

Submission
No 234

INQUIRY INTO USE OF PRIMATES AND OTHER ANIMALS IN MEDICAL RESEARCH IN NEW SOUTH WALES

Organisation: Australian and New Zealand Council for the Care of Animals in
Research and Teaching (ANZCCART)

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ANZCCART submission to parliamentary inquiry into the use of primates and other animals in medical research in New South Wales

Overview

ANZCCART was established as a collaborative effort between the existing Australian Council for the Care of Animals in Research and Teaching (ACCART) and New Zealand authorities, to provide a focus for consideration of the scientific, ethical and social issues associated with the use of animals in research and teaching.

ANZCCART operates on a purely advisory basis and provides guidance and information to all interested parties including Animal Ethics Committees (AEC), scientists, teachers, regulatory authorities, granting agencies, government, animal welfare organisations, the media and the general public.

In Australia, ANZCCART's principle sponsors are the Commonwealth Scientific and Industrial Research Organisation (CSIRO), Royal Society Te Apārangi (RSNZ), Universities Australia (UA), State Government Departments responsible for the management of animal welfare legislation and also members. ANZCCART receives annual contributions from professional organisations.

ANZCCART's main role is to provide leadership in developing community consensus on ethical, social and scientific issues relating to the use and wellbeing of animals in research and teaching.

ANZCCART's key objectives are to promote:

- excellence in the care of animals supplied for or used in research and teaching;
- responsible scientific use of animals;
- the 3Rs policy of Replacement, Reduction and Refinement as they apply to the use of animals for scientific purposes;
- informed discussion and debate within the community regarding these matters; and
- strategic partnerships to contribute to the education and training of scientists, students and the broader community.

As such, ANZCCART supports the adoption of best practice standards regarding the use of animals in scientific research.

Response to inquiry terms of reference

(a) the nature, purpose and effectiveness of medical research being conducted on animals in New South Wales, and the potential public health risks and benefits posed by this research.

The contribution of animal science to medical research and human health over many decades has been substantial and led to many benefits and improvements regarding the health and well-being of people as well as animals themselves.

Continuous improvements in research methods, animal care and the exploration of non-animal alternatives have also contributed to improved effectiveness and outcomes from medical research.

When conducting scientific research using animals it is essential that best practice standards (particularly the application of the 3Rs and requirements of the Code) are maintained at all times to ensure animal welfare and beneficial outcomes. Current regulatory and governance requirements surrounding animal research in Australia are considered to be robust.

(b) the costs associated with animal research, and the extent to which the New South Wales and Federal Government is commissioning and funding the importing, breeding and use of animals in medical research in New South Wales.

No comment.

(c) the availability, effectiveness and funding for alternative approaches to animal research methods and technologies, and the ability of researchers to meet the 3 R's of Replacement, Reduction and Refinement.

All scientific research using animals must be justified and demonstrate how the 3Rs (reduction, refinement and replacement) have been applied to the proposed activity as part of the review and approval process by an AEC. ANZCCART supports the promotion of the 3Rs and best practice standards in scientific research in these processes.

To date there has been limited funding specifically available for 3Rs research in Australia. While some research institutions have provided their own additional internal funding grants to support 3Rs research and the advancement of refined or alternative research methods, there is a need for further funding to support improvements in this area across the sector more generally. Funding of this nature should not just be restricted to exploring innovations in research methods but also the translation of these outcomes into mainstream research practice and the upskilling of researchers and AEC members.

(d) the ethical and animal welfare issues surrounding the importing, breeding and use of animals in medical research.

This is a complex area that requires consideration of both animal welfare and scientific issues. AEC members involved in the review of scientific research require appropriate training and support to be able to effectively understand the specific issues surrounding animal importation and breeding so that they can fulfill their roles and ensure that animal welfare is paramount and all relevant standards and legislative requirements are met.

(e) the adequacy of the current regulatory regime regarding the use of animals in medical research, particularly in relation to transparency and accountability.

Regulatory regime

In Australia, the use of animals in research and teaching is governed by the *Australian Code for the Care and Use of Animals for Scientific Purposes (the Code)* which is enforced through strict legislation in each state and territory. Under the requirements of the Code and state legislation animals must not be used unless approved in advance by properly constituted and registered Animal Ethics Committee (AEC) which must weigh the scientific need against the impact on animals for the research being proposed. Ongoing monitoring by an Animal Ethics Committee is also required once a project has been approved.

The Code's Governing Principles require respect for animals, ethical review processes, high scientific standards and application of 'the 3Rs':

- Replacement (non-animal alternatives must be used wherever possible)
- Reduction (the number of animals used must be kept to a minimum)
- Refinement (steps must be taken at all times to minimise harm)

A key feature of the animal research Code is its focus on prioritising animal welfare and minimising any adverse impact on animals before, during and after studies.

The requirements specified by the Code provide a robust framework for the governance of animal research in Australia. Variances in regulatory approaches across each state jurisdiction however can be unwieldy and at times confusing for researchers, AECs and administrators. Increased standardisation across jurisdictions would improve understanding of requirements and the adoption of best practice. A standard definition of an animal within various animal welfare legislation would also be helpful.

Transparency and accountability

The use of animals in research or teaching can be seen as contentious and opinions in the broader community range from many different levels of qualified support through to strong opposition. It is also often technically complex and may involve sophisticated technology, complex statistical analysis, international collaboration, and skills that can only be acquired through intense study.

Because of these considerations, and recognising legitimate community expectations for transparency, ANZCCART believes openness and clarity surrounding the use of animals in research and teaching is imperative to enable well-informed public discussion. As such ANZCCART is currently leading a national initiative for the development of an Openness Agreement on Animal Research in Australia.

The primary aim of an openness agreement is to improve openness and public understanding of animal research. This follows a similar approach being adopted overseas. The first openness agreement was launched in the UK in 2014 and others are now in place in Spain, Portugal, Belgium, France, Germany, The Netherlands and New Zealand. Openness agreements are also under development in several other countries including the USA and Switzerland.

A draft Openness Agreement has been developed so organisations that conduct, fund or are otherwise associated with the use of animals in research or teaching can demonstrate a commitment to openness, and can promote awareness of the reasons why animals are used, the benefits derived, the limitations that apply, and the steps taken to minimise harm. The agreement will provide

This draft openness agreement for Australia was recently released for [public consultation](#) with feedback received from a range of institutional and community stakeholders. This feedback will now be considered as part of the final drafting process with a view to inviting organisations to become supporters and signatories to the agreement later in the year.

(f) overseas developments regarding the regulation and use of animals in medical research.

See above re adoption of Openness Agreements overseas.

(g) any other related matters.

No further comments.

Contact

[ANZCCART](#)