



**GRICE**

“

Common  
organization and  
operating rules  
of ethics committees  
for animal  
experimentation

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1<sup>st</sup> edition - March 2018



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GIRCOR

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DOCUMENT PREPARED BY GRICE

(GROUPE DE RELEXION INTERPROFESSIONNEL SUR LES COMITES D'ETHIQUE  
/ INTERPROFESSIONAL REFLECTION GROUP ON ETHICS COMMITTEES),

A WORKING GROUP AT GIRCOR

(GROUPE INTERPROFESSIONNEL DE REFLEXION ET COMMUNICATION SUR LA RECHERCHE /  
INTERPROFESSIONAL REFLECTION AND COMMUNICATION GROUP ON RESEARCH)

FOLLOWING THE RECOMMENDATIONS OF THE CNREEA

(COMITE NATIONAL DE REFLEXION ETHIQUE SUR L'EXPERIMENTATION ANIMALE /  
FRENCH NATIONAL COMMITTEE FOR CONSIDERATION OF ETHICS IN ANIMAL EXPERIMENTATION)

AND AT THE REQUEST OF THE MINISTRY OF HIGHER  
EDUCATION AND RESEARCH

(WHICH ENSURES THE CNREEA SECRETARIAT)



## THE CNREEA

COMITE NATIONAL DE REFLEXION ETHIQUE  
SUR L'EXPERIMENTATION ANIMALE / FRENCH  
NATIONAL COMMITTEE FOR CONSIDERATION  
OF ETHICS IN ANIMAL EXPERIMENTATION

“ Within the framework which regulates the use of animals for scientific purposes<sup>1</sup>, the CNREEA is the advisory commission whose mission is to issue opinions on the ethical issues raised by animal experimentation (Articles R. 214-134 and followings of the Rural and Sea Fisheries Code). Its secretariat is provided by the services of the General Directorate for Research and Innovation (DGRI) of the Ministry of Research. According to its missions, it is responsible for leading the development and update of a guide on good operating practices of ethics committees for animal experimentation

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@ <sup>1</sup><http://www.enseignementsup-recherche.gouv.fr/cid70598/l-encadrement-reglementaire-de-l-utilisation-d-animaux-a-des-fins-scientifiques.html>



# LE GIRCOR

GRUPE INTERPROFESSIONNEL DE REFLEXION ET COMMUNICATION  
SUR LA RECHERCHE / INTERPROFESSIONAL REFLECTION AND  
COMMUNICATION GROUP ON RESEARCH <sup>2</sup>

“ GIRCOR is an association created in 1991 to help explain to the public the reasons and conditions for the use of animal experiments in biomedical research. It brings together public and private research institutions. It advocates scientifically sound and ethically acceptable research.

GRICE (Groupe de Réflexion Interprofessionnel sur les Comités d’Ethique / Interprofessional Reflection Group on Ethics Committees) is the GIRCOR’s working group devoted to the activities of ethics committees for animal experimentation (CEEAs), whose main mission is to promote ethical principles and the development of ethic committees. In 2012, the GIRCOR was mandated by the General Director for Research and Innovation to draw up two complementary reference documents relating to the activity of the CEEAs :

- *A document gathering common rules for the organization and operation of ethics committees: recruitment and renewal of members, conduct and proceedings of debates, building blocks of the rules of procedure and the activity report ;*
- *A document gathering the modalities for the ethical evaluation of projects by the committees.*

” This document responds to the first request. It was put together based on shared experience of professionals involved in ethics committees and grouped within GRICE, in relations with the DGRI’s services. It was approved by the CNREEA during its plenary session on the 10/19/2017. The second document will also be published to assist the CEEAs in their project evaluation mission.

