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Re: Proposed National animal Welfare Bill 2005

Dear Sir/Madam,

I wish to tender a submission to the Senate Rural and Regional Affairs and Transport Legislation Committee inquiry relating to the proposed National Animal welfare Bill 2005.

As an established Researcher with more than 10 years practical experience in the performance of responsible and ethical animal-based medical research I would like to make it clear at the outset I support reasonable and productive measures to promote ethical animal research. I feel compelled, however, to pass comment on several aspects of the proposed National animal Welfare Bill 2005 that pertain to the scientific use of animals.

General Comments

Necessity for further legislation.

Currently, scientific use of animals is an area of animal welfare that is highly regulated. The NH&MRC publish the Australian Code of Practice for the Care and Use of Animals for Scientific Purposes (the Code) the purpose of which is: “to ensure the ethical and humane care and use of animals used for scientific purposes as defined in the Code”. The principles set out in the Code are for the guidance of investigators, teachers, institutions, Animal Ethics Committees and all people involved in the care and use of animals for scientific purposes. The guidelines of the Code are given legislative authority by being enshrined in state legislation. Furthermore, all animal-based research is subject to stringent scrutiny through Institutional Animal Ethics Committees (AECs) that function under the guidelines of the Code.

Therefore, I feel the legislation is unnecessary. Additionally, introduction of yet further poorly-justified legislation will be overly burdensome on both scientists and regulatory bodies alike.

Specific Comments

99(1)l It is unclear what is meant by the term “cruel experiments” but unethical experimentation is not permitted and it is disappointing to see it suggested that unethical experimentation would be proposed.

(1) It is not only unproductive, but impractical, to “establish a data bank of all experiments using animals, carried out in both Australia and overseas.” What can be gained from generating a data base of *all* animal experiments? Records are kept by Institutional AECs of the nature of experimentation performed and the total number of animals used.

(2) A databank of alternatives to animal experimentation is of no use on it's own. Application of alternative research strategies wherever possible is, however, useful and is already required by the Code and AECs.

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I am personally astonished that any attempt to legislate disclosure of the personal details (including names and addresses) of individuals licensed for scientific use of animals is considered. Firstly this is an invasion of personal rights. Secondly and most importantly such information would facilitate the ability of extremist groups to perpetrate terrorist activities directed against individuals associated with scientific use of animals. Such terrorist activities are already a severe problem in other countries.

Conclusions

It appears to me that the authors of the Bill feel that only they are able to make valid decisions about what should or should not occur in our society and wish to introduce draconian and inflexible legislation to ensure their views prevail. What is required is a balanced approach to the issue of scientific use of animals that weighs the potential gains provided by such use with the reasonable concerns of the general public. Such a system is already in existence in Australia, having evolved to deal equitably and practically with the needs of the research and educational community along with those of concerned individuals. Furthermore, I question whether the approach engendered by this proposed bill would not, in fact, be detrimental.

In summary I am opposed to the consideration of the proposed National Animal welfare Bill 2005 for legislation.

Yours sincerely

Raymond Steptoe