



Socio-Technical Barriers to the Uptake of NAMs

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Workshop on a Roadmap Towards Phasing Out Animal Testing...

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Brussels

PrecisionTox and ASPIS

“Working to advance the safety assessment of chemicals without using animal testing”



**Embedded
Translation**



Research

Motivation:

- Why are animal tests still used, despite alternatives being developed?

What is the main outcome:

- Inform work for a solutions action plan

Why the work was done:

- Understand nuances and determine root causes
- Transition theory: What are technical and social issues?

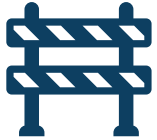
Methodology:

- Building on previous scholarship
- Semi-structured interviews; Qualitative analysis

Interviewees	Locations		Regulations
Industry Regulators Policy	EU USA Australia	UK Canada	Industrial Chemicals Agrichemicals CLP Cosmetics



Science



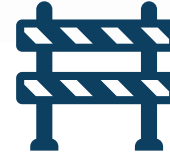
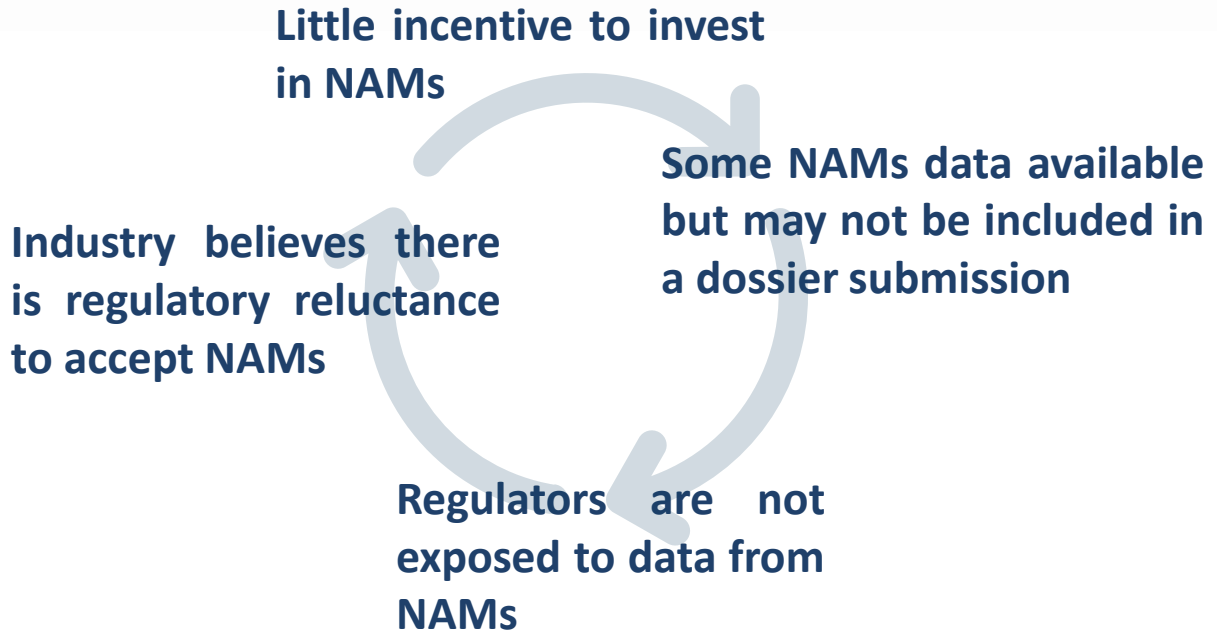
- Divided opinion – ready? What for?
- Resources needed (time, cost, people), including for validation



- Familiarity (confidence that making the ‘right’ decisions)
- Doubts due to language (‘uncertainty’)
- Different risk tolerances
- Scepticism of motives (trust)

“The simple reality is that there's too many chemicals, not enough time, and not enough toxicologists” - Regulator

Regulation / Regulatory Culture



Legislation wording (REACH, CLP)



Flexibility pros / cons
Interpretation, soft law guidance
Leadership
Societal expectations

“[Regulators] are individuals paid to do a job and follow law and follow guidelines. They're not paid to do anything different to that. So, I think the regulatory acceptance piece, we're really talking about policymakers” - Industry



- **Predominance of social rather than technical barriers**
- **Rules, standards:** incremental change, soft law guidance (interpretation)
- **Science, technology:** relevant, reliable, fit for purpose decisions
- **Actors, institutions:** Appropriate communication from and for all, leadership and clear direction, coordination, dialogue, collaboration
- **Clear value of NAMs:** ethics, time and cost comparison, better science, legal

Next for PrecisionTox's Embedded Translation: Expert stakeholder group to challenge scenarios and develop options...



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