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## 1.1 List of acronyms

- ARRETE** Ministerial Order of the 1<sup>st</sup> February 2013 concerning the ethical evaluation and the authorization of projects involving the use of animals in experimental procedures
- APAFiS** (Autorisation de Projet utilisant des Animaux à des Fins Scientifiques) - Project Authorization for the use of Animals for Scientific Purposes
- CEEA** (Comité d’Ethique en Expérimentation Animale) - Ethics Committee for Animal Experimentation
- CNREEA** (Comité National de Réflexion Ethique sur l’Expérimentation Animale) - French National Committee for Consideration of Ethics in Animal Experimentation
- CRPM** (Code Rural et de la Pêche Maritime) - Rural and Sea Fisheries Code
- DD(CS)PP** (Direction Départementale (de la Cohésion Sociale et) de la Protection des Populations) - Departmental Direction of (Social Cohesion and) Protection of Populations
- DGRI** (Direction Générale de la Recherche et de l’Innovation) - General Directorate for Research and Innovation
- EU** (Etablissement Utilisateur) - User Establishment
- GIRCOR** (Groupe Interprofessionnel de Réflexion et de Communication sur la Recherche) - Interprofessional Reflection and Communication Group on Research
- GRICE** (Groupe de Réflexion Interprofessionnel sur les Comités d’Ethique) - Interprofessional Reflection Group on Ethics Committees
- MESRI** (Ministère de l’Enseignement Supérieur, de la Recherche et de l’Innovation) - Ministry of Higher Education, Research and Innovation (referred to in this document as "the ministry")
- MOE** (Mise en Œuvre générale du projet et de sa conformité à l’autorisation de projet) - Overall implementation of the project and its compliance with the project authorization
- SBEA** (Structure chargée du Bien-Etre des Animaux) - Animal Welfare Body

## 1.2 Preface

Under the Directive 2010/63/EU on the protection of animals used for scientific purposes, France has set up an authorization procedure for projects using animals, and has identified as competent authorities the Ministry responsible for higher education and research (here called "the ministry") and the ethics committees for animal experimentation (CEEA) approved by the latter. The authorization of these projects by the ministry is based on the expertise of the CEEAs.

In fact, the CEEAs' main task is to carry out the ethical evaluation of projects as established in the Rural and Sea Fisheries Code (CRPM)<sup>3</sup> and in the Article 4 of the Ministerial Order of the 1<sup>st</sup> February 2013 concerning the ethical evaluation and the authorization of projects involving the use of animals in experimental procedures<sup>4</sup>, the term "project" being defined in Article R. 214-89 of the CRPM.

In this context, based on the regulatory texts and the National Charter on the Ethics of Animal Experimentation<sup>5</sup> (hereinafter referred to as the "National Charter"), this document proposes a set of organization and operation principles on the basis of which the CEEAs may draw up their rules of procedure. It aims to allow sufficient harmonization to ensure equal treatment of projects evaluated by the CEEAs while preserving the specific uses of institutions responsible for user establishments<sup>6</sup>.

The CEEAs may also adopt other standards such as the Guide for the ethical evaluation of experiments using laboratory animals, of which the 2009 version<sup>7</sup> is currently being updated (GIRCOR, forthcoming), the "Guide for the Care and Use of Laboratory Animals"<sup>8</sup> (NRC, 2011) and the specific recommendations each institution may have established internally.

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<sup>3</sup> Articles R. 214-87 to R. 214-137 and R. 215-10 of the Rural and Sea Fisheries Code (CRPM)

<sup>4</sup> Ministerial Order of the 1<sup>st</sup> February 2013 on the ethical evaluation and authorization of projects involving the use of animals in experimental procedures

<sup>5</sup> National Charter on the Ethics of Animal Experimentation, updated on the 18<sup>th</sup> December 2014

<sup>6</sup> User establishment: Establishment using animals for scientific purposes ("Establishment" and "user" are defined in Article R.214-89 of the Rural and Sea Fisheries Code)

<sup>7</sup> Guide for the ethical evaluation of experiments using laboratory animals (2009 - in the process of being updated)

<sup>8</sup> Guide for the care and use of laboratory animals, 8<sup>th</sup> edition, 2011. National Academy Press.

