Animals in Science Working Group: Summary of Activity & Progress, June 2021

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Of the many areas of animal use and interaction with humans to be specifically mentioned in the government's post-Brexit Action Plan for Animals (May 2021), those in animal experiments were the most notable absentee. No area has attracted so much attention yet seen so little progress spanning decades than animal experimentation. It is often argued by experimenters and legislators that the United Kingdom benefits from one of the most robust legislative frameworks in the world. However, in the Animals in Science Working Group (ASWG) we occupy different ground which recognises significant concerns in this area.

To illustrate this, in early 2021, we made representations to the Home Office Animals in Science Committee Futures Capability Working Group, which is reviewing the operation and legislative control of the area. This will be supplemented by one of our ASWG attending a Home Office workshop in late July 2021 to discuss representations made during the consultation.

The area has so many weaknesses and flaws that it was difficult to pin down just four in our representations. However, we raised the following areas as those of significant concern and need of reform. The congruent themes of transparency, openness and accountability run through all our suggestions:

1. The need for more transparency and freedom of information in the area. The operation of the Animals (Scientific Procedures) Act 1986, as amended in 2013, is specifically removed from oversight under the Freedom of Information Act (2000), due to fears over industrial secrecy and alleged potential threats to those working in the area. Section 24 of A(SP)A 1986, prohibits disclosure of sensitive information. However, despite a 2014 government consultation recommending repeal of section 24, it remains a significant bar to transparency in the area. It prevents

- scrutiny of experiments after results have emerged, and shrouds, for example, the operation of the infamous severity test, in secrecy. The repeal of section 24 would be a significant milestone and might lead to greater accountability in the area.
- The theme of accountability runs into our second recommendation - changes to the membership profile of the Animals in Science committee tasked with oversight of the operation of the act. We suggest that the membership has a significant science bias, which prevent proper scrutiny from others with significant expertise in the area. We suggest the expansion of this group to include those from animal welfare groups, local authorities and others to increase public accountability and to provide a better gauge of public morality in decision making.
- The replacement of scrutiny and collaboration lost after Brexit. Chief amongst our concerns here is the fact that the knowledge shared under the European Union Registration, Evaluation, Authorisation and Restriction of Chemicals Regulation (No, 1907/2006) (REACH) will be lost. The UK government has committed to a UK version, but this still omits the wealth of knowledge of experimental outcomes from the EU. It leaves open the possibility of significant suffering through ignorance of previous research and is extremely troubling. We also suggest that the oversight of the EU needs to be replicated or replaced in the UK with a body of standing to ask questions and maintain sufficient oversight in the area.
- 4. Finally, we recommend an overall review of whether the UK employs the best that can be offered in good practice in carrying out experiments on animals. It is chilling to image the suffering caused by poorly designed experiments, without adequate consideration of replacement, reduction and refinement. In tandem with this we also question whether the promotion situation for researchers in universities is driving down the publication of negative results as they seek to hide the outcomes of poorly designed or ineffective experiments. We suggest that wider use of the ARRIVE (2010) (Animals in Research: Reporting In Vivo Experiments) guidelines might help improve the comprehensive reporting of scientific experimentation and improve the welfare of animals as a



result.

Overall, we can see significant challenges that require of us to keep the pressure on to reform the regulation of animal experimentation. We hope that the Animals in Science Committee review will enable us to press the UK government to incorporate animal welfare in experimentation into the promises made post-Brexit.