

1.0 Summary Evidence

1.1 Dogs

Dogs and other animals are poor predictors of efficacy and toxicity for humans, 92-96% of novel drugs fail at human clinical trial stage due to issues not identified by non-predictive animal models. Dogs are used mostly as a second species (non-rodent) in toxicity testing yet their short lives of suffering are evidenced to add at most an insignificant 2% to existing probabilities of toxicity in humans.

The Government's own commissioned Ipsos Mori survey on UK public attitudes to animal testing in 2018 showed that 86% of people find it unacceptable to test on dogs for the purpose of medical research, *even when that research is said to be for the benefit of human health.* [IPSOS](#)

MBR (Marshall BioResources) Acres near Huntingdon breeds around 2,000 puppies a year to be sold to UK toxicity laboratories. Most of these pups, with proven sentience equivalent to that of a 3-year-old child, are forced to ingest or inhale pharmaceuticals, industrial or agricultural chemicals for 28, 90 or over 120 days. They are then most often killed by suffocation or by being bled out as euthanasia drugs could affect post-mortem results.

Ingesting is via a forced procedure called 'gavage', involving a flexible tube pushed manually down a dog's throat into its stomach without any pain relief for 1-3 times daily. This is considered to be of mild severity classification, [\(6\)](#) despite two people being needed to hold a frantically struggling dog. Beagles are the breed most often used in research because of their intermediate size and forgiving nature.

The total amount of taxpayer's money granted by the Medical Research Council (MRC) for research involving the use of dogs licensed under The Animals (Scientific Procedures) Act 1986 revised 2012 (ASPA) increased by 45%, from £2.9 million in 2021 to £4.2 million in 2023. ASPA and its Code of Practice sets out minimum guidelines, not even best practice for the care, transit, housing and killing of research animals. [\(6\)](#) [\(7\)](#) For example, Establishment standard condition 4 refers only to 'adequate care and accommodation' appropriate to the species. [\(8\)](#)

Both of the commercial breeding companies in the UK have a well-documented history of international animal abuse. A high profile Envigo site in West Virginia, USA was closed in August 22 due to gross welfare violations. Just prior to closure 96 beagles were shipped from this facility in the USA to Envigo in Belton, Leicestershire. Green Hill, MBR's beagle breeding facilities in Italy, was closed down by the authorities due to serious animal welfare violations, and the Director, the Executive Manager and the site veterinarian were given prison sentences for animal abuse in 2016. Over 3,000 dogs, mostly puppies 3-8 months old, but also pregnant mothers and studs, were seized and taken to forever safe homes. MBR sold the Green Hill site, stating that Italy's animal protection laws were 'too restrictive', and a year later, MBR moved its dog breeding facilities to the UK, safeguarded by UK legislation which explicitly excludes research animals from the Animal Welfare Act. The official investigation into Green Hill found out that MBR had killed over 6,000 dogs during a 4 year period deliberately inducing heart attacks in several of them, and over 90 puppies died from ingesting sawdust used to soak up urine. The report raised concerns regarding the lack

Petition Creator: Maria Iriart on behalf of www.thecampbeagle.COM
Petition: Ban immediately the use of dogs in scientific and regulatory procedures
<https://petition.parliament.uk/petitions/705384>

of exercise areas, and how leaving the dogs unattended from 6pm to 7am caused unnecessary suffering. Today, here in the UK, MBR continues to use the same breeding practices it was convicted for in Italy, as these dogs have no protection from the Animal Welfare Bill.

The Animals in Science Regulation Unit (ASRU) actively supports these companies and permits them to operate beyond the reach and oversight of the public, deeming them to be low-risk. Two General Regulatory Council tribunals have forced information to be released which was previously withheld by using exemptions from the Freedom of Information Act 2000. Inspections are minimal, announced, brief and increasingly carried out virtually. Neither the number of or a percentage of animals 'inspected' are recorded. ASRU do not have records as to how many sites an establishment has and therefore do not even know where animals are held.

At MBR Acres Limited, beagle puppies are bred for the research industry in conditions reflecting an industrial scale puppy factory with over 1,000 dogs on site at any one time. The dogs are left unattended 20 hours a day at weekends and 16 hours a day during the week. In December 2024 on one occasion the dogs were left without human care for 23.5 hours. Once the staff have left only security remains patrolling the outside areas, they have no access to the dog sheds.

The beagles are housed in soundproofed, windowless industrial sheds, they have no access to the outside world, no natural light, no bedding, not even a bowl of water.

The number of staff reduced from 41 in 2017 to 21 in 2022. A basic welfare need is that a veterinary surgeon and care staff should be on site 24/7 yet neither are.

Marshalls had a 5-year licence renewed by the Home Office in October 2023 to bleed out ex-breeding bitches and studs and grade B puppies so their blood and organs can be sold. This is under terminal anaesthesia and most commonly via cardiac puncture which is literally bleeding from a beating heart to maximise the volume of blood for sale.