## 2.1 Introduction

Under the CEEAs' missions, first come the regulatory obligations defined in Articles R.214-118 and followings of the CRPM and Article 4 of the Ministerial Order. They consist of :

- proceeding to, as part of the administrative authorization procedure of projects involving the use of animals in experimental procedures, an ethical evaluation of projects and issuing a reasoned opinion ;
- carrying out the retrospective assessment of the project after its completion in cases where it is deemed necessary or made compulsory ;
- drawing up an annual report of its activity according to the indications of the CNREEA and transmitting it to the CNREEA ;
- taking into account the recommendations of the latter in terms of ethics in animal experimentation ;
- responding to audits conducted by the Ministry's services.

In addition to these obligations, it should be noted that, because of its proven competence in the use of animals for scientific purposes, a CEEA may also be solicited by the research community for evaluation, consulting or animation activities outside the regulatory scope of the authorization of projects. In addition, by disseminating as widely as possible the knowledge and experience gained in animal experimentation, the CEEA affirms its position as a place for dialogue and reflection.

These activities, which are not part of the regulatory field, are left to the free will of the CEEA, but nevertheless need to take place in compliance with the National Charter, which is a text of general scope that goes well beyond the regulatory obligations. At the discretion of each CEEA, specific provisions relating to these possible activities outside the regulatory context may therefore be identified in the rules of procedure of the committee.

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**Note :** The CEEAs' missions are different from those of the animal welfare body (SBEA) mentioned in Article R. 214-103 of the CRPM. A comparative table of the respective missions and obligations of the CEEA and the SBEA is given in *Appendix 1*.

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## 2.2 Composition of the ethics committee

According to the terms of Article R.214-118 of the CRPM, each CEEA is composed of at least 5 people :

- a person competent in the field of the design of experimental procedures and projects involving animals ;
- a person competent in the field of carrying out experimental procedures on animals ;
- a person competent in the field of animal care or euthanasia ;
- a veterinarian ;
- a person who is not specialized in matters relating to the use of animals for scientific purposes.

This multidisciplinary representation and these skills are essential to guarantee the legitimacy of the CEEA and therefore its reliability for each of the opinions delivered.

In addition, the multidisciplinary must be ensured by a sufficient number of members to guarantee in all circumstances the competence of the CEEA during the evaluations, including in situations where some members withdraw from an assessment due to a perceived or actual conflict of interest.

The members belonging to the user establishments (EU) bring skills which vary according to their category (design or implementation of experimental procedures or animal care), but also according to their disciplines of expertise and their knowledge of the different species used.

The veterinarian also provides scientific expertise, for example, on the behavioural and physiological needs of animals or any other need related to experimental procedures.

The person "not specialized in issues relating to the use of animals for scientific purposes" brings a societal perspective during the evaluations and will therefore contribute to the quality and richness of the debates within the CEEA.

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In all cases, the CEEA President ensures that, for each project evaluated, the CEEA is competent and legitimate to give its opinion, meaning that at least one member from each of the five categories mentioned above expressed himself.

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Finally, the CEEA may take into account the opinion of independent parties or external experts, provided that they comply with the operating rules of the CEEA, particularly with regards to the impartiality and the confidentiality of information, including intellectual and industrial property.

**The recruitment process** for all members must be clearly established prior to the registration statement with the Ministry and shall promote volunteerism. The moral commitment of a new member is communicated to the Ministry prior to his participation in the evaluation process.

It is necessary to have a sufficient number of members available within the CEEA, particularly in order to deal with absences or situations that may give rise to conflicts of interests.

The rules of procedure specify, besides the method for the designation of the members (permanent members, external experts...), the method for the designation of the president and if necessary of the vice-president(s) or deputy(-ies). The duration of the mandates, the number of possible term renewals for each member and the renewal procedures (vote, tacit renewal ...) must be specified. The rules of procedure specify a replacement system for members voluntarily resigning or members identified by the president as insufficiently involved in the assessment of projects and thus threatening the competence of the CEEA and the opinions delivered.

These departures are communicated to the ministry, for example, in the annual activity report.

### 2.3 Responsibilities of the actors of the ethical approach

The actors of the ethical approach must be aware of their individual or collective responsibilities mentioned in the National Charter and which are of two kinds:

- on the one hand, the regulatory responsibility, which is inherently framed, and which will be illustrated below by the elements that may be included in the rules of procedure ;
- on the other hand, the moral responsibility, which is not regulated and is left to the discretion of each individual and/or entity, provided it does not conflict with regulatory responsibility.

