



AATA  
PO Box 4052  
Parkville 3052

Dear Sir/Mam

Please accept the Australian Animal Technician' s Associations comment on the Australian Animal Welfare Bill.

This submission is intended to only address those provisions of the Bill relating to the use of animals for scientific purposes. Our major concern is the redundancy of this bill under existing state legislation:

- The key provisions of the Bill relating to animal research are already covered by state legislation.
- The 'Australian Code of Practice for the Care and Use of Animals for Scientific Purposes' Is a legally binding document embedded into legislation in every state and territory in Australia. It applies to all animal research including any research that is "commercial in confidence".
- Each State has a 'Prevention of Cruelty to Animals' or 'Animal Welfare' act that has regulations that encompass having licensed premises and authorised officers for inspection of premises.
- "**animal**" The definition implies that the Bill apply to all invertebrates. This would include non-sentient animals such as nematodes and arthropods. It is felt that extending animal research legislation to cover non-sentient animals would dilute and divert funds and resources from sentient animals. Also the definition of animal differs from one state to another some will consider fish as an animal while other do not
- The Animal Ethics Committees (AEC) have a clear and defined role under the 'Australian Code of Practice for the Care and Use of Animals for Scientific Purposes'. The AEC are independent arbitrators and have a clear role in matters of responsibility, monitoring, and assessment or research protocols and techniques and the staff that can carry them out. This committee sits in a local setting with inside and in-depth knowledge of the

organisation and it's staff – this is far more advantageous than a central agency that collects fees.

- Public notices and allowing access to a register of animal experimenters is clearly putting people at risk and in a controlled environment under the scrutiny of an approved AEC it seems unnecessary.

Kind Regards  
Magdy Sourial  
Chairperson |  
Australian Animal Technicians Association