From Promise to Proof?

A Six-Month progress review of the *Replacing Animals in Science Strategy.*

June 2026

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Introduction

This document provides an evidence-based assessment of initial progress against the government's commitments to replace animals in science through support for the development, validation, and uptake of non-animal approaches, as detailed in Replacing Animals in Science, published in November 2025. This assessment is intended to support transparency, scrutiny, and effective delivery.

At six months, it is not possible or fair to draw final conclusions. Many commitments depend on long-term structural change across funding, regulation and policy, scientific practice, and international coordination. Meaningful outcomes, particularly measurable reductions in animal use, will take time to materialise, not least because the collected and published statistics on animal use will inevitably lag behind real-world changes.

Nevertheless, this early phase is critical. The commitments made should now be translating into clear and observable activity. Where evidence of delivery is limited, this raises reasonable questions about pace and prioritisation, as well as transparency.

This assessment recognises early progress where evidence of it exists, while identifying gaps and risks.

Progress is assessed using a standard traffic light framework:

Green: Clear evidence of delivery in line with the timelines given and expectations at this stage.

Amber: Some indication of progress, or indication of partial progress, or where it is too early to reach a reasonable, firm judgement.

Red: Limited or no publicly available evidence of activity, where evidence of initial steps being taken would be expected.

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1. Accelerating the Development of Non-Animal Approaches

Creating a strong pipeline of new non-animal approaches.

Accelerating the Development of Non-Animal Approaches	Deadline	Progress (Evidence)	Progress score
Create a preclinical translational models hub.	By the end of 2026.	The Strategy commits £30m of new funding for the establishment of a preclinical translational models hub. This commitment has been subsequently restated by Ministers. Subsequently, the Medical Research Council has published a £20m funding call for organisations interested in establishing the Hub.	Amber, too early to tell. A detailed assessment will later need to be made, setting out how spending contributes directly to the advancement of non-animal approaches.
Increase investment in alternative methods.	By the end of 2026.	The Strategy commits £75m of total funding to support the delivery of its objectives. While these figures have not been formally written into Departmental budgets or delivery plans, Ministers have subsequently recommitted to this headline figure, and targeted funding announcements have been made e.g. £2m Innovate UK / NC3Rs funding call for "industrial human-relevant drug models". These are promising early signs but to date, limited to targeted, ringfenced initiatives and pilot schemes. As yet, there is no strong public evidence of systematic shift in funding away from animal-based research and testing, or structural mainstreaming of budgets for "alternative methods".	Amber, encouraging early signs but too early to tell. A detailed assessment will later need to be made, setting out the proportion of money spent directly on or measurably contributing towards non-animal approaches that replace animal tests.
Publish areas of research interest for alternative methods.	Initiate in H1 2026.	While we are yet to see a formal publication of research priorities from UKRI, an initial list of priorities for targeted replacement is provided in Part 3 of the Strategy and subsequent funding calls have explicitly stated support for areas on that list.	Amber, too early to tell.
Expand challenge led innovation for alternative methods.	Start in first 2026 funding cycle.	Early targeted funding has explicitly targeted priorities set out in the Strategy e.g. £2m Innovate UK / NC3Rs funding call for "industrial human-relevant drug models".	Amber, too early to tell. A detailed assessment will later need to be made, setting out how spending contributes directly to the advancement of non-animal approaches.
Increase investment in data driven biology.	Initiate in 2026 funding cycle (linked to LSSP).	While the strategy has already been connected with wider data, computational and AI-driven strategic funding programmes such as the 'AI for Science Strategy', there is as yet no substantial, new, standalone funding stream targeted at 'data-driven biology'.	Amber, too early to tell.

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2. Uptake and Adoption of Non-Animal Approaches (part 1)

Ensuring alternatives are robust, trusted, and regulator-ready.