Puppies are sold and transported in vans at around 20 weeks old to undergo repeat dose toxicity testing. Customers include Labcorp in Huntingdon and Harrogate, Sequani in Ledbury and Charles River in Tranent, Scotland which is a grueling 6-8 hour journey.

MBR Acres was granted an establishment licence in October 2017. Since then ASRU, the regulator, has conducted just fourteen, in some cases just 30 minute cursory visits, on-site inspections, only eight of which were unannounced. The only time an inspector noted having seen dogs in outside pens was on arranged visits on 25th April 2018 and 27th November 2020. An inspector's report on 13th November 2019 notes that 'outdoor exercise areas in particular being somewhat neglected.' Transportation, bleeding (be it by donor dogs or terminal anaesthesia) and surgery had not been observed on any visits up to 5th July 22.

Petition Creator: Maria Iriart on behalf of www.thecampbeagle.COM
Petition: Ban immediately the use of dogs in scientific and regulatory procedures
<https://petition.parliament.uk/petitions/705384>

ASRU own documentation states that “Each establishment will receive a full system audit at least every three years if it does not hold special species and at least every year if it holds special species.” [Full System Audit](#) – see page 4. In 2022 there were only 4 full system audits despite there being 30 Establishments holding special species. The MBR Acres audit for 2022-2024 were all facility audits and there has never been a full systems audit. Recent communications have started to refer to just an audit rather than the full system audit that is required.

1.2 No UK legal requirement

In the UK, there is no legal requirement to use animals for testing pharmaceuticals and chemicals. It is only international guidelines that include animal tests as an expectation. To use a non-animal method (NAMs) it must be formally validated and accepted as a “replacement”. The caveat is that validation requires that the human relevant, superior and cheaper results from NAMs match that of animal data, even though it is not a predictive model for humans - a catch 22. The system to validate NAMs is set to fail, and without officially accepted NAMs, the UK Home Office will automatically grant licences for animal testing. Applications to conduct animal testing in the UK have a zero rejection rate. [\(9\) Table 3](#) Animal use has never been validated or approved and is certainly not scientifically satisfactory.

The UK is a member of the International Council for Harmonisation of Technical Requirements for Pharmaceuticals for Human Use (ICH), which publishes guidelines and standards for testing, e.g., [Guidance M3\(R2\) on non-clinical safety studies](#). The ICH guidelines are an expectation to enable smoother trade between participating countries. They are *not a legal requirement*.

The Government response to our second petition [Ref: 633591](#) states: “*In the UK it is required by law that all new drugs are tested within two species*”. This is *untrue* as confirmed by a question raised in October 23 by Giles Watling MP. [Oct 23 MP written question](#)

1.3 The Science and Non-animal, New Approach Methodologies (NAMs)

The scientific community is recognizing that urgent change is needed in research. NAMs are human-specific techniques that represent superior science. They are continuing to be developed and optimized to provide results that are human relevant and therefore not hampered by the non-predictive translation of one species to another. NAMs are not a choice between an animal life or a human loved one, they provide an opportunity to develop and use superior, cutting edge new approaches that are specific to humans making them more accurate.

For example, a liver on a chip has 87% accuracy for human toxicity . [\(10\)](#) Compare this with 92% - 96% of drugs being abandoned during human trials. Half of those failures are due to unanticipated human toxicity and most of the rest are due to efficacy reasons not identified in non-predictive animal models. It is clear that there is an urgent and long overdue need to modernise research and safety testing methods, to accelerate new drugs to market and save effective medicine from being discarded that could save many human lives.

Adverse drug reactions kill thousands of people in the UK and cost NHS England billions each year. Tests which combine a variety of more cutting edge and human relevant approaches can predict dangerous drug side effects where animal tests and even human trials fail. 8% of licenced human drugs are later withdrawn due to unexpected side effects including death.

NAMs are available right now, for example, a liver on a chip has 87% accuracy for human toxicity.

1.4 Toxicity Testing

Animal testing is used in pharmaceutical, agricultural and industrial research to predict human toxicity, and yet analysis suggests that animal models are poor predictors of drug safety in humans. The cost of animal research is high, financially, time delays in drug approval, and in the loss of potentially beneficial drugs for human use.

Using animals to predict toxicity safety of human pharmaceuticals can:

- 1) Falsely identify a toxic drug as “safe”
- 2) Falsely label a potentially useful therapeutic agent as toxic.

An analysis of 2,366 drugs concluded that:

“Results from tests on animals (specifically rat, mouse and rabbit models) are highly inconsistent predictors of toxic responses in humans, and are little better than what would result merely by chance, or tossing a coin, in providing a basis decide whether a compound should proceed to testing in humans” (1). Similar results were found for non-human primates and dogs (2).”

