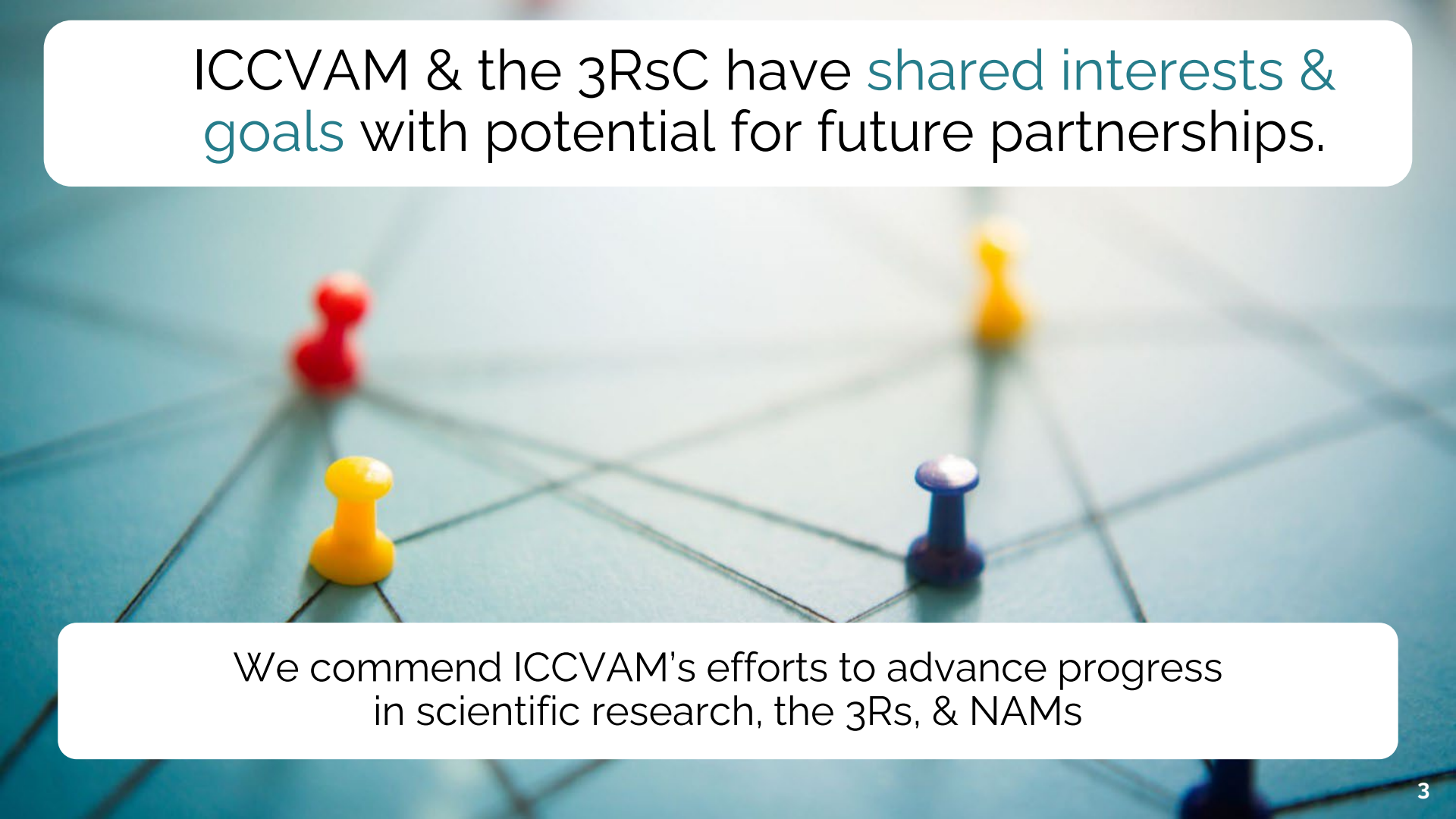
The 3Rs Collaborative (3RsC):
ICCVAM Public Comment, July 2025

The 3RsC's is a U.S. based non-profit whose mission is to advance better science – for both people & animals.

We achieve this goal through facilitating collaborative 3Rs efforts.

ICCVAM & the 3RsC have shared interests & goals with potential for future partnerships.



We commend ICCVAM's efforts to advance progress in scientific research, the 3Rs, & NAMs

3 Key Recommendations

Rec #1 Increase federal partnership with and funding for the 3Rs Collaborative

The 3RsC's work is non-partisan,
balanced across all 3Rs, &
trusted by both animal and non-animal stakeholders.