Uptake and Adoption of Non-Animal Approaches	Deadline	Progress (Evidence)	Progress score
Establish a UK Centre for the Validation of Alternative Methods (UKCVAM).	By the end of 2026.	Ministers have now publicly committed £30 million to support the establishment of UKCVAM and have confirmed responsibility for the delivery of UKCVAM lies with the Office for Life Sciences and that "Proposals for the Centre are currently in development". An Advisory Board meeting took place in April 2026, and a commitment has been made for a delivery update alongside wider key performance indicators "later in 2026".	Green, on track. Moving from theory to practice. Warning note: Long term sustainability requires multi-year budget commitments.
Publish regulatory agency accepted alternative methods and priorities for future development and validation.	By the end of 2026.	There is some evidence of partial movement towards greater regulatory favourability towards non-animal data e.g. MHRA offering early review of non-animal data and clarifying how it will be assessed. However, this commitment is a long way from being fully delivered, with no standalone, mature, and publicly accessible list of accepted methods yet available. Elsewhere, the NC3Rs published a report with the ABPI which "examines the UK landscape in human relevant in vitro models", which is intended to "help inform the wider policy, funding and infrastructure requirements to accelerate translation and delivery benefits for pharmaceutical R&D". This indicates positive movement in the wider ecosystem of alternative method development, to replace the use of animals, but represents an early indicator rather than concrete delivery against this commitment.	Amber, too early to tell.
Support training in alternative method development, qualification and validation.	Infrastructure and program in place by start of 2027.	There is some limited evidence of decentralised activity in support of the skills and training agenda, through e.g. funding calls and emerging governance structures. However, there is an absence of evidence of work towards a clear and publicly accessible national framework or workforce strategy for training, upskilling and increasing capacity in alternative methods to replace the use of animals.	Amber, too early to tell.
Supporting the upskilling of regulatory assessors.	Programme in place by end of 2026.	Very little publicly available evidence of a formal national training programme for assessor training.	Red. Six months in and no visible movement.
Develop mechanisms to enable regulators to provide pre-submission feedback.	Initiate in 2026.	MHRA is now offering early review of non-animal data and clarifying how it will be assessed. This announcement supports the regulated community in the pre-submission stage by de-risking applications prior to full submission and indicates openness by the regulator to scientifically justified non-animal approaches. However, this does not yet constitute a comprehensive, routine pre-submission feedback pathway, specifically dedicated to accelerating acceptance of non-animal approaches.	Amber, early contours emerging but full scope definition and implementation pending.

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2. Uptake and Adoption of Non-Animal Approaches (part 2)

Ensuring alternatives are robust, trusted, and regulator-ready.

Uptake and Adoption of Non-Animal Approaches	Deadline	Progress (Evidence)	Progress score
Increase the visibility of available alternative methods.	By the end of 2026.	While there is a generally increasing focus on visibility of non-animal approaches in emerging regulatory, funding and innovation programmes, there is no evidence of direct delivery against this commitment. The UK Test Method Regulation (TMR) is severely out of date, having gone without update since the UK's exit from the EU. There is no indication of plans to address this gap, leaving uncertainty for industry as to whether data from non-animal approaches will be accepted by regulators for fulfilling UK chemical regulation requirements.	Amber, too early to tell. Warning signs in relation to TMR.
Accelerate uptake in alternative methods through reform of animals in science regulation.	Complete by the end of 2026.	A programme of reform within the Animals in Science Regulatory Unit (ASRU) has recently concluded. Additionally, there are indications that the themes highlighted in the recent National Centre for the 3Rs (NC3Rs) report into the 3Rs in animal testing such as cross-government governance, strategic coordination, scientific capacity building, regulatory reform and improved transparency are guiding principles behind many elements of the UK strategy for replacing animals in science. However, there is limited publicly available evidence of a comprehensive and transparent implementation of the Rawle Review and its recommendations as a whole.	Amber, too early to tell. Early signs of movement but lacking concrete measurability.
Establish data sharing frameworks to support the equitable access to public and private data sources.	Complete in 2026.	Early signs of increased focus on data management and linked funding for relevant infrastructure as set out in the strategy. As yet, limited publicly available evidence of active delivery towards the establishment of new comprehensive frameworks in accordance with this commitment.	Amber, early signs of movement but lacking concrete measurability. Too early to tell.
Enhance data curation and quality control and develop regulatory frameworks for data use.	Complete in 2026	Early signs of increased focus on data management and linked funding for relevant infrastructure as set out in the strategy. As yet, limited publicly available evidence of active delivery towards the establishment of new comprehensive frameworks in accordance with this commitment.	Amber, early signs of movement but lacking concrete measurability. Too early to tell.

