Animals in Science Committee

Minutes of the 47th Meeting: 10th June 2025

Hybrid Meeting

Welcome, Introductions and Conflicts of Interest

1. Dr Sally Robinson, Chair of the Animals in Science Committee (ASC), welcomed Members to the June 2025 plenary meeting. Apologies were received by Professor Christine Watson, Professor Hazel Screen, and Professor Martin Knight. No conflicts of interest were declared. A full list of attendees can be found at Annex A.
2. The Chair thanked Members for their input at the June 2025 Strategic Planning Meeting and continued that the Secretariat would provide an update on actions from this meeting at the next plenary, due to be held on 8 September 2025.

Action: Secretariat to provide an update on actions taken from the June 2025 Strategic Planning Meeting at the September plenary

3. Dr Sally Robinson welcomed officials from the Animals in Science Regulation Policy Unit (ASRPU), who noted that the wider team would attend from ASRPU's update later in the agenda.

Actions and minutes

4. The Chair updated that the ASC plenary minutes from December 2024 had been published and were now available on the ASC website[1].
5. The Chair continued that the ASC plenary minutes from March 2025 had now been drafted and would be circulated to the ASC for their comments shortly.
6. The Chair invited reflections on the meeting with Lord Hanson, held on 19 May 2025. Members noted that it had been a productive meeting and expressed interest in inviting Lord Hanson to a future plenary.
7. The Chair reminded the Committee that the Crustacean Compassion roundtable readout was circulated on 20 March 2025.
8. The Chair updated that the Ways of Working document was ratified at the June 2025 strategic planning meeting and would be published in due course.

[1] Membership - Animals in Science Committee - GOV.UK

Chair's update

9. The Chair had commenced their tenure as ASC Chair on 1 June 2025. As part of their onboarding and induction, they had attended relevant ASC meetings, participated in Member appraisals to hear individual thoughts and concerns, and held a series of handover conversations with the previous Chair prior to the conclusion of his tenure.

ASC name and acronym

10. The Committee agreed that the ASC would retain its current name, despite noted similarities with the acronym of the Animal Sentience Committee. To minimise confusion, it was agreed that the full name of the Committee would be used more frequently in written communications.

AI and LLMs

11. A Member returned to a discussion topic from the June 2025 strategic planning meeting. It was highlighted that a key point from the meeting with Lord Hanson on 19 May 2025 was that ASC could proactively offer the government advice on issues it considered most critical. They reiterated that one such topic of Committee agreed importance was the risks and opportunities of Artificial Intelligence (AI) and Large Language Models (LLMs) within the sector, with specific references to replacement and auditing made.

12. The Committee agreed to draft a letter to Lord Hanson outlining the issue, associated opportunities, risks, and proposed mitigation strategies. It was noted that providing forward guidance and requesting a formal commission could help prompt action in this area. ASRPU noted that Lord Hanson was keen to use the transformative potential of the UK's data assets.

Action: Professor Jonathan Birch to draft letter to Lord Hanson on risks and opportunities of AI and LLMs within the sector

Regulator landscape

13. A Member raised a question regarding the role of regulators, such as the Health and Safety Executive (HSE) and the Medicines and Healthcare products Regulatory Agency (MHRA), in the context of the growing focus on alternatives to animal use. They asked how these bodies fit into the broader regulatory landscape and stakeholder environment.

14. ASRPU explained that these regulators were nested within different government departments, primarily the Department of Health and Social Care (DHSC) and the Department for Business and Trade (DBT). They acknowledged that some regulators, such as the MHRA, operated with a high degree of independence. However, the government's developing alternatives strategy had brought these regulators together for coordinated discussions, including consultations with over 40 organisations across central government. There was a further challenge in co-ordinating internationally, but the UK was keen to take a leadership role in driving regulatory reform.

UKHSA visit

15. The Chair invited reflection from Members who attended the ASC visit to UK Health Security Agency (UKHSA) to Porton Down on 18 March. This involved an overview of both their *in vivo* and *in vitro* work and a tour of the NHP colony.

16. A Member noted that it had been useful to attend to better understand the type of work being carried out at these types of establishments and was pleased to observe that camera improvements had been implemented, following a recommendation made during a previous ASC visit

Correspondence

17. The Chair updated the Committee on ongoing correspondence, as well as the nature of the responses being prepared. It was noted that further correspondence would be brought forward for discussion at the next plenary meeting.