The 3RsC's efforts span across critical topics:

Culture of Care

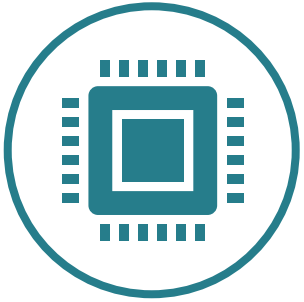
Environmental Health Monitoring

Translational Digital Biomarkers

Artificial Intelligence

3Rs Certificate Course

Refinement (Mouse Handling & NHP)



Microphysiological Systems

The 3RsC already collaborates with the FDA, NIH, & EPA

Member of the FNIH's NAMs Validation & Qualification Network

Active PPP with FDA-CDER & working on regulatory focused collaborative cross-platform MPS DILI project

Federal reps on our BOD, AI, and MPS initiatives (We welcome more!)

To expand our reach, recommend increasing funding & establishing the 3RsC as an independent 3Rs Center in the US

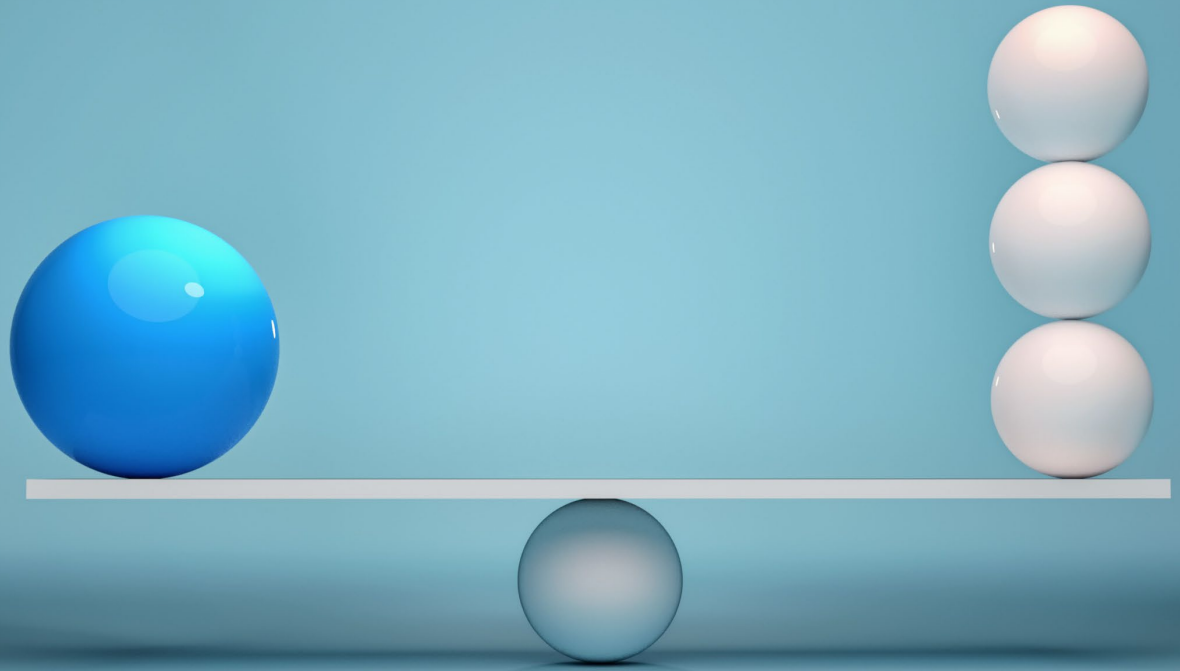
We also recommend mandating comprehensive 3Rs training as part of a responsible conduct of research.

Our recently released 3Rs Certificate Course could fulfill this requirement

Rec #2 Prioritize strategic partnerships across all scientific research.

Meaningful culture change requires inclusive engagement across the scientific ecosystem – from laboratory animal veterinarians to in vitro scientists.

Communications, workshops, and funding opportunities should be realistic, balanced, and evidence-based.



