

**Submission
No 271**

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

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USE OF PRIMATES AND OTHER ANIMALS IN MEDICAL RESEARCH IN NSW

SUBMISSION

Thank you for the opportunity to make a submission.

I make a point of following the debate about animal experimentation, because it is important to me that sentient creatures – primates and other animals – should not be subjected to unethical treatment.

At the outset I point out that I support completely the submission and recommendations made by Humane Research Australia. HRA speaks authoritatively on this subject, and the organisation presents valid arguments and useful solutions to this morally unacceptable practice. For many years, primates and other sentient animals have endured cruel experiments, yet humans are still beset by incurable diseases.

The whole ‘business’ of animal experimentation is based on causing misery for sentient beings. And there is an ‘industry’ in breeding animals for experimentation. Indeed, in developing countries wild primates are trapped in the wild and exported. This is totally unacceptable.

TRANSPARENCY

Those who experiment upon animals have a moral duty to open up their practices for the public to see for themselves what is going on. The ‘industry’ of scientific experimentation is cloaked in secrecy. It is time to shine the light and cease this cruelty.

Sound ethical and scientific arguments can be made against the use of other species as models for human disease. However, one cannot have an open discussion about the costs and benefits of animal use when the statistics are a secret, and members of the public like me are denied access to the truth of what occurs in Australian laboratories.

It does not have to be this way. The European Union has taken action.

Its Article 43.3 Directive 2010/63/EU requires that non-technical summaries (NTS) be published by the European member states to provide the public with access to information concerning projects using live animals.

The NTS must include title, purpose, objectives and benefits, number and type of animals, predicted harms and application of the 3Rs (Reduction, Refinement & Replacement). They must be written in non-scientific language and accessible for five years. Annual reports on animal use in research are published, unlike Australia, which has no mandatory reporting system, meaning that there is no way of measuring progress or otherwise in this country.

Certain projects (including those that use non-human primates) must also undergo a retrospective analysis. This is a powerful tool to enable critical review of the use of animals. It also facilitates improved design for similar studies, raises openness of best practice and prevents mistakes.

Importantly, NTS were made compulsory in the EU from 2013, and they make a significant contribution to transparency. This is an example NSW and the rest of Australia should follow.

As a human being and as a taxpayer, I want to see greater transparency and accountability concerning the use of animals in medical research.

I have often heard it said that people who work in laboratories and establishments that conduct animal testing are afraid to admit to their acquaintances where they work and what they do. Imagine meeting a new person. Almost the first question one asks is 'And what do you do for a living?'. The fact that animal experimentation lacks transparency surely must cause those employed in the 'industry' some angst in such personal situations. Australians are animal lovers, and research has shown that many are opposed to animal testing for any purpose on moral and ethical grounds.

There are severe limitations on the translation of findings due to biological differences between humans and mice and other animals and differing responses to interventions between species. It is impossible for a mouse, for example, to accurately mimic human inhalation in testing.

New non-animal-approach methods in research, testing, education and training must be used instead of using sentient creatures – they include lung-on-a-chip; in vitro methods; in-silico (computer based); advanced computer modelling, simulation; human studies; and simulator (either virtual reality or physical modelling).

Many of the experiments that use animals are funded by Australian taxpayers by way of grants from the National Health and Medical Research Council, Australia's prominent funding body for medical research.

There is no transparency about what percentage of my taxes are being used for animal medical (and other) experimentation. I am entitled to know what my taxes are spent on.

Medical experimentation is one of the most hidden animal-use industries. It is not possible to obtain from the Government how much taxpayer money is being given to this industry or what sort of experiments are being funded. And we cannot find out what taxpayer funds are going into breeding animals for experimentation.

AN EARLIER INQUIRY'S RECOMMENDATIONS WERE NOT ACTED UPON

As long ago as 1989 the Commonwealth government held an inquiry into animal experimentation.

It recommended that Commonwealth, State and Territory governments publish annually accurate and comprehensive information on the extent and forms of animal experimentation AND establish a separate fund for research into the use of alternatives to animal experiments.

Those recommendations were shelved, which is diabolical when Australia is one of the highest users of animals in research globally - and NSW typically reports usage of more than two million animals a year.

FUNDING IS NEEDED FOR THE VALIDATION OF NON-ANIMAL RESEARCH METHODS

Below are examples of government-funded initiatives overseas that are addressing the need to further develop and validate non-animal methods of research, including:

- NC3Rs, The National Centre for the Replacement, Refinement and Reduction of Animals in Research, an independent **UK** organisation established in 2004;
- ECVAM, The **European Centre** for the Validation of Alternative Methods (ECVAM), established in 1991;
- ICCVAM, The Interagency Coordinating Committee on the Validation of Alternative Methods (ICCVAM), established in **the US** in 1997; and
- ZEBET, The Centre for Documentation and Evaluation of Alternatives to Animal Experiments, which forms part of the **German** Federal Institute for Risk Management, Berlin, established in 1989.

