

**Animals in Science Committee**  
**Minutes of the 49<sup>th</sup> Meeting: 8<sup>th</sup> December 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 December 2025 plenary meeting. Apologies were received by representatives from the Department of Health, Northern Ireland (NI). No conflicts of interest were declared. A full list of attendees can be found at Annex A.
2. The Chair 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 and noted that the Chief Executive of the National Centre for the Replacement, Refinement & Reduction of Animals in Research (NC3Rs) would later join the meeting as an NC3Rs representative.

## **Actions and minutes**

3. The Chair updated that the ASC plenary minutes from June 2025 had been published and were now available on the ASC website<sup>1</sup>. The Chair noted that the September minutes had been shared with the ASC for comment.

## **Chair's Update**

### Recommendations tracker update

4. The Chair updated that the recommendations tracker had been updated. The updates included recommendations from the non-technical summaries and retrospective assessments report<sup>2</sup>, Lord Hanson's responses to the cumulative severity thematic review letter<sup>3</sup> and Lord Hanson's responses to the recommendations from the non-human primates bred for use in scientific purposes report<sup>4</sup>.

### Ways of Working update

5. The Chair updated that the revisions to the Ways of Working and Working Protocol had been agreed by Lord Hanson. The Committee was awaiting confirmation that a letter had been sent to the Northern Ireland Department of Health, which must be consulted on any changes. Once this confirmation had

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<sup>1</sup> [ASC meeting minutes, 10 June 2025](#)

<sup>2</sup> [Non-technical summaries and retrospective assessments - GOV.UK](#)

<sup>3</sup> [Cumulative severity in project licences: response from Lord Hanson - GOV.UK](#)

<sup>4</sup> [Non-human primates bred for use in scientific purposes: response from Lord Hanson - GOV.UK](#)

been received, arrangements would be made for publication, highlighting the strengthening of ways of working with the Department for Science, Innovation and Technology (DSIT) in light of the new alternatives strategy.

#### ASC Member recruitment update

6. The Chair reported that recruitment was progressing well. The panel expected to conduct interviews throughout December 2025. Appointments were expected to be confirmed by the end of March 2026, with new Members due to take up post on 1 April 2026.

#### ASRPU stakeholder meetings & PLA thematic review proposal

7. The Chair noted that the proposed update to the Project Licence Application (PLA) process towards a more thematic review had been presented to industry and welfare stakeholder groups on 11 November 2025. The presentation had been well received by both groups, with no objections raised.
8. The main feedback from the welfare stakeholders concerned the definition of “societal concern.” It was emphasised that this should not be too prescriptive to ensure agility and flexibility, although the ASC might undertake exploratory work on this in 2026.
9. The Chair reported that a letter would be sent to Lord Hanson outlining the proposal, and ASRPU would take forward the next steps of seeking his formal agreement.

#### Laboratory Animal Science Association Establishment Licence Holders’ forum

10. The Chair updated that they had attended the Laboratory Animal Science Association (LASA) Establishment Licence Holder (PELh) holders forum on 21 October 2025, which focused on replacement. The main areas of relevance to the ASC were leading practice and the alternatives strategy, particularly views from establishments on the associated challenges.

#### POSTNote interview

11. The Chair updated that they and two Members had attended an interview hosted by Parliamentary Office of Science and Technology (POST) on 28 October 2025 on the topic of technology alternatives to animals in life sciences research.
12. It was noted that the report developed following this interview would be used to brief Parliament. The intention was to provide an evidence-based paper presenting the current animals in science landscape to inform future debates<sup>5</sup>.

#### Alliance for Human Relevant Research Parliamentary workshop

13. The Chair noted that a Member had attended a Parliamentary workshop hosted by the Alliance for Human Relevant Research on 4 November 2025. This attendance had been in his organisational capacity rather than as a representative of the ASC, but the workshop was relevant to ASC interests and activity.

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<sup>5</sup> [Technology alternatives to animals in life sciences research - POST](#)

14. The Member reported that the workshop had taken place ahead of the publication of the alternatives strategy<sup>6</sup>, which would have been of significant interest to attendees. Despite this, they stated that there had been productive discussions on alternatives and New Approach Methodologies (NAMs).

## **Futures Working Group update**

15. The Chair of the Futures Working Group (FWG) provided a brief summary of the background to the Subgroup and outlined the aim of the plenary session, which was to decide on the next steps for the Subgroup and whether it should operate as a standing subgroup or as a task and finish group.

