

Transparency Agreement on Animal Testing in the Netherlands

Introduction

The signatories to this agreement are involved in animal research by either conducting, financing, or facilitating research or education that involves the use of animals. Scientific research with animals, both within and outside the Netherlands, has brought us significant medical, pharmaceutical, and veterinary progress. It is crucial for the well-being of both humans and animals to continue this research globally, and the Netherlands is one of the key players in this field. Significant efforts are made to replace animal experiments with animal-free alternatives and progress in this area has been made. However, alternatives cannot fully replace all animal research and animal experiments will remain necessary in the near future.

Animal research is a controversial topic in society, but it is also carried out for the benefit of society. It is important for everyone to have access to accurate and comprehensive information about animal research so that they can form their own informed opinions on this matter.

The aim of this agreement is to provide greater openness and transparency to society regarding animal research. To achieve this, the signatories will work together on a joint approach regarding communication about:

- a. What animal experiments entail
- b. The regulation of animal experiments and the protection of experimental animals within the Dutch legal framework
- c. The role of animal experiments in scientific research, the development of new medical treatments, safety testing, improving animal welfare, and nature conservation
- d. The professional commitment of researchers, institutions, and animal caretakers to promote animal welfare (culture of care)
- e. The extent to which efforts are made to reduce the use of animals and minimize animal discomfort
- f. The extent to which animal experiments can be replaced by other methods and how many animal experiments are already being replaced by animal-free methods
- g. The use of new techniques and technology to improve animal experiments, resulting in fewer animals while achieving the same results (refinement)
- h. The efforts that are made to make the transition to animal-free innovation

About the agreement

This agreement was developed through discussions with the initial signatories beginning in October 2020. The final Transparency Agreement on Animal Research in the Netherlands in its current state was formally launched in November 2021 after input from a wider group of stakeholders.

The development of this agreement has also been inspired by progress in the United Kingdom, Spain, Portugal, and Belgium, countries that have implemented similar national transparency agreements on the communication of animal research.

Dutch life scientists conduct cutting-edge research. They strive for responsible and ethical design of their research and its reporting, upholding high standards for the well-being of the animals involved. The European Directive 2010/63/EU obligates member states to publish data on animal experiments, based in part on data from the relevant institutions (see appendix for background information on Dutch regulations). However, these data are not necessarily openly available or easily accessible to someone not specifically seeking them. The ambitions in this agreement go beyond the legally required publication of information. It is about actual interaction with society in a proactive and accessible manner. Only with complete and accurate information, people can form their own opinion. We recognize and respect the fact that many people are opposed to the use of experimental animals. To this end, we demonstrate openness, transparency, and responsibility for the research we conduct, finance, or facilitate.

The agreement includes four commitments, each specified with practical steps that organizations can take. How the commitments are fulfilled may vary by organization, depending on their procedures and legal obligations. Research funding bodies, organizations conducting animal experiments, organizations facilitating animal experiments, and interest groups all play different roles. Many signatories were already engaged in communicating about animal experiments based on the Code of Openness on Animal Experiments (2009). Therefore, there are already numerous examples of openness regarding animal research (such as playing an active role in media communication about animal research, inviting interested parties to visit animal facilities, and providing clear and comprehensive information about animal experiments online). However, some institutions may still have a long way to go before they can implement the practical steps described in this agreement. Nevertheless, all signatories commit to making progress in implementing the agreement and helping to increase openness about animal experiments in the Netherlands. This Transparency Agreement goes beyond the Code of Openness on Animal Experiments in the sense that individual organizations across a broader spectrum sign this agreement, thus becoming more directly involved in the collective efforts to improve transparency.

Signatories will report annually on their progress in each of the four commitments.

THE FOUR COMMITMENTS

Commitment 1: We are clear about when, how, and why animals are used in research.

This commitment requires all organizations to acknowledge (both internally and externally) that they, or their members, conduct, facilitate, or finance animal research, and to communicate transparently about the use of animals in such research. All signatories agree to these fundamental principles of openness, which form the basis of the agreement.

When we communicate about the use of animals in research, we provide an accurate description of the benefits and limitations of animal experiments. We are realistic about the potential result and impact of such research, open about its impact on animal welfare, and ethical considerations.

We will inform staff (and where relevant, students) about our organization's involvement in using animals in research or facilitating and/or financing such research. We will provide information explaining our involvement in animal research and answer questions about the

nature of this research, whenever realistic and reasonable. If there are reasons not to respond to questions (e.g., due to intellectual property concerns), we will explain why.

When signatories of the agreement collaborate on a research project (with parties within or outside the agreement), all relevant parties agree to take an open approach to communication about the number and types of animals used for the project and support each other in this regard. If there are partnerships with non-signatory organizations or confidentiality, protection of intellectual property, or commercial sensitivity are involved, signatory organizations will be as open as possible in sharing information with the public, while respecting necessary limitations.

Commitment 2: We aim for improved communication with the media and the public about animal research in the Netherlands.

The goal of this commitment is to ensure that relevant details about the use of animals by signatories are easily accessible to the public. This builds upon Commitment 1 by outlining practical steps that organizations can take to optimize their communication about animal research.

