FRAME's Policy Approach

Fund for the Replacement of Animals in Medical Experiments

FRAME

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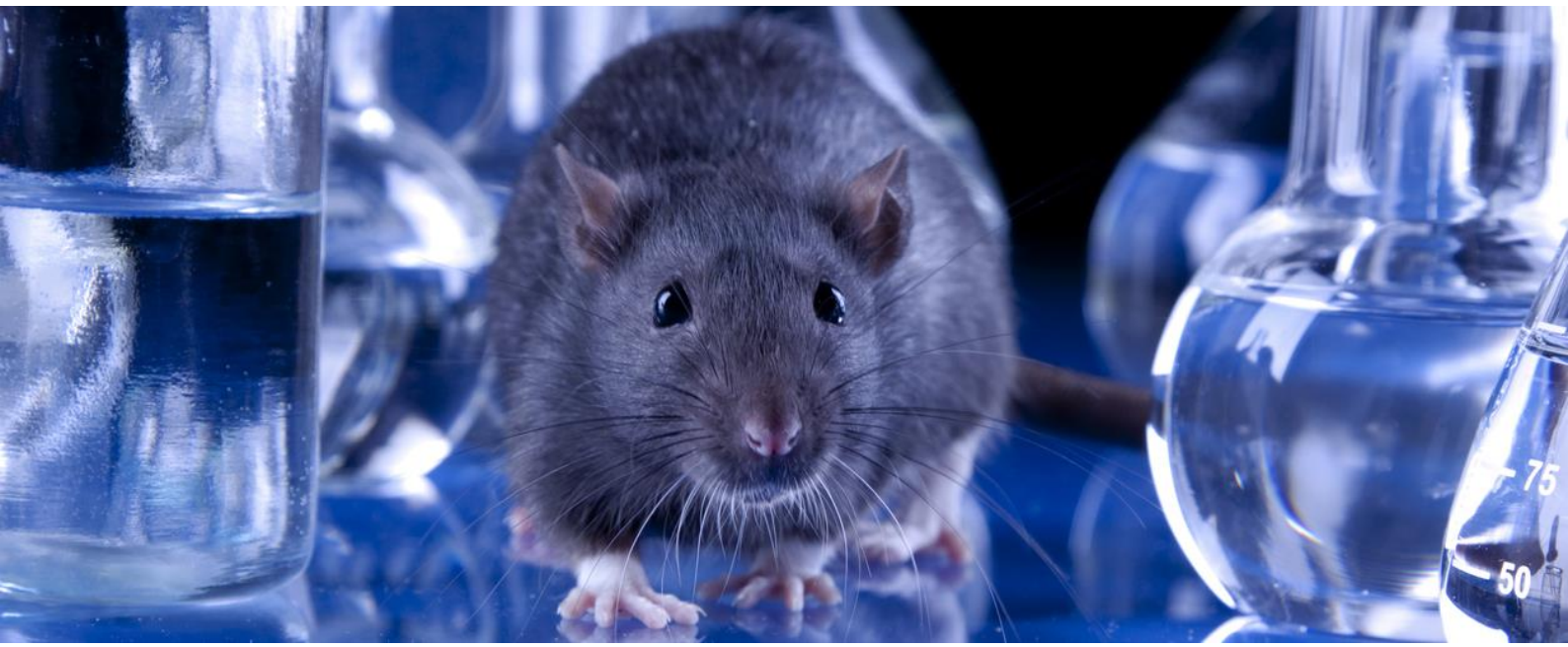
Summary



Advocating for change

The policy landscape surrounding animal use in scientific research is ever-changing and requires reactive work alongside proactive initiatives. We will work to actively stay abreast of parliamentary, legislative, and policy related matters, both UK and internationally were relevant. This will be conducted through activities such as horizon scanning, sharing, and writing of articles and blogs, submissions to public enquiries and evidence calls, and communications with MPs.

Below is an overview of the general policy areas where we will advocate for change.

Promoting a joined-up approach to UK life sciences strategy

We believe that there must be an overarching animal-free life science strategy across all relevant government departments that will prioritise replacement and allow open streams of conversation. A strategy would provide a framework to unify priorities and goals to replace animal tests and increase utilisation of new approach methodologies across Government departments.

For the UK to lead the world in scientific development, increase the number of successful drugs on the market, or speed up the development pipeline, there must be a push for an overarching goal to create an animal-free future for research and testing in the life sciences.

