

**Creating a NAMs Committee: a simple, effective action to increase the use of non-animal methods**  
**Westminster Hall petition debate, 16<sup>th</sup> January 2023, 4.30PM**

*This briefing has been written in support of a proposal made in the e-petition 611810 signed by 102,230 people calling for the Government to 'Implement reform to approve and use NAMs'. It provides an overview of the current animal testing licensing situation, sets out the benefits of non-animal methods for scientific research, and suggests a simple and effective action for increasing their uptake and reducing animal use – the creation of a NAMs Committee.*

**Animal testing licensing – the current situation**

The Home Secretary cannot grant an animal testing licence unless she is satisfied that a non-animal approach could not give the desired scientific answer. Applicants are asked, as part of the application process, to demonstrate that they have considered non-animal alternatives to the animal tests proposed, but often treat this as a box-ticking exercise, providing only the most cursory information on, for example, how opportunities to replace animal testing with non-animal methods (NAMs) were considered.<sup>1</sup>

The application is then evaluated by one of a very small group of inspectors - a medical doctor or veterinarian who is not necessarily an expert in that area of research or the possibilities for replacing animal tests. Inspectors almost always have a background in animal research. The final decision is taken in the Home Secretary's name by a relatively junior official, who is extremely unlikely to go against the inspector's recommendation.

According to the Animals (Scientific Procedures) Act 1986, "wherever possible, a scientifically satisfactory method or testing strategy not entailing the use of protected animals must be used instead of [an animal test]". But an application is likely to be assessed and approved without a NAMs expert ever setting eyes on it and, as a result, we believe that animal tests are being licensed where NAMs would do an equally good or better job meeting the research or testing need.

**Harnessing the power of non-animal methods**

NAMs – research and testing methods that use cutting-edge technologies including three-dimensional cell cultures, organs-on-chips and artificial intelligence to give new insights into human biology and disease<sup>2</sup> – have the power to not just replace animal testing, but to improve robustness and thus support scientific progress and human health. For example, a recent study found that Liver-Chip devices were far better at identifying toxic drugs than animal tests and could generate over \$3 billion for the pharmaceutical industry each year through increased productivity.<sup>3</sup> Wider use of NAMs would benefit citizens, the economy and animals in laboratories.

**The role of a NAMs Committee**

Creating a NAMs Committee would be a simple and effective action that the Government could take to realise the potential of NAMs without necessarily requiring regulatory change.

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<sup>1</sup> Animal Free Research UK. Home Office licences reveal the millions of animals set to suffer and die in experiments. 2021. Available at: <https://www.animalfreeresearchuk.org/home-office-licences/>.

<sup>2</sup> Cruelty Free International. *Alternatives to animal testing*. 2022. Available at: <https://crueltyfreeinternational.org/about-animal-testing/alternatives-animal-testing>.

<sup>3</sup> Ewart, L et al. Performance assessment and economic analysis of a human Liver-Chip for predictive toxicology. 2022. *Commun Med* 2, 154. <https://doi.org/10.1038/s43856-022-00209-1>.

The Committee's role would be to provide an additional layer of input on animal testing licence applications to supplement existing functions by giving an expert view on whether all opportunities to replace animal testing with NAMs have been thoroughly considered. If the Committee felt this was not the case, they could recommend referring the application back to the applicant, and those assessing it, with advice on where to find appropriate NAMs to meet the research or testing need. This would help to ensure that animal testing licences are only granted if there is genuinely currently no appropriate replacement and promote the wider use of NAMs.

The NAMs Committee could be structured in the same way as the existing Animals in Science Committee, as an advisory non-departmental public body sponsored by the Home Office. Members would be independent NAMs experts representing a wide range of expertise.

**Recommendation:** Create a NAMs Committee to provide expert input during the licence application process on opportunities to replace animal tests with NAMs.

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