



MWC's Position on the UK's Replacement Strategy:

Not Enough. Not Even Close

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In July 2024, the UK labour party came into power and, with it, a long-awaited pledge for meaningful change for animals in laboratories. The renewal of hope and belief finally arrived, not through rhetoric, but through commitments that demanded action. Buried within the 136-page election manifesto, nestled between promises for clean water and a crackdown on antisocial behaviour, lay a single sentence upon which scientists, activists, and the wider animal-protection community pinned real hope:

“And we will partner with scientists, industry, and civil society as we work towards the phasing out of animal testing.”

Contemporary medical and chemical safety research has moved away from animal testing because they do not reliably predict human outcomes, it does not even reliably confirm outcomes within its own animal species. Far from accelerating progress, animal tests mislead it. Throughout history, reliance on animal data has delayed medical breakthroughs, obscured genuine risks, and contributed to human and animal harm. This raises an obvious question; one the public continues to ask with growing frustration:

If non-animal science is already here, why have we not ended animal testing immediately?

Fast-forward to November 2025, when the government finally released its long-awaited policy paper: **“Replacing animals in science: A strategy to support the development, validation and uptake of alternative methods.”**

At first glance, the title seems promising- an official strategy dedicated to replacing animals. But the optimism fades as soon as one examines how the policy defines its central term. **Alternative methods**, it states, are “scientific methods and testing strategies which do not use protected animals, or which...use fewer protected animals.”

This definition exposes the core weakness of the strategy. By conflating reduction with replacement, the policy mirrors the long-standing and ineffective three Rs framework (Reduce, Refine, Replace) instead of committing to true replacement as the only goal. What the UK urgently needs is a strategy guided by a single principle: to end animal testing, not incrementally adjusting how many animals continue to be tortured. Incrementalism does not serve human health, and it certainly does not serve animals.



Public Opinion is Not the Barrier

The strategy hints at the need to “build public confidence” in non-animal science and to re-establish a survey. But the public’s view is already clear, repeatedly and consistently. Multiple petitions to the government, one of which reached over 100,000 signatures in days and debated in parliament, and surveys led by NGOs and government-funded research, show that the British public:

- **does not support animal testing when alternatives exist,**
- **wants the government to prioritise non-animal methods,**
- **trusts human-based science more than animal data,**
- **and believes replacing animals should be a national priority.**

The public is waiting for animal testing to end. It is policymakers who are hesitating.

To suggest otherwise is another form of deflection.

The Largest Source of Animal Use – Basic Science – Ignored

The strategy acknowledges that over half of all animal procedures in the UK (52%) are carried out in basic, curiosity-driven scientific research. This is not drug development, regulatory toxicology or safety assurance. It is exploratory work, conducted overwhelmingly in academia, governed by entrenched academic incentives and decades-old habits.

Yet the strategy does nothing to address it.

There are no targets for removing basic research animal use.

No reforms to the licensing system.

No changes to academic funding requirements, peer-review expectations, or the ethical review bodies inside institutions.

No mention of the cultural and systemic pressures that keeps animal testing alive long after modern science has rendered them obsolete.

A genuine replacement strategy should at the very least have a view to remove the area where most animals are used. This one avoids it.

Achievements Presented as Progress ... Even When They Already Exist

Several commitments in the strategy are framed as future ambitions, despite the fact that validated, internationally accepted non-animal methods already exist and have done for years.

For example:

- **Skin irritation and corrosion**
- **Eye irritation**



- **Skin sensitisation**

For example, skin irritation, sensitisation and eye irritation have OECD-validated non-animal test methods, widely adopted in the EU and internationally. The UK's promise to "transition to these by 2026" is not progress; it is catching up with scientific standards that should already be mandatory. It is rebranding the expected as innovative.

Worse still, the strategy celebrates its commitment to replacing the rabbit pyrogen test despite the fact that the European Pharmacopoeia began phasing it out back in 2021 and has moved to remove it from all official texts with implementation by 2025–26. Four years later, the UK is presenting overdue compliance as leadership.

This pattern repeats: small updates, framed as breakthroughs, masking the absence of real structural change.

The Monoclonal Antibody Illusion

The strategy highlights a supposedly ambitious commitment regarding therapeutic monoclonal antibodies. Yet the promise applies only to one narrow situation: *when a monoclonal antibody does not bind to any animal species, making animal toxicology impossible*.

In such cases, regulators already waive animal tests. They have no choice.

What the strategy does not address is the far larger issue: the widespread use of *animal immunisation* to generate antibodies used in research, diagnostics, imaging, and many therapeutic pipelines.