Department for Science, Innovation and Technology update

18. The Chair welcomed representatives from DSIT and invited them to update on progress on alternatives, including the alternative methods strategy, and any other activity in this space.

Alternatives strategy

19. DSIT provided an update on the development of the Government's alternatives strategy, in line with the manifesto commitment. The strategy aimed to support the adoption and validation of alternative methods, and extensive engagement had already taken place across the sector.

20. Funding bids had been submitted through the spending review process to support key elements of the strategy, particularly around validation, subject to the outcome of the Treasury's spending review and subsequent internal allocations within DSIT.

21. The strategy would outline three categories of activity: (1) short term goals – areas that could be phased out imminently, (2) medium-term ambitions, and (3) longer-term goals. It would also acknowledge

22. DSIT emphasised that the strategy would be accompanied by a new governance framework to ensure the right expertise and oversight were in place. While the draft was not yet available for public sharing, the Minister was keen to continue engaging with key stakeholders during the development process.

23. A Member asked whether there was a specific reason why the ASC had not been included among the approximately 40 organisations engaged during the development of the Government's alternative strategy. ASRPU responded that the Ministerial view was that the early engagement should be limited to central government bodies. As an advisory committee, the ASC fell outside that scope, as

with other advisory bodies. It was emphasised that the ASC would play a vital role in supporting delivery of the strategy after its publication.

24. A Member asked whether the stakeholder engagement undertaken as part of the strategy development had a global approach, with a particular interest in how international discussions concerning the evolving definition of validation in toxicology and regulatory science were incorporated. DSIT confirmed that relevant international committees and organisations had been engaged.

25. A Member asked whether consideration had been given to the time the industry would need to adjust to any immediate changes and referenced the first of the three categories of activity outlined in their update. DSIT responded that there was no intention to announce an abrupt halt to any practices. It was recognised that while there were clear areas for improvement, there would also need to be allowances for exceptions.

26. A Member asked whether the strategy was expected to be published before or after the parliamentary recess. DSIT acknowledged that, while the preference remained to publish before the parliamentary recess, this could not be guaranteed due to internal processes and feedback from other departments.

27. A Member asked whether the Committee could be notified in advance of the publication date. DSIT responded that a definitive date could not yet be confirmed due to internal processes and dependencies. It was expected that certainty around publication would likely come approximately two weeks in advance, and the Committee would be kept updated accordingly. The Committee agreed that an ad-hoc meeting should be held as close to the alternative strategy publication date as possible, within a month ideally, to align on any immediate actions outside of the quarterly plenary meetings.

<u>Public attitudes</u>

28. A Member noted that an adjournment debate on “Animal Experiments: Medical Research” was scheduled for 16 June 2025, which had been highlighted by colleagues. DSIT confirmed that the team was aware of the debate and was actively working on briefing their Minister.

29. A Member asked about the Government’s response to the recent increase in animal rights activism. In response, DSIT confirmed that cross-government work was underway, including immediate actions to address urgent concerns and the establishment of a senior cross-government working group to explore medium- and long-term solutions.

Department for Environment, Food & Rural Affairs (DEFRA) update

30. The Chair welcomed representatives from DEFRA and invited them to update on their progress with the precision breeding workstream.

31. DEFRA provided an update that covered the following:

    a) The definition of precision breeding as a set of technologies enabling more efficient and precise DNA edits than traditional breeding methods, with scientific advice confirming no greater risk than in the case of conventional breeding.

    b) Key legislative changes introduced by the Precision Breeding Act 2023, including the animal welfare declaration, the role of the welfare advisory body, and the potential for post-market reporting obligations.

    c) The benefits of precision breeding, including improvements to animal health and welfare, economic growth and innovation, and environmental adaptability, alongside international regulatory developments.

    d) Three commissioned research projects being undertaken at Scotland's Rural College (SRUC) – a published report, a finalised report (Update: now published), and one in draft – including work on a holistic approach to welfare assessments, species-specific indicators, and statistical modelling for assessing changes in precision bred animals.

    e) The development of welfare indicators for precision-bred pigs, poultry and salmon, structured by life stage and categorised into basic, enhanced, and enhanced-plus levels.

    f) Alignment with ASPA, including case-by-case licence assessments, and the use of marketing authorisation data to support rehoming.

    g) Secondary legislation would be required to implement the precision breeding framework for animals and until that point, gene edited animals will continue to be regulated under the GMO regulations.