3. Targeted Replacement of Animal Tests

Tracking concrete, test-specific change.

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Given the range and technicality of these commitments, this section provides a high-level assessment rather than reviewing each target in detail. For a full list of targets set out in the Strategy see Annex A at the end of this document.

For targets with 2026 deadlines, there are some early signs of progress, with limited examples of regulatory change and initial funding. Nevertheless, it remains too early to determine whether these will result in measurable reductions in animal use. This will need to be assessed through Home Office published data on animal use (2026 data expected in 2027 at the earliest), licence applications, and licence approvals. For targets beyond 2026, it is necessarily too early to judge delivery, but clear evidence of implementation steps is needed as soon as possible.

Two common issues emerge. First, regulatory change does not immediately translate into practice. Even where animal tests have been identified as redundant, including because non-animal replacements are available, full transition away from the animal test is likely to be phased. In these instances, continued use of the animal test should be robustly justified and used strictly as a last resort. Second, for specific tests, much of the relevant testing is carried out outside the UK, meaning progress depends on international alignment and therefore progress remains uncertain.

Overall, while there are some positive early signals, progress is still largely procedural. The key test will be whether these commitments deliver demonstrable reductions in, and ultimately replacement of, animal use in practice.

4. Governance, Leadership, and Coordination (part 1)

Strategic direction and system-wide coherence.

a. Skills, Training, and Culture

Building capability, mainstreaming knowledge, and shifting behavioural norms.

Skills, Training, and Culture	Deadline	Progress (Evidence)	Progress score
Enable funders to ensure thorough scrutiny of animal research in funding decisions.	Start in 2026 funding cycle.	There is limited concrete evidence of new activity towards the implementation of this commitment. The measurable impact of this commitment is long term and assessed through indirect measures. There is therefore a strong requirement of evidence of activity in the intermediate period. This is currently lacking.	Red. Limited evidence of new implementation activity.
Provide foundational training for early career researchers in alternative methods.	Start in 2026 funding cycle.	There is currently very little publicly available evidence of tangible delivery against this commitment. Having reached the six-month mark and noting the foundational importance of early-career training in shifting behaviour and culture in science, this is an area of concern.	Red. No evidence of progress.
Strengthen journal editor commitment to publishing alternative method research.	Initiate at start of 2027.	While there is no publicly available evidence of work towards this commitment, the delivery timeline does not initiate until 2027, and it is therefore too soon to judge.	Amber, too early to tell.

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4. Governance, Leadership, and Coordination (part 2)

Strategic direction and system-wide coherence.

b. Transparency and Accountability

Monitoring progress, enabling scrutiny, and creating political ownership.

Transparency and Accountability	Deadline	Progress (Evidence)	Progress score
Provide Ministerial leadership on alternative methods.	Initiate in H1 2026.	The strategy has been presented with clear Ministerial responsibility resting with the Science Minister, Sir Patrick Vallance. In addition, Ministers have provided written and verbal confirmation of the establishment of ministerial and official-level groups intended to oversee and coordinate delivery. These include the cross-government Ministerial committee which Ministers confirmed was due to meet in April and July and would provide a formal mechanism to drive progress and ensure alignment across policy areas. While these assurances are positive, without regular, formalised information sharing or stakeholder engagement it is challenging for civil society organisations to make clear assessments of progress and impact.	Amber, positive to receive Ministerial confirmation but missing transparency, accountability and progress reporting.
Restart the survey on public attitudes to animal research.	Initiate in H1 2026.	In April 2026, a Government Minister confirmed that a process has been launched to find a delivery partner for future waves of the public attitudes survey.	Green. On track.
Establish KPIs to assess delivery of the strategy.	Initiate in H1 2026.	In April 2026, a Government Minister confirmed that further updates on delivery and key performance indicators will be provided later in 2026.	Amber, too early to tell.
Quantify annually the inclusion of second species testing in clinical trial applications.	First publication by mid 2026.	While there are early signs of preparatory work towards institutional, governance, and regulatory change that would facilitate the end of second-species testing, there is as yet no publicly available evidence of delivery against this specific commitment.	Amber, too early to tell.