#### a Responsibility of the institutions to which the user establishments belong

Whether from the public research sector or the private industrial sector, the institutions allocate to the CEEA all the human and material means necessary to carry out the ethical evaluations of the projects submitted.

Firstly, the institutions allow members to participate effectively in the activities of the CEEA (allocation of "committee hours" allowing them to participate to meetings, mentions in the job description or in an engagement letter).

In addition, the institutions strive to make available to the CEEA :

- computer equipment ;
- a part-time or full-time secretariat for the administrative management of the CEEA, individual contractors for emergencies, etc ;
- and coverage of the operating costs (meetings, training, conferences, travel...).

The existing resources can be identified in the rules of procedure.

#### b The person responsible for the user establishment

The person responsible for the user establishment (EU) is the original creator of the CEEA in accordance with the CRPM, the applicable Ministerial Order and the National Charter.



He/She is legally responsible for all uses of animal for scientific purposes within the EU. He/She is therefore responsible for all projects carried out within the EU and for which he/she submits the application for authorization to the Ministry. For this purpose, and in order to facilitate the communication between the EU and the Ministry, a delegate of the person responsible of the EU is identified in the project authorization application form.

The person responsible of the EU is aware of the CEEA's rules of procedure.

**c. The person responsible for the overall implementation of the project and its compliance with the project authorization, a privileged contact with the ethics committee**

The person responsible for the overall implementation of the project and its compliance with the project authorization (MOE) is part of the EU staff. He/She is competent in project design and in the application of experimental procedures, and will supervise the project. In practice, he/she is the person best able to draft the authorization application and interact with the CEEA during the project evaluation, in case additional information is requested.

This MOE officer also ensures the implementation of the project in accordance with the project authorization issued by the Ministry. If a modification is to be made to the project (as authorized), he/she needs to discuss the potential impact on animal welfare with the SBEA in order to renew the application of the project authorization delivered by the Ministry, in the situations when these changes have a negative impact on animal welfare.

Among the EU, the person responsible for MOE has a regulatory responsibility for all projects in which he/she is identified.

In addition, because of his/her role in the implementation of the project and its compliance with the project authorization, the person responsible for MOE plays a central role in the collection of information that will be used by the CEEA to perform the retrospective assessment of projects.

#### **d** The chairman of the ethics committee's responsibilities

The CEEA's president is the interlocutor for the services of the Ministry and the CNREEA. The president ensures the registration of the CEEA with the Ministry and the operation of the CEEA in accordance with the CRPM, the Decree and with the National Charter, thus allowing the CEEA to be legitimate vis-à-vis the authorities, the research community and the civil society. Finally, he/she ensures the smooth running of CEEA debates.

In particular,

- he/she ensures that, during the ethical evaluation of a given project, the opinion of the CEEA is based on the plurality of the points of view expressed by the members ;
- he/she sends the opinions to the Ministry within the statutory timelines ;
- he/she sends to the Ministry the requests for CEEA certifications (described in Article 1 of the Decree) and informs the Ministry of any changes in the composition of the CEEA and the list of EUs under the CEEA ;
- he/she commits to update the CEEA's rules of procedure in the event of changes to the organization and operating rules ;
- he/she sends the CEEA's annual report of activity to the CNREEA at the request of the latter.

Within the framework of his missions, the president may be replaced by a vice-president or a deputy who ensures the continuity and the conformity of the CEEA's operation in the event of the president being unavailable or in incapacity (because of conflicts of interests) to render an opinion according to the rules and on time.

#### **e** Responsibilities of the members of the ethics committee

Each member of the CEEA must actively participate in the life of the CEEA. Members agree to respect the following moral principles during the evaluations :

- the principles set out in the National Charter ;
- the confidentiality of the information communicated to them in the context of the project evaluations and their withdrawal from discussions in the event of a perceived or manifest conflict of interest, principles identified in the Decree ;
- the independence and impartiality of the opinions, principles identified in the CRPM.

