

# The case for scientists' engagement in animal research policy-making

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The European Directive that protects animals used in scientific procedures is under review as part of the normal legislative process in Europe. Directive 2010/63/EU took effect in Member States in January 2013 after a long period transposing it into national laws. The Directive seeks to harmonize welfare standards of laboratory animals across Europe and to encourage the implementation of the 3R principles of Replacement, Reduction and Refinement. Five years after its initial launch, it is time for the European Commission to assess the Directive's impact.

The review started earlier this year and consists of a series of consultations with users involved in animal research, Member States and interested parties. The information collected from these surveys will be complemented with opinions on recurrent issues, such as Non-Human Primate research provisions and available alternative methods, developed by relevant European bodies and Scientific Committees aided by external experts.

The Directive's review began a few months after the European Commission responded in June 2015 to the European Citizens Initiative (ECI) 'Stop Vivisection'. The petition asked the Commission to abrogate the Directive and propose a new legislative framework phasing out animal research. The petitioners claimed that animal research is a hazard to human health and the environment and puts a brake on the development of alternative methods.

In its response, the Commission acknowledged that while the ultimate goal of EU legislation is to phase out animal research, in some instances alternative methods cannot mimic the complexity of a living being and research using animals continues to

be necessary. It also reminded us that animal welfare is part of the Treaty on the Functioning of the European Union (Article 13) and that Directive 2010/63/EU mandates the application of alternative approaches and establishes mechanisms to speed up their development, validation and uptake.

Although it did not achieve its goal of repealing and replacing Directive 2010/63/EU, the strategically timed 'Stop Vivisection' initiative was far from unsuccessful as it sparked a very active debate ahead of the Directive's review.

The Commission's response to the petition spelled out three actions that it will follow to evaluate the Directive's impact on the promotion of alternative methods: assess existing opportunities to accelerate 3Rs' progress; continue to support the development, validation and implementation of alternative approaches; and enforce compliance with the 3Rs. The Commission also pledged to organize a scientific conference to exchange views on accelerating progress in the development of non-animal approaches. The conference, which will take place in Brussels on 6 and 7 December, has been accordingly entitled 'Non-Animal Approaches – The Way Forward'.

It is logical to think that the conference will feed into the Directive's review. Hence, the European Animal Research Association and other research organisations called upon the European scientific community to actively participate in its successful development. Despite the uninviting title for a conference whose primary audience regularly relies on animal research, the response was very encouraging. Over 190 abstracts were submitted to illustrate the current state of animal research and the prospects for alternative

methods. The 'Stop Vivisection' petition organizers also submitted suggestions for the conference program. From all of the submissions received, the Commission selected those that will facilitate a balanced and constructive discussion for fifteen minute presentations.

Surprisingly the petition organizers have threatened not to attend the conference. In their view, the allocated fifteen minute speaking slots do not guarantee an adequate representation of their position. Needless to say, all speakers are given equal speaking time and furthermore only one of the six sessions in the provisional programme explicitly refers to 'Animal Testing'. Of the remaining five sessions, two revolve around non-animal alternatives in different scientific fields. A closing session will determine the way forward with all participating parties. If the program is as slanted as the ECI organizers seem to suggest, it does not appear to be towards the side of biomedical research.

As the conference's outcome will likely contribute to the review of Directive 2010/63/EU, it is important for scientists to contribute. Their participation sends a strong message about how seriously the scientific community takes its duty of care while performing responsible animal research. Policy-makers listen to and value this scientific input. The global scientific community should continue to participate in the dialogue about animal use in research and harness the resources provided for them by research organisations. Few scientists are public advocates or professional communicators, yet they have the evidence that the public and decision makers need to make informed opinions and the right decisions.

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