16. The Subgroup Chair proposed hosting another Futures Workshop and developing an associated horizon-scanning portal to capture insights, including keywords, opportunities, challenges, and relevant categories. The Committee was generally supportive of the workshop proposal but considered that the portal required further discussion and refinement before implementation.

17. The Committee discussed whether the FWG should operate as a standing subgroup or be convened as a three-year task and finish group, with the option to extend if required. The Chair's preference was for a task and finish group of a fixed duration with regular review points.

**Action: Secretariat to determine the feasibility of hosting the portal on the GOV.UK website.**

## **Department for Science, Innovation and Technology update**

18. The Chair welcomed a representative from DSIT and invited them to answer questions from the ASC about the recently published government strategy: Replacing animals in science: A strategy to support the development, validation and uptake of alternative methods<sup>6</sup>.

19. DSIT and the Committee discussed separating regulatory and basic research contexts to improve strategy implementation. DSIT stated that the strategy comprised five sections: one on discovery science, one on regulatory testing, and three cross-cutting areas. Delivery would involve different partners, with the UK Centre for the Validation of Alternative Methods (UKCVAM) leading on validation. DSIT noted that any perceived regulatory emphasis was unintentional and confirmed that the strategy was intended to support both regulatory and discovery research, with future outputs expected to reflect this balance.

20. A Member raised that the omission of physiological and wider discovery research in the strategy could lead readers to assume these areas were being phased out. DSIT responded that section one set out where alternative approaches worked

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<sup>6</sup> [Replacing animals in science: A strategy to support the development, validation and uptake of alternative methods - GOV.UK](#)

and where they did not, and emphasised that discovery and physiological research remained essential. DSIT confirmed that animal research would continue where necessary, and that the strategy did not imply its withdrawal. A Member noted that the term “necessary” carried significant weight within the strategy’s framing and risked being interpreted too broadly. DSIT responded that this was unavoidable, as the research landscape could not be broken down in detail within the strategy and therefore needed to remain conceptual. It was noted that NC3Rs, ASC, and other stakeholders would be tasked with defining this term more precisely.

21. DSIT and the Committee discussed proposals for journal review practices to support assessment of alternative methods. DSIT stated the work would be led by NC3Rs, with journals clarifying expectations for peer reviewers.
22. DSIT and the Committee discussed incorporating ethical considerations for organoids and AI into strategy delivery. DSIT stated there was no plan to change the current ethical framework, leaving decisions to researchers and institutions, but DSIT would welcome ASC advice.
23. The Committee noted that research for veterinary medicines should be addressed separately, as it might require a different approach. DSIT replied that part three of the strategy’s baskets referred to “human,” and confirmed that veterinary research would continue to use the correct target species.
24. The Committee asked for clarification on the role and focus of UKCVAM. DSIT confirmed the role would be policy-focused, acting as a validation coordinator. It was acknowledged that funding and coordination for regulatory and safety work were currently limited. UKCVAM would have small portion of its budget for coordination funding, with the rest allocated for competitive validation funding.
25. The Committee raised concerns that the strategy could be misinterpreted as discouraging investment in animal facilities. DSIT stated communications emphasised continued use of animals where necessary and confirmed the Medical Research Council (MRC) would maintain animal research funding alongside increased alternative funding. The Committee suggested that DSIT should issue directed communications to senior university leaders to emphasise this. DSIT agreed to liaise with MRC to align messaging and provide context.
26. DSIT and the Committee discussed next steps for delivering the strategy and ASC’s role in supporting implementation. DSIT stated an internal implementation plan was in development, supported by ministerial and officials groups. Key performance indicators (KPIs) would be required, and DSIT welcomed ASC advice on these.