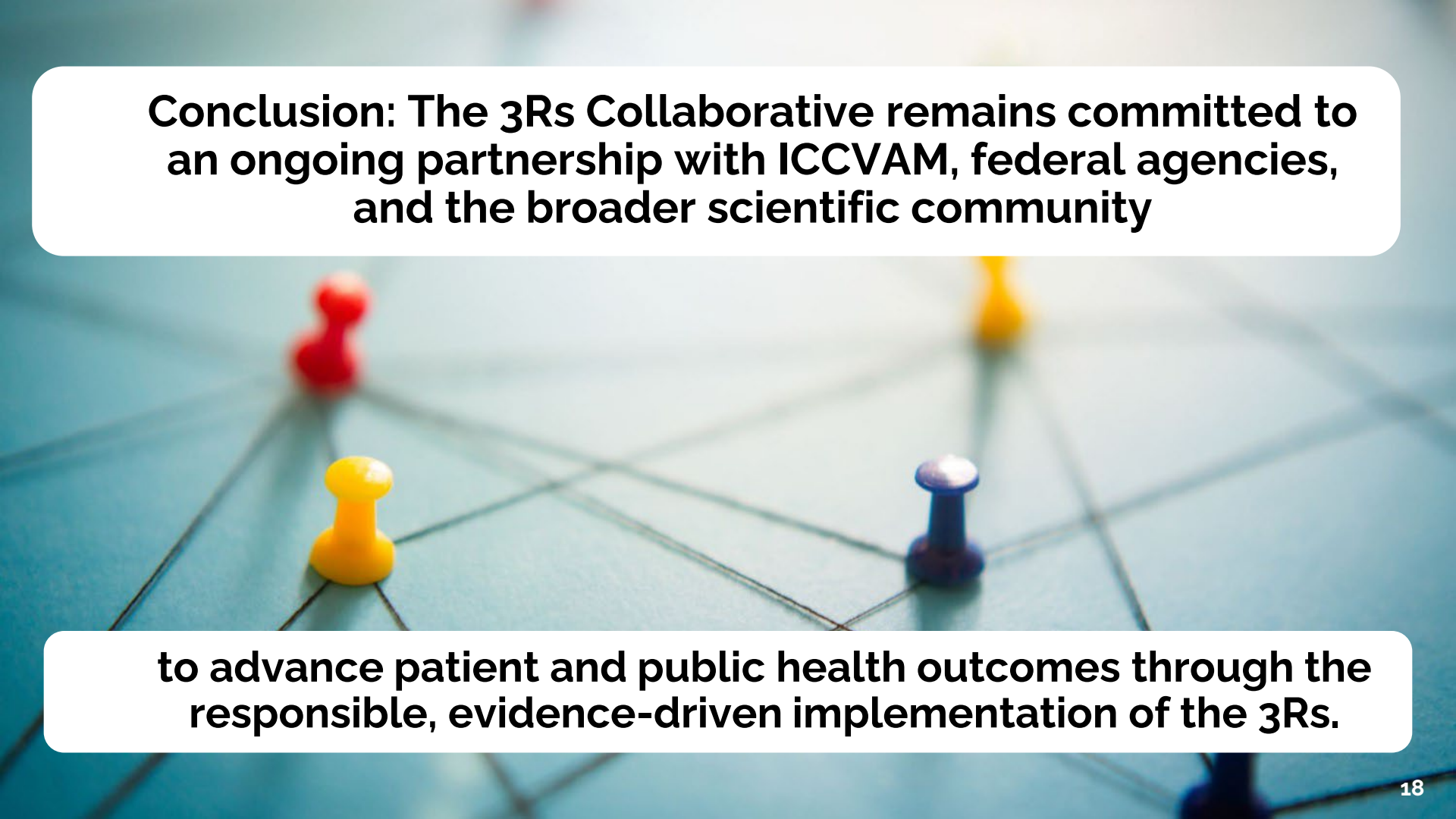
Overpromising the current capacity of NAMs,
while dismissing the continued value of animal models,

risks alienating the very research organizations we need to reach while simultaneously undermining public trust in science

Rec #3 Focus on the most predictive models that incorporate all 3Rs to advance public health & patient outcomes.

Prioritize research with the highest scientific merit and potential impact, regardless of the model type, ensuring full implementation of all 3Rs.

As Replacement will not happen overnight, Reduction & Refinement should be pursued in parallel, to promote ethical, translational research through good experimental design and improved animal welfare.



Conclusion: The 3Rs Collaborative remains committed to an ongoing partnership with ICCVAM, federal agencies, and the broader scientific community

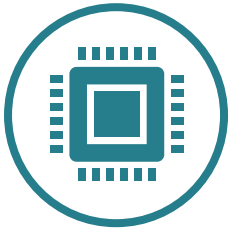
to advance patient and public health outcomes through the responsible, evidence-driven implementation of the 3Rs.

To follow along with the 3RsC sign-up for our newsletter & check out our website: 3rc.org

SCAN ME

Email 3RsC's executive director: meglafollette@3rc.org

All 3Rs are a critical part of NAMs



Replacement

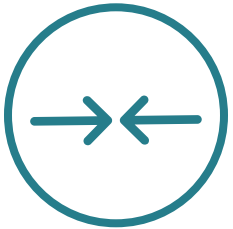
Avoiding the use of animals where they otherwise would have been used.

Examples: In Vitro, In Chemico, In Silico, Ex Vivo, or Training technologies such as microphysiological systems, computer modeling, etc.

Refinement

Minimizing pain & distress providing positive experiences to enhance well-being throughout an animals' lifetime.

Examples: enrichments, positive reinforcement training, better housing & handling, pain relief, etc.



Reduction

Ensuring that animal studies that occur use techniques to support rigor and reproducibility while minimizing animals necessary to answer the scientific question.

Examples: Fit for purpose experimental design/statistics/analysis, tissue sharing, improved colony management, animal re-use (when well-justified), etc.