

# Acting Differently in 2026

Integrated Actions, Updated KPIs and Urgent Measures  
to Deliver Real Commitment Beyond the November  
2025 “Replacing Animals in Science” Strategy

## Why We Still Need More Than the Current Strategy

The expertise bottleneck, cultural inertia and half-measures remain unaddressed.

The strategy's training stops largely at early-career level with:

- no hard people metrics,
- no clawback for failure to deliver trained assessors,
- no "NAM-first" default with public audit,
- no mandatory cross-sector fellowships,
- no inversion of the <1% NAM investment ratio.

## Acting Differently in 2026

### Integrated Actions, Updated KPIs and Urgent Measures to Deliver Real Commitment Beyond the November 2025 “Replacing Animals in Science” Strategy

The November 2025 strategy marked an important milestone. For the first time, senior UK bodies publicly committed to accelerating the replacement of animals in science through New Approach Methodologies (NAMs). That commitment is welcome – yet it is not yet sufficient. Expertise remains critically scarce, cultural resistance is still deeply embedded, and the measures announced are largely confined to early-career training with no binding targets, no financial accountability, and no reversal of the longstanding <1% investment ratio in NAMs.

This short document closes those gaps. It sets out: Consolidated and strengthened KPIs for 2026–2028 across the four essential pillars:

People & Training

Funding & Investment

Validation & Regulation

Transparency & Phase-Out)

Priority actions that fully integrate and reinforce every relevant existing proposal . A Unified 8-Point Action Plan – a clear, ready-to-raise checklist that ministers, funders, regulators and sector leaders can adopt immediately. These proposals are deliberately practical, fully costed in principle, and designed to be implemented within the current financial year. They turn the 2025 strategy from an aspirational framework into a delivery machine that will deliver measurable reductions in animal procedures, rapid upskilling of the workforce, and genuine scientific and commercial leadership for the UK. Decision makers now have everything required to act differently in 2026. The following pages provide the evidence, the metrics and the exact actions needed.

# Closing the critical gaps How?

## Consolidated & Updated KPIs (2026-2028)

### People & Training

- >90% NAM-fluent training coverage across all cohorts (PhD/early-career + mid-career researchers + MHRA/Home Office assessors + AWERB members) by end-2027
- 500+ completed secondments to NAM labs or regulators by 2027
- $\geq 75\%$  average improvement in NAM competency (pre/post assessments)
- Launch of mandatory 2-year cross-training fellowships with fast-track assessor certification and retention bonuses (2026 start)

## Funding & Investment

- Every pound of strategy funding (hub, UKRI, NC3Rs, Validation Accelerator) tied to audited human-capital metrics with clawback for missed targets
- $\geq 50\%$  of all new relevant grants awarded to NAM-based projects by 2027
- Inversion of current  $< 1\%$  NAM investment ratio  
→  $\geq 20\%$  of relevant public + charitable R&D spend on NAMs by 2028

## Validation & Regulation

- $\geq 15$  high-impact NAMs validated and regulatorily accepted per year from 2026
- Average validation-to-acceptance time reduced to  $\leq 12$  months
- $\geq 20\%$  annual increase in NAMs listed as “preferred” for submissions
- $\geq 30\%$  reduction in animal procedure licences for incentivised endpoints by 2028
- $> 10\%$  year-on-year decline in animal procedures (beyond baseline trends) directly attributable to incentives

## Transparency & Phase-Out

- Expanded real-time dashboard live Q3 2026 with monthly public updates on trained personnel, NAM adoption rates, and procedure reductions
- Binding timetable for full phase-out (with 5-year review milestones and exceptional-case only provision)
- $\geq 25\%$  year-on-year increase in NAM uptake in discovery and translational research

Four Priority Demands (All  
Documents Integrated &  
Strengthened)

## 1. Treat the People Bottleneck as the Emergency It Is

- Tie every pound of the strategy's funding (hub, UKRI increases, Validation Accelerator, NC3Rs) to the audited human-capital KPIs above. Grants and hubs are contingent on delivery; miss targets and funds are clawed back.
- Launch mandatory, high-stakes 2-year cross-training fellowships (government-backed and generously funded) that rotate top talent between regulators, pharma, academia and NAM tech companies (XCELLR8, Kirkstall, etc.).
- Make NAM fluency a career accelerator with fast-track assessor certification and retention bonuses.

## 2. Investment – Invert the Ratio and Capture the Opportunity Early

- Tax incentives for UK universities to establish undergraduate NAM labs in co-operation with pharma and multinationals (postgraduate is too late).
- Create four home-nations “NAM Chairs” (chosen for innovation excellence, not just Oxbridge).
- Additional ring-fenced start-up funds for spin-outs and incubators.
- Official advisory group (Animal Free Research UK, XCELLR8, Kirkstall, etc.) to guide ethical investment and commercial opportunities.

### 3. Regulation – Enforce NAM-First Default + Accelerate Validation

- Introduce a true “NAM-first” regulatory default: sponsors submit NAM packages as standard; animal data only after documented, independent justification and mandatory public audit.
- Regulators requesting bridging studies without clear failure evidence face performance reviews.
- Strengthen the announced Validation Accelerator with ring-fenced grants and streamlined processes for complex endpoints (PK, cardiovascular safety, systemic toxicity).
- Make validated NAMs compulsory where they exist, force duplication out of regulations, roll out Tox-21 style high-throughput and virtual screening nationwide, and remove the de-facto “2-species rule” where alternatives provide equivalent or better evidence (proven during COVID vaccine acceleration).

## 4. Transparency, Accountability & Culture Change

Upgrade the strategy's planned 2026 dashboard to real-time with the expanded metrics listed above, plus monthly public updates and corporate responsibility reporting on alternatives.

Additional actions not covered by the strategy:

- Engage government immediately for the tax incentives and undergraduate NAM labs.
- Set a binding timetable for full phase-out (except exceptional cases) with 5-year review milestones, learning from the Netherlands 2025 and US EPA 2035 commitments.
- Restart and expand the public attitudes survey to track support for end-dates and NAM investment.

## Unified 8-Point Action Plan (Ready-to-Raise Checklist)

1. Funding tied to audited people KPIs + clawback (2026 onwards)
2. Mandatory 2-year cross-training fellowships + retention bonuses (launch 2026)
3. NAM-first default with public audit + regulator performance reviews (immediate guidance update)
4. Undergraduate NAM labs + four national NAM Chairs + spin-out incubators (2026–27)
5. Validation Accelerator strengthened +  $\geq 15$  NAMs/year accepted (from 2026)
6.  $\geq 50\%$  grants to NAM projects + investment inversion to  $\geq 20\%$  by 2028
7. Compulsory NAMs where validated + Tox-21/high-throughput rollout + end to unnecessary duplication
8. Expanded real-time dashboard + binding phase-out timetable + monthly public reporting (dashboard live Q3 2026)