## **NC3Rs update**

27. The Chair welcomed a representative from the National Centre for the Replacement, Refinement and Reduction of Animals in Research (NC3Rs) and invited them to provide an update.
28. The NC3Rs reported that the quinquennial review process that determines its funding allocation had been completed and that discussions were ongoing with MRC and the Office for Life Sciences (OLS) about next steps.
29. The NC3Rs provided an update on their ongoing projects, including the ARRIVE compliance checker and the resources on improving the reliability and reproducibility of *in vitro* studies. The NC3Rs reported that the ARRIVE tool was undergoing final checks and that resources for design and reporting were nearing completion.
30. The NC3Rs had previously reviewed the World Health Organization's (WHO) biologics guidance with a report published in 2023. In response the WHO had recently published guidelines on non-animal tests for the quality control of biologics. This was considered a significant success with the potential to reduce the use of millions of animals in studies involving considerable suffering. The NC3Rs also noted that the European Medicines Agency (EMA) had cited their work in a reflections paper on the use of non-human primates in safety testing of human medicinal products, and that the US Food and Drug Administration (FDA) had recently published draft guidance on reducing testing on non-human primates for monoclonal antibodies which was also aligned with recommendation arising from NC3Rs' collaborative work.
31. The NC3Rs provided an update on the ongoing project licence application review. Work was focused on separating 3Rs considerations from operational aspects and road-testing recommendations, alongside broader efforts to improve the application of the 3Rs in collaboration with partners.
32. The NC3Rs asked whether sharing their KPIs with the ASC for feedback would be useful, which the Chair assented. It was agreed that the ASC would review the KPIs at a future meeting or in the interim via email.

### **Animals in Science Regulation Policy Unit update**

33. The Chair welcomed representatives from Animals in Science Regulation Policy Unit (ASRPU) and invited them to update on their progress with the policy and regulatory reform programmes.

#### Decapods

34. The Policy Unit reported that it had met with the Animal Sentience Committee in November 2025 to discuss the Home Office's obligations under the Animal Welfare (Sentience) Act 2022 in relation to decapod crustaceans. The Policy Unit was developing a detailed scoping plan and position and would attend the Animal Sentience Committee's plenary meeting in January to present the position.

35. The Department for Environment, Food & Rural Affairs (DEFRA) was continuing to build the evidence base and was carefully considering next steps in collaboration with the Policy Unit.
36. DEFRA was expected to publish an animal welfare strategy later in the year<sup>7</sup>. ASRPU had responded to the write-round on the proposed strategy, which referenced DSIT's alternatives strategy and included commitments to improving the welfare of decapods and cephalopods within the food and fisheries supply chain. DEFRA had previously confirmed that there were no plans to include decapods within the Animal Welfare Act 2006.
37. A Member reiterated their support for a commission of the Committee. They reiterated the view that Animals (Scientific Procedures) Act 1986 (ASPA) should be amended pre-emptively rather than waiting for changes to animal welfare legislation. ASRPU responded that options were being explored, including integration within ASPA and alternative approaches such as sector-specific guidelines with varying levels of alignment to ASPA. ASRPU highlighted the need for additional inspector training, increased inspector numbers, and adjustments to inspection arrangements at establishments. The Committee was advised that these considerations would inform future options and that a commission was anticipated, although the timing remained uncertain.

#### Article 10 of EU Directive 2010/63/EU: Non-Human Primates

38. ASRU reported that a submission addressing the ASC's recommendations on Non-Human Primates bred for use in scientific purposes<sup>8</sup>, under Article 10 of EU Directive 2010/63/EU, had been cleared, with all recommendations accepted by the Minister. Guidance was currently being developed, and a letter from Lord Hanson had been sent to the ASC outlining how each recommendation would be implemented<sup>9</sup>.

#### Licence duration review

39. ASRPU confirmed that a submission regarding the internal review of licence duration was scheduled to be sent to the Minister within the next month.

#### Non-Human Primates used in service licences

40. ASRPU reported that it had reviewed the ASC's report and recommendations on Non-Human Primates used in service licences and had discussed implementation with ASRU. A submission was scheduled to be sent to the Minister within the next month.

#### Retained EU Legislation and Code of Practice

41. ASRPU confirmed that it was refining and revising the draft statutory instrument in collaboration with the Home Office legal team. The aim was to lay a statutory instrument and revised Code of Practice to clarify UK law in early 2026. A copy of

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<sup>7</sup> [Animal welfare strategy for England - GOV.UK](#)

<sup>8</sup> [Non-human primates bred for use in scientific purposes - GOV.UK](#)

<sup>9</sup> [Non-human primates bred for use in scientific purposes: response from Lord Hanson - GOV.UK](#)

the Code of Practice would be sent to the ASC for information. No substantive changes were being made, and the ASC was not required to provide comments unless factual inaccuracies were identified.

