

**Submission
No 276**

**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 of making a submission.

Ask the experimenters why they experiment on animals, and the answer is, 'Because the animals are like us'. Ask the experimenters why it is morally okay to experiment on animals, and the answer is, 'Because animals are not like us'. – Ref: Professor Charles R. Magel

You cannot have it both ways. The above quote (oxymoron) sums up how my family and I feel about animal experimentation. It is unethical and immoral.

Background

My horror at experimentation on sentient creatures 'just like us' began at a young age. The cruelty, secrecy and lack of transparency surrounding this subject has long troubled and depressed me. The most important and arguably the only way animals are like humans is that both animal and human have sentience, and that alone is why experiments are evil and unconscionable when alternative methodologies are not only available but improving all the time overseas. These technologies must be used in Australia instead of animals.

I grew up on a farm and am aware of 'normal' farm husbandry procedures, so I have seen cruelty. But I still recall vividly in the 1960s the horror of boys in our school class being asked by the biology teacher to catch frogs and/or rats to cut open in our science class. I confess I sneaked in and released the poor creatures, as what use was this to students in the classroom? I still remember one poor frog, who hadn't been properly anaesthetised. He was on a board, and his legs were pinned down with drawing pins. The sight of him stretching and trying to release each of his legs in turn was heartbreaking. I can still see it; it is forever imprinted in my psyche. I believe schools still allow such 'experiments' to continue. It must be traumatic for most students, as it was for me, because I remember it vividly after 60 years.

That is why I whole-heartedly agree with and totally support the submission and recommendations made by Humane Research Australia. Please listen to and take note of what HRA has to say, because that organisation speaks for many people like me who care deeply about our sentient animal companions on this Earth and want to do everything to help them avoid such torture, the results of which very rarely translate to the human body anyway. Decades of animal-based research, costing billions of dollars, have failed to provide cures for humans, and only cure disease in the mouse, for example!

The fact that there are industries in Australia and abroad that breed animals for testing and experimentation is abhorrent. Likewise, is the importing of animals on which to conduct experiments - animals such as primates who are kidnapped from the wild and sold for experimentation.

Need for Transparency

There are sound ethical and scientific arguments against the use of other species as models for human disease. But it is impossible to have an open discussion about the costs and benefits of animal use when all information is shrouded in secrecy and the public is denied access to what occurs within Australian laboratories.

I understand the European Union has addressed such concerns.

The Article 43.3 Directive 2010/63/EU now requires that non-technical summaries (NTS) are 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 – a powerful tool to facilitate critical review of the use of animals. It is believed that this facilitates improved design for similar studies, raises openness of best practice and prevents mistakes.

NTS were made compulsory in the EU from 2013, and they make a significant contribution to transparency.

I urge the adoption of such requirements – particularly for taxpayer-funded research – so that there can be greater transparency and accountability about the use of animals in medical research.

I have read widely on animal experimentation. The big stand-out is that more transparency is needed.

NSW at least publishes annual reports detailing their animal use in research statistics, which give some indication of the nature and purpose of research, but the whole issue is shrouded in secrecy. I have spoken to people who have either worked or who have family members who have worked in animal testing, and they confirm this. They are afraid to even admit they work in such places, for fear of what people will think of them. The public is kept in the dark; we do not know where testing facilities are located; we do not know what goes on inside them; we fear for the sentient animals inside; and what is being done to them equates to a torture chamber, obviously they have no quality of life. Followed in the main, by their death.

I maintain that many 'scientific' procedures like the 'Forced Swim Test', antibody production, and Forced Inhalation tests (and many others) are unnecessary and cruel, and that other non-animal methods could be used, but are not.

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.

New non-animal-approach methods in research, testing, education and training must be used instead of 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) – to name a few.

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.

But there is no transparency about what percentage of my taxes are being used for animal medical (and other) experimentation. I should be able to find out where my taxes go. What sort of hideous experiments are being funded with my taxes? I need that information so that I can write to my members of Parliament, and also to the various ministers involved to voice my stern disapproval at such inhumanity.

Not enough is being done in this country to stop the use of sentient animals of all species in scientific experimentation and other research. For too many years and to this day unacceptable secrecy surrounds the use of animals in research. Transparency is essential so the public is aware of what is happening behind closed doors. Medical experimentation is one of the most hidden animal-use industries. Despite the use of public funds, 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. Nor what taxpayer funds are going into breeding animals for experimentation.

Change is long overdue

Way back in 1989 the Commonwealth government held an inquiry into animal experimentation. BUT, despite its recommendations 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 have still not been implemented 30 years later! Governments are good at wasting other people's money!

This is a disgrace 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

A number of government-funded initiatives overseas 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 fast developing alternative research initiatives that do not require animal experimentation. NSW and Australia are missing a valuable opportunity to excel in clinical translation

The future

Current legislative changes banning the testing of cosmetics products on animals illustrate that it is both possible and preferable to adopt non-animal methodologies.

Logic dictates that this must be extended 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 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 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. It is already happening in other nations. So Australia and its states are being left behind.

Recommendations re transparency generally:

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 re research establishments

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

I trust the committee will read my submission and that it will help to stop the use of animals – sentient beings like us – in experiments and bring our states up-to-date with the more forward-thinking and compassionate nations around the world.

Jan Kendall
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