

## Americans for Medical Progress Written Statement to ICCVAM Public Forum 2025

Americans for Medical Progress appreciates the opportunity to provide written comments to the ICCVAM 2025 Public Forum. As a nonprofit organization that advocates responsible and ethical biomedical research, we support the thoughtful integration of NAMs, where feasible and scientifically validated, while also recognizing the continued importance of animal models for many areas of science.

As the research community navigates this pivotal point in research and technology development, ICCVAM's role as a convener and trusted builder of cross-sector partnerships will be essential. The recommendations below highlight how ICCVAM can serve as a neutral and impartial leader to support these initiatives. They build upon AMP's [recent comments](#) to FDA and NIH regarding the Reducing Animal Testing workshop, while specifically considering this group's role, strengths, and capabilities.

**1. Establish a Standardized Definition of NAMs.** ICCVAM is uniquely positioned to provide much-needed clarity to the field—beginning with standardizing the definition and use of the acronym “NAMs.” Currently, this acronym holds several different definitions and connotations for various stakeholders, including federal agencies. To address this, ICCVAM could lead a formal effort to distinguish between NAMs as specific non-animal technologies (“Non-animal Models,” “Novel Alternative Methods,” etc.) and NAMs as a broader cultural shift that embraces the 3Rs framework and a more holistic approach to modern research (“New Approach Methodologies”). This clarity would significantly benefit policy discussions and public communication.

**2. Promote Understanding of Federal Policy Changes.** Secondly, we urge ICCVAM to take on a more proactive educational role. Recent announcements from FDA and NIH—such as the FDA's [roadmap](#) to reduce animal use and the creation of NIH's new [Office of Research Innovation, Validation, and Application](#)—signal major changes in how research is conducted and funded. NIH's shift in funding opportunity language to encourage broader use of human-relevant methods is an exciting development. However, the rollout has generated widespread confusion, which is being compounded by misinformation—intentional or otherwise. This is a critical time for transparency, and ICCVAM can serve as a credible voice to explain what these policy changes really mean, especially in areas like research design, funding eligibility, and the appropriate consideration of NAMs.

While AMP fully supports the advancement of NAMs, it's equally important to acknowledge their scientific limitations. Animal models remain essential for many disciplines, such as neuroscience, immunology, developmental biology, and behavioral research, and have been critical in advancing groundbreaking treatments. This is evident in recent developments,

including the successful application of [personalized gene therapy](#) in a nine-month-old baby and the FDA's [recent approval](#) of a new injection for HIV prevention. We caution against prematurely removing these models before alternative options are validated, reliable, and regulatory-ready, as doing so could endanger patient safety and undermine scientific integrity. We appreciate ICCVAM's role in this space thus far—including recent publications and ongoing workgroups—and encourage continued collaboration with the research advocacy community.

**3. Proactively Engage with the Veterinary and IACUC Community.** Finally, as part of ICCVAM's role as a bridge between funding agencies and stakeholders, we urge you to proactively include veterinarians, animal care experts, and Institutional Animal Care and Use Committee (IACUC) professionals in these conversations. These individuals are essential to ensuring refinement and responsible use of animals, and their insights into protocol development, alternative model/literature searches, and study design are invaluable—yet often underrepresented.

At AMP, we recognize that improving science, advancing public health, and maintaining strong ethical standards are shared goals. ICCVAM is well-positioned to move past polarized debates and help guide a more balanced and collaborative approach that supports both scientific progress and animal welfare.