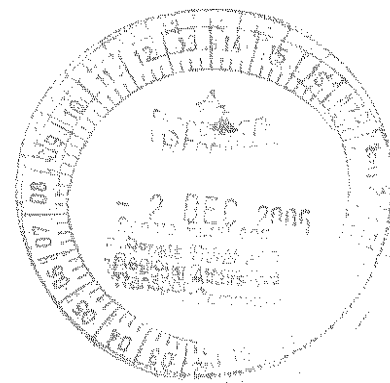


Institute for Molecular Bioscience

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Committee Secretary  
Senate Rural and Regional Affairs and Transport Committee  
Department of the Senate  
Parliament House  
Canberra ACT 2600  
Australia



Tuesday, November 29, 2005

Dear Sir/madam

**Re: National Animal Welfare Bill 2005**

The following submission relates to the National Animal Welfare Bill 2005, specifically in relation to guidelines for the use of animals for scientific research purposes. As senior biomedical researchers at the Institute for Molecular Bioscience at the University of Queensland, our research activities are likely to be affected by the provisions in Parts 8 “Animal used for experimental purposes” and 9 “Funding for animal research etc” of the Bill.

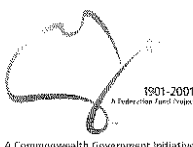
It is generally agreed that the use of animals in research should be monitored appropriately to protect the welfare of animals. However, it is important to bear in mind that scientific research involving animals is most often aimed at improving the diagnosis, understanding and treatment of human disease. It is vitally important that measures taken to protect animal welfare do not prevent the timely and productive conduct of this research, especially given that the research itself is most often publicly funded and has been rigorously scrutinized for public benefits prior to funding.

We are concerned that the changes proposed in Sections 8 and 9 of the draft Bill will result in a level of administrative regulation, reporting and compliance measures so high as to impede the progress of vital biomedical research.

We advocate the adoption of a simpler system of licensing research involving animals in Australia. The system that has been used successfully in the UK for many years (<http://scienceandresearch.homeoffice.gov.uk/animal-research/>), in which a researcher with appropriate qualifications and experience is granted a 5-year licence to conduct approved categories of experiment in line with aims of a beneficial and high-quality research programme, represents a useful template for the regulation of animal-based research in Australia.

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Such a system should be administered federally or at the State level, but not both. Because the new Bill does not clarify how proposed Federal regulation of animal research would integrate with the current State-based system, we submit that continuation of State-based regulation would adequately protect the interests of animals used in research while allowing a streamlined approach to licensing as suggested above.

We urge the Senate Rural and Regional Affairs and Transport Legislation Committee to consider amending the National Animal Welfare Bill 2005 to accommodate the simplified style of licensing described above, in order to allow appropriate scrutiny of animal welfare and at the same time allow researchers to continue to generate important advances in biomedical research for the benefit of the Australian people.

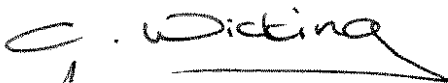
Sincerely



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