4. Governance, Leadership, and Coordination (part 3)

Strategic direction and system-wide coherence.

c. External Engagement and Breadth of Expertise

Ensuring delivery is informed, credible, and outward-facing.

While not reflected as a standalone commitment within the Strategy, effective external engagement is clearly indicated in the original manifesto commitment and remains an important cross-cutting factor in successful delivery. Although the Strategy references engagement with civil society during implementation, there is limited evidence of systematic integration of external, independent, or non-traditional expertise into delivery, oversight, or policy development. Current activity appears concentrated within established governmental, regulatory, and institutional structures, with limited visibility of proactive engagement with NGOs or wider independent stakeholders. Evidence also suggests that barriers to engagement remain for some animal protection organisations with stakeholders identified as responsible for delivery. This risks reducing external challenge, limiting policy innovation, and weakening opportunities to build public confidence and identify delivery barriers at an early stage. The commitments set out below are necessary but not sufficient for ensuring delivery is fully informed, credible, and outward-facing.

External Engagement and Breadth of Expertise	Deadline	Progress (Evidence)	Progress score
Formally involve DSIT in commissioning and receipt of advice from the ASC.	Initiate in H1 2026.	In February, the Animals in Science Committee (ASC) published new guidance on 'Ways of Working' which includes revisions to establish a new mechanism for DSIT to directly commission the ASC for advice. Subsequently, the ASC was commissioned for advice on the establishment of an alternative methods committee by the Office for Life Science, which is part of the Department for Science, Innovation and Technology. As yet, no publicly available evidence of active commissioning or coordination between DSIT and Home Office Ministers.	Green, strong indication of action and delivery.
Enable better advice on alternative methods.	Initiate in H1 2026.	In line with the commitments made in the strategy the ASC has been commissioned for advice on the establishment of an alternative methods committee, based on a proposal for a committee structure that closely resembles the commitment in the strategy. While actions directed at delivering this commitment have been set in train, this process is just beginning and a full assessment of the positive impact of this commitment must necessarily wait until we have clarity on membership, scope and operational impact.	Amber, positive signs of progress but the devil will be in the detail.

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4. Governance, Leadership, and Coordination (part 4)

Strategic direction and system-wide coherence.

d. International cooperation

Positioning the UK as a global leader while driving coordinated international action to advance humane science.

International Cooperation	Deadline	Progress (Evidence)	Progress score
Establish the UK as a global leader in alternative methods regulation and science.	Complete by end of 2026.	The framing by Ministers of the strategy and key commitments, such as UK Centre for Validation of Alternative Methods (UKCVAM), is explicitly oriented towards international leadership and bridging influential regulatory regimes in the US and EU. While this framing and the commitment to fund and deliver this key institutional framework is a positive sign, there is little publicly available evidence of demonstrable long-term initiatives and outcomes.	Amber, too early to tell.
Host an international meeting of regulators on validation and acceptance.	Establish in H1 2027.	While there is emerging evidence of a genuine focus by the UK Government to take a proactive role towards international regulatory acceptance, we do not yet have any clear and concrete evidence of progress towards this commitment. While the deadline is far enough on the horizon to not yet present a challenge, it is clear that preparatory work should already be under way.	Amber, too early to tell.
Launch specific projects to secure international acceptance.	Align with first funding cycle by end of 2026, once UKCVAM is established.	There are modest positive indications that the UK Government is intending to take an active stance towards international regulatory positioning, including through emerging initiatives, such as the establishment of UKCVAM, and challenge led funding calls, which have been framed with international acceptability in mind. However, there is no publicly announced initiative directly in support of international acceptance at this time. Meanwhile, the delivery timeline for this commitment is directly linked to the establishment of UKCVAM.	Amber, some positive signs but too early to tell.