When a human-toxic drug is identified as “safe” by animal testing, the most likely outcome by far is that the drug will fail in clinical testing, often due to unacceptable adverse human effects, and sometimes significantly harming volunteer research subjects in the process. Drugs that survive clinical trials and attain market approval may still be recalled later due to toxicity identified only after months or years of human use.

Of 578 discontinued and withdrawn drugs in Europe and the USA almost half were withdrawn or discontinued in post-approval actions due to toxicity (3). There are many notable examples of cases in which animal trials did not predict severe human toxicity

When animal tests falsely identify a safe chemical as “toxic,” the almost certain outcome is abandonment of further development. Undoubtedly many potentially beneficial drugs have failed animal testing and been lost to patients, even though they would have been both safe and effective, the magnitude of this type of “error” is unknown. Many highly beneficial drugs would have failed animal testing and never been brought to market except that they were developed before animal testing was required E.g. penicillin (fatal to guinea pigs), paracetamol (toxic in dogs and cats), and aspirin (embryo toxicity in rats and rhesus monkeys).

Petition Creator: Maria Iriart on behalf of www.thecampbeagle.COM
Petition: Ban immediately the use of dogs in scientific and regulatory procedures
<https://petition.parliament.uk/petitions/705384>

Reproducibility of animal studies within species, even when carried out under rigorous protocols, is questionable. Using a database of more than 800,000 animal toxicity studies performed for 350 chemicals under rigorous guidelines, a reviewer found toxicity was repeatable just 70% of the time in the same species (4). Another reviewer found that results for a single chemical often differed with animal model, strain, dose, and delivery route. About 26% of chemicals demonstrated contradictory results on repeat testing in the same species.

The absence of toxicity in animals (dogs, rats, mice, rabbits and monkeys) provides essentially no insight into the likelihood of a similar lack of toxicity in humans: the former contributes no, or almost no, evidential weight in relation to the latter. Quantitatively, if, for example, a new drug has (based on prior information, such as similarity to other drugs, data from in vitro or in silico tests, and so on) a 70% chance of not being toxic in humans, then a negative test in any of these five species will increase this probability to an average of just 74%. The most controversial species, dogs and monkeys, the use of which, as opinion polls show, the general public object to particularly strongly, were the least predictive for humans in this respect, raising the probability from 70% to just 72% and 70.4% respectively. Therefore, animal tests provide essentially no additional confidence in the outcome for humans, but at a great ethical, and financial, cost (5).

1.5 Funding and The National Centre of the 3Rs (NC3Rs)

It is very difficult to accurately identify how much the UK spends on human relevant NAMs research. However, calculations suggest it is close to insignificant at less than 1%.

For example: In 2019, the UK government's gross expenditure on research and development (R&D) was £ 38.5 billion. Around 40%, £ 15.4 billion, is spent on basic research which uses many animals and is largely publicly funded. The annual budget of the NC3Rs is around £10 million, of which around £ 6.375 million is for “replacement” although this is not all NAMs as includes replacing one species with another. This equates to just 0.016%. Such nominally low figures for funding of replacement methods are supported by a previous study which compared funding between countries including the UK. (11) [Table 1](#)

There is an urgent need for greater funding to improve the human relevance of research and improve human safety and protection by accelerating the uptake of NAMs.

We refer you to [APPG Human Relevant Science](#) for more information on funding and the lack of uptake of NAMs.

The NC3Rs commissioned Dr Frances Rawle, former Director of Policy, Ethics and Governance at the Medical Research Council (MRC), to produce a detailed review of the current 3Rs landscape. [NC3Rs Rawle Report](#) This is highly critical of the lack of funding and availability of information of “replacements.” Extract from conclusions is that: “...so the best strategy for improving this situation would be to ensure that the expert peer review organised by the funders explicitly covers this area.” This is the subject of our first petition [Ref: 611810](#) where we suggested an advisory NAMs specialist committee, even an independent report reached the same conclusion.

1.6 The statistics and ethics

In 2023, there were 2.68 million scientific procedures on living animals carried out in GB. Additional statistics, last published in 2017, revealed 1.81 million non-GA animals were bred for scientific procedures but were killed or died without being used in regulated procedures.

There is a strong ethical case for replacing animals with modern, human relevant, innovative methods.

1.7 The regulators – Animals in Science Regulation Unit (ASRU)

During 2023, there were just 14.54, full-time equivalent, Home Office inspectors. Of these only 5.75 were tasked with audits of the over 4 million animals in laboratories. Lack of regulatory oversight, combined with the sheer number of animals held in laboratories, means that shocking welfare violations occur. The ASRU annual reports for 2023 were published in December 2024. Non-compliance cases show a significant increase to 169 from 61 in 2021 this is despite inspections/audits reducing from 214 in 2021 to 69 in 2023.

