

The Rt Hon Mr Alistair Carmichael (Chair)
Environment, Food and Rural Affairs Committee
House of Commons
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Thursday 18th December 2025



Dear Mr Carmichael,

I am writing to advise that the Animal Sentience Committee have set out their initial thoughts on the recently published policy paper: Replacing animals in science: A strategy to support the development, validation and uptake of alternative methods. This assessment was conducted by Professor Christine Nicol, Professor Richard Bennett, Dr Penny Hawkins and Richard Cooper in November 2025.

Background

The UK government has set out a clear long-term vision to replace the use of animals in science and has developed a strategy with practical steps that will be taken over the next five years.

The overriding goal is to create a research and innovation system that uses alternative methods instead of animals in all but 'exceptional circumstances'. The strategy sets out to accelerate the development, validation and adoption of scientifically robust alternatives to animals in science, and to ensure these deliver equal or better research and testing outcomes.

The strategy also aims to mobilise inward private investment to encourage more research and adoption of alternative biological and data-driven approaches. The government would like to see the UK as an established global leader in these areas.

Together, these aims reflect a clear commitment not only to replace animals in science, significantly reducing animal welfare and ethical concerns, but also to harness scientific and technological advances to deliver effective and economically beneficial research practices.

Due Regard to Animal Welfare

The ASC strongly welcomes the strategy, especially its aspiration to replace the use of animals in science in all but 'exceptional circumstances'. This over-arching vision is forward-looking and offers significant benefits to animal welfare. However, the processes required to *achieve* this vision in practice will be complex and require considered approaches. These processes are of great interest to the ASC, and we will be extending invitations to relevant policy teams in due course, asking them to engage with us as the strategy commitments are developed.

As is our remit, we will be reporting on whether due regard has been paid to animal welfare in specific policy areas. ASC will focus initially on government plans, processes and time frames for:

- Developing critical elements of the strategy, such as including more tests and models in 'Basket 3', addressing the cultural barriers to replacement and enabling stakeholders to manage change effectively.
- Defining the key performance indicators (KPIs) by which to assess strategy delivery, including the involvement of appropriate stakeholders in this task, and ensuring that KPIs include metrics that are most relevant to animal welfare.
- Ensuring adequate monitoring of how effectively animal use will be phased out, and numbers reduced, e.g. by making sure that animal procedures will not be licensed if there are available NAMs or if the animal use cannot be justified.
- Considering the use of animals in fundamental, academic research equally alongside the use of animals in regulatory testing.
- Developing a strategy where effort is focused on the replacement of animals in those procedures that use the greatest numbers, and those that cause the most severe harms to animals.
- Clarifying and boundary-setting around what might count as 'exceptional circumstances'.
- Leveraging sufficient private funding to ensure that the vision can be achieved.

The Animal Sentience Committee was established by the Animal Welfare (Sentience) Act 2022 and may produce reports containing its views on whether, or to what extent, the Government is having, or has had, all due regard to the ways in which the policy might have an adverse effect on the welfare of animals as sentient beings.

Yours sincerely,

A handwritten signature in black ink that reads "Michael Seals." The signature is written in a cursive style and is underlined with a single horizontal line.

Michael Seals

Animal Sentience Committee Chair

If you have any questions, please contact the Animal Sentience Committee secretariat at: SentienceSecretariat@defra.gov.uk

You can find out more about the Animal Sentience Committee at: [Animal Sentience Committee - GOV.UK \(www.gov.uk\)](https://www.gov.uk)