Understanding Animal Research

UAR welcomes the chance to comment on Labour's proposals for animal research, to ensure both that their workable parts are enhanced and the negative impact on animal welfare that would result from some of their provisions can be avoided.

"Contribute to the development and validation of non-animal research methods and technologies and encourage research in the field."

UAR has long lobbied for greater funding for alternatives research and is fully supportive both of the '3Rs' of Reduction, Refinement and Replacement, and the National Centre for the 3Rs (NC3Rs) which has existed for the last 14 years to fund 3Rs technology and initiatives. Despite considerable 3Rs investment by the pharmaceutical industry, individual Contract Research Organisations, universities and charities, the NC3Rs remains overwhelmingly the main funder of 3Rs research in the UK with over £56 million committed since 2004. It has an annual budget of around £10 million, with core funding coming from the Medical Research Council (MRC) and the Biotechnology and Biological Sciences Research Council (BBSRC).

Other grant funding for specific programmes comes from sources such as industry, charities and government departments. An example of this class of project is the joint NC3Rs/ABPI investigation of the necessity of testing new drugs on two different species.

Although Labour's pledge makes no mention of existing significant investment in 3Rs research, an increase in alternatives funding would be welcomed by the bioscience sector. In particular, any increase in funding would be best directed via the NC3Rs so that funds can be invested via a coherent and integrated approach.

"Commit to ending within an achievable timeframe, the permitting of 'severe' suffering as defined in UK legislation."

UK legislation already outlaws any animal research where pain and suffering cannot be ameliorated by the use of anaesthetics and analgesics. UAR fully supports efforts to reduce, replace and refine experiments so that severe suffering is minimised and eliminated wherever possible. The RSPCA is currently working with several laboratory animal science organisations to further this aim: https://science.rspca.org.uk/sciencegroup/researchanimals/severesuffering The project includes sharing good practice so that any developments that allow a reduction in severe suffering can be disseminated as widely as possible.

Some human and veterinary diseases and conditions, such as arthritis and neuropathic pain, are inherently painful. If we are to continue research to find treatments and cures for such conditions, the experience of the animal models used is likely to be categorised as 'severe'. Setting a date

beyond which such research could not happen in the UK, before alternative or more refined techniques have been developed, would close down ongoing UK research projects and likely result in the research being done in countries without such strict restrictions on severity. This would effectively displace rather than replace the experiment and could compromise animal welfare.

It should also be noted that not all animal research that is given a 'severe' licence is found to have been severe when a retrospective review of the work takes place. Neurology experiments using non-human primates, for instance, are often licensed as 'severe' despite in practice rarely reaching that severity band. 'Severe' is also used to describe things like animals that are found dead in circumstances where one cannot be sure it wasn't the fault of the experimental protocol. The word 'permitting' therefore does not cover the scope of experimental severity.

"Make animal testing project licences open and transparent. This would be undertaken in such a way as to ensure addresses and names of individuals were not exposed."

Non-technical summaries of all experiments licensed by the Home Office are currently published in Plain English on the Home Office website. One can only assume that this pledge means the reform of Section 24 of the Animals (Scientific Procedures) Act 1986 (ASPA), which forbids specific project licences from being released by the government, since the Home Office is the temporary guardian of others' intellectual property and confidential information.

The bioscience sector has long argued for the reform of Section 24 because it creates a legal tension for public bodies, wherein they are either violating ASPA or the Freedom of Information Act (FOIA) whether or not they respond to public requests for information about experiments.

However, great care must be taken when protecting both names and addresses, which may themselves be inferred by the nature of the experiment (such as with researchers taking novel approaches) and intellectual property.

Private companies are not directly subject to the FOIA and their private data should be protected by exemptions to the FOIA for the Home Office when handling private information. Reform of Section 24 will simply resolve the legal tension affecting public bodies. However, as non-technical summaries of research projects are already available, it is debatable how much extra information will be presented to the public by the printing of redacted project licences, and the attendant risks to researchers and their ideas will be difficult to avoid.

"Commit to a ban on the export of animals for use in research unless with specific consent from the Home Office where there would otherwise be greater welfare detriment."

Scientific research is often a collaborative effort between universities and institutions in several different countries. In many cases the exact same strain of animal, with or without a specific genetic alteration, needs to be used in all the research centres for a particular project, or else the results of the research may not be valid and animals may be wasted. An export ban such the one proposed here would prevent UK institutions from sharing animals with colleagues overseas and would thereby close down many ongoing collaborative projects.

We would argue that it is unclear why a ban is needed, and such a proposal further raises a question of total animal suffering if it is the case that the animals are, subsequent to an ex-UK transport ban, imported from another country potentially more distant with poorer traveling conditions. Thus 'welfare detriment' should specifically refer to *all* animals regardless of whether or not they are in

the UK in order to avoid greater suffering than transport would have incurred. This is just one of the variables that the Home Office would need to consider, with others including the size and species of animal being transported plus the method of transportation and the animals' familiarisation with potential stressors since all of these appear in the scientific literature as key aspects in determining whether an animal suffers in transit or not.

In short, animal welfare will have to consider the welfare costs of animals abroad in order to be meaningful, but doing so will place the Civil Service in a position of having to guess how the future would unfold in the event of transport being disallowed. We would suggest that a better way to improve the experience of laboratory animals transported abroad would be to work with suppliers, transport companies and customs officials to ensure that the animals have the shortest and least stressful journey possible.

In addition, research establishments and funders alike often have minimum welfare standards which they would wish to see in the foreign establishments to which the animals are headed, but it can be difficult to ascertain whether these standards are present. The Home Office could take a more active role in assisting the Animal Welfare Ethical Review Bodies (AWERBs), which approve or deny licence applications at the local level, with ascertaining whether standards are met, particularly in non-EU countries or establishments.

"Commit to a stringent review of defined areas in regulatory testing, with the aim of identifying and eliminating avoidable tests."

The National Centre for the 3Rs has had several successes in this area. By acting as an 'honest broker', the NC3Rs used data provided by several companies around the world in order to show that single dose acute toxicity tests were no longer relevant, with the result that these tests are no longer required: https://www.nc3rs.org.uk/single-dose-acute-toxicity-studies Similarly, a review in currently underway looking at the regulatory requirement for testing in two species of mammal before first in man studies: https://www.nc3rs.org.uk/news/launch-new-nc3rs-abpi-collaboration

UAR would support an increase in funding for the NC3Rs so that further areas of regulatory testing could be identified in this way, and avoidable tests eliminated. It should be remembered, however, that regulations tend to exist for a reason, such as safety requirements for drugs or chemical products set out in the laws of the countries they may be used in. Whether or not a test is 'avoidable' is thus often related to the validation and acceptance of animal alternatives in the destination country. In addition to the successes of the NC3Rs mentioned above, good work has been done by the Home Office and its contractors in convincing foreign governments to accept non-animal alternatives where they exist, and far greater progress towards animal welfare could be made by expanding this programme of work.

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