

CHANGE

A systems thinking
approach for more effective
use of new approach
methods (NAMs)

EFSA Focal Point Meeting

September 2026,

Project overview

2024–2026

INTERNATIONAL

MULTIDISCIPLINARY

CROSS-SECTORIAL

Partners and funding

Project lead: Norwegian Scientific Committee for Food and Environment (VKM)

Collaborating partner: Evidence-Based Toxicology Collaboration (EBTC)

Funded by: European Food Safety Authority (EFSA)



CHANGE PROJECT
WEBPAGE



Why CHANGE?

Important elements for a transition to NAM-based regulatory decision-making are already in place

Willingness

A shared ambition to reduce reliance on animal studies

Knowledge

Rapid advances in NAM science and technology

Investment

Substantial investment dedicated to advancing NAMs

Yet the system favours established approaches and animal studies remain the default option in many contexts

CHANGE was established to address this challenge as a system problem

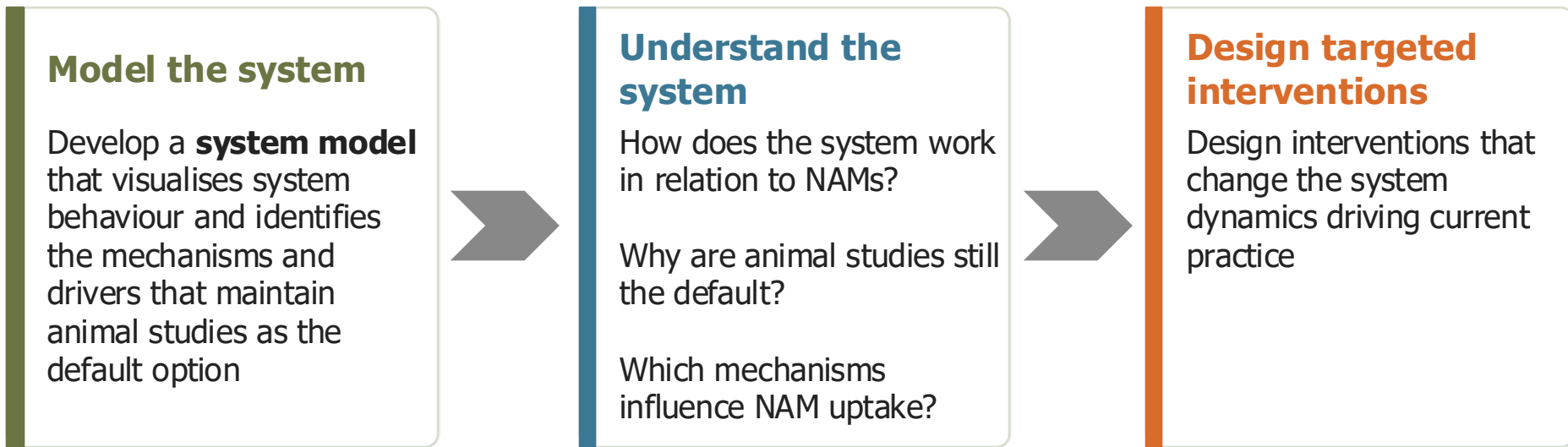
The goal of CHANGE

Contribute to more effective use of NAMs in the regulatory toxicology system



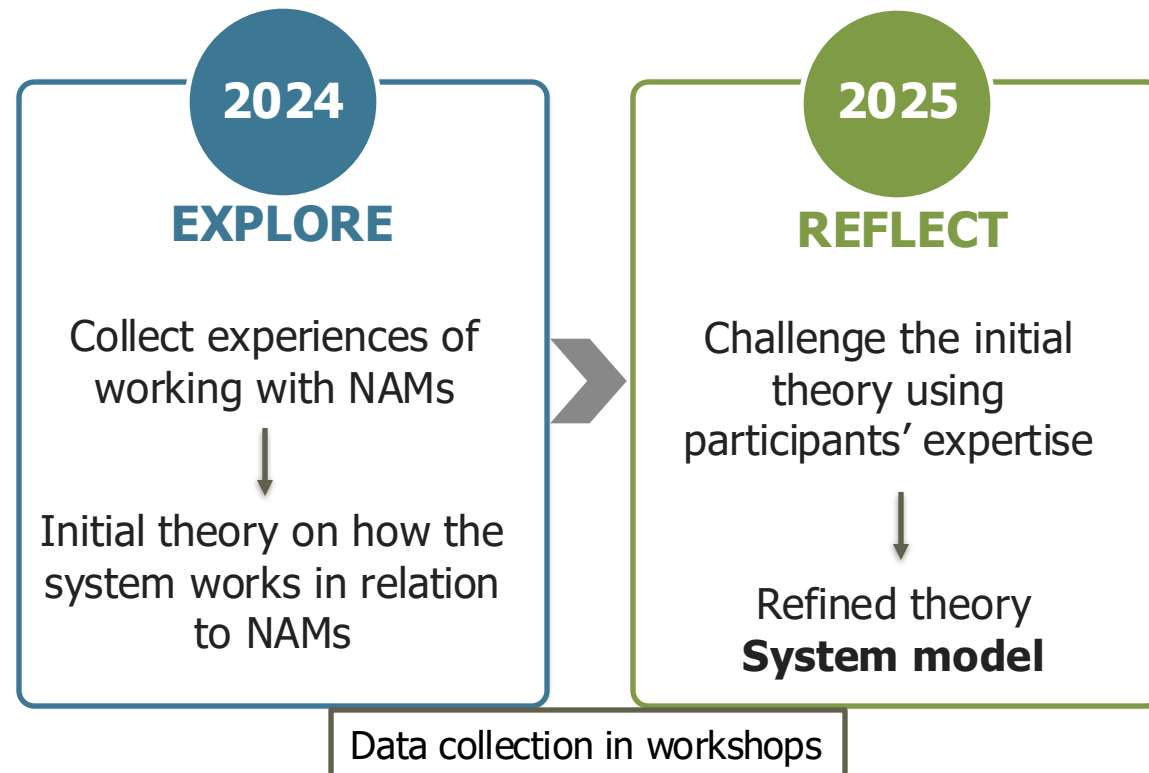
Effective use of NAMs means achieving all

System understanding as a foundation for change



The CHANGE approach to model the system

Use stakeholder experiences from across the regulatory toxicology system to build the model



How does the system work in relation to NAMs?

Animal studies remain the default for regulatory decision-making
not necessarily because they always provide the best basis for decisions

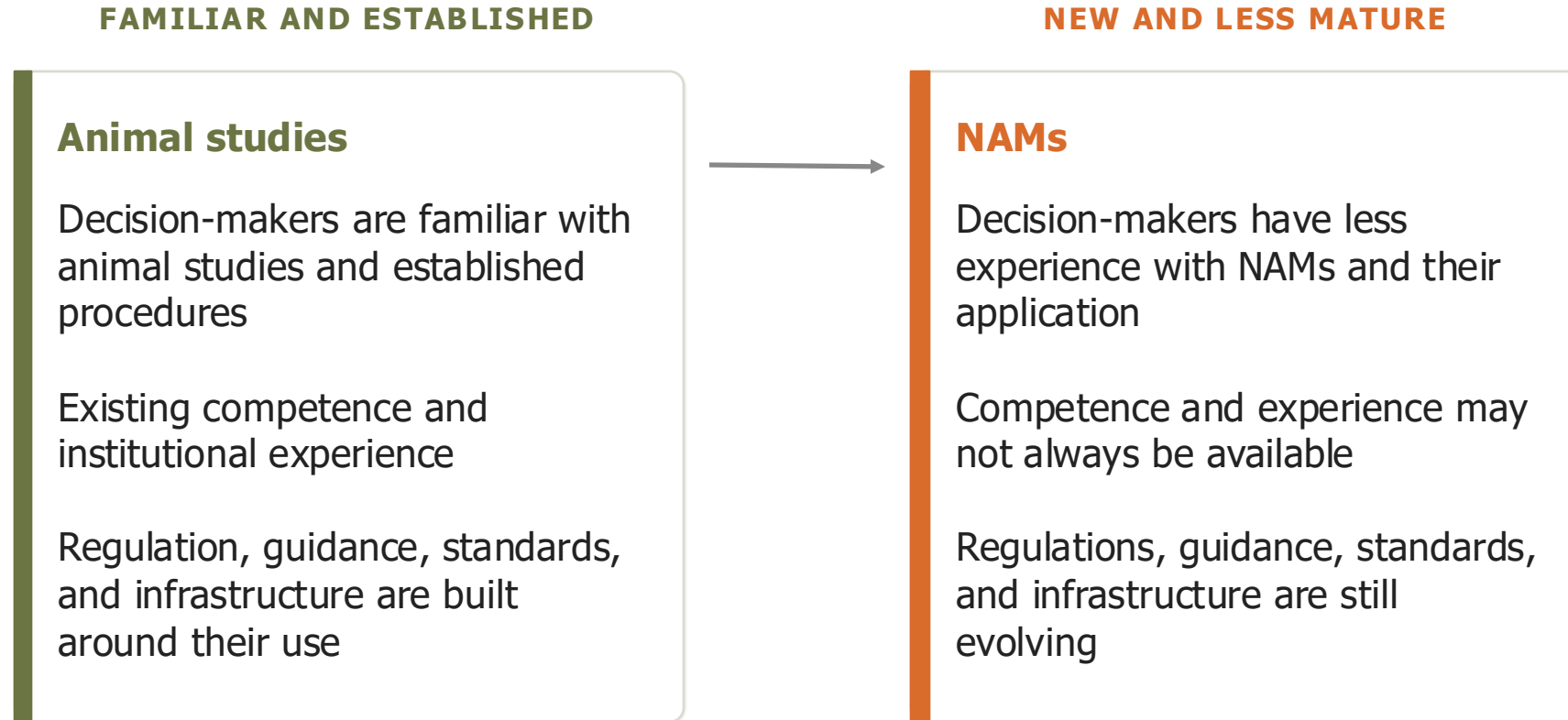
**They dominate because the system makes them the
safest and most established choice**

