

The 3Rs Collaborative's Written Comments to ICCVAM Public Forum 2026

The 3Rs Collaborative (3RsC), a US-based non-profit dedicated to advancing better science – for both people and animals – believes that **progress in scientific research, the 3Rs, and NAMs must be measured by improved scientific outcomes for patients and public health**. We commend ICCVAM's efforts to work across stakeholders to provide funding for the development, characterization, validation, and qualification of NAMs for specific contexts of use such as through the Complement-ARIE program, FNIH NAMs VQN, ORIVA, SOM, and the Technology Development Centers.

The 3RsC offers three recommendations for ICCVAM going forward.

1. **Bolster efforts to advance Reduction and Refinement, alongside Replacement, as outlined in the ICCVAM Authorization Act.** The act defines alternative methods as new or revised test methods that, alongside replacements, “reduces the number of animals requires” or “refines procedures to lessen or eliminate pain or distress to animals, or enhances animal well-being.” As replacing animal research is a gradual process, numerous animals are and will continue to be used for scientific research for many years. Therefore, ICCVAM has an ethical priority to advance Reduction and Refinement in parallel to ensure translational research through robust experimental design and improved animal welfare. Full implementation of all 3Rs advances scientific research as a whole and addresses concerns related to humane research practices. In turn, Reduction and Refinement should also be given dedicated funding streams, training, and communication efforts alongside Replacement. Closer partnership with the 3RsC would accelerate these efforts including requiring stakeholders to take our 3Rs Certificate Course as part of Responsible Conduct of Research Training.
2. **Prioritize strategic partnerships and constructive relationships across scientific research.** Communications, workshops, and funding opportunities should present realistic, balanced and evidence based expectations. Meaningful culture change requires inclusive engagement across disciplines including both animal researchers and NAMs researchers. from laboratory animal veterinarians to in vitro scientists. When outputs do not match or holistically condemn animal research, the scientific community is left without clarity, policy makers are led to believe that practices are ahead of where they are, and the public are misled as to the current state of science and the importance and value of animal models. Human relevance should be treated as a shared scientific objective that may be advanced through NAMs, animal models, human data, or integrated approaches, depending on the question and context of use. Harassment, vilification, or dismissal of individuals based on the methods they develop or use is unacceptable and undermines both scientific progress and public trust. The 3Rs Collaborative is uniquely positioned to create and sustain trusted spaces where experts can come together, establish realistic expectations, address areas of disagreement, and develop practical, evidence based pathways forward. Its expertise in scientific communication, behavior change, and cross sector engagement can help translate collaboration into meaningful and durable culture change.
3. **Align on a goal-directed, harmonized definition of NAMs.** The lack of a clear definition of NAMs stalls progress as stakeholders debate what should be included in efforts rather than focusing on confidence building efforts. The 3RsC has recently proposed such a harmonized

definition in [LaFollette et al. 2026](#): “*New Approach Methodologies (NAMs) are technologies that do not directly involve live animals and generate mechanistic or predictive information to advance biological understanding or inform decisions related to human, animal, or environmental health. They typically rely on target species’ data, cells, tissues, or computational approaches. These technologies may, but do not always, contribute to the 3Rs of animal research.*”

Conclusion: A Call for 3Rs Partnership

The 3Rs Collaborative appreciates the opportunity to contribute to this dialogue. There is a clear need for funding on 3Rs research, education, reproducibility, translation, and dissemination. The convergence of regulatory willingness, technological advancement, and organizational support presents an immense opportunity. We remain committed to ongoing partnership with ICCVAM & SACATM, federal agencies, and the broader scientific community to advance patient and public health outcomes through the responsible, evidence-driven implementation of the 3Rs. Please consider the 3Rs Collaborative as a resource and partner in these efforts.