA) rules for clinical

trials. DSIT responded that this was an international issue, and while they were trying to drive improvements, they acknowledged that the UK's market share is an issue when it comes to pharmaceutical leverage.

47. DSIT additionally updated that details on cross-departmental advisory body working had been included in the strategy.

NC3Rs update

48. The Chair invited the representative from the NC3Rs to provide an update. The NC3Rs started by requesting whether the ASC would be interested in reviewing NC3R key performance indicators in future meetings, to which the Chair responded that they would.
49. The NC3Rs updated that in terms of investments, they had recently committed £1.2 million for new partnership and impact scheme. They continued that £400,000 worth of awards for ICURe had been given out to further commercialisation in 3Rs approaches. They gave a final update on a new project to determine whether use of the 3Rs provides sustainability benefits.

Animals in Science Regulation Policy Unit update

50. ASRPU provided the Committee with an update on the key areas of the policy programme, regulatory reform programme, and ASRU operations.

International Engagement

51. ASRPU updated that they were currently making plans for the 10th International Symposium on Animal Welfare and Ethics, 20–23 October 2025, China, and that there would be representatives from UK Universities and NC3Rs attending.
52. ASRPU updated that they were meeting with the Department of Business and Trade and the Cosmetic Toiletry and Perfumery Association to discuss future work concerned with market access barriers on special cosmetics.

Decapods

53. As had been discussed earlier, there was no further progress to report on the inclusion of decapods under ASPA, as the Home Office were still awaiting DEFRA's decision on the Animal Welfare Act 2006 following further research being commissioned. The Committee would be kept updated.

Forced Swim Test report

54. ASRPU were continuing to engage with the relevant licence holders and other stakeholders to further develop the policy position.

Non-Human Primates bred for use in scientific procedures report

55. ASRPU updated that, with regard to Article 10 of EU Directive 2010/63/EU, there was a policy drafted internally with the goal of implementation this summer. The

ASC should expect to receive a copy of the policy along with a response to each recommendation made in the next plenary.

Licence duration review

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

Genetic Technology (Precision Breeding) Act 2023

57. ASRPU were continuing to engage with DEFRA on their precision breeding evidence gathering and would continue to keep the Committee updated. ASRPU suggested that officials from this programme should attend the next plenary meeting to provide an update, which was agreed.

Regulatory reform programme

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

59. The indicative date for Animals in Science Regulatory Unit (ASRU) to adopt its new operating model and organisational design was July 2025. The formal reform programme between ASRU and ASRPU should complete in 2025, with ASRU then taking ownership.

60. Recruitment for multiple internal roles was ongoing, with a large recruitment campaign for new inspectors, Regulatory Delivery Officers, and a Governance & Business Performance Lead underway.

61. Proposals for strengthened governance arrangements had received approval from the Chief Scientific Adviser and had now been submitted to the Permanent Secretary for clearance. The roles, responsibilities and interaction of the ASC with new governance arrangements would be discussed and agreed with the ASC Chair. Members raised that this would be important to consider carefully to ensure that the ASC could fulfil its function effectively.

Operational update

62. 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.

63. The Committee raised the importance of timely responses to Standard Condition 18 reports and asked how ASRPU expected to reduce delays on these. ASRPU acknowledged the issue and responded that the efforts to increase staff number should improve response times.

Ways of working

64. Following the action at the December 2023 plenary to further update the ASC Ways of Working, the updates were reviewed and discussed.

65. A Member outlined that the description of the ASC's self-commissioning was not reflective of the reality. It was agreed that this paragraph should be removed.
66. Members discussed how the involvement with DSIT should be reported in this document, its importance was agreed and it was suggested that it should be specified that the Chair should meet with both the DSIT and Home Office Ministers.
67. It was agreed that the Committee should produce an annual report of its operation for each preceding year (January – December) and present these to the Ministers. This would be taken forward by the new Chair.
68. A Member commented on the length of the document and suggested that a concise executive summary would be beneficial to those outside the ASC.
69. The Chair agreed that further amendments to the document would be agreed by the incoming Chair due to the timelines involved. The document would be ratified at the June 2025 plenary.

Action: Ratify ASC Ways of Working document at June 2025 plenary.

Committee Matters & AOB

Artificial Intelligence (AI) and Large Language Models (LLMs)

70. A Member requested if the Leading Practice Subgroup had engaged with people or organisations that were using AI or LLMs, while highlighting the potential for data analysis, the impact on leading practice in the healthcare sector, and potential for protein design. The Subgroup Chair raised the issue that getting in contact with the appropriate people to inform on this topic was difficult, but it was agreed that the Subgroup should keep engaging stakeholders on this topic.
71. A Member referenced a government press release⁸, published 12 January 2025, wherein an AI Action Plan would drive the Plan for Change. They continued by highlighting the risks of inputting highly sensitive data into these systems and the potential issues of allowing AI to review licence applications. The Member then referenced the possibility of AI hallucinations, where a response contains wrong or misleading information.
72. A Member added the potential use case of submitting data from previous animal experiments into LLMs and potentially reducing the requirement of rerunning experiments, thereby using fewer animals.
73. ASRPU were asked if the regulators have any policy on the use of AI in licence applications. ASRPU responded that they did not have a policy in place currently. They raised that inspectors reviewed licences on a case-by-case basis to determine whether they were compliant with ASPA, rather than the way the licence had been developed.

⁸ [Prime Minister sets out blueprint to turbocharge AI - GOV.UK](#)

74. A Member suggested that the Committee could look to self-commission advice on both the opportunities and risks in using AI. This could include providing guidance to direct individuals and groups towards certain LLMs that use peer-reviewed scientific data (Consensus, for example). They went on to describe how this could be used within AWERBs to reduce the impact of specific expertise being required.

Appraisals

75. The Chair reminded the Committee that there would be the standard annual appraisals, as outlined in Section 3.3 of the Code of Practice for Science Advisory Committees, scheduled throughout April and May 2025. The Secretariat would circulate a template to Members for them to complete a short initial self-assessment.

Annex A – List of Attendees

Committee Members

Professor David Main (ASC Chair)
Dr Sally Robinson (incoming 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
Dr Dharaminder Singh
Dr Carl Westmoreland
Dr Lucy Whitfield
Professor Christine Watson

Secretariat

Emily Townley
Alister Cox

Animals in Science Regulation Policy Unit (ASRPU)

William Reynolds
Chloe Jenkins
Mamataj Begum

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

Dr Vicky Robinson

Department for Science, Innovation and Technology (DSIT)

Colin Wilson

Apologies

Professor Hazel Screen