The members of the CEEA participate in the drafting of the CEEA's rules of procedure and approve them, thus committing to respect them.

## 2.4 Operating Procedures of the Ethics Committee

This chapter deals with the modalities of the ethical evaluation of projects (consultation of the members, conduct of the debates, issue of the opinion) and the retrospective assessment of the projects. It concludes with a paragraph on the more general activities of the CEEA.

To carry out its missions, the CEEA's operating procedures must be described in the rules of procedure.

### a Members consultation method

In order to guarantee the CEEA's competence required for any opinion, the President transmits the project authorization application files he receives to all CEEA's members.

This transmission to all members, however, does not prevent the president from identifying, among the CEEA's members, rapporteurs who are in charge of the initial analysis of the file and the possible dialogue with the person responsible for MOE in order to transmit a preliminary report to the CEEA on the basis of which all members will debate.

Examples of ethical review processes are illustrated in *Appendix 2*.

### b Debate conduct and expression of individual opinions

On the basis of the dossier received (and the rapporteur's report, if applicable), the CEEA members discuss, request additional information, then debate before issuing their individual opinion which will be used to compile the CEEA's collective opinion.

Whatever means are available, it is essential to encourage exchanges between members so that they can confront their opinions. Plenary sessions more conducive to discussion will therefore be preferred.

Whatever the system adopted, it must allow for an adversarial debate and take into account the different points of view of the evaluators and experts consulted, if need be.

As a whole or in summary, must be recorded in writing and kept in the archives of the CEEA :

- the exchanges between the president or CEEA members or the rapporteurs and persons(s) responsible for MOE ;
- the discussions within the CEEA, including the opinions expressed by each member ;
- a summary of the discussions leading to the CEEA's final opinion.

The rules of procedure may define, as appropriate, how external experts participate in the debate, define their moral commitments and specify whether they must produce a written report so that it can be considered by the members in the CEEA's final opinion.

### **c** Issue of the CEEA's opinion on each project

The rules of procedure must estimate a quorum below which the CEEA cannot deliberate and issue a legitimate opinion.

At the end of the members' consultation period, it is up to the CEEA's president to draft and transmit the CEEA's opinion to the ministry who will take it into account in its authorization decision, but also transmit it to the applicant.

The rules of procedure shall specify the manner in which the CEEA proceeds to take its decisions and justify its opinions (vote in accordance with the quorum, consensus, summary of the debates, all evaluator opinions accounted for, including minority opinions ... ).

For each project, the CEEA uses the form provided by the Ministry to issue its opinion. The notice is communicated to the Ministry not later than

- **7 weeks** from receipt of the file by the CEEA in most situations, with the possibility for the CEEA, if it asks for it upon receipt of the demand, to request an extension of this period of 3 weeks in cases of complex projects or projects with a multidisciplinary nature ;
- **3 weeks** for requests to update the authorization granted when a project, while being implemented, is subject to changes that may have a negative impact on the welfare of animals at the time of implementation.

At the end of the discussions, debates and possible exchanges with the person responsible for MOE, the final opinion, delivered by the president to the Ministry, can only be of two sorts :

**Favourable opinion :** The project is in line with the ethical principles of animal experimentation. Following the possible exchanges with the person responsible for MOE, the CEEA does not (or no longer) have any reservations in regards to the implementation of the project.

This opinion is rendered either :

- on the initial version of the project file that it is sent to the CEEA by the Ministry, when no modifications are necessary ;
- or on an amended version of the project by the person responsible for MOE following the new insights provided (the version's number will always be referenced in the notice).

**Unfavourable opinion :** In this case, the CEEA, during its exchanges with the applicant, has expressed certain reservations which are not alleviated by the applicant's new proposals delivered within the time limits. The CEEA cannot issue a conditional opinion since the conditions were debated during the deliberation and discussion phase with the applicant and involve modifications to the initial application on which the applicant and the CEEA do reach an agreement. The CEEA explains the reasons for its unfavourable opinion in the Ministry's opinion form.