Conclusions and recommendations

With six months passed since the publication of the UK government's strategy for Replacing Animals in Science a mixed picture emerges. There are positive early signals, including ministerial commitment, targeted funding, and movement towards the establishment of key institutions such as UKCVAM. In some areas, activity is beginning to move from commitment to implementation.

However, across much of the strategy, progress remains early-stage, fragmented, or procedural. In several critical areas such as skills, training, research scrutiny, and external engagement, there is limited evidence of meaningful implementation at this stage.

In particular, there has been a clear failure to draw on the full breadth of expertise available to government or to engage meaningfully with civil society, including animal protection organisations who have played a critical role in securing the commitments laid out in the strategy. This creates a risk of insularity, weakens scrutiny, and limits government’s ability to anticipate delivery challenges and build public confidence. Given the scale of the undertaking, this gap is significant and should be addressed urgently.

A further challenge lies in the inherent limitations in the balance of the strategy itself. There is a predominant focus on the development and phase-in of “alternative methods”, which is not yet matched by efforts to actively pursue the phase-out and ultimate replacement of animal tests. A stronger emphasis on non-animal approaches, incorporating the widest possible and combined use of data, methods, and regulatory change, with an explicit emphasis on replacement, would better align activity with stated ambition. Without this, progress risks remaining incremental rather than transformative.

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Conclusions and recommendations

The Government has made a serious and widely welcomed commitment. Naturally, the process of delivering progress must be transparent, measurable, and open to scrutiny.

Key asks and proposals:

Strengthen transparency and accountability

- Publish clear delivery plans, accelerate the publication of KPIs, and provide regular public reporting.

Demonstrate meaningful and concrete investment

- Show how funding is secure and sustainable, while clearly delivering a shift towards non-animal approaches that replace animal use.

Accelerate regulatory and institutional delivery

- Set out clear pathways for validation, acceptance, and routine regulatory use, and address gaps in existing frameworks.

Invest in skills and capability across the system

- Establish a coherent national approach to training for researchers, regulators, and decision-makers.

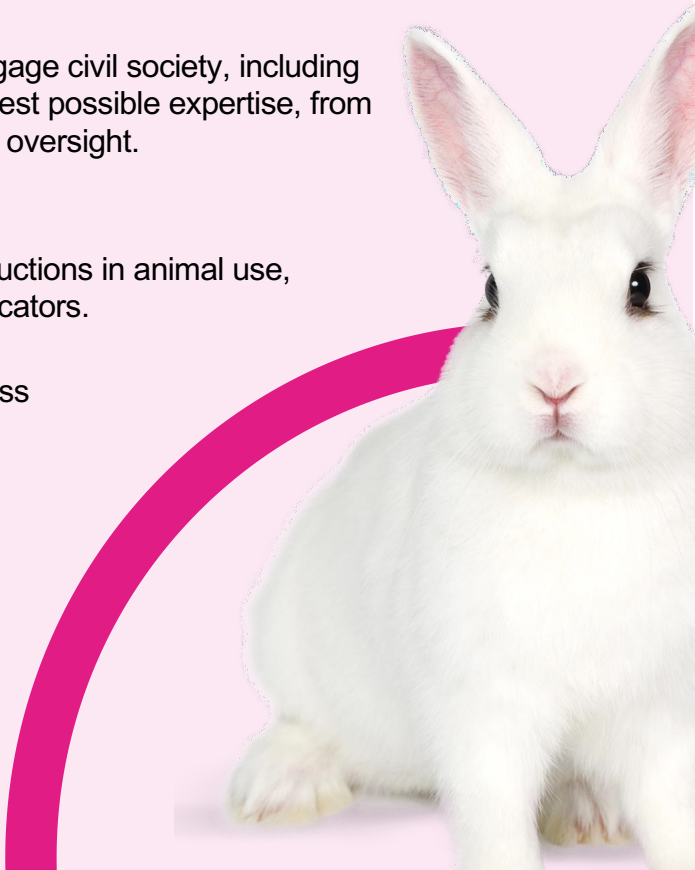
Embed productive external engagement

- Put in place structured, transparent mechanisms to engage civil society, including animal protection NGOs, and ensure access to the widest possible expertise, from across government and externally, in both delivery and oversight.

