Department for Business, Innovation, Science and Trade

Department of Health & Social Care

Chris McDonald MP
Minister for Science, Innovation and Investment
Department for Business, Innovation, Science and Trade and the Department of Health & Social Care

Old Admiralty Building
Admiralty Place
SW1A 2DY

www.gov.uk

Our ref:

16th October 2026

To: Dr Sally Robinson
Chair of the Animals in Science Committee
By email only: asc.secretariat@homeoffice.gov.uk

Response to the Animal in Science Committee's Report on establishing the Alternative Methods Expert Committee

Dear Sally,

Thank you for the Committee's report on the establishment of the Alternative Methods Expert Committee (AMEC). The report provides a thoughtful and constructive assessment of how a strategic expert committee could support the development, validation and uptake of alternative methods, and help deliver the Government's commitment to accelerate the replacement of animals in science.

I am grateful to the Committee for the extensive evidence gathering and engagement undertaken in producing this report. The recommendations provide a valuable framework for establishing AMEC as a strategic body capable of bringing together expertise across academia, industry, regulators, funders and animal welfare organisations.

The Government has carefully considered the Committee's recommendations alongside implementation planning for the Replacing Animals in Science Strategy, including the establishment of AMEC and the UK Centre for the Validation of Alternative Methods (UKCVAM). Officials have engaged with delivery partners including NC3Rs, UKRI and regulators to consider how these recommendations can be implemented in a way that strengthens coordination across the landscape whilst avoiding duplication of existing functions.

The Government accepts all twelve recommendations made by the Committee, with some caveats. Working with NC3Rs, UKRI, regulators and other stakeholders, we will take forward the actions outlined below to support the establishment of AMEC and ensure it is positioned to provide strategic leadership across the alternatives landscape.

Taken together, these measures will help create a coherent governance framework for accelerating the development, validation and uptake of alternative methods while strengthening collaboration across the UK's research and regulatory system.

Yours sincerely,

Chris McDonald MP
Minister for Science, Innovation and Investment
Department for Business, Innovation, Science and Trade and
Department of Health & Social Care

The Government's Response to the Animals in Science Committee's Recommendations on Establishing the Alternative Methods Expert Committee

The Government welcomes the Animals in Science Committee's report on the establishment of the Alternative Methods Expert Committee (AMEC). We agree that AMEC has an important role to play in supporting delivery of the Replacing Animals in Science Strategy through strategic leadership, coordination, prioritisation and horizon scanning across the alternatives landscape.

The Government accepts all recommendations made by the Committee, with some caveats. Implementation will be taken forward through the establishment of AMEC itself, alongside the development of UKCVAM and engagement with NC3Rs, UKRI, regulators and wider stakeholders.

Implementation Plan

1. **AMEC should work with UKCVAM and other relevant bodies to clarify terminology and establish context-specific validation criteria across the system. UKCVAM should lead on clarifying validation criteria for regulatory testing, while AMEC should provide strategic oversight and coordination for validation approaches in research (basic and applied) to support coherence.**

The Government accepts this recommendation.

- We agree that a lack of common terminology and clarity around validation presents a significant challenge to the uptake of alternative methods.
- As an early priority, AMEC and UKCVAM will work collaboratively with relevant stakeholders to define key terminology and establish context-specific validation criteria across the system.
- AMEC will lead this work for research applications, while UKCVAM will support development of validation approaches for regulatory testing.
- These actions will be completed by the end of 2027.

2. **AMEC should work with UKCVAM, DBIST, the ASC and other relevant bodies to develop a clear, system-wide framework for signalling the readiness of alternative methods and identifying when particular uses of animals should no longer receive funding, licensing approval, or operational support. This framework should include consideration of monitoring and evaluation of alternative methods.**

The Government accepts this recommendation, with some caveats.

- AMEC and UKCVAM will work with relevant bodies to jointly develop a framework to identify and communicate the readiness of alternative methods that considers monitoring, evaluation and evidence requirements for adoption.
- While this process may lead to recommendations of where others should seek specific justification for continued animal use, we do not consider it within AMEC’s remit to identify when particular uses of animals should no longer receive funding, licensing approval or operational support. Regulatory, licensing and funding decisions will continue to rest with the relevant regulators, funders and related bodies, but the framework will support consistent understanding of maturity and readiness across sectors.
- AMEC will lead development of this framework with relevant stakeholders.

- These actions will be completed by the end of 2027.

3. **AMEC should be a strategic-level committee which facilitates progress in replacement through its core functions of advising, convening, prioritising and horizon scanning.**

The Government accepts this recommendation.

- AMEC will be established as a strategic advisory committee that will focus on advising, convening stakeholders, identifying priorities and emerging opportunities, and undertaking horizon scanning activities.
- AMEC will not duplicate the technical peer review, validation or regulatory functions carried out elsewhere in the system.
- These functions will be reflected within the committee's Terms of Reference that will be developed by the NC3Rs.

4. **AMEC should be established as an expert committee sponsored by BIST. BIST may wish to make use of official appointments recruited via open competition and, initially, direct appointments where necessary to speed up the establishment of the committee, but should give due consideration to the public perception of fairness by implementing the appropriate safeguards against bias.**

The Government accepts this recommendation.

- The Government agrees that an expert committee model provides the most appropriate mechanism for establishing AMEC.
- Appointments will be made through a fair and transparent process that will consider the appropriate balance between open competition and direct appointments where necessary to support timely establishment while maintaining public confidence.
- Appropriate safeguards will be implemented to ensure fairness and impartiality.
- The NC3Rs will lead the appointment process.
- Members of AMEC will be appointed by the end of H1 2027.