Within one year of signing the agreement, all signatories, where not already present, will make a policy statement available on their publicly accessible website about their role in animal research. This policy statement provides clear information about the nature of their involvement in animal research and its role in the broader context of research goals.

Signatory universities, research institutes, pharmaceutical companies, associations, and organizations that facilitate research will provide information on their website and through other communication channels on how they work to promote the 3 Rs (Replacement, Refinement, and Reduction of animal experiments) and provide examples of their progress, including initiatives to develop and/or use alternative methods. Where animal research has played a significant role in scientific advancement and/or product development, we will include information about that research in relevant communications. A central page on the website of the Foundation for Information on Animal Research (Stichting Informatie Dierproeven, SID) will display examples of this. Signatory organizations encourage researchers and staff who want to communicate with the public and the media and support them in doing so. Signatory organizations appoint a contact point within their organization for information on their involvement in the use of animals. Researchers are also encouraged to follow recognized guidelines when conducting experiments and publishing their research results (e.g., the principles outlined in the PREPARE and ARRIVE guidelines), to the extent that it aligns with the guidelines of the journal in which they publish.

Signatories of the agreement can, as some already do, grant access to their facilities to journalists and media organizations, policymakers, as well as local schools or patient organizations (where applicable). The public and the media may consider access to animal facilities as a gesture of good faith, but they will be informed, where applicable, that such visits are not always possible.

Commitment 3: We proactively provide opportunities for the general public to learn about animal research and the relevant regulations.

This commitment is intended to encourage the public debate on animal research in the Netherlands. It builds upon Commitments 1 and 2 by suggesting ways in which signatories

can proactively communicate with the public, both directly and indirectly, in addition to providing information.

We will collaborate to provide comprehensive explanations about the regulations surrounding animal research, project licenses, and their careful use, the animal experiments themselves, and what is done to promote animal welfare. These explanations may include images and videos, which can be used independently or in conjunction with other communication tools. They must contain information about the context of animal research. The institutions' websites will be key in this communication.

Where relevant, representatives of signatory organizations will include information about the role of animals in their work and what they do to achieve optimal application of the 3 Rs in lectures or public events, such as at schools or in the local community. Signatories also consider other activities to encourage public involvement in animal research.

Commitment 4: We report on our progress and share experiences annually.

Monitoring the implementation of the agreement is essential for its success. We will show and share the progress we have made in being more open about animal research in the Netherlands and improving the information available to the public. We will review the agreement and our own processes to keep them up to date.

The signatories will report annually to the SID and the European Animal Research Association (EARA) on the actions they have taken to fulfil these commitments and share their experiences regarding the effectiveness and impact of the implemented strategies. This reporting is based on a questionnaire, the answers to which are combined and summarized in an annual report.

We believe that this agreement will provide signatories with the opportunity to share and promote best practices by encouraging them to be open about animal research and provide the public with better insights into the reasons for, methods of, considerations for, and benefits of animal experiments.

Three years after publication, in collaboration with SID and EARA, signatories will evaluate this agreement and its impact. This evaluation will not only consider the efforts made but also how these efforts have influenced the public debate.

Background information on the regulatory and legislative framework in the Netherlands

Animal experiments in the Netherlands are regulated by the Animal Experiments Act (Wet op dierproeven, Wod). This legislation is based on, but goes beyond, European Directive 2010/63/EU. According to this legislation, an institution conducting animal experiments must have an institutional license issued by the Netherlands Food and Consumer Product Safety Authority (Nederlandse Voedsel- en Warenautoriteit, NVWA). In addition, separate project licenses must be requested from the Central Committee on Animal Experiments (Centrale Commissie Dierproeven, CCD) for each research project involving animals. The CCD grants these permits only when there is no animal-free alternative available to answer the scientific question and when the benefits and necessity of the study outweigh the animals' discomfort. This ethical assessment must be conducted by a recognized Animal Welfare Body (Dierexperimentencommissie, DEC) advising the CCD. Part of the permit application is a non-technical summary (NTS), which describes the research in language that is understandable to laypersons. The NTS is published by the CCD.

Furthermore, the legislation requires that each license holder reports data on animal use to the government, annually. This information is collected at the national level and published in 'Zo Doende,' the NVWA's annual overview of animal experiments and experimental animals.

The EU has provided regulations for the NTS and data on animal use and is establishing a searchable European database (from 2021).

<https://www.nvwa.nl/documenten/dier/dierenwelzijn/zo-doende/publicaties/zo-doende-2021-jaaroverzicht-dierproeven-en-proefdieren> (most recent annual overview, as of November 2023)

The signatories of this agreement adhere to Dutch and EU legislation. This means that animals should not be used if alternative research methods are available that provide equivalent data; that the number of animals used should be minimized to the level required for statistically robust research; and that researchers must ensure that pain, stress, or fear (physical or psychological) is minimized. We want the public to have access to accurate and reliable information and to have a realistic understanding of both animal discomfort and the benefits of animal research in terms of knowledge and medical advancement.