A project which receives an unfavourable opinion, which will therefore lead to a non-authorization decision by the Ministry, will not be allowed to re-enter a project authorization application unless it has been substantially amended. It will then be resubmitted to the Ministry.

In the event of an unfavourable opinion leading to an authorization refusal by the Ministry, an appeal procedure can be arranged (Article 8 of the Ministerial Order). In the event of an objection, the Ministry will take the necessary and appropriate measures. For example, the Ministry may refer to the CNREEA, which may in turn request a counter-evaluation by one or more other qualified CEEAs.

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**Note :** In the event that the Ministry, after receiving the CEEA's opinion, requests changes to the file that impact the ethical opinion, the file is re-evaluated and a new opinion is delivered.

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**d Retrospective assessment of projects**

In accordance with Article R. 214-120 of the CRPM and Article 7 of the Ministerial Order concerning the ethical evaluation and the authorization of projects, it is the CEEA's responsibility to carry out a retrospective assessment of projects for which it is required. These aspects are detailed in the CEEA's second guide to good operating practices, developed under the guidance of the CNREEA : the Guide for the ethical evaluation of projects using animals for scientific purposes.

The Ministry indicates in the project authorization notification whether the project is subject to a retrospective assessment and specifies in this case that the person responsible for MOE will contact the CEEA upon completion of the project. The CEEA ensures proper compliance with this obligation.

This retrospective assessment focuses on :

- whether the objectives of the project were achieved ;
- the harm inflicted on animals, including the numbers and species of animals used, and the actual severity of the experimental procedures ; and
- any elements that may contribute to the further implementation of the requirement of replacement, reduction and refinement.

The CEEA relies on the information provided by the persons responsible for MOE to conduct this analysis. The practical arrangements under which the information is made available and exploited by the CEEA can be specified in the rules of procedure.

**e Other CEEA activities**

Beyond ethical evaluations as part of project authorizations, the CEEA can carry out activities which are outside the regulatory field, but participate in the promotion of ethical principles in a general way, as stated in the National Charter.

This can include, for example, the use of animals which is outside the regulatory scope of project authorizations, such as experimental acts on live animals according to good veterinary practice which are below the needle introduction threshold, or recognized breeding activities. These may also be evaluations carried out as part of a project's presentation to an evaluation body, intermediary funding agency or any other scientific authority or any competent French, European or international authority provided that the latter requires an ethical assessment attached to the scientific proposal. As the regulatory application form for project authorization is not adapted to these situations, the CEEA uses another form.

Furthermore, although this is not planned for in the regulatory framework, it is appropriate for the CEEA, in compliance with Article 7 of the National Charter, to deliver reasoned opinions with recommendation, including when these opinions are favourable. In addition, the CEEA will strive to disseminate as widely as possible the knowledge and experience gained in animal experimentation. Thus, it can organize dedicated meetings or seminars that can help present the CEEA's activities to EU members and staff, and prepare for the Ministry's audits and the annual activity report.

The rules of procedure will specify, where appropriate, the modalities according to which these complementary activities are organized.

## 2.5 Structure of the rules of procedure and documentation

In the preceding paragraphs, the elements relevant to include in the CEEAs' rules of procedure were discussed. By way of illustration, a structure of rules of procedure is provided in *Appendix 3*.

In detail, these aspects are left to the CEEA's discretion, in order to :

- provide important principles to guide the CEEAs' operation ;
- establish a solid basis for any response to requests from the Ministry's services.

In addition, because of its statutory missions and responsibilities, it is the CEEA's duty to ensure the administrative management of all documentation relating to its organization and operation, a list of which is proposed in *Appendix 4*.

Please recall that all the elements of the file must be made available, either spontaneously by the CEEA, or in the event of an audit, or following an official request from the Ministry in the event of an objection by the applicant regarding the project authorization decision.

In conclusion, the CEEAs are required by law to carry out an annual activity report, which they will draw up and transmit according to indications provided by the CNREEA. The CEEA will state this obligation in its rules of procedure and will be able to specify the approval method of the annual activity report by the members : for example, an endorsement in a plenary session following a presentation to the CEEA's members or by electronic means requiring a synthesis by the President.







