

25 November 2005



Queensland Institute of
Medical Research

Comments from the Animal Ethics Committee, Queensland Institute of Medical Research, on the proposed *National Animal Welfare Bill 2005*

The Committee welcomes the interest of legislators in animal welfare. The following comments reflect general concern about increasing the burden of compliance in the area of animal experimentation which is already closely regulated.

1. The Bill would add another layer of regulation to existing processes: NHMRC guidelines for animal experimentation and Qld legislation. The NHMRC guidelines effectively are already binding Australia-wide because they have been adopted by institutions and granting bodies.
2. The Bill is not intended to affect existing State laws (Sec 6.1) but the additional National Animal Welfare Authority (NAWA) requirements will evidently still need to be met.
3. Will require an additional report from QIMR. The QIMR-AEC already produces 3 different annual reports (for Qld-DPIF, NHMRC and QIMR Council).
4. Will require QIMR to be licensed at the federal as well as at the State level.
5. The annual report from QIMR (a research unit operator) will be onerous in its additional requirements (Sec 110). For each experiment, the purpose, need and commercial interest must be shown (Sec 110a –c). For the Unit, the number of animals used for breeding(f), the surplus (g), the number of experiments (i) and the number of animals per category (k) where category is defined by purpose (eg, cancer research, diagnostics vaccines, safety testing) rather than by welfare issues as at present.
6. No provision is made for importing research animals from outside of Australia (Sec 106).
7. Doubt has been expressed as to whether the Federal government has jurisdiction in this area. However, NAWA requirements could be binding on federally-funded projects (eg, NHMRC) and thus add an additional regulatory load on researchers and research institutions.

I trust that these comments will receive due consideration.

Yours sincerely

A handwritten signature in black ink, appearing to read 'PG Parsons'.

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