5. **BIST should be responsible for arranging adequate secretariat resource for the committee. BIST should seek to agree provision of the secretariat from NC3Rs, due to their unique and strong position in the landscape. BIST should ensure that an internal official has responsibility for maintaining the secretariat link to the sponsor.**

The Government accepts this recommendation, with some caveats.

- NC3Rs will provide day-to-day secretariat support for AMEC with resource requirements agreed with NC3Rs as part of implementation planning.
- Although tasking will flow from BIST, responsibility for the provision of adequate secretariat resource will rest with UKRI, as the overarching body of which NC3Rs is a part.
- Secretariat functions and responsibilities will be formalised before AMEC becomes operational.

6. **BIST should recruit 12-14 members across the pillars of alternatives developers, alternatives end users, animal research, adoption and public confidence. Membership should be reasonably balanced across the dimensions of sector, research context and application domain. As a whole, AMEC should be representative of the whole system as in the ASC's proposed expertise framework.**

The Government accepts this recommendation.

- AMEC membership will bring together expertise from across research, industry, regulation, alternatives development, alternatives adoption and animal welfare and will be informed by the expertise framework proposed by the ASC.
- As secretariat with responsibility for AMEC appointments, the NC3Rs will seek an appropriate balance of perspectives (for example, academia and industry) to ensure the committee can provide independent and informed advice across the whole system.

7. **BIST should develop a person specification for AMEC's chair and members, including but not limited to the criteria identified by the ASC in Table 4, and assess proposed candidates against these criteria.**

The Government accepts this recommendation, with some caveats.

- NC3Rs will develop a person specification for the Chair and committee members that will likely incorporate the criteria identified by the ASC, though decisions on exact wording and mandatory vs optional criteria will be taken as the process progresses.
- Particular consideration will be given to leadership experience, committee experience and an understanding of the research, regulatory and policy landscape.
- These actions will be completed by the end of February 2027.

8. **BIST should, in agreement with the AMEC chair, appoint ex officio members to AMEC to provide linkages, information flow and organisational expertise. Ex-officio members should not have voting rights. The ASC initially recommends that ex-officio members should be drawn from UKCVAM, NC3Rs Regulatory Sciences Forum, UKRI and the Preclinical Translation Models Hub.**

The Government accepts this recommendation.

- The NC3Rs will consider the appointment of a small number of non-voting ex officio members to support information sharing and coordination across the landscape.
- Initial consideration will include representation from organisations such as UKCVAM, UKRI, the NC3Rs Regulatory Sciences Forum and the Preclinical Translational Models Hub.
- Membership arrangements will be reviewed as new bodies become operational.

9. **AMEC should develop its ways of working document, adhering to best practice guidance and the recommendations made by the ASC in this report. AMEC should also develop a working protocol with BIST and a working protocol with the ASC, clearly describing respective remits, interactions and regular engagement.**

The Government accepts this recommendation.

- AMEC will develop a ways of working document as an early deliverable.
- Formal protocols will be established between AMEC, BIST and the ASC.
- These arrangements will help ensure clear roles and responsibilities, effective information sharing and the avoidance of duplication across the system.
- NC3Rs will support development of the initial documentation for agreement by the Chair and sponsor body.
- These actions will be completed by the end of H1 2027.

10. **BIST should consider locating UKCVAM within the NC3Rs, recognising the potential to enhance system coherence, capability and synergy across the development, validation and uptake of alternative methods.**

The Government accepts this recommendation in principle.

- The Government recognises the potential benefits of locating UKCVAM within NC3Rs and how this approach could strengthen coordination across the development, validation and uptake of alternative methods.
- Discussions with UKRI, MRC and NC3Rs will continue as part of UKCVAM implementation planning.
- Final decisions will be taken following these discussions with a decision on where UKCVAM will be hosted before the end of 2026.

11. **BIST should appoint the NC3Rs Regulatory Sciences Forum as the science advisory group to UKCVAM. The NC3Rs Regulatory Sciences Forum should review its membership and terms of reference to take on these additional responsibilities.**

The Government accepts this recommendation in principle.

- The NC3Rs Regulatory Sciences Forum is well placed to provide scientific advice to UKCVAM.
- Before formalising this arrangement, Government will work with NC3Rs to review the Forum's remit, membership, transparency arrangements and resource requirements.
- This will ensure it is appropriately configured to discharge any additional responsibilities.

12. **Across all of the recommendations made in this report, BIST should consider and appropriately address resource implications during implementation.**

The Government accepts this recommendation, noting the overall responsibility for the NC3Rs lies with UKRI.

- Successful implementation will require appropriate capacity across government, NC3Rs, UKCVAM, regulators and other delivery partners.
- Resource requirements will be considered as part of implementation planning for AMEC and UKCVAM and incorporated into future tasking arrangements in partnership with UKRI.

- Government will ensure that delivery commitments are aligned with available resources and organisational capability, and will provide the NC3Rs secretariat with the resources and support required to deliver agreed activities on time.
- Resourcing requirements for AMEC delivery will be determined by the end of 2026.

Conclusion

The Government welcomes the Animals in Science Committee's recommendations and accepts all twelve recommendations. Together, these actions provide a strong foundation for the establishment of AMEC as a strategic body supporting delivery of the Replacing Animals in Science Strategy. Through AMEC, UKCVAM and wider partnerships across the research and regulatory landscape, the Government will strengthen coordination, improve confidence in alternative methods and accelerate their development, validation and uptake.