**3.1 Appendix 1**

**Comparative table of the respective compulsory missions of the Ethics Committee for Animal Experimentation (CEEA) and the Animal Welfare Body (SBEA), as well as complementary activities of the CEEA**

**The CEEA's Mandatory Missions**

- Conduct an ethical evaluation of projects and provide an opinion to the Ministry of Research for the purpose of their authorization prior to their implementation
- Perform a retrospective assessment of the animal experimentation projects for which it is required
- Draw up an annual activity report and to transmit it to the CNREEA
- Take into account the CNREEA's recommendations
- Respond to audits conducted by the Ministry of Research

**The CEEA's complementary activities identified in the National Charter**

- Be a place of dialogue and reflection
- Participate in the promotion of ethical principles
- Disseminate knowledge and experience gained in animal experimentation and alternative methods, including unpublished results

**The SBEA's Mandatory Missions**

- Advise the staff dealing with animals on matters related to the welfare of animals, in relation to their acquisition, accommodation, care and use
- Advise the staff on the application of the requirement of replacement, reduction and refinement, and keep it informed of technical and scientific developments concerning the application of that requirement
- Establish and review internal operational processes as regards monitoring, reporting and follow-up in relation to the welfare of animals housed or used in the establishment
- Follow the development and outcome of projects, taking into account the effect on the animals used, and identify and advise as regards elements that further contribute to replacement, reduction and refinement
- Exchange information with those responsible for the overall implementation of the projects in preparation for a possible request to amend project authorizations
- Advise on rehoming schemes, including the appropriate socialization of the animals to be rehomed
- Make available to inspectors, at their request, the documents relating to the opinions given and the decisions taken. Keep these documents for five years

### 3.2 Appendix 2

#### Examples of Ethical Review Processes

The two examples below illustrate the possible processes for conducting project evaluations, with or without the appointment of rapporteurs, for a project submitted electronically on the APAFiS platform.

##### Colour codes for the responsibilities

- Person responsible for the project (EU) or Person responsible for MOE (CEEA interlocutor)
- CEEA
- President of the CEEA or his deputy

##### a Distribution of a project to all members



- The project is submitted by the project manager using the APAFiS platform. It is immediately sent to CEEA's president and his deputy.
- On receipt, the CEEA's president (or his deputy) is responsible for its distribution to all members. They are informed of the time they have to comment on the project.
- Based on the comments received, the CEEA may request additional information from the person responsible for MOE. Discussions in meetings should be favoured to clarify issues.
- If necessary, the CEEA recommends that modifications be made to the project initially submitted. The person responsible for the project makes the necessary modifications and CEEA members form their opinion afterwards on the corrected version of the project.
- The CEEA's opinion is then sent to the Ministry by the CEEA's president or his deputy.

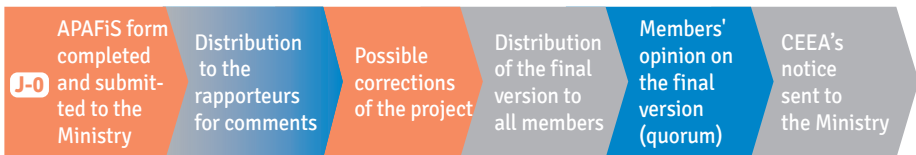
### 3.2 Appendix 2

#### Examples of Ethical Review Processes (2)

##### Colour codes for the responsibilities

- Person responsible for the project (EU) or Person responsible for MOE (CEEA interlocutor)
- CEEA
- President of the CEEA or his deputy

##### **b** Initial distribution of the project to 2 appointed rapporteurs before informing all members



- The project is submitted by the project manager using the APAFiS platform. It is immediately sent to CEEA's president and his deputy.
- The CEEA's president (or his deputy) transmits the file to the two CEEA members appointed as rapporteurs. They are the only ones to receive this initial version of the project, provide comments and request additional information from the person responsible for MOE. If necessary, they ask the person responsible for the project to make changes to the project.
- Once the modifications are integrated in the project, the CEEA distributes it to all the members so that they can read it and give their opinion as a result of a joint deliberation, and in the light of the elements advanced by the rapporteurs. Discussions in meetings should be favoured to clarify issues.
- The CEEA's opinion is then transmitted to the Ministry by the president or his deputy.

