

Ethical review of non-ASPA animal use

Aim of this resource

To help the AWERB review activities that use animals but do not fall within the scope of ASPA, such as research, teaching and training.

Relevant AWERB task

Help to promote a Culture of Care; advise on matters related to the welfare of the animals, in relation to their acquisition, accommodation, care and use; provide a forum for discussion and development of ethical advice.

Recommendation

Use this resource to discuss animal use at the establishment that does not fall within the scope of ASPA, and to help set up, or improve, the processes used to review this.



The issue

Animal use which falls outside the scope of ASPA can still raise significant ethical and welfare concerns. Non-ASPA animal use can include training and teaching, humane killing (e.g. for tissues), sub-threshold procedures using in-scope animals (such as behavioural studies), use of cadavers and use of invertebrates like insects and decapod crustaceans (use of cephalopods, e.g. octopuses and squid, comes under ASPA).

It also includes research undertaken outside the UK and indirect uses, such as purchasing cells or reagents derived from animals, or using historical data obtained using methods that would not be permissible today.



At some establishments (mainly universities), there may also be non-scientific uses of animals, e.g. in arts projects and as 'emotional support' animals.

Non-ASPAs projects can be diverse, but all should align with the establishment's local Culture of Care. Ensuring proper ethical oversight will help to minimise reputational risk, as well as ensuring that all animals are treated respectfully according to a good Culture of Care that encompasses the whole establishment.

Key points:

- **There should be appropriate ethical justification for all uses of, and interactions with, animals**
- **There are sound ethical, animal welfare and scientific reasons for conducting ethical reviews of all research, teaching or training using animals, even if it does not involve procedures regulated by ASPA**
- **Every establishment should have a full understanding of all animal use as part of the establishment's culture, both within and outside scientific procedures. This may include animal use in arts projects or as emotional support**
- **Increasingly, establishments are developing processes for the effective review of non-ASPAs projects at an appropriate level, including identifying responsible bodies, reviewing animal use and developing forms, templates and records**
- **Non-ASPAs review should include the application of the Precautionary Principle, giving animals the 'benefit of the doubt'**
- **It will be necessary to ensure positive, clear communication with researchers whose work will be reviewed, possibly for the first time**



Background Information:

- **There should be appropriate ethical justification for all uses of, and interactions with, animals.** All uses of animals, regardless of their regulatory status, should be underpinned by a clear ethical justification. The potential benefits must outweigh the likely harms, and alternatives to animal use should be used wherever possible. This applies equally to animal use in the arts, or for emotional support. In these cases, animals may be caused stress due to exposure to unfamiliar people, lack of autonomy (including rest) and, in the case of emotional support animals, contact with distressed people (which is distressing for many animals). Animals' dignity may also be compromised if they are made to wear costumes, or clothing that they do not need. Note: Projects involving human-animal interactions are likely to require dual review by committees concerned with ethics and welfare relating to humans and animals, which will need to connect and communicate.
- **There are sound ethical, animal welfare and scientific reasons for conducting ethical reviews of all research, teaching or training using animals, even if it does not involve procedures regulated by ASPA.** Many unregulated activities can still raise significant ethical concerns, impact animal welfare and lead to reputational risk. For example, sub-threshold procedures using in-scope animals may involve stress, humane killing, or unintended impacts that may not be fully anticipated. Widening the scope of ethical review demonstrates a commitment to upholding high standards of animal welfare, with effective challenge to animal use and implementation of the 3Rs across all procedures (and activities) that directly or indirectly use animals. This principle is also supported by the UK Research Integrity Office (UKRIO) in its [Primer on research involving animals](#).
- **Every establishment should have a full understanding of all animal use under its auspices, both within and outside scientific procedures. This may include animal use in arts projects or as emotional support.** A comprehensive overview of non-ASPAs use will enable the identification of areas that may benefit from ethical review, to ensure transparency, consistency, and high standards of animal welfare beyond regulatory requirements (where these exist). It is crucial that establishments ensure compliance with all relevant regulations, such as the Animal Welfare Act 2006 for non-ASPAs work, and hold any necessary licences. It is good practice to develop systems that allow relevant staff and governance bodies to be aware of all activities using animals across the organisation. For example, using companion animals in therapy or public engagement can cause them anxiety and distress, so these activities should undergo ethical review to ensure each use is justifiable, there are no alternative approaches, welfare is safeguarded and animals are respected.
- **Increasingly, establishments are developing processes for the effective review of non-ASPAs projects at an appropriate level, including identifying responsible bodies, reviewing animal use and developing forms, templates and records.** This may be done by the AWERB, or a dedicated sub-group, or a separate 'Non-ASPAs' committee. Any sub-committees should ensure clear and ongoing communication with the AWERB and research governance or integrity committees.



The level of review can be proportionate to the potential animal welfare and ethical impact of the activity, provided that it provides meaningful ethical oversight. For example, the [UKRIO Ethical Framework for Obtaining Materials from Sentient Animals](#) provides practical guidance for one area of non-ASPA animal use. Although identifying, and reviewing, non-ASPA use may require additional resources, this is justified by the benefits to the Culture of Care and institutional integrity, and reputation. It is also vital to ensure that relevant staff and bodies receive adequate training in the systems and processes involved. You can download an editable template for a non-ASPA application form [here](#), which can be tailored to your establishment's requirements.

- **Non-ASPA review should include the application of the Precautionary Principle, giving animals the 'benefit of the doubt'.** Recognition of the potential for sentience in invertebrates (e.g. insects) is rapidly increasing, as is our understanding that, for any animal, interactions with humans which appear to be benign, or positive, can actually be stressful. Bodies reviewing out-of-scope animal use should include members who have adequate knowledge and expertise relating to the above, and who are prepared to challenge assumptions and be a voice for the animals.

Examples of this could include:

- Ensuring the sourcing of biological materials, such as out-of-scope chicken embryos for research, is carefully reviewed to ensure that eggs come from high-welfare flocks.
- Acknowledging the rapidly growing understanding of invertebrate sentience and the potential for them to experience pain and distress. For example, activities involving invertebrates, such as decapod crustaceans or insects in research and teaching, should be carefully reviewed to check for current evidence as to their potential for sentience, and to ensure there are no non-animal alternatives and the 3Rs are fully implemented.
- Behavioural studies with companion animals should be carefully reviewed, including observational studies. Reviewers should ensure clear protocols are in place to assess stress and to immediately end the session if the animal shows signs of distress, such as excessive vocalisation, increased heart rate, or body language indicative of anxiety.
- Activities involving drones, traps, or tagging in the wild should be carefully reviewed to minimise disturbance, stress, or interference with natural behaviours of free-living animals.
- Methods of 'pest control', or dealing with unwanted populations of animals such as mice and rats, should also be reviewed to ensure that food waste is disposed of responsibly, animals are deterred wherever possible and the most humane methods of removal or killing are chosen.



- **It will be necessary to ensure positive, clear communication with researchers whose work will be reviewed, possibly for the first time.** Many researchers, especially those outside the regulated community, may be unfamiliar with animal-related ethical review processes. It is important to clearly communicate the purpose - and the benefits - of review. Comprehensive guidance, supportive dialogue, and opportunities for feedback can help ensure that the process is seen as collaborative and positive. It also provides a chance to engage researchers more deeply with ethical thinking and animal welfare principles. Workshops, or discussion sessions, can also help foster engagement. Top level engagement with senior leadership teams, and heads of schools, can help to achieve support for good practice around ethical review.

Thank you to colleagues at [Replacing Animal Research](#) and University of Surrey for their valuable input into this resource.