This omission is particularly striking because *animal-free antibody technologies already exist and have done so for years*. The EU's scientific authority recommended the phase-out of animal-derived antibodies as far back as 2020. Yet the UK strategy does not even acknowledge these technologies, let alone commit to adopting them.

Once again, the government ignores a major, achievable opportunity for real replacement.

Urgency in Words, Delay in Action

The strategy uses the language of urgency, "tipping point, accelerating progress, transformative change", but the timelines tell a different story entirely.

Key metrics, targets, and performance indicators will not be defined until 2026.

Major actions begin in 2026–27.

Critical frameworks for evaluation are postponed into the future.

There are no legally binding deadlines, and nothing to prevent further delay.

This is not urgency. It is deferral dressed as ambition.

And delay has deadly consequences.



Every year the government delays action, animals continue to be:

- **bred into genetic lines that modern science does not need,**
- **born only to be used and killed,**
- **produced as surplus and killed,**
- **kept within systems that assume animals are indispensable to science,**
- **replenished in a cycle that should have ended decades ago.**

These are not administrative timelines.

These are life-and-death timelines.

A delay of even one year means hundreds of thousands of animals are bred into a system that the government itself acknowledges must end. Five years of delay means millions.

Delay is harm.

Delay is more breeding.

Delay is more suffering.

A strategy that truly aims to *replace* animals would act with the urgency appropriate to the scale of the harm inflicted.

This one does not.

A Strategy That Avoids the Hardest Questions

When viewed as a whole, the strategy reveals a consistent pattern:

- It focuses on narrow, often already-solved areas.
- It reframes overdue updates as bold progress.
- It avoids basic research, which accounts for more than half of all animal procedures.
- It ignores major replacement opportunities such as animal-free antibody technologies.
- It commits to timelines that allow the system to continue largely unchanged for years.
- It contains no binding legislation, merely intentions.
- It leaves breeding fully operational, with no plan to wind them down.

The Numbers That Reveal the Truth

In 2023, **2.68 million** animals were used in scientific procedures.

In 2024, **2.64 million**.

A reduction of **just 1.6%**.

Breeding decreased by a mere **0.4%**, revealing what the strategy does not acknowledge:

breeding remains fully operational.

Animals continue to be produced, generation after generation, for testing or to spend their life in laboratories as “surplus” stock.



These reductions are not meaningful.

They are statistical noise, the annual fluctuation of an entrenched system, not evidence of progress.

At this pace, the UK will not end animal testing for decades.

Not because alternatives are insufficient.

Not because science requires animals.

But because the strategy avoids confronting the structures that sustain the status quo.

A replacement strategy should make these numbers fall rapidly and decisively.

This one has barely made them flicker.

MWC's Recommendations

Our recommendations are simple, direct, and grounded in both scientific evidence and ethical necessity.

They are the minimum conditions for a genuine strategy to replace animals in science.

1 A replacement-only national roadmap

The UK must commit to a roadmap that focuses solely on **ending animal use**, not reducing or refining it.

This must include:

- legally binding timelines,
- clear milestones,
- mandatory adoption of non-animal methods as they are validated.

Replacement must be the explicit, enforceable goal.

2 Legislation

Without legislation, a strategy is a statement, not an enforceable plan.

The UK must establish:

- statutory duties on regulators, funders, universities, and industry,
- enforceable consequences for failing to adopt validated non-animal methods,

This is how meaningful change is achieved – through law, not through aspiration.

3 Breeding must stop now

Ending animal testing begins with ending the **breeding** that sustains it.

Every breeding colony represents a future pipeline of suffering.

Every genetically altered line represents decades of continued use unless halted.



4 Mandatory aftercare and rehoming for laboratory animals

The end of animal testing must include responsibility for animals already harmed by the system.

We call for:

- Mandatory aftercare and rehoming for laboratory animals including veterinary treatment and behavioural rehabilitation.
- This must include a national rehoming strategy, working only with specialist carers that meet strict welfare, transparency, and non-exploitation standards, to ensure animals are rehabilitated and rehomed through adoption, or provided with lifelong sanctuary care where adoption is not appropriate.

Animals who cannot be rehomed must still be guaranteed a life free from experimentation, pain, and fear.

They are not waste products of a failed system; they are survivors of it.

Final Statement

The UK has the scientific capacity, the public support, and the moral obligation to end animal testing. What it lacks is political courage to act at the speed that science and ethics demand.

A future without animal testing can happen today. But it will not arrive through delay, misdirection, or incremental adjustments.

It will arrive through replacement-only policy, binding legislation, and a decisive commitment to end breeding now.

Medicine Without Cruelty stands ready to support this transition and to hold the government accountable until it becomes a reality.

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