Remedial action, in almost all cases, is a letter or advice. Non-compliance falls under systems relying on self-reported or whistleblower testimony, leading to a worrying lack of oversight by the regulatory authority. The reality is neither the Home Office Animals in Scientific Regulation Unit (ASRU) or the public know what is happening behind those closed doors. The self-reported non-compliance cases will be just the tip of the iceberg. Additionally, ASRU is fully funded by those it regulates leading to a conflict of interest and lack of independence.

Sadly, the cruel treatment of animals within laboratories continues under the falsehood that the ASRU regulation of ASPA, provides adequate protection for laboratory animals. In February 22, Chris Sherwood, CEO of the RSPCA, resigned from the ASRU change programme steering committee, citing lack of confidence in this Regulator. The regulated community and wider stakeholders also have expressed concerns that there was inadequate consultation in the regulatory reform that was implemented in July 2021.

2.0 The Government response to the petition and a recent MP written question

[MP written answer 04.03.25](#) re the 96% predictive accuracy of dogs to humans. This figure comes from the 2017 Monticello paper which used a tiny sample size of 182 also universally acknowledged inferior statistical techniques. A 2019 paper Bailey/Balls (5 – pages 2 and 3 on link) gives a full rebuttal to this earlier paper. We can put MPs in touch with Dr Jarrod Bailey to explain more fully.

[Government response to petition](#) scroll to government response.

We strongly dispute that ‘the carefully regulated use of animals in scientific research remains necessary to protect humans, animal health and the wider environment.’ The continued use of animals is failing both animals and humans. We have much evidence supporting that the regulator is not fit for purpose and is certainly not protecting laboratory animals. Quite simply there are no rigorous regulatory controls, just mountains of paperwork and tick boxes completed by inspectors, researchers and AWERBS who have no knowledge of NAMs.

The cessation of use of non-predictive animal models for human health must be Government led. It is the Government that must radically reallocate financial resources and demand review of NAMs validation processes. If something does not work it should be stopped, not phased out as a long term goal. As for using a biological system, it cannot be predictive of a different biological system. As humans we also show individual differences regarding the efficacy or toxicity of drugs/chemicals. Even identical twins will have different diseases and respond differently to treatments.

Current Government funding is less than 1% of that granted to animal research.

Animal testing is not required by legislation. There are absolutely no regulations, guidelines or even expectations that dogs must be used to predict human efficacy or toxicity – a dog ban for repeat dose toxicity is a reasonable ask that can happen immediately by exempting their use and as a first step to stopping the use of animals altogether.

3.0 References and links

1. Bailey J, Thew M, Balls M. An analysis of the use of animal models in predicting human toxicology and drug safety. *Altern Lab Anim* 2014;42: 189-99.
2. Bailey J, Thew M, Balls M. Predicting human drug toxicity and safety via animal tests: can any one species predict drug toxicity in any other, and do monkeys help? *Altern Lab Anim* 2015;43: 393–403.
3. [Siramshetty BV, Nickel J, Omieczynski C, et al. WITHDRAWN—a resource for withdrawn and discontinued drugs. *Nucl Acids Res* 2016;44: D1080-6](#)
4. [Meigs L, Smirova L, Rovida C, Leist M, Hartung T. Animal testing and its alternatives—the most important omics is economics. *ALTEX* 2018; 35:275–305.](#)
5. Jarrod Bailey and Michael Balls: Recent efforts to elucidate the scientific validity of animal-based drug tests by the pharmaceutical industry, pro-testing lobby groups, and animal welfare organisations. 2019 [Paper Link](#)
6. Guidance on the operation of the Animals (Scientific Procedures) Act 1986 (ASPA)
<https://www.gov.uk/government/publications/the-operation-of-the-animals-scientific-procedures-act-1986/the-operation-of-the-animals-scientific-procedures-act-1986-aspa-accessible>
7. Housing and care of animals used for scientific purposes: code of practice
<https://www.gov.uk/government/publications/code-of-practice-for-the-housing-and-care-of-animals-bred-supplied-or-used-for-scientific-purposes>
8. Establishment licence: standard conditions
<https://www.gov.uk/government/publications/establishment-licence-standard-conditions/establishment-licence-standard-conditions>
9. New European Union Statistics on Laboratory Animal Use – What Really Counts!
<https://www.altex.org/index.php/altex/article/view/1755/1722> see Table 3
10. Performance assessment and economic analysis of a human Liver-Chip for predictive toxicology
<https://www.nature.com/articles/s43856-022-00209-1>
11. EU member state government contribution to alternative methods
https://crueltyfreeinternational.org/sites/default/files/2021-10/Taylor_member%20state%20alternatives%20funding_ALTEX_2014.pdf Table 1