

# The 3Rs Collaborative (3RsC): ICCVAM Public Comment, July 2026



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



Replace.  
Reduce.  
Refine.

We achieve this goal through facilitating collaborative 3Rs efforts.

We commend ICCVAM's efforts to work across stakeholders.

Providing funding for the development, characterization, validation, & 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.

**New: 3Rs Executive Committee!**



# 3 Key Recommendations

**#1 Bolster efforts to advance  
Reduction and Refinement,  
alongside Replacement, as outlined  
in the ICCVAM Authorization Act**

The ICCVAM Authorization act defines alternatives as new or revised test methods that (in addition to replacements)...

reduces the number of animals required

refines procedures to lessen or eliminate pain or distress to animals, or enhances animal well-being



As Replacement is a gradual process, **Reduction & Refinement** should be pursued in parallel, to promote ethical, translational research through valid experimental & statistical design and improved animal welfare.



Full implementation of the 3Rs advances scientific research as a whole & addresses concerns related to humane research

Reduction &  
Refinement should be  
given dedicated  
funding streams,  
training, &  
communication

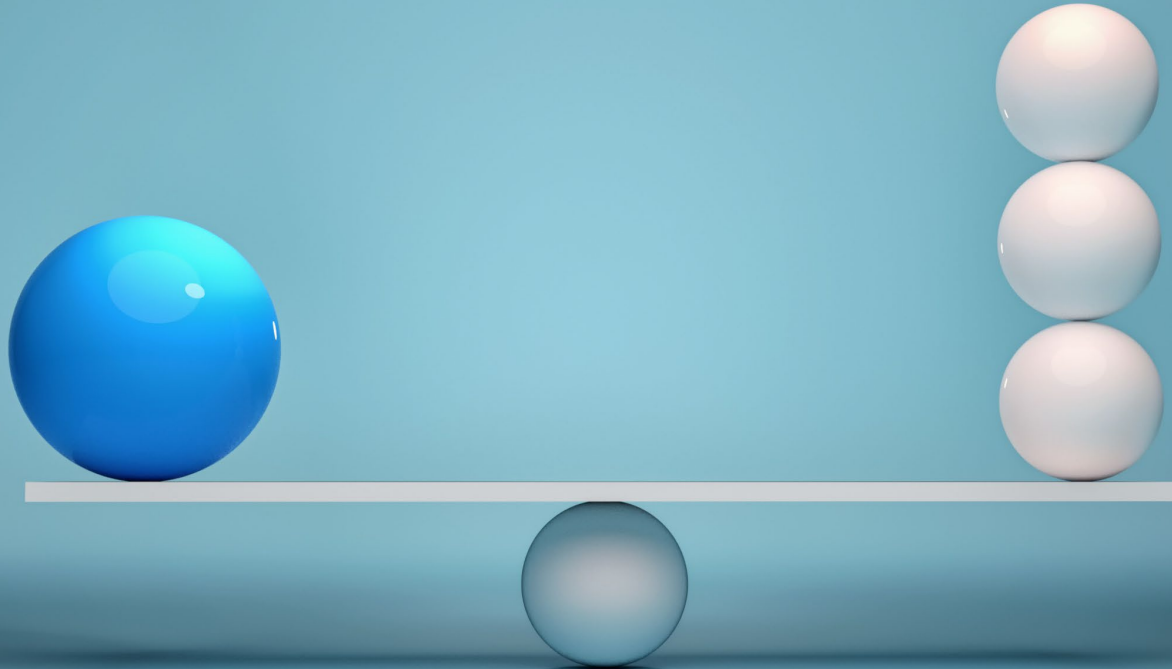
Alongside Replacements



The 3RsC's 3Rs Certificate Course could be required as part of Responsible Conduct of Research Training

**#2: Prioritize strategic partnerships  
& constructive relationships **across**  
**scientific research.****

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





Meaningful culture change requires  
**inclusive engagement** across disciplines – including both  
animal and NAMs researchers.



**When outputs do not match evidence & practice, or holistically condemn animal research:**

- The scientific community is left without clarity
- Policymakers are led to believe that practices are ahead of where they are
- The public is 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 3RsC is uniquely positioned to create and sustain trusted spaces with our expertise in balanced scientific communication, behavior change, & cross-sector engagement

# **#3: Align on a goal-directed, harmonized definition of NAMs.**

(Or perhaps preferring “human-based” or “species-specific”  
rather than “human-relevant”)

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.



**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.

The 3RsC remains committed to an ongoing partnership with ICCVAM.

Please consider us a resource & partner.

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

3rc.org



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