Why?

NAMs are often perceived as the riskier option
The system favours short-term certainty

Why are animal studies still the default?

NAMs are often perceived as the riskier option



The system is built around current practice, making animal studies the trusted and lower-risk option

Why are animal studies still the default?

The system favours short-term certainty

When faced with uncertainty, the system tends to rely on the most familiar options

Request animal studies

Follow established practice

Postpone decisions

Short-term certainty reduces opportunities to build the experience needed for change

Which mechanisms influence NAM uptake?

Three interacting **drivers** that maintain animal studies as the default

A disconnected system

- Actors work in silos, with different goals, terminology, expectations, and ways of working
- Insufficient connection between NAM developers and decision-makers

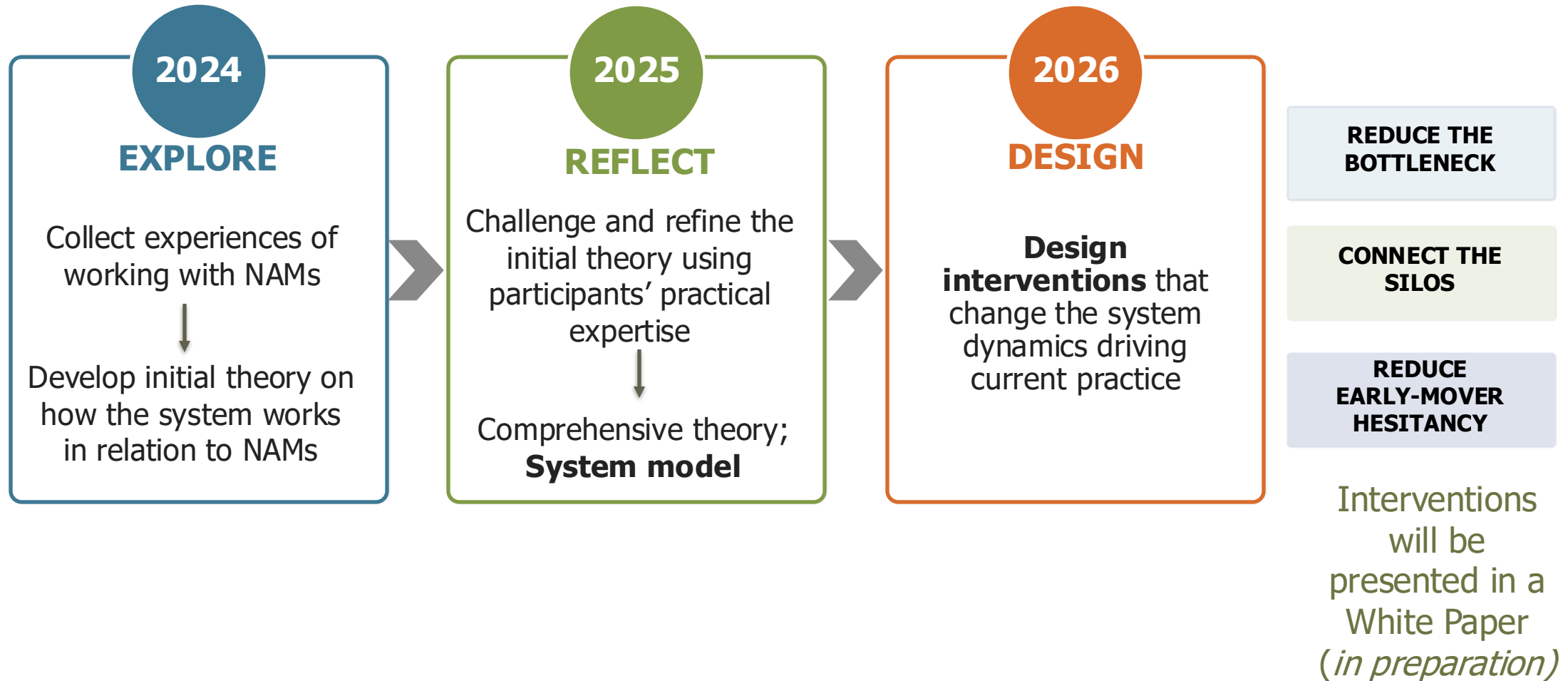
A bottleneck between innovation and use of NAMs