#### Additional statistics collection

42. ASRPU reported that, following Ministerial and stakeholder interest, work was underway to explore the collection of additional statistics on animals bred for use but not used in procedures. A submission was expected to be sent to the Minister in early 2026. It was noted that this item had been deprioritised due to competing priorities.

#### Non-technical summaries and retrospective assessments

43. ASRPU confirmed that work had commenced on the recommendations for the non-technical summaries and retrospective assessments commission. A formal response was expected to be sent by the end of March 2026.

#### Regulatory reform programme

44. ASRPU reported that its new operating model officially launched on 4 November at an all-staff meeting, which included an address from Lord Hanson. Staff attended in-person sessions covering ASRU's transition, team building, organisational values, and presentations on AWERBs and ASRPU's work.

45. ASRPU noted that recruitment for the new organisational design was largely complete. Successful candidates for all posts had been identified, and onboarding was in progress for the final members of staff. All but two permanent inspectors had joined, and approval had been granted for two additional inspectors to be seconded to Northern Ireland. ASRU confirmed that all members of its new management team were now in post.

46. ASRPU reported that interviews for its governance board had concluded, with sufficient candidates meeting the required standard to establish the board. Members would need to be appointed by the Home Office Chief Scientific Adviser, and the relevant approval process was underway. Subject to Director General approval, the governance board was expected to be operational in the first half of 2026.

47. ASRPU reported that the reform programme was in its final phase and was expected to close by the end of the year. Work was being handed over from the reform programme team and integrated into ASRU's operations, with most handovers already completed. It was noted that some improvement initiatives would continue under policy ownership and that monitoring of programme benefits would remain ongoing.

#### Public Order Act 2023

48. ASRPU noted concerns had been raised by contract research organisations, including encampments, drone surveillance, theft, and secondary targeting of suppliers.

49. ASRPU confirmed that, following consideration of legal mechanisms to protect these sites and their supply chains, the Government had decided to utilise Section 7 of the Public Order Act 2023. This provision would establish clear restrictions around establishments and make activities of the nature described criminal offences. The new powers were expected to come into effect in February.
50. The ASC was broadly supportive of the measures, but one Member noted their dissent, citing concerns about preventing peaceful protests. ASRPU responded that the Minister had given significant scrutiny to the proposals, particularly to safeguard the right to peaceful protest. The Minister will make clear that should this become law, it will not impinge on fundamental and democratic freedoms for peaceful protest. The law is being changed to provide powers where there is disruptive protest. It was reported that the Minister had engaged extensively with parliamentary colleagues to ensure the measures were proportionate and appropriate, noting that similar provisions were limited to key national infrastructure.

### Operational update

51. ASRU reported that its suite of procedural documents had been maintained with no significant changes during the period. It was noted that, with the appointment of the new Head of Standards and Guidance on 12 August, developments were expected in the next quarter.
52. ASRPU reported that work had commenced to develop a more mature performance framework in alignment with ASRU's new business framework. It was noted that, following the successful recruitment of a dedicated data analyst, progress had been made to strengthen ASRU's analytical capability. Performance dashboards would be developed to clearly present data and would incorporate, where applicable, metrics to track benefits realised from recent reforms. Elements of the new alternatives strategy would also be embedded, ensuring that regulatory improvements and advances in the use of non-animal methods were reported.
53. ASRPU reported that it met with the Home Office Liaison and Technical Implementation Forum (HOLTIF) and the LASA PELh holders forum, 21 October 2025, to provide updates on regulatory delivery, the reform programme, and ASPeL changes and associated benefits.
54. The engagement sessions included Q&A segments during which ASRU addressed questions raised by members. These focused primarily on the progress of the reform programme and any potential impact on delivery timelines during and following the transition.

## **Animal Welfare and Ethical Review Body Subgroup**

### Commissions

55. The ASC report on non-technical summaries and retrospective assessments was published on 7 October 2025<sup>10</sup>. A response from ASRPU is due by 30 March 2026.
56. The AWERB Subgroup Chair noted that, following the initial commission on AWERBs and the Named Information Officer (NIO)<sup>11</sup>, the ASC Chair had written to Lord Hanson to refine the scope of this work<sup>12</sup>.
57. The AWERB Subgroup Chair reported that, following Ministerial agreement, the Subgroup would proceed with a revised approach by dividing the work into two separate commissions to ensure focused advice:
- a) Development of standards of effectiveness and governance for AWERBs, including a framework to support audit and evaluation. The focus would be on overall governance but may also encompass the full range of AWERB duties, including responsibilities under the 3Rs, and consideration of the ASC AWERB Hub model.
  - b) A dedicated review of the named roles, with a likely focus on the effective functioning of NIOs. The Subgroup indicated that it would welcome the opportunity to consider all named roles as part of this review.
58. The AWERB Subgroup Chair informed Members that they would be taking on new members to assist with these commissions, and to reach out if interested.

