

P-06-1497 End Welsh Govt funding of animal experiments and divert funds to modern, human-relevant technologies – Correspondence from the Petitioner to the Committee, 13 April 2025

Response to the Deputy First Minister's letter dated 31.3.25 concerning Petition 246343

Please be assured that we are aware that animal experimentation is not devolved to Wales. Our petition did not ask the Welsh Government to end animal experiments as this is not in its gift. Rather, we invited the Welsh Government to take the initiative of ending its own funding of such procedures and thereby encourage industry and the charitable sector to follow suit.

The importance of the biomedical sector to the Welsh economy is not disputed, but we believe that the expansion of the sector as urged by the Senedd Cross Party Group on Medical Research (CPG) requires input from the Welsh Government in terms of direction. It's not simply a question of allowing scientists to determine their own priorities, as expansion would inevitably result in an increase in animal use. This would fly in the face of the UK Government's pledge to 'partner with scientists, industry, and civil society as we work towards the phasing out of animal testing' and would be disastrous on ethical, economic and scientific grounds. A growing body of scientific literature documents the poor reliability and predictive value of animal studies for human health outcomes due to biological species differences. A reliance on animal data can lead to ineffective or harmful treatments in clinical trials and the loss of potential new therapies.

The economic benefits to be accrued by attracting more charity-funded medical research to Wales, as forecast by the CPG, would also be at the cost of increased animal use, as the Association of Medical Research Charities (AMRC) **demands** that members publicly declare support for animal experiments.

We acknowledge that the National Centre for the 3Rs (NC3Rs) was established in 2004 to ensure delivery of the 3Rs principles, as compliance with these principles is a legal requirement in the UK under the Animals (Scientific Procedures) Act 1986. The act states that 'wherever possible, a scientifically satisfactory method or testing strategy not entailing the use of protected animals must be used instead of a regulated procedure'. The 3Rs initiative has served to reassure both the public and policy makers that animals are being adequately protected. However, almost 20 years later in 2023, a report commissioned by the NC3Rs itself was published in recognition of the fact that the oversight mechanisms concerning project licence applications were not working satisfactorily. The report, [The role of review and regulatory approvals processes for animal research in supporting implementation of the 3Rs](#) explained that most academic research involving animals is externally funded from public sector or charitable bodies. It revealed that, despite a costly three-tier review system of project licence applications, the replacement of animals in experimental design was not being adequately observed, clearly contravening the 3Rs principles. The author of the report, Dr Frances Rawle, former Director of Policy, Ethics and Governance at the Medical

Research Council, interviewed/surveyed key stakeholders including chairs of Animal Ethics Bodies, current and former Home Office inspectors, establishment, project and personal licence holders and senior scientists, amongst others. In conducting a 'detailed review of the current 3Rs landscape' Dr Rawle identified several key reasons why replacement often fails to happen.

The reasons cited for animal methods being favoured include: the time and cost involved in setting up new techniques in a laboratory, a lack of expertise on alternative methods, concern by researchers about their chance of being funded or being published and concern for their career prospects. A reluctance on the part of reviewers to find fault with a colleague's application in the knowledge that their own licence would be coming round for review in due course also came to light. Furthermore, the 3-tier project licence review system is skewed in favour of such studies as the Animal Welfare & Ethical review (AWERB) and Regulator reviews take place after funding has been secured. Dr Rawle concludes that challenging the use of animals is rare after the initial funding stage as the reviewers 'do not (and could not)' have the in-depth scientific expertise required to know what alternatives are available. She further acknowledges that project licences are very rarely refused. It is sadly evident, contrary to what those in favour of animal experimentation may say, that sentient animals are being harmed and killed unnecessarily in our universities, in contravention of the law.

Since submitting the petition, we have been keeping abreast of developments connected to the UK Government's manifesto pledge. It has become apparent that some policy makers have accepted the argument that animals are required to observe the effects of an intervention or drug on an entire body system. The phasing out of animal experiments is therefore seen as a long-term goal. But fully utilising alternative methods need not take many years. Researchers have a large toolbox to choose from and human cell technologies such as organ-on-a-chip, combined with in silico methods such as computational modelling and AI can create a complex picture of how drugs or interventions will work in a human body and are thus superior to that of say a mouse model - the *wrong* body system. There are key differences between species, as expressed in anatomy, organ structure and function, metabolism, chemical absorption, genetics, mechanisms of DNA repair, behaviour and lifespan. Many documented cases from around the world reveal the harm and even death of volunteers in clinical trials or at a later stage, despite the drugs having been tested on animals - Vioxx and TGN1412 are 2 well known examples.

