

Ms Maureen Weeks
Committee Secretary
Senate Rural and Regional Affairs and Transport Committee
Department of the Senate
Parliament House

35 Tallaroon Street
Jindalee
Qld 4074

November 2, 2005

Dear Ms Weeks,

I have read the proposed Bill, in particular the sections concerning use of animals in experimentation and it is this aspect on which I wish to make my submission.

I strongly support the view that all animals should be used and treated responsibly and humanely. I welcome those aspects of the Bill which require all research to be registered as approved and complying with the requirements of NHMRC *Australian Code of Practice for the Care and Use of Animals for Scientific Purposes* which includes oversight by an approved AEEC. This has been the case in universities for many years and should apply to all research to ensure universal conditions for experimentation on animals.

However, I do not support the creation of a national public access registry or licensing of every individual researcher, for the following reasons.

Data base

- Whilst the public access intent of this proposal is clear and laudable, pragmatism is required in its operation and to accord with the Australian Animal Welfare Strategy which supports self regulation. The lists of experiments and researchers will be of formidable size and this size will limit the utility of the database. For example, universities will probably be the largest sites of animal research; a single researcher may be undertaking a large number of projects, each with different aims and animal requirements and universities have hundreds of researchers generating thousands of projects. So to ensure data collection of is not an onerous burden on already limited research resources of these institutions and creation of an extensive federal bureaucracy, I urge that the data collected be that already required by the local (state) jurisdiction and in the same format. A different format and basis will increase demands on an already stretched administrative system.
- Furthermore, the information published may be used maliciously. I am reminded of the recent intimidation of a UK animal breeder (*A farm that has been breeding guinea pigs for medical research for more than 30 years is to stop after intimidation by animal rights activists*. BBC News online Tuesday, 23 August 2005, 15:39 GMT) and other situations in UK and Canada. Thus, I suggest that individual names not be readily accessible and that instead the Bill trust and rely on the already excellent performance of institutional ethics committees. Again state regulation require reports that should serve the purposes of ensuring humane and responsible research

Licensing

- Any licensing should be limited to the chief executive or delegated officer of the institution or company, who holds the responsibility that all employees be trained in accord with NHMRC guidelines. This eliminates the need for of a complex and expensive system (and staff) of testing, issuance and policing individual licenses as occurs in UK, whilst ensuring training in techniques, ethics and legal responsibilities of all researchers. This system works excellently in universities already. Indeed the training courses run by universities might be a resource for the non-university researchers.

Yours sincerely,

Peter L Kaye, PhD