At present many scientists and organisations, including FRAME, are promoting the use of new approach methodologies over animals due to emerging evidence that they are better able to predict human responses and improve the validity of outcomes for human biomedical research. Equally, as gene-altering technology has become more developed and accessible, there are other stakeholders that would advocate that many of the same outcomes could be achieved by further developing genetically altered animal models. This creates competing demand for attention around new technologies from different bodies and departments within government depending on their priorities and commitment to phasing out animal tests. However, from a policy perspective, when the government is considering what to regulate and what to incentivise, these new technologies cannot be seen as equal. The UK has a legal framework that is situated in a baseline assumption that causing suffering to animals is not permitted. The public, by and large, reluctantly accepts animal testing on the assumption that it will end at some point, so a clear goal on reducing and eliminating animal use in science here is likely to be popular with the electorate. Technicians and researchers working with animals would also prefer not to cause suffering, and there is growing evidence of the detrimental effects of this work on the mental health of these staff. Therefore, the fairly overwhelming consensus is that the direction of travel should be toward an animal-free life sciences future that delivers the same or better outcomes for health. This needs to be stated and owned by the government as part of its overarching scientific strategy.

This would allow the National Centre for the 3Rs and other bodies that fund 3Rs research to focus their efforts much more specifically on this goal, and would also give funders and research councils spending public money the incentive to question the evidence around

model choice, and be less risk averse to new technologies. It would also enable conversations with university establishments about how to up-skill their staff across a range of technologies and create practical, long-term phase out plans that do not result in loss of funding or prestige.

There are areas where new approach methodologies are far more developed than in others, but this provides an additional reason to bring policy and thinking around new approach methodologies and animal use together. A high level, aspirational, policy steer towards a future that expects fewer animals to be used year on year as new technologies are developed and utilised, will provide a clear rationale for why some choices in technologies are being made over others. In this case, it would lead to far more rigorous questioning about why we would fund the ongoing development of further animal models when there is a strong scientific and ethical (in terms of public expectation) case for funding alternatives. It would also help to resolve the replacement paradox for the Animals in Science Committee (an advisory non-departmental public body that provides independent advice to the Home Office), which has the remit to support the implementation of the 3Rs and therefore replacement, but terms of reference that only cover *how* animals are used in science, rather than whether there are areas that they should not be used at all.

Pushing for clear targets

We support the introduction of realistic and targeted bans on the use of animals in research, particularly in areas that have established and validated non-animal methods. Realistic goals are vital in ensuring time and funding can be directed into creating new methods of testing, whilst holding the government accountable to commitments to reduce reliance on animal tests.

The idea of banning animal research outright is a highly debated topic and is the subject of many public petitions. It is clear from previous parliamentary debates that the UK Government is not yet prepared to instate a blanket ban on the use of animals in research, and scientifically speaking, not all areas of research yet have robust and available non-animal methods that can replace animal models.

However, bans have been successful in the past. In 1998, the UK Government banned the testing of cosmetic products and their ingredients on animals, and in 2013 the sale of animal-tested cosmetic products was also banned in the EU. Humane Society International cite that over 40 countries worldwide have now passed laws banning cosmetic animal testing. This is evidence that bans can, and have, worked in the past, and begs the question of why targets to end animal use, even phased targets, cannot at least be discussed with regard to medical research.

Whilst it may be challenging to predict exact timelines for banning animal testing in specific areas of research due to the unpredictable timescales required to ensure modern non-animal technologies are suitably developed and accessible, there is a strong case for trying. If the government could commit to targets to phase out animal use area by area, the idea becomes considerably less daunting. Areas such as chemical safety testing, in which a lot of advances in non-animal methods are already established and validated alternatives already exist could be one of the first areas to be phased out in the short term. We also believe the cosmetic ban must be upheld in its entirety by ending the animal testing requirements for cosmetic ingredients under REACH, a view supported by the scientific community due to existing data and alternative approaches.

To apply sufficient pressure on regulators and the Government to accelerate the development and uptake of non-animal technologies, realistic goals must be set that allow the time for new methods to be funded, created, and validated, whilst still holding the government accountable.

Using petitions for change

We will support petitions that will elicit a worthwhile response from the government and provide insight and advice on real opportunities for change in the reduction of animal use and uptake of non-animal methods.