As long as funding is available, scientists who have been trained to research using animals and consider animal studies as the 'gold standard' will be reluctant to embrace new methodologies. An 'animal methods bias' will continue to block the progress of modern human relevant approaches. This bias is enabled by the availability of continuing funding streams, a fact brought to light by the APPG on Human Relevant Science in its 2022 Report 'Bringing Back the Human' <https://www.humanrelevantscience.org/wp-content/uploads/APPG-report-March-2022.pdf>. The APPG recommended that the UK Government strategically divert resources away from animal-based research towards new approach methodologies (NAMs). Its report described a UK climate in which limited funding opportunities exist for NAMs, which receive between 0.2% and 0.6% of total biomedical research funding in the UK. Given that the human-specific technologies sector is forecast to

contribute £2.5 billion to UK GDP by 2026 (source: Animal Free Research UK), it follows that modernizing science will bring great economic benefits in addition to better public health outcomes.

Withdrawing funding from animal research here in Wales could have the effect of galvanizing scientists into looking for other methods. After all, when the ban on the sale of animal-tested cosmetics came into force in 2013, scientists found other ways of testing their products.

We acknowledge that the funding allocated to Welsh universities by Medr is in the form of a block grant, to be distributed as individual universities see fit. However, on further researching public funding of medical research, we learned that the Welsh Government works hand in glove with industry, medical research charities and other bodies in pre-clinical research on a number of initiatives. This partnership gives a seal of approval to their activities, which include animal studies. Further, Health and Care Research Wales (HCRW) has some jointly funded projects with charities undertaking research on animals. Partners involve for instance the Stroke Association (Cross-Funder & Partner Scheme) and Alzheimer's Society (Joint Programme for Neurodegenerative Disease research). Furthermore, the Medicines Discovery Institute, based at Cardiff University is part funded by Welsh Government. Publications detailing animal research are to be found on its website. Given that 9 out of 10 drugs found to be effective in animals fail to make it to the market and that liver-on-a chip has an 87% success rate in detecting toxicity, changing to non-animal methods for drug testing would improve human health and save money.

To summarise, the reasons for withdrawing support from animal experiments are many: they are incredibly costly and time consuming; they are poor predictors of human health outcomes and can result in human harm; they block medical progress; despite claims that animals can only be used 'when there is no other way to do the research' (Understanding Animal Research's website), the NC3Rs own report tells quite a different story. There is in addition, a growing moral concern about the use of animals in medical research in the 21st century (as indicated by several recent polls and the number of signatures garnered by our petition).

While the Welsh Government can rightly claim that animal experimentation is not an area for which it has responsibility, it *is* responsible for scrutinising how it spends its limited resources. **We ask that it choose to withhold funds for projects and initiatives which are known to involve animal use.** While partnering with key stakeholders in medical research is no doubt beneficial, doing so without taking a stance in opposition to animal testing is facilitating the continuation of such research. Will Quince, former Minister of State, confirmed in response to a parliamentary question in 2023: 'there is no United Kingdom legislation that mandates animal testing'. Further, the National Institute for Health and Care Research (NIHR) has a policy of not funding 'work involving animals, animal tissue or both'.

Is Wales really going to continue causing suffering and death to sentient beings, irrespective of public opinion, when there is no legal requirement nor scientific basis to do so? Just short of 32,000 'procedures' took place in Wales in 2023 but this figure excludes the animals bred

and not used which are then destroyed. For instance, on its website, Swansea University declares a total of 430 procedures conducted on fish in 2023 but a Freedom of Information request revealed that over 8,000 fish were 'euthanised' at the institution in the same year. (FOI 209/24-25) While NAMs *are* gaining ground in Wales as elsewhere, investment is necessary in order to promote innovation. Diverting funds from animal research can only bring rewards in terms of public health and economic growth.

DD/12.4.25