- NAMs are developed faster than they are validated, endorsed, accepted, and used
- The system rewards NAM development more strongly than application and implementation

Reinforcing early-mover hesitancy

- Perceived and actual legal, financial, and reputational risk favours established practice
- Decisions that reduce risk for individual actors reinforce current practice across the system

Use system understanding to design interventions



Publications

Explore (2024)



Editorial "Time for CHANGE"



Phase 1 Project Team Report



Phase 1 results



Phase 1 Participant Workshop Report



[CHANGE webpage](#)

Reflect (2025)



Editorial "Preparing for CHANGE"



Phase 2 results



Phase 2 Participant Workshop Report

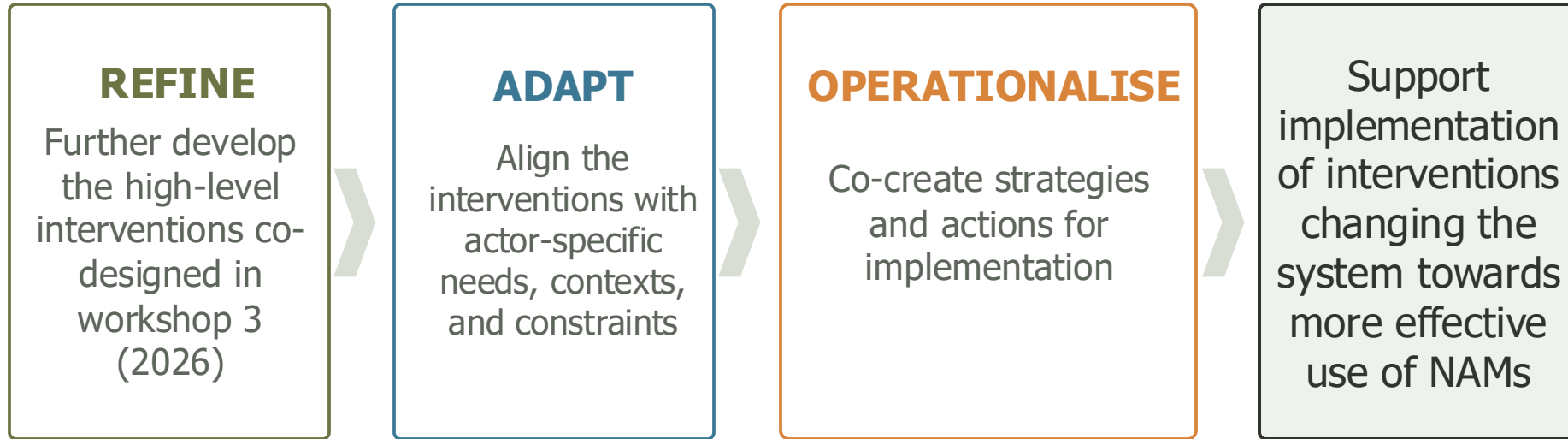
Design (2026)

A protocol for organising co-design research workshops
In preparation

CHANGE White Paper
In preparation

An article describing the methods and results of the "design" phase of CHANGE
In preparation

CHANGE 2: Objectives and goal



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CHANGE 1 – International reach and engagement