### 3.3 Appendix 3

#### Proposed Structure of the Ethics Committee's Rules of Procedure

The rules of procedure must at least define the principles to respect regarding the :

- composition of the CEEA ;
- rules on the members' appointments and mandates ;
- roles and responsibilities of individuals and institutions ;
- CEEA's missions and its members ;
- rules applicable to examination, evaluation and decision-making ;
- organization of the ethical evaluation of projects using animals for scientific purposes: the evaluation methods and the debates' conduct ;
- modalities of exchanges with the applicant, decision-making and delivery of the opinion.

The rules of procedure are drafted by the CEEA and approved by the members. The members of the CEEA commit individually to respect it.

The user establishments, institutions and supervisory bodies of the user establishments that create the CEEAs are the intended recipients.

The name of the user establishments (EU) which created the CEEA and, in essence, for which the CEEA is competent to evaluate the projects, must be included in this rules of procedure (ideally in the appendix as this list is likely to evolve).

In the event of a change in the rules of organization and operation, the rules of procedure must be updated. The modalities for updating the rules of procedure must appear in this original version.

### 3.4 Appendix 4

## Documentation of the ethics committee

The CEEA's documentation must demonstrate that the operation is in accordance with the regulations in effect, the principles of the National Charter and, of course, the CEEA's rules of procedure. It may be presented during audits by the Ministry's services.

**It must at least consist of :**

- the rules of procedure, the National Charter, the aforementioned regulations ;
- the CEEA's application for approval (see Article 1 of the Order) and the Ministry's registration letter in response to this request ;
- any document serving as a reference for the CEEA to carry out the project evaluations ;
- information relating to the project evaluations :
  - **the list of evaluated projects,**
  - **for each project evaluated :**
    - the project authorization application file;
    - a copy of the exchanges and debates between the CEEA members, including experts if applicable, and the exchanges with the person responsible for MOE and the dates of these exchanges ;
    - where applicable, the references of the scientific documents supporting the applicants' arguments ;
    - a copy of the CEEA's expressed opinion (or expressed opinions if several versions of the file subsequently produced before authorization) sent to the Ministry ;
    - if applicable, the name of the participant (s) who had to withdraw from the debates due to a perceived or declared conflict of interest ;
    - a copy of the project authorization (or non-authorization) notification issued by the Ministry ;
    - finally, where applicable, the exchanges in the context of the retrospective assessment, as well as its result (progress in terms of the 3Rs for example).

These elements will help the CEEA demonstrate that the project evaluations were conducted independently, impartially and with the required expertise.

All relevant documents, including the project authorization and the result of the project's ethical review must be retained by the CEEA for at least five years after the expiry date of the project authorization and made available for the Ministry if needed. Without reducing this duration, the documents are kept until the end of the retrospective assessment when it takes place.

The CEEA also keeps its annual activity reports, the Ministry's documents and the CNREEA's recommendations it received, as well as the minutes of the meetings it has held.



## GRICE

Common  
organization and  
operating rules  
of ethics committees  
for animal  
experimentation

In 2000, the GRICE, an interprofessional reflection group on ethics committees applied to animal experimentation, published recommendations for ethics committees, the implementation of which was the result of a voluntary approach by research institutes in France.

Following the transposition of the Directive 2010/63/EU into French law, ethics committees have become competent authorities in charge of the ethical evaluation of projects. As such, the General Director of Research and Innovation of the Ministry of Research mandated GRICE in 2012 to draft reference documents on the operation of ethics committees.

This guide responds to this request with regards to the common rules for the organization and operation of the committees. It draws from the regulatory texts and the National Charter on the Ethics of Animal Experimentation. It suggests a set of principles which will help committees draw up and update their rules of procedure. It encourages to a harmonization of French committees' operations to ensure a homogeneous treatment of the evaluated projects. It also suggests ethics committees ways to affirm their position as a place for dialogue and reflection in accordance with the National Charter.