The Physiological Society was founded in 1876; it is a learned society with over 3000 Members (including 24 Nobel Laureates) drawn from over 60 countries. The Society supports physiology research and education, which ultimately benefits the health of the population and facilitates the prevention and treatment of disease.

The Physiological Society welcomes the Home Office consultation on the transposition of the European Directive 2010/63/EU on the protection of animals used for scientific purposes (henceforth referred to as 'the Directive'). Members of The Society have been centrally involved with the preparation of the UK Bioscience Sector Coalition response (henceforth referred to as 'the Coalition'), and we fully endorse their submission.

It is critical that the Directive is transposed in a fashion that enables high-quality research and the concomitant scientific and medical benefits such work will permit, whilst not only retaining (and indeed promoting) high standards of animal welfare , but also ensuring public confidence in the research carried out.

Our Society has members throughout the EU and beyond, and as a result we are aware of how the current regulatory system can restrict international cooperation. We consider it a high priority for the EU to promote transnational research and we therefore believe it is vital to implement the Directive's goal of harmonisation of regulation across Europe. Failure in this would not only restrict the mobility of staff and projects across the EU, but would also incur competitive disadvantage to the United Kingdom research and science base, in comparison to our global competitors.

The Directive is wisely written in putting a strong emphasis on the 3Rs rather than on control of the procedures to be undertaken. While promoting welfare, this permits the flexibility in day to day research that is sometimes lacking under the current regulation. We would also caution against absolute rules and bans because these are in danger of having unintended consequences.

Our Society is solidly behind the drive to maximise the welfare of animals used in all areas of biomedical research. In that regard we will support any measures that are based on sound evidence that welfare benefit would accrue. We are, however, aware that the strictest regulation is not necessarily the best for promoting either welfare or research.

In the light of the above, we support the Coalition recommendation that the default option should be to transpose the minimum requirements of the Directive. Where current UK specifications exceed those of the Directive it is important for all the above reasons to ensure that there is an objective assessment of the evidence base before retaining more stringent controls.

We believe it important that the public has confidence in the animal work that is carried out, and consider that greater general openness and transparency in relation to the use of animals in scientific research will aid this. One area of public concern is the number of animals subjected to procedures

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causing distress. While we support the concept of retrospective reporting of severity, we have some concerns over how onerous the eventual requirements will be. We would welcome greater clarity for the public over how low the levels of distress are for most animals currently returned in the statistics as undergoing procedures. A significant issue here is the number of transgenic animals with behaviourally undetectable phenotypes that are currently returned as undergoing a procedure. We strongly support the Directive in allowing such strains to be excluded from both controls and statistics. We also consider it essential that there is parity of statistical reporting between member states.

In summary, we consider the Directive to provide a well-planned and balanced structure for promoting both science and animal welfare. It is incomplete in a few areas and differs from current UK regulation in others. We support the recommendations of the Coalition in how the UK could best approach the resulting issues.

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