In the UK, members of the public can start online petitions through the petition.parliament.uk website. Petitions can be set up about any topic and run for 6 months before closing. If a petition reaches 10,000 signatures, the government will respond in

writing. If a petition reaches 100,000 signatures, the topic will be considered for debate in parliament. Occasionally, petitions surrounding the use of animals in research are started, most often calling for animal use in research to be banned. Whilst these petitions are useful for demonstrating the public desire and support for change in this area, broad topic petitions unfortunately receive similar, standard responses from the government around the strength of the Animals (Scientific Procedures) Act 1986, regulatory animal tests requirements and 3Rs implementation. These broad petitions, therefore, do not drive effective conversations on specific areas where there are real opportunities for change such as improving transparency in animal research or improving regulatory frameworks to transition to more modern non-animal testing approaches.

Advising policymakers

We contact and advise MPs through briefings for debates and letters on specific issues, regularly attend government stakeholder meetings, and submit evidence to government enquiries to urge the replacement of the use of animals in science.

As seen with the recent petitions that have led to parliamentary debates, keeping MPs informed on matters relating to the use of animals in science is vitally important. Without well-informed MPs, legislative and regulatory change will be harder to achieve. FRAME produces briefings for MPs ahead of debates and letters in response to specific issues raised by MPs. We plan to remain in contact with MPs and policymakers to ensure they are kept up to date on relevant issues surrounding animals in research. We will also continue to submit evidence to Government enquiries both through calls from the Animals in Science Committee, relating to specific animal research issues, but also wider calls around education, training, funding, and the prioritisation of research without animals.

Strengthening legislative provisions

The Animals (Scientific Procedures) Act 1986 sets out details on regulated procedures, licensing, 3Rs (Replacement, Reduction, and Refinement), protected animals, and laboratory animal care and welfare, among other areas. In terms of laboratory animal protection globally, the Animals (Scientific Procedures) Act 1986 is often considered the most stringent piece of legislation with the most comprehensive details surrounding the welfare and care of animals used in research. Whilst this may be true, we believe there are several areas where the implementation of the Animals (Scientific Procedures) Act 1986 could be strengthened to increase scientific transparency and communication around the current use of animals in science. This is particularly important to help guide choices away from using animals in basic and applied research projects where there are no legislative or regulatory requirements to do so.

Read more about our proposed improvements below.

Ensuring research transparency

We are calling for increased transparency of project licence applications. It is a democratic principle to be open, and challenge work that happens in the public interest funded by public money. Increased transparency will help identify research areas where animal use could be reduced through the utilisation of non-animal methods and allow for funding to be directed more specifically into these areas. This information could also be used to inform training needs and raise awareness of non-animal methods.

Currently, aside from the annual publication of Non-Technical Summaries of projects granted licences for regulated animal research procedures, the Home Office is not obliged to release any other details of licence applications for the use of animals.

Section 24 of the Animals (Scientific Procedures) Act 1986 is the section that concerns the protection of confidential information. Under section 24, the Home Office cannot release any information received in confidence under the Animals (Scientific Procedures) Act 1986, even if the provider of the information has no objection to its disclosure. This prevents the sharing of licensing assessments, inspector visit reports, and review papers, among other information. This is incompatible with the Government's policies on openness and transparency, and the central principles of the Freedom of Information Act 2000 (The Freedom of Information Act allows for public access to information held by public authorities and is predated by the Animals (Scientific Procedures) Act 1986 by 14 years).

The appropriateness of this section has been questioned on several occasions by MPs, spanning over 20 years. The Government held a public consultation in 2014 which proposed three options for amending section 24:

1. Retain section 24

2a. Repeal section 24 and amend the Animals (Scientific Procedures) Act 1986 by creating a criminal offence of malicious disclosure of information about the use of animals in scientific research

2b. As option 2a but with the amended legislative framework to include a statutory prohibition on disclosure of information relating only to people, places, and intellectual property

3. Repeal section 24 allowing all information to be publicly disclosed unless exempt under the Freedom of Information Act 2000.

As of November 2022, no results have been published from this consultation.