32. A Member raised concerns about breeding practices, highlighting issues with current broiler breeders. In response, DEFRA confirmed that this was a recognised area of concern for stakeholders. The Animal Welfare Committee are undertaking a review of modern livestock breeding practices, which the Government will consider and respond to. Strong welfare safeguards under the precision breeding framework, including the requirement for a welfare declaration, were noted.

33. A Member raised concerns about the use of low-welfare breeds as benchmarks in precision breeding assessments, suggesting this could undermine ethical standards. Another Member questioned whether the welfare criteria were too focused on production outcomes, such as growth and absence of injury, rather than broader indicators of well-being. In response, DEFRA noted that the animal welfare indicators framework developed by SRUC would help address these

concerns. While basic indicators focused on health indicators, the enhanced and enhanced-plus levels incorporated behavioural and mental state measures, aligning with the five domains approach recommended by SRUC.

34. A Member raised concerns about public perception and media backlash. They asked what engagement was planned to prevent misunderstanding of genetic techniques and asked whether labelling had been considered. In response, DEFRA confirmed that there is no labelling requirement in the Act, based on advice that precision-bred animals pose no greater risk to consumers than traditionally bred ones. Public engagement was recognised as a core area of work.

35. A Member raised concerns that public backlash could negatively impact the sector, particularly if ethical or welfare standards were perceived to be compromised. DEFRA agreed that stakeholders had raised concerns about precision breeding during the passage of the Act but noted that recent polling suggested public attitudes were becoming more supportive where precision breeding was shown to improve animal health and welfare.

36. A Member asked whether there was a perceived conflict between the Government's support for increased scientific use of animals in precision breeding and the development of an alternative strategy. A key benchmark for DSIT was expected to be a reduction in scientific procedures, whereas precision breeding could increase those numbers. The importance of a joined-up communication strategy was highlighted. DEFRA responded that unlike some kinds of regulatory testing, the use of animals is an essential part of precision breeding, and for this research there are robust safeguards in the Act to protect health and welfare. DEFRA confirmed that any changes to the number of scientific procedures would be monitored closely and noted that not all uses of the technology would necessarily fall under ASPA, as some applications may exit the regulatory framework once technical research had concluded and commercial production commenced.

37. A Member highlighted the global nature of the breeding industry and emphasised that any improvements in ethical standards within this sector would be of significant international importance, particularly in the context of efforts to feed the global population.

38. A Member asked how regulatory oversight would apply in a scenario where two precision-bred animals were bred together. DEFRA responded that once a marketing authorisation had been granted, there may then be post-market reporting obligations to ensure that animal health and welfare continues to be monitored.

39. A Member concluded that early involvement of the Committee in the implementation of the Precision Breeding Act would be valuable.

Animal Welfare and Ethical Review Bodies (AWERB) Subgroup

40. The AWERB Subgroup Chair updated that a Subgroup co-optee, Ms Linda Horan, would be stepping down from their position upon completion of the non-technical summaries and retrospective assessments report. The Chair thanked Ms Horan for her valuable contribution and ongoing support of the ASC throughout her time with the Subgroup.

41. The Subgroup Chair updated that work on the commission for advice on "Non-technical summaries and retrospective assessments"[2] was ongoing. The deadline for a sector and non-sector call for evidence had recently passed, and the Subgroup were in the process of analysing the data. The Subgroup Chair continued to update that this workstream was being conducted in parallel with NC3Rs licence application review, and that they were meeting monthly to share information.

42. The Subgroup Chair updated that they would like to clarify the scope of the commission on strengthening the functioning of AWERBs and the Named Information Officer (NIO)[3]. ASRPU agreed to meet with the Chair and Subgroup Chair to determine next steps. The Subgroup Chair suggested that this was a large piece of work, and that other Members may need to be recruited into the Subgroup to assist with its delivery.

Action: Secretariat to arrange a meeting between ASRPU, the ASC Chair, and AWERB Subgroup Chair to discuss the scope of the commission on strengthening the functioning of AWERBs and the NIO.

43. The Subgroup Chair updated that the last AWERB Hub Workshop on replacement, held on 2 April 2025, was a success with over 200 attendees.

44. The Subgroup Chair continued that the next AWERB Hub Workshop, scheduled for 15 October 2025 (13:00-16:00), would have the theme of "The Role of AWERBs in Successful Rehoming".

