



## New Citizens Initiative attempting to limit animal testing will have detrimental effect on life-saving health research

The medical & scientific community represented within the BioMed Alliance expresses its strong concerns about the European Citizens Initiative 'Save cruelty free cosmetics - Commit to a Europe without animal testing' which calls on the Commission to introduce a 'legislative proposal plotting a roadmap to phase-out all animal testing in the EU before the end of the current legislative term'<sup>1</sup> and is currently being considered by EU policy makers.

The proposed phase-out will have a detrimental effect on biomedical research and will significantly hinder the search for new insights into the characteristics and progress of diseases and the development of life saving treatment options for patients.

The scientific sector is already reducing the number of animals used in research by refining animal models and developing alternative non-animal methods including in vitro, ex vivo, organoid and in silico models. However, in the current state of the art these non-animal models are not full-fledged alternatives that provide the same level of insights as animal studies, and this is unlikely to change in the foreseeable future. Our regulatory framework including **Directive 2010/63/EU** on the protection of animals for scientific purposes remains fit for purpose, and aims to promote the wellbeing of animals and the use of alternative methods where scientifically possible according to the 3R principle (Reduction, Refinement and Replacement of animal models). Nonetheless, the ECI is calling to go beyond the current legislative framework and scientific practice and is therefore surpassing the current reality in the health research sector.

The 36 medical and research societies represented within the BioMed Alliance believe that the proposed swift transition that completely phases out the use of animals would have a detrimental effect and hinder progress in essential biomedical research. The use of animals in research has been playing a crucial role in developing much of our current knowledge about human and animal health, and has been essential for the development and approval of countless treatment options available to patients today. Just recently during the COVID-19 Pandemic, animal models were used to better understand the virus and to develop and verify the safety and efficacy of the vaccines that millions of people in Europe benefited from<sup>2</sup>. The current regulatory pathway in drug development necessitates animal data before proceeding towards human studies, to enhance the safety of participants in clinical trials (including for vulnerable groups like children). The research sector needs more time to further refine animal models and develop and improve alternatives to animal methods, and life-saving biomedical research must not be brought to a halt as a result of the ECI.

**The BioMed Alliance is therefore urging EU policy makers not to support the ECI in order to preserve health research in Europe and to adhere to a more gradual and longer-term approach to the reduction of the use of animals in health research (where possible) in line with current practice and considering the scientific reality.**

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<sup>1</sup> See: *Save cruelty free cosmetics - Commit to a Europe without animal testing* [https://europa.eu/citizens-initiative/initiatives/details/2021/000006\\_en](https://europa.eu/citizens-initiative/initiatives/details/2021/000006_en)

<sup>2</sup> See e.g.: Chu, Chan and Yuen in *Nature Methods* (2022) *Animal models in SARS-CoV-2 research* <https://www.nature.com/articles/s41592-022-01447-w>



# Biomedical Alliance in Europe

## About us:

The [Biomedical Alliance in Europe](#) (BioMed Alliance) is the result of a unique initiative of 36 leading European medical societies that together include more than 400,000 researchers and health professionals.



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