### Hub Workshops

59. The AWERB Subgroup Chair updated that the most recent AWERB Hub workshop on rehoming was held on 15 October 2025, and the draft workshop report had been circulated for comment. They continued that the next workshop would be held in April 2026.
60. The Committee discussed the challenges of ensuring effective training and assessment for implementing replacement strategies. Members noted the shortage of expertise across the breadth of research areas and the need for structured resources to support AWERBs in evaluating alternatives. It was agreed that training should focus on framing the right questions and equipping applicants to demonstrate where they have sourced information on replacement options, rather than providing generic responses and clear signposting to resources and databases on alternatives.
61. In relation to the ongoing NC3R's commission on project licence applications, Members emphasised that reliance on individual judgement alone was insufficient. The Committee agreed that robust systems and processes should be developed to support licence applicants and AWERBs.

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<sup>10</sup> [Non-technical summaries and retrospective assessments - GOV.UK](#)

<sup>11</sup> [Commission on AWERBs and Named Information Officer - GOV.UK](#)

<sup>12</sup> [Refining the scope for commissioned advice: letter to Lord Hanson \(accessible\) - GOV.UK](#)

## Leading Practice Subgroup

62. The Leading Practice Subgroup Chair noted that the final draft of the Leading Practice report was complete and circulated for comment and ratification. As agreed at the September 2025 plenary, the following decisions had been made regarding the scope of the report:

- a) AWERBs would not be considered in detail due to forthcoming commissions focused specifically on AWERBs.
- b) While the overall framework of leading practice was relevant to all 3Rs, the report focused primarily on refinement and reduction, as the commission requested recommendations for ASRU and the animals in science sector. Replacement was acknowledged as operating under different contexts and drivers; Recommendation 1 proposed a further commission to address this area.
- c) Recommendations were not directed to funders, publishers, or wider regulators, as the scope was limited to ASRU and the animals in science sector.

63. The Committee were broadly supportive of the current recommendations and ratified them. Feedback was raised to consolidate certain recommendations to ensure focus, and that the terminology would benefit from being clearer.

## Artificial Intelligence (AI) Letter

64. A Member noted that, at the ASC plenary meeting held on 8 September 2025, the initial draft of the letter was discussed. It had since been updated to focus on the use of artificial intelligence (AI) for ethical oversight and licensing and included a clear recommendation for the Minister. Members discussed rewording certain sections to strengthen the tone while maintaining clarity.

65. The Committee agreed that the letter was ready to be sent.

**Action: Secretariat to send the letter on AI to Lord Hanson and publish on the ASC website in due course**

## Annual Report

66. The Committee noted that, following feedback at the previous plenary, the annual report had been updated and the most recent version circulated.

67. Members discussed the report and agreed that it should be succinct to maximise impact at ground level and clearly summarise future priorities. The Committee supported retaining detailed appendices for those interested while keeping the main report concise, with potential links to the ASC website to maintain accessibility.

68. Members requested that the report make clear the costings of the ASC.



## **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 (11:00-12:00)  
Professor Jonathan Birch  
Dr Lucy Whitfield  
Professor Stephen May  
Dr Stuart Greenhill  
Mrs Tina O'Mahony  
Professor Christine Watson  
Professor Hazel Screen (11:00-14:00)  
Professor Martin Knight (from 12:00)  
Mrs Wendy Jarrett

### Secretariat

Emily Townley  
Alister Cox

### Animals in Science Regulation Policy Unit (ASRPU)

William Reynolds  
Chloe Jenkins  
Mamataj Begum  
Lucy Duncan  
Bernadette Godson  
Seer Ikurior  
Marlowe Cadiz

### Department for Science, Innovation and Technology (DSIT)

Colin Wilson

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

Vicky Robinson

### Apologies

Christine Henderson (Department of Health Northern Ireland)  
Karen Somerville (Department of Health Northern Ireland)  
Amy Scheijde (ASC Secretariat)