

The 3Rs Collaborative (3RsC): SACATM Public Comment, September 2025



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



Refine.
Reduce.
Replace.

We achieve this goal through facilitating collaborative 3Rs efforts.

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

We commend SACATM'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**



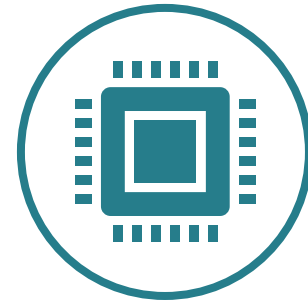
**Artificial
Intelligence**



**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

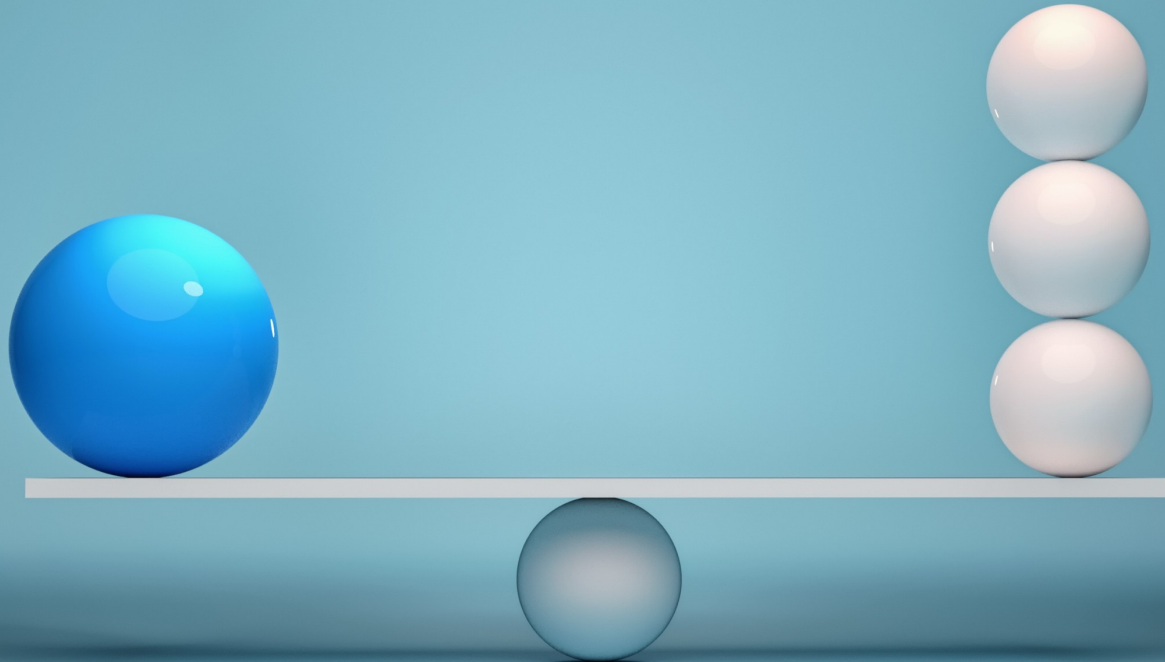
An abstract graphic of a network or mesh structure, composed of numerous small black dots connected by thin black lines, forming a complex, interconnected web that spans the width of the slide. The dots and lines are more densely packed in some areas, creating a sense of depth and complexity. The overall color scheme is grayscale, with the network elements appearing in dark gray against a lighter gray background.

Rec #2 Prioritize strategic partnerships across all scientific research.



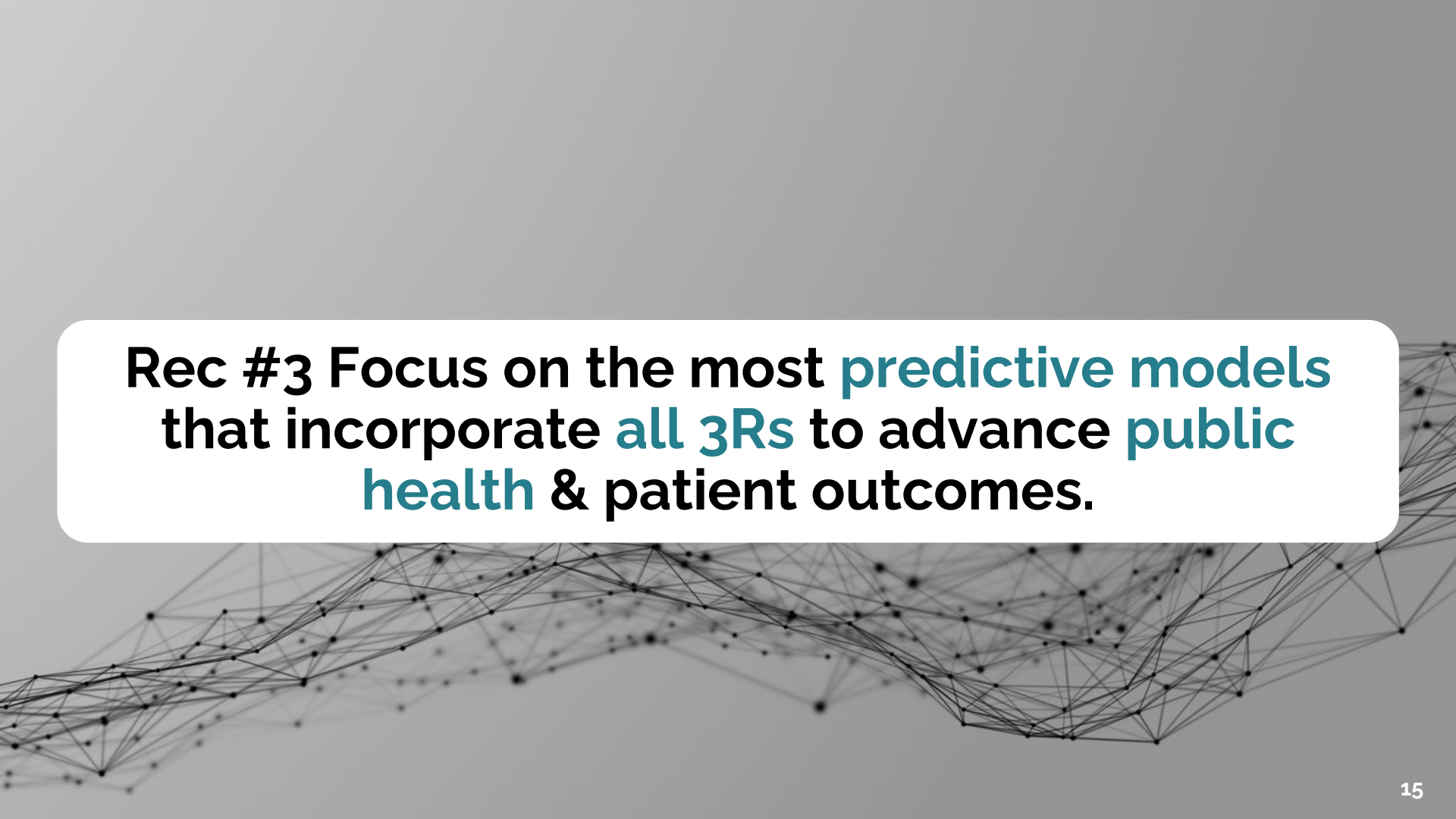
Meaningful culture change requires **inclusive engagement** across the scientific ecosystem – from laboratory animal veterinarians to in vitro scientists.