Other nations are developing alternative research initiatives that do not require animal experimentation. Why is Australia not doing so?

SIMILAR LEGISLATION ALREADY INTRODUCED

The recent laws banning animal testing of cosmetics products shows that it is both possible and preferable to adopt non-animal methodologies.

The same logic must be applied to the use of animals in other research fields. A government-funded institution, dedicated to the replacement of animals in medical research, must be established. Meanwhile:

- allocate a percentage of medical research funding specifically for the development of research methods that will replace the use of animals;
- award a state or federal prize for innovative research replacing animals; and
- implement grants to enable researchers to seek replacements for animals in medical research.

Every year many millions of dollars are distributed for medical research. As the validity of animal testing is increasingly being questioned, Australian research is in danger of becoming irrelevant. Hence, there is a compelling argument for allocating a significant proportion of funding to provide financial incentives for researchers to develop alternatives to using animals.

RECOMMENDATIONS ABOUT TRANSPARENCY:

1. Commission an extensive independent report evaluating the impact of animal-based research in NSW
2. Make retrospective assessments of animal research mandatory as a condition of funding - and publicise the results
3. Publicise grant evaluation reports - for all taxpayer/publicly funded research

4. Publicise animal care and ethics committee applications for animal-based research - to enable scrutiny of the proposed cost/benefit assessment

RECOMMENDATIONS ABOUT RESEARCH ORGANISATIONS

1. Make the list of license-holders publicly available
2. Publicise statistics of adverse incidents
3. Publicise clinical trial failure rates
4. Provide greater scrutiny of basic research using animals
5. Make pre-registration of all animal experiments mandatory to prevent duplication of experiments
6. Fund the development of non-animal based scientific testing via incentives such as awards, scholarships, or research grants.
7. Publish the numbers of animals bred, but not used for medical research, instead of their being killed for no purpose
8. Use plain language and non-technical summaries of research projects
9. Introduce greater scrutiny of undergraduate and postgraduate animal use
10. Ban the forced swim test and forced inhalation research
11. Phase out primate research and research using dogs and cats
12. Introduce mandatory rehoming of suitable dogs and cats used in research (current rehoming guidelines are voluntary)
13. Introduce a mandatory retirement age for dogs and cats used in research
14. Publicise the fate of all species used in research
15. Make CCTV cameras mandatory in research facilities
16. Make visits available to primate breeding colonies for media and animal welfare organisations, in accordance with biosecurity measures
17. Publicise Ministerial approvals for lethal dose tests
18. Revise the 2013 National Code. (The code specifies that research institutes should 'consider making reports available'. Annual reports and summaries of external reviews/inspection must be mandatory.)
19. Encourage the establishment of a national body for animal ethics reviews, similar to Belberry for human ethics.

RECOMMENDATIONS RE NSW RESEARCH REVIEW PANEL

1. At least two members on the panel must have a demonstrated knowledge of and commitment to alternatives to animals in medical research
2. An update must be provided to complainants for complaints lodged via the Animal Research Review Panel at the end of the investigation
3. Increase powers of investigation and take decisive action to penalise breaches

Thank you for reading my submission.

I am sure the eminent thinkers I quote below would agree with my recommendations. I know Christiaan Barnard, the surgeon who performed the first human-to-human heart transplant, would agree.

I hope the Committee will agree to implementing my recommendations.

Vivisection is a social evil because if it advances human knowledge, it does so at the expense of human character. **George Bernard Shaw**

We must fight against the spirit of unconscious cruelty with which we treat the animals. Animals suffer as much as we do. True humanity does not allow us to impose such sufferings on them. It is our duty to make the whole world recognize it. Until we extend our circle of compassion to all living things, humanity will not find peace. **Albert Schweitzer**

The indifference, callousness and contempt that so many people exhibit toward animals is evil first because it results in great suffering in animals, and second because it results in an incalculably great impoverishment of the human spirit. **Albert Einstein**

At present scientists do not look for alternatives simply because they do not care enough about the animals they are using. **Peter Singer**

I am not interested to know whether vivisection produces results that are profitable to the human race or doesn't...The pain which it inflicts upon unconsenting animals is the basis of my enmity toward it, and it is to me sufficient justification of the enmity without looking further. **Mark Twain**

I had bought two male chimps from a primate colony in Holland. They lived next to each other in separate cages for several months before I used one as a [heart] donor. When we put him to sleep in his cage in preparation for the operation, he chattered and cried incessantly. We attached no significance to this, but it must have made a great impression on his companion, for when we removed the body to the operating room, the other chimp wept bitterly and was inconsolable for days. The incident made a deep impression on me. I vowed never again to experiment with such sensitive creatures. **Christiaan Barnard**

Charles Davis
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