THE ADMINISTRATOR
WASHINGTON, D.C. 20460

January 22, 2026

MEMORANDUM

SUBJECT: Recommitment to Reducing Animal Testing and Eliminating Mammalian Testing by 2035

FROM: Lee M. Zeldin

TO: Deputy Administrator
General Counsel
Assistant Administrators
Chief Financial and Administrative Officer
Inspector General
Chief of Staff
Associate Administrators
Regional Administrators

Background

In September 2019, then-U.S. Environmental Protection Agency Administrator Andrew Wheeler signed a directive to prioritize the Agency's commitment to move away from animal testing, with the goal of phasing it out completely by 2035. The memo directed EPA leadership to prioritize the reduction of animal testing in a manner consistent with Agency statutory obligations and scientific integrity, all while ensuring protection of human health and the environment.[1] This was a pivotal action in EPA history that set the Agency on a path to utilize scientific innovation and strategic partnerships to save the lives of thousands of laboratory animals, including rabbits, guinea pigs, mice, rats and dogs.

Unfortunately, the previous administration rescinded Administrator Wheeler's directive entirely and canceled the phase-out deadlines it established. This action not only imperiled the Agency's progress in reducing animal testing but also imperiled scientific progress in identifying high-quality alternatives to animal testing. It is time to get back on track. Since President Trump was sworn back into office in January 2025, significant progress has already been made to reduce, replace and refine our animal testing requirements under both statutory and strategic directives. This shift back to the goals set in 2019 is about ensuring progress continues and the Agency is

[1] Memorandum from Andrew Wheeler, Administrator, U.S. EPA, *Directive to Prioritize Efforts to Reduce Animal Testing* (Sept. 10, 2019), https://www.epa.gov/sites/default/files/2019-09/documents/image2019-09-09-231249.pdf.

adhering to gold standard science and the law. The 2016 amendments to the Toxic Substances Control Act added an explicit requirement for EPA to promote the development and incorporation of methods that reduce or replace the use of animals in the Agency's scientific testing. The advancements that have been achieved in the development of alternatives (some of which I have detailed below), combined with the new progress that will come in the years ahead, will allow the Agency to better assess potential hazards for risk without continuing to rely on unnecessary animal testing.

Recommitment To Reducing Animal Testing and Eliminating Mammal Testing By 2035

This document reaffirms EPA's commitment under the leadership of President Donald Trump to meeting the ambitious goal laid out in 2019 to eliminate mammalian testing by 2035.

This effort will be supported by the entire Agency, including the development of alternatives to animal testing, also referred to as New Approach Methods or NAMs. NAMs refer to technologies, methodologies or approaches that can be used instead of vertebrate animal testing to inform chemical hazard and risk assessments. These include in vitro tests, in chemico assays and in silico models. NAMs are functionally equivalent to "alternatives" to mammal testing.

EPA released a *New Approach Methods Work Plan* in 2020, which was updated under the last administration in 2021.[2] The last administration's update, however, canceled phase-out deadlines, imperiling the scientific progress on NAMs and the broader goals of eventually eliminating animal testing altogether. The Biden Administration also did not meaningfully track progress on meeting the goals laid out during the first Trump Administration. Meanwhile, the scientific community has been advancing rapidly toward reducing the use of laboratory animals in regulatory toxicity testing and replacing standard animal studies with NAMs. I will not let the previous administration's intransigence hold back EPA from adopting cutting-edge scientific innovations.

Therefore, I am directing the Office of Chemical Safety and Pollution Prevention, with support of other program offices and the Office of Applied Science and Environmental Solutions, to prioritize developing and implementing high-quality alternatives to reduce testing on animals to align with regulatory requirements and the high bar of gold standard science. While some mammalian animal testing is still required to support EPA's statutorily mandated regulatory responsibilities to test certain chemicals, the Agency will work in targeted ways to further reduce it however possible and collaborate with other government agencies, researchers and advocates to develop and validate the use of alternative methods for toxicity testing.

EPA has already made great strides in reducing animal testing. For the first time ever in a risk evaluation completed in 2025 under the Toxic Substances Control Act program, EPA used high-quality alternative scientific methods to animal testing in its cancer evaluations for dibutyl phthalate and di(2-ethylhexyl) phthalate, sparing an estimated 1,600 mice and rats from undergoing lab experiments.

---

[2] U.S. EPA, *New Approach Methods Work Plan* (June 2020), https://www.epa.gov/sites/default/files/2020-06/documents/epa_nam_work_plan.pdf; U.S. EPA, *New Approach Methods Work Plan* (Dec. 2021), https://www.epa.gov/system/files/documents/2021-11/nams-work-plan_11_15_21_508-tagged.pdf.

EPA has also developed an alternative non-animal testing framework for identifying skin irritation and corrosion hazards in chemicals, replacing the need for traditional toxicity testing that would have been conducted on rabbits. This new framework supports EPA's mandate under TSCA to identify and develop alternatives to animal testing.

EPA under the Trump Administration is well positioned to use NAMs to reduce animal testing requirements when appropriate under existing law and scientifically defensible. NAMs offer many potential benefits over traditional animal testing methods:

- Many laboratory animal findings may have questionable relevance to humans.
- NAMs have the potential to provide more rapid and cost-effective results.
- Studies based on animal testing sometimes are not reproducible, while NAM-based scientific tests are repeatable and reproducible and can test endpoints, life stages, disease states and health outcomes that cannot be done in laboratory animals.
- NAMs position EPA to do even more gold standard science, allowing the agency to gather and make decisions based on real facts and data, not assumptions.

Through OCSPP's leadership, EPA is committed to using a three-pronged strategy to ensure the Agency stays on track with phasing out animal testing and meeting the 2035 goal. This work will include:

1. Identifying NAMs that can currently be used as an alternative to traditional animal testing.
2. Conducting a comprehensive review of Agency guidance and the Code of Federal Regulations to provide flexibility in fulfilling data requirements for toxicity assessments and issuing waivers to further reduce animal testing requirements.
3. Encouraging external researchers and data providers to use NAMs and apply for animal testing waivers whenever possible.

EPA under the Trump Administration will work to be at the forefront of developing and incorporating advances in NAMs into its scientific framework to ensure Agency assessments and scientific work uses high-quality, gold standard science.