We believe that as a fundamental principle of an open democracy, there should always be an assumption of transparency unless there is clear evidence that any risk of disclosure outweighs the public interest. This is what the Freedom of Information Act is designed to do, and its existence and protections render Section 24 of the Animals (Scientific Procedures) Act 1986 obsolete. We therefore believe that Section 24 should be repealed to allow access to information that is currently protected. This would increase transparency and provide opportunities for further scrutiny of the quality and detail of successful project licence applications. Option 2b, the preferred Government option in 2014, would allow the controlled release of information for independent auditing or review whilst protecting the identities of the researchers involved. This would be a massive step forward and would allow the implementation of replacement, as the first of the legally required 3Rs, to be independently assessed. In particular, it would be hugely beneficial to better understand what alternative approaches were considered by licence applicants and ultimately rejected, and why. This information could be used to direct funding for the development of alternatives, inform and strengthen future licence application processes and drive training and resource development to support those applying for licences, and those involved in review processes, such as members of Animal Welfare Ethical Review Boards (AWERBs).

Advocating for easy access to Non-Technical Summaries

We are calling for Non-Technical Summaries to be made available in a format that facilitates searching and benchmarking against other countries for increased accountability. This would also increase transparency to help direct funding, address gaps in research where non-animal approaches are lacking and challenge animal use where alternatives exist.

A Non-Technical Summary is a document produced by researchers as part of their licence application to provide a clear outline of their project to be shared publicly. It must be written in non-technical language and is intended to provide information on why and how the project has taken place. It is mandatory under the Animals (Scientific Procedures) Act and is published by the Home Office annually.

In the EU, Non-Technical Summaries from all EU countries are published onto the Animal Use Reporting- EU System (ALURES) Non-Technical Summaries database which allows searching and filtering by country, title of project, keywords, species, purpose of project, year of publication and language. This provides further transparency and openness on how and why animals are used in scientific procedures.

As the UK is no longer a member of the EU, it does not benefit from inclusion in this Non-Technical Summaries database. As one of the global leaders in scientific research, this makes little sense and could be addressed in two ways. Firstly, if all parties agreed, the UK figures could be included in the EU database. This will allow for searching, benchmarking, and accountability between countries to be significantly easier. If this cannot be achieved, creating a similar Non-Technical Summaries database in the UK from the summaries that are published under the Animals (Scientific Procedures) Act 1986 would allow the UK to accrue the same benefits of increased transparency and openness surrounding the use of animals in research.

Increasing the transparency of how and why animals are used also allows improved development of non-animal methods, as there would be a more detailed picture of the areas in which most animals are used, and where alternative methods would be most beneficial.

Strengthening replacement requirements

We believe the practice of searching for replacements and evidencing these searches needs to be improved as the current system is weak. strengthening searching requirements will allow for non-animal methods to be more thoroughly explored and utilised, and further improve transparency of how researchers search for these methods.

Under the Animals (Scientific Procedures) Act 1986, researchers must correctly and robustly apply the 3Rs when planning projects and include this information in their licence applications. However, there is currently no standard searching practice or requirements to provide specific evidence on the searching processes used. This is particularly key for 'Replacement' and the justification for why an alternative approach could not be used. It is

impossible for the application reviewer to know every possible non-animal method or alternative that is available across different research fields. It is therefore vital that project licence applicants clearly demonstrate how they searched for and explored alternative approaches, what the outcomes were and why these were ultimately rejected. This could be achieved in various ways:

- By strengthening evidence requirements in current project licence applications or implementing mandatory searching criteria prior to licence applications being submitted, such as systematic or literature reviews.
    - Whilst an assumption of secrecy is still in place around project licence applications, we would like more robust evidence of searches and replacement consideration to be included within the publicly available Non-Technical Summaries.
    - If there was greater visibility of project licences, a retrospective auditing system where experts review licences every few years could be implemented. This information could identify missed replacement opportunities and inform future training and information sharing initiatives on non-animal methods.
- Making the licensing system more effective by assessing alternative approaches prior to a licence being granted. This again would require greater transparency and visibility of licensed projects. This could, for example, take the form of a specialist New Approach Methodologies (NAMs) panel to review and scrutinise licensing applications as they are submitted.

