Baroness Hayman of Ullock
Parliamentary Under-Secretary, Department for Environment,
Food and Rural Affairs
House of Lords
London
SW1A 0PW

31st October 2024

Dear Lady Hayman of Ullock,

Firstly, congratulations on your appointment as Parliamentary Under-Secretary for the Department for Environment, Food and Rural Affairs.

We are Replacing Animal Research. For over 50 years, we have championed a world where no animal suffers for science. Under our previous name, FRAME, we acted as a government advisor during the creation of the Animals (Scientific Procedures) Act 1986, and received the first government grant specifically for the development of non-animal cosmetic tests. Today, we remain committed to collaborating with and empowering researchers, policymakers, and other stakeholders to create change. We want to support you to be well-informed about this subject area and help push for better science and treatments for people, through non-animal research.

What are the issues around the regulation of animals in science?
Whilst the Animals (Scientific Procedures) Act 1986 (ASPA) regulates the use of protected animals in scientific procedures in the UK, we have concerns that there are flaws around the guidance and implementation of the act. These flaws mean that the act is failing to ensure that the required replacement of animals is happening as it should be, and hampering transparency around animal use. It is vital that these areas are robustly addressed to fully understand where scientific funding and taxpayer money is being spent, not only as research shows that a large percentage of the public would like to see funding moved away from animal use in research, but also to ensure that animals are not being used where an alternative, non-animal method exists. We know from the 2023 independent report by Dr Francis Rawle, commissioned by the NC3Rs, that replacement does not seem to be covered well by any part of the review process, confirming that replacement is not being prioritised as it legally should be.

The transition away from animal research is underway, but it is slow and opportunities are being missed, both in existing legislation and wider governmental strategy. In particular:

- Regulatory frameworks around the use of animals in science, which are **failing to ensure methods to replace animals are being implemented** as required by the law.
- The lack of **transparency around where animals are being used.** Whilst understandable due to the divisive nature of animal research, we believe transparency can be increased quickly, effectively and safely, with some simple changes to the implementation of ASPA, particularly Section 24, and improving the annual reporting of statistics of scientific procedures on animals.
- The principle of replacement as enshrined in law, which is focussed on the immediate

Replacing Animal Research
Cawley House, 149-155 Canal Street, Nottingham NG1 7HR
Registered charity no:1176266

hello@replacinganimalresearch.org.uk
www.replacinganimalresearch.org.uk
0115 958 4740

replacement of a scientific research procedure on an animal. It is not focussed on the **wider phase out of animal use** and ensuring mechanisms and infrastructure exists to support this. There needs to be a cross-departmental strategy to support this transition across all areas of science.

We were very pleased to hear that first steps are being taken towards Labour's manifesto pledge to phase out animal testing. It is fantastic to see that this plan will be led by Lord Vallance and will include the Department for Science, Innovation and Technology, the Home Office, and the Department for Environment, Food and Rural Affairs, as a cross-departmental approach is vital to achieve this goal. However, plans and maps to replace animal use often focus on 'animal testing', looking at regulatory tests for drug development, consumer or chemical safety tests, agriculture, or environmental protection. Yet, the majority of experimental procedures on animals are for basic research (52%) and 25% for applied research to understand disease. There is no legal or mandated reason to use animals for these types of research. Recent government pledges, and manifesto commitments to phase out 'animal testing' once again focus on strengthening regulatory mechanisms to advance the replacement of animals, but what about other areas of research?

Curiosity driven research, such as basic and applied research, is important to scientific progress, but we must support the advancement and uptake of human-relevant methods to research human disease rather than modelling them in laboratory animals, with different biology and living in very different conditions to us. The only driving factor to encourage scientists to explore alternative methods in basic and applied research is ASPA, yet we know that is failing to ensure replacements are explored or utilised.

What can we do?
This issue must be addressed through all aspects of research including legislation, regulation, funding, education, training and strategy. The Government as a regulator, policymaker, and investor of public funding into research has a responsibility and an opportunity to address this across all channels.

We always welcome being reached out to for advice or further discussions on the use of animals in science, particularly in terms of ensuring replacement is being fully met. If you have any questions or would like to discuss the topic further, please do not hesitate to get in contact via email, at jessie@replacinganimalresearch.org.uk.

I look forward to hopefully hearing from you soon.

Yours Sincerely,
Jessie Hellier
Policy Officer, Replacing Animal Research

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