45. The Committee discussed the challenges and opportunities surrounding the rehoming of animals used in scientific procedures. It was noted that while many establishments had policies in place for smaller animals such as rats, rabbits, and dogs, larger animals, such as feral ponies, posed significant challenges. Greater sector coordination, potentially involving tissue-sharing networks and best practice examples, could help address the current gaps.

46. It was acknowledged that charities involved in rehoming were currently overwhelmed, and that there was a clear funding gap in this area. It was noted that more could be done to encourage funders to recognise the resource implications of rehoming. It was suggested that rehoming considerations should be considered at the project licence stage and that funders should challenge applicants to include appropriate overheads for rehoming in their grant proposals.

[2] Commission on non-technical summaries and retrospective assessments - GOV.UK
[3] Commission on AWERBs and Named Information Officer - GOV.UK

Leading Practice Subgroup

47. The Subgroup Chair updated that work on the commission for advice on "Strengthening leading practice in the animals in science sector"[4] was ongoing. It was noted that a substantial number of responses was received through the recent call for evidence, and that all organisations who completed the call for evidence were invited to the live stakeholder engagement event, held on 29 April 2025.

48. The Subgroup Chair confirmed that work had commenced on the draft report, following discussions on the call for evidence and the stakeholder event. Progress was ongoing, with Members considering how best to incorporate the 3Rs framework into the structure of the report.

Animals in Science Regulation Policy Unit update

49. The Chair welcomed representatives from ASRPU and invited them to update on their progress with the policy and regulatory reform programmes.

ASRPU responses to ASC reports

50. ASRPU provided an update on the response to the non-human primates (NHPs) used in service licences report[5]. It was confirmed that the proposed response was soon to be submitted to the Minister for approval and would be circulated to the ASC and published once approved.

51. ASRPU continued that the response to the NHPs bred for use in scientific purposes report[6] was at a similar stage, with the policy drafted, stakeholder engagement completed, and a transition period proposed. Although the policy had not yet been published, it was stated that establishments were aware of the direction of travel. ASRPU acknowledged that the recommendations made by the ASC in this report were time sensitive and updating these in the policy delivery would be taken into account.

52. ASRPU updated that they were continuing to engage with licence holders on the Forced Swim Test following the ASC's advice. The FST would be reported as a technique of special interest in the annual statistics publication for 2024.

Governance board

53. ASRPU continued that, for the governance board, the agreements made between the Chair of the ASC and the Head of ASRPU on the interactions between the ASC and the governance board were now reflected in the Terms of Reference. Applications to the board were due to open in June and would be open for a minimum of four weeks. ASRPU agreed to share a link with the ASC once recruitment was live, for their information.

[4] Commission on leading practice in the animals in science sector - GOV.UK
[5] Advice on non-human primates used in service licences - GOV.UK
[6] Non-human primates bred for use in scientific purposes - GOV.UK

ASRU performance measurement

54. ASRPU noted the ASC's continued interest in the development of Key Performance Indicators (KPIs) for ASRU, as outlined in the agreed interactions with the planned governance board. A successful candidate had been appointed as Head of ASRU Performance and was due to start at the end of June as part of ASRU's leadership team. The individual would bring specific analytical expertise in performance framework development.

55. A Member asked if KPIs could measure not just operational outputs like licensing approvals, but also the impact establishments have on advancing the 3Rs, potentially linking these to conditions on establishment licences. ASRPU responded that while current reporting focuses on outputs, the goal is to develop a more mature system including impact measures. This would take time, but work was underway, including appointing a new Head of Performance. ASRPU stressed the importance of outcome-based measures that reflect real-world improvements, with progress expected to be shared at future plenaries.

Regulatory reform programme

56. ASRPU informed Members that the formal reform programme was expected to conclude in 2025. Work currently managed under the reform programme would be integrated into ASRU's operations or handed over, with some areas likely to retain policy involvement.

57. ASRPU updated that the indicative date for the Animals in Science Regulation Unit (ASRU) to adopt its new operating model and organisational design is currently August 2025. Reform activity will continue beyond this date to embed staff, allow new members of the leadership team to shape their areas to deliver ASRU's strategic priorities, and pilot and evaluate new initiatives where required. It was raised that a broader "cultural launch" would happen in November 2025 to allow time for these activities.

58. ASRPU updated that ten of the twelve recruitment campaigns for ASRU's new organisational design had been successfully completed and that three of the post holders identified would form part of ASRU's new leadership team. ASRU were now at various stages of offering and going through the onboarding process for these roles.