Regulatory research

Aside from the Animals (Scientific Procedures) Act 1986, most other legislative requirements to use animal tests come from regulatory bodies overseeing the implementation of legislation related to product development and marketing authorisation. Requirements to use animal tests fall under regulatory body guidance. These stipulate what animal tests to perform and what data to provide to obtain market authorisation for a new drug; to carry out safety batch testing of medical products; to develop new veterinary drugs; or to test new agricultural or biocide products. The specific animal tests, or approved and validated alternatives, are defined by the regulatory body itself, or set out by an overriding global harmonisation membership body of which the regulatory body may be part. This for example can be seen in the specific data requirements of UK REACH (Registration, Evaluation, Authorisation and Restriction of Chemicals), overseen by the UK Health and Safety Executive (HSE) to test the safety of chemicals, or the pre-clinical data requirements from the UK Medicines and Healthcare products Regulatory Agency (MHRA) under the Human Medicines Regulations 2012.

Below are the regulatory based changes we propose.

Re-wording of regulatory testing guidance

We are calling for the wording of regulatory testing guidance to be changed, where possible, to remove the specific references to animal tests, and to instead specify the data that is required. This will allow non-animal methods to be given equal standing in law and provide evidence of a strong commitment to replacement by the government.

We believe that wherever possible, the wording of regulatory testing guidance should be changed to remove specific references to animal tests. Instead, the wording should specify data requirements, rather than setting out a specific testing approach to collect the data. This is similar in principle to the aims of the recently passed Food and Drug Administration's Modernization Act in the United States of America. This bill amends the Food, Drug and Cosmetic Act in the United States to allow applications for market approval for a new drug to use methods other than animal testing to establish the drug's safety and effectiveness. These methods could include cell-based assays, organ-on-a-chip technologies, and computer modelling. Whilst animal tests will still be allowed under this change, they will no longer be mandatory, opening the door to data submission from alternative means. Where it previously stated 'animal tests or studies,' it will now state 'non-clinical tests or studies.'

This is a small change in text, but a huge step in bringing New Approach Methodologies to the forefront of scientific research. There is an opportunity here for the UK to follow suit. By removing the specific need for animal tests in UK regulatory requirements and allowing non-animal methods to be given equal standing, the Government's commitment to the 3Rs will become a lot clearer. This will also put pressure on regulators to be more open to the consideration of data collected using modern, non-animal methods.

Supporting pre-registration pre-clinical trials

We believe that pre-clinical animal trials should be pre-registered in the same manner as clinical trials. This would allow for scrutiny and input from other biomedical experts and allow problematic practices to be identified prior to studies being conducted. This would in turn reduce publication bias, ensuring all results are accessible rather than only successful trials, and help avoid duplication of animal studies previously conducted or underway.

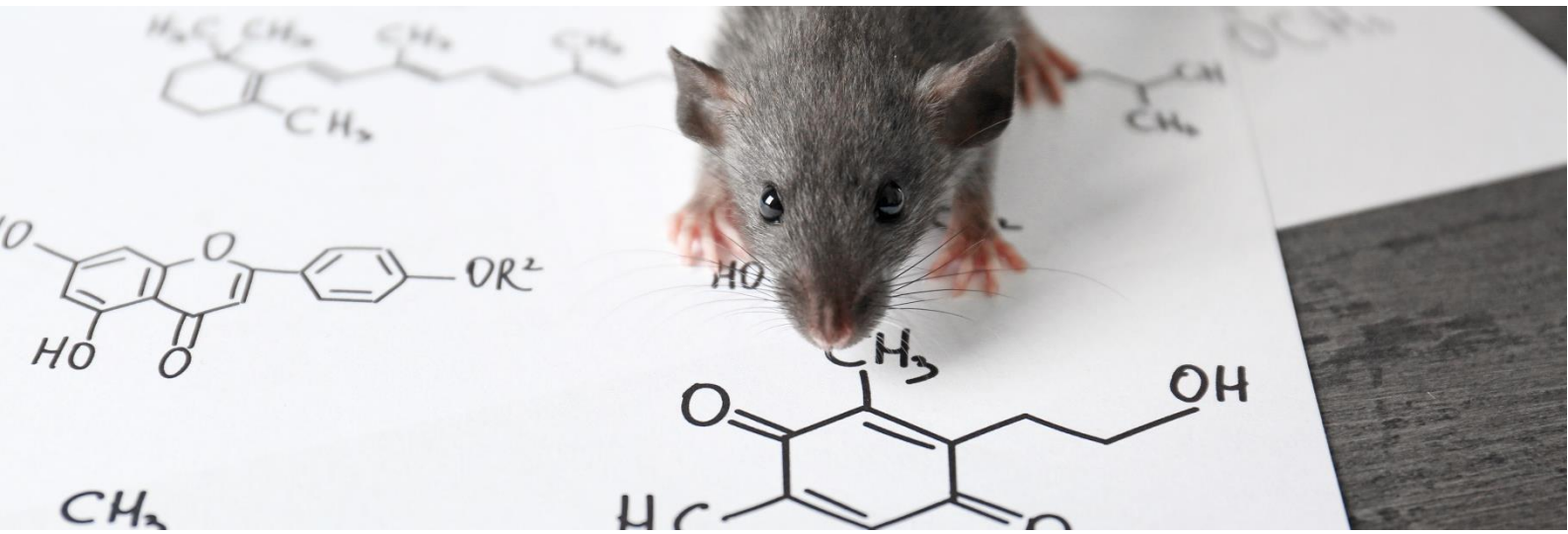
In terms of clinical tests, pre-registration involves registering hypotheses and methods of a study into a public registry before it is conducted. This has benefits including identifying problematic research practices, allowing input and scrutiny from others in the industry before the study is started, allowing journals to conditionally accept studies without knowing the results, and allowing a clear distinction between confirmatory and exploratory analyses. Whilst it is mandatory to pre-register clinical trials, no such rule currently exists for pre-clinical animal trials. If this were adopted as standard pre-clinical practice in the same way as clinical trial registration, this research would receive the same benefit of scrutiny. This would allow for more cost effective and relevant science, which would also lead to a reduction in the number of studies that pass through this registration period, help avoid study duplication, and therefore reduce animal use. This change would inevitably help reduce the failure rate from animal trials to human trials through greater visibility of null or negative results, increase transparency around pre-clinical animal use, and inform understanding of the translational value of pre-clinical animal studies in different areas.

