AMRC response to the Home Office Consultation on the Animals (Scientific Procedures) Act 1986: Review of the Ethical Review Process

The Association of Medical Research Charities (AMRC) has over 100 member charities whose combined expenditure on medical research in the UK was £520 million in 1999/00. The member charities are a major source of funding for research in all areas of medicine in the UK. Not all AMRC charities currently fund research involving animals, but all of them recognise the important role it has played, and its vital future contribution to understanding, preventing and treating human diseases.

The use of animals for medical research is very strictly regulated (by the Animals (Scientific Procedures) Act 1986). AMRC supports these regulations: the tightest in the world. AMRC welcomed the introduction of the ERP, at the local level and welcomes this Home Office review.

**a) Aims of the process**
ERP aims to improve animal welfare standards by providing “independent ethical advice”, providing “support to named people and advice to licensees”, and promoting the use of “ethical analysis”.

Anecdotal evidence from a variety of sources suggests ERP has begun to achieve the stated aims. It appears to have improved communication between scientists (those who do and don’t use animals in research), technicians who look after the animals and lay members. This has also led to better communication within universities and local communities. AMRC considers this will lead to new ideas and encourage staff to try out new methods of improving animal welfare. ERP, however, has only been in place for two years so there is, as yet, no measured evidence for this.

**b/c) Problems encountered**
The ERP creates an additional tier of regulation and AMRC is concerned that in some cases this has led to inefficiencies in planning and conducting research. ERP has proven complex and difficult to resource in many establishments. There is clear evidence that it has led to delays in gaining project licence approval.

These problems may also adversely effect animal welfare, for example, where there are delays to a minor amendment of a project licence to refine a methodology.

**Changes in the arrangements**
AMRC would welcome Home Office effort to highlight best practice in the operation of the ERP, to clarify which are efficient processes, and to support open debate and greater transparency, including ways of measuring the outcomes of the ERP.

AMRC would support initiatives to improve the efficiency of ERP such as the introduction of a ‘fast-track’ system for minor amendments to project licences.

AMRC member charities and some other organisations have strict peer review guidelines to assess the scientific strength of research projects. AMRC considers that the ERP should not re-assess the scientific content of such a project. AMRC considers that the ERP should concentrate on promoting a culture of care, improving standards of housing and husbandry, and advancing the possibilities for reduction, refinement and replacement.