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





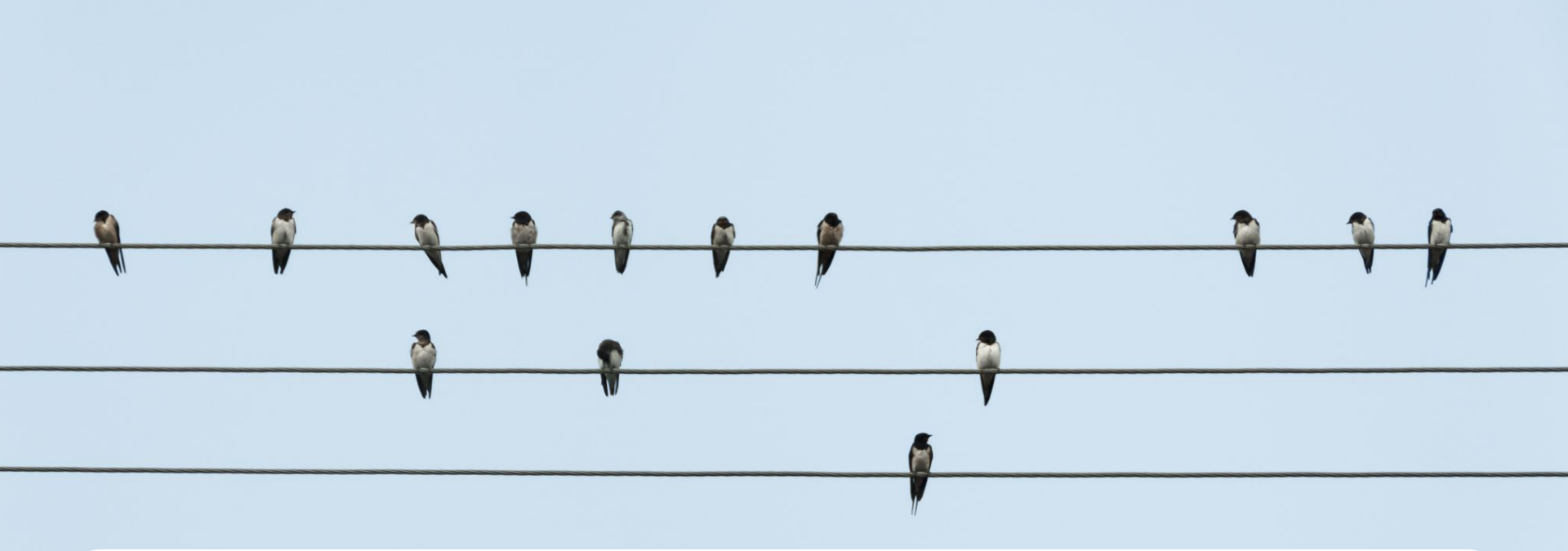
Overpromising the current capacity of NAMs, while dismissing the continued value of animal models, risks alienating the very research organizations we need to reach while simultaneously undermining public trust in science



**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.

The background of the slide is a close-up photograph of a blue surface with a white grid pattern. Several colorful pushpins (red, yellow, and blue) are pinned to the grid, creating a sense of strategic planning or data visualization.

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

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

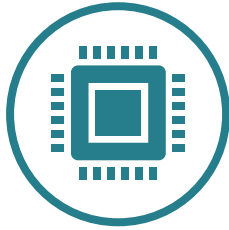
To follow along with the 3RsC sign-up for our newsletter & check out our website: 3rc.org



Email 3RsC's
executive director:
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SCAN ME

All 3Rs are a critical part of NAMs



Replacement

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

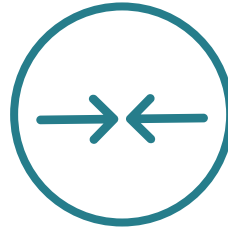
Examples: In Vitro, In Chemico, In Silico, Ex Vivo, or Training technologies such as microphysiological systems, computer modeling, etc.



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.