Pushing for evidence-based actionable changes

There is growing evidence supporting the use of non-animal methods, yet it can take years for government guidelines and policy to be updated. **In areas that have evidence of non-animal methods providing equal or better data, we believe that licences for the equivalent animal tests should not be granted, and the animal requirement removed, effectively banning these tests.**

In some regulatory testing guidelines, there is mounting evidence that existing non-animal methods can provide equivalent or better data than the animal test that is either stipulated or still allowed. We believe that in such areas the non-animal approach should be the sole testing method required, requirements to carry out the animal test should be removed, and more specifically licences should not be granted for these tests, effectively banning the tests. In these cases, we will continue to support and call for change, both in the UK and globally. We would also like to see a more open and objective framework for maintaining up-to-date knowledge on emerging non-animal technologies and how they can be utilised to provide data that negates the need for animal use.

Where current animal tests are shown to be unnecessary due to a lack of predictive value, or repetition of data, test requirements should be removed and updated. For example, the phasing out of specific requirements in pre-clinical toxicity testing that require testing on two species. Under regulatory guidelines, safety, and tolerability data from two species is usually required prior to administering new medicines to humans in clinical trials. The two species must be a rodent species (often a mouse or rat), and a non-rodent (commonly a dog, pig, or non-human primate). Two species are used as it is believed that the adverse effects that are exhibited by both species are similar to those of humans. If data from a rodent species provides the required information and there is no evidence that the non-rodent species provides extra evidence on efficacy or safety, then the requirement for the second species should be dropped from guidance, and regulatory data accepted without it. There is no doubt that we would like to see testing of this type entirely replaced by non-animal methods in the future. However, in the short term, the actionable change would be accepting data from only one species when possible.



About FRAME

For over 50 years, FRAME has worked tirelessly to replace animals in medical experiments.

Originally founded in 1969 by animal-lover Dorothy Hegarty, FRAME was established to work with researchers and institutions to end animal testing. Today, we champion Dorothy's legacy across the world by funding innovative science, sharing cutting-edge non-animal methods, and educating on human-relevant approaches to research.

FRAME is an international organisation. We disseminate information related to policy on animal use across the world, however, most of our policy work is currently focussed on the government and legal framework of England and Wales, or the UK more broadly.

Our vision is a world where non-animal methods are accepted as scientific best practice and animals are no longer used in scientific or medical research and testing.

Join us as we work to replace animal testing with human-relevant science. Together, we will create a better world for humans and animals.

Get in touch

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FRAME (Fund for the Replacement of Animals in Medical Experiments) is a charitable incorporated organisation with registration number: 1176266