

## Joint LERU/EU-LIFE Statement on the ECI ‘Save Cruelty-free Cosmetics - Commit to a Europe without Animal Testing’

The EU Citizen’s Initiative (ECI) [“Save Cruelty-free Cosmetics - Commit to a Europe without Animal Testing”](#) calls upon the European Commission to commit to a legislative proposal plotting a roadmap to phase-out all animal testing in the EU before the end of the current legislative term (June 2024). This is extremely worrying for LERU and EU-LIFE.

During the past decades, our member organisations have been at the forefront of the implementation of [the 3Rs policies \(replace, reduce, refine\)](#) as well as developing alternative methods to the use of animals for regulatory and research purposes. We call upon the authorities to allow the scientific community to continue to serve progress in biomedical research at the best of its capabilities. A phase out, or an outright ban on animal experimentation would severely confine European research with detrimental effects for the health of European citizens.

LERU and EU-LIFE call upon European leaders to consider the following:

1. The use of animal testing for regulatory purposes and animal experimentation in scientific research encompasses different scopes and impacts. Debating and acting on the reduction of the use of animals for any purpose – which is fully supported by the scientific community – calls for these differences to be taken into account.
2. The **efforts to replace animal use in research** should be significant, keep a pace with, and push forward, scientific knowledge and development of technology.
3. The last decade has brought significant **advances in New Approach Methodologies (NAMs)**, such as 3D cell cultures, organoid cultures, and 3D models of tissues on chips that can mimic, for example, air-to-blood interfaces. Still, for all their worth and sophistication, such model systems are far from recapitulating the biological complexity of the systems studied in health and disease. At the **multi-systemic level**, many existing alternatives are **not capable of capturing the complexity** that is required to, for instance, study pathologies involving the immune system, neurological disorders, the influence of the microbiome in health, etc. Animal models help us understand some of this complexity but also have limitations, as all model systems do. Human-based model systems are becoming increasingly important, but their development is hampered by the availability of human tissues.
4. Sustained and generous **funding for alternatives to animal experimentation** are essential to develop and improve these new methodologies. Barriers for their implementation must be lifted to advance the replacement of animal use. This should not go at the cost of existing funding programs or hinder animal research funding. Removing funds would prevent scientific competitiveness for the EU compared to all other parties and severely curtail patient and animal health science.
5. We welcome dialogue on our work and encourage visits to our facilities where possible. Stronger efforts should be made at European and national level to promote

**citizen engagement on debating and understanding of animal experimentation** in the framework of scientific research as well as in the development of new alternative methodologies.

6. [Directive 2010/63/EC \(on the protection of animals used for scientific purposes\)](#) already foresees the complete replacement of animal use in areas where scientifically possible to do so. **The 2010 Directive remains fit for purpose.**

LERU and EU-LIFE are extremely concerned that this ECI will be the death-knell for the biomedical science industry in Europe. While NAMs have significant potential, they are not able to substitute all uses of animals at present. They may not ever be able to in some cases. Committing to a timeline for the phase-out of animal experiments is ill-advised and will significantly harm European competitiveness in the life sciences at a time when technological sovereignty is crucial to Europe.

LERU and EU-LIFE have together outlined their thoughts on this ECI in view of the EP hearing on May 25, and the EC decision later. We urge other organisations to join our call and express their concerns too.



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