Clarify the impact of activity

- Set out how current activity will lead to measurable reductions in animal use, supported by interim targets, clear milestones, and indicators.

Overall, it is too early to reach a definitive judgement across all commitments made. However, at this stage there is a reasonable expectation for visible evidence of progress, not only commitment, which is missing in key areas. The coming period will be critical in determining whether early activity translates into sustained, system-wide change, and ultimately the end of animal testing in the UK.



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Annex A: Test Method Targets in the 'Replacing Animals in Science' Strategy (part 1)

This annex lists the targets set out in 'Replacing Animals in Science: A strategy to support the development, validation and uptake of alternative methods.' They are grouped by delivery timeline. Particular emphasis is placed on targets with deadlines by the end of 2026 or earlier, where early evidence of implementation would reasonably be expected.

1. Targets with Deadlines by the End of 2026 or earlier

Pharmacopoeial pyrogen testing (2025)

"By the end of 2025 we will aim to apply only validated alternative methods for pharmacopoeial pyrogen testing."

First-in-human clinical trial submissions

"By the end of 2026 we will define and apply guidance that permits first in human clinical trial submission for biological therapies where no pharmacologically relevant preclinical animal model exists based only on non-animal data."

Skin irritation testing

"By the end of 2026 we will aim to apply only validated alternative methods to satisfy UK regulatory requirements for skin irritation testing."

Eye irritation testing

"By the end of 2026 we will aim to apply only validated alternative methods to satisfy UK regulatory requirements for eye irritation testing."

Skin sensitisation testing

"By the end of 2026 we will aim to apply only validated alternative methods to satisfy UK regulatory requirements for skin sensitisation testing."

Forced Swim Test (FST)

"We will no longer grant licences for the FST as a models of depression. In cases of screening for antidepressant efficacy and studying the neurobiology of stress, we will aim to support the validation of alternatives to FST by the end of this Parliament to replace the use of the FST."

Annex A: Test Method Targets in the ‘Replacing Animals in Science’ Strategy (part 2)

This annex lists the targets set out in ‘Replacing Animals in Science: A strategy to support the development, validation and uptake of alternative methods.’ They are grouped by delivery timeline. Particular emphasis is placed on targets with deadlines by the end of 2026 or earlier, where early evidence of implementation would reasonably be expected.

2. Medium-Term Targets (2027/8)

Adventitious agent testing for human medicinal products (2027)

“We will aim to apply only validated alternative methods for pharmacopoeial adventitious agent testing for human medicinal products licensed in the UK by the end of 2027.”

Botulinum toxin potency testing (2027)

“By the end of 2027 we will aim to apply only validated alternative methods in the pharmacopoeial potency testing of botulinum toxin.”

Fish acute toxicity tests (UK REACH)

“We will aim to replace fish acute toxicity tests for chemicals registered under UK REACH with alternative methods by the end of 2028 and reduce such tests for pesticides and agrochemicals in line with international acceptance.”

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Annex A: Test Method Targets in the ‘Replacing Animals in Science’ Strategy (part 3)

This annex lists the targets set out in ‘Replacing Animals in Science: A strategy to support the development, validation and uptake of alternative methods’. They are grouped by delivery timeline. Particular emphasis is placed on targets with deadlines by the end of 2026 or earlier, where early evidence of implementation would reasonably be expected.

3. Longer-Term Targets

Use of dogs and non-human primates in PK studies

“We will aim to use validated alternative methods to reduce the use of dogs and non-human primates in dedicated PK studies for human medicines by at least 35% by 2030.”

Animal-derived polyclonal antibodies (pAbs)

“We will aim to replace the use of animal-derived pAbs by 2030.”

Fish endocrine disruption testing

“By the end of 2035 we will aim to include validated alternative methods in UK regulatory guidance to reduce the use of fish endocrine disruption tests.”

4. Targets with conditional commitments

Veterinary vaccine testing

“Following international competent authority acceptance of an alternative quality control (QC) test, we will aim to replace the use of animals in the UK for veterinary vaccine testing as soon as is feasible where these tests can be validated and implemented for the relevant veterinary vaccine.”

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