59. A Member asked about the realistic timeframe for service improvements, especially in licensing and audits, and any key milestones. ASRPU responded that major recruitment was underway, with 40 new staff plus short-term support to aid the transition to its new organisational design. An initial performance dip was expected due to the scale of change. Gradual improvements were anticipated from November, with more significant progress by spring. An enhanced audit framework and thematic inspections were being developed to enhance how ASRU delivers animal protections through compliance with ASRU. ASRPU also highlighted the plans to establish the governance board during 2025 to ensure transparency and accountability.

60. ASRPU updated Members on wider reform programme updates, including audit improvements, gov.uk changes, review of training material ahead of new joiners, licencing/3Rs improvements, tiered model for licensing, harm benefit assessment review, and technology improvements.

61. A Member requested more detail on the types of audits being developed and their purpose, highlighting the value of in-person visits as raised by stakeholders. ASRPU explained that the audit framework was under review, covering current formats like facility and full systems audits, and exploring underused types. The aim was to identify the most effective elements, clarify triggers for each audit type, and improve documentation for transparency and standardisation. Feedback from ongoing audits was being used, and the work aligned with the new risk profiling approach. ASRPU added that the goal is to ensure that the audit approach is most effective in its purpose of assuring compliance with ASPA, while avoiding unnecessary burden on the science sector. ASRU audits should be proportionate, risk-based, clearly documented, and targeted to achieve the greatest impact with ASRU's available resources. Unannounced audits were expected to form a larger part of the new audit schedule. The new framework would support fair compliance monitoring against ASPA and agreed metrics.

62. A Member asked for an update on whether the 'bred but not used' data would be reported annually, or in line with the EU's five-year reporting model. ASRPU confirmed that the 'bred but not used' issue was under ministerial consideration and suggested that the reporting frequency may align with the EU's five-year model, though annual reporting remained a possibility.

63. A Member reiterated concerns regarding Standard Condition 18 (SC18) and queried whether cases could be automatically closed after a set period. ASRPU recognised the operational challenges of implementing automated systems but agreed that closure of cases would be beneficial for maintaining trust and engagement.

Committee Matters & AOB

Onboarding process

64. The Chair opened discussions on the induction process for new ASC Members, given there would be a new intake of Members in April 2026.

65. Members suggested that future inductions should include a short presentation outlining current workstreams, a description of the Committee's structure and roles, its Subgroups, recent projects, and Member biographies, to support continuity across incoming Member intakes. It was also agreed that a clearer summary of the ASC on the GOV.UK website could assist in addressing this.

66. A Member suggested that introducing an "onboarding mentor" role could be a helpful way to encourage new Members to ask challenging questions. Another Member emphasised the importance of fostering a respectful environment where

differing views were welcomed, noting that this would help new Members feel confident that they would not be judged for holding alternative opinions.

Visits

67. Members agreed that visiting Newcastle University or the University of Oxford would be beneficial. This would help upskill ASC Members without *in vivo* expertise in reviewing licences.

Action: Secretariat to organise a visit to the NHP facilities at either Newcastle University or the University of Oxford

68. It was also discussed that a visit to Queen Mary University of London (QMUL) Centre for Predictive *in vitro* Models could be arranged to further the Committee's understanding of organ-on-a-chip technology and predictive *in vitro* models.

Action: Secretariat to organise a visit to the QMUL Centre for Predictive *in vitro* Models.

Annex A – List of Attendees

Committee Members

Dr Sally Robinson (ASC Chair)
Professor Andrew Jackson
Dr Carl Westmoreland
Mrs Caroline Chadwick
Dr Dharaminder Singh
Professor Johanna Gibson
Professor Jonathan Birch
Dr Lucy Whitfield
Professor Stephen May
Dr Stuart Greenhill
Mrs Tina O'Mahony
Mrs Wendy Jarrett

Secretariat

Emily Townley
Alister Cox

Animals in Science Regulation Policy Unit (ASRPU)

William Reynolds
Chloe Jenkins
Mamataj Begum
Alex Allenby-Mckeown
Alice Whiteman
Lucy Duncan
Nicholas Were

Department for Science, Innovation and Technology (DSIT)

Amelia Philpott

Department for Environment, Food & Rural Affairs (DEFRA)

Alexander Gilbert
Ruth Shin

Apologies

Professor Christine Watson
Professor Hazel Screen
Professor Martin Knight