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27 October 2005

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

Dear Sir/Madam,

I write in response to your invitation to comment on the National Animal Welfare Bill 2005.

The Australian Association for Humane Research Inc. is a non-profit organization that challenges the use of animals in medical research on both ethical and scientific grounds. We maintain that real medical progress can only be made through studying our own species and not artificially-induced diseases and conditions in animals.

As much of the Bill has no relevance to our organization, we wish only to make specific comments relating to the sections on the use of animals in research.

**Part 4 Animal welfare offences**

**81. Use for certain scientific purposes unlawful.**

We fully endorse this section of the Bill.

The Draize eye test, the skin irritancy test and the LD50 test should not be permitted under any circumstances. There are already sufficient companies in the market that produce cosmetics, sunscreens and ingredients which have been proven safe through decades of human use. Furthermore, alternative tests already exist that are cheaper, more humane (by not using animals) and provide far more accurate results than those obtained through causing harm to other species.

We direct you to the Choose Cruelty Free website [www.choosecrueltyfree.org.au](http://www.choosecrueltyfree.org.au) and in particular, the section on testing, which outlines many of the problems associated with these animal tests, and the section on alternatives.

**Part 8 – Animals used for experimental purposes**

While we appreciate the intention of this section to protect animals as much as possible, there is little comment we can make in this regard as AAHR considers that animals should not be used in research in the first place. Commenting on welfare standards would therefore be endorsing their presence in a laboratory setting – which we are strongly opposed to on both ethical and scientific grounds.



Extrapolation from animals to humans can and does result in dangerously misleading outcomes. The reason is due to species differences. Every species has a different genetic make-up and it is on the genetic and molecular level that variances occur. Species differences occur in respect of anatomy, the structure and function of organs, metabolism of toxins, rates of detoxification and protein binding, absorption of chemicals, mechanisms of DNA repair and lifespan, and more. Results can differ between different sexes of the same species, different strains, and even due to different housing conditions or levels of stress within the same species. So if such differences can occur within the same species then it's negligent to extrapolate from say a rat to a human – two totally different species with a totally different genetic make-up.

Researchers often claim that animals are used because they need to test in a living system rather than on isolated cells or tissue, however an entire living system creates more variables which can further affect the outcome of any results.

Another problem is that more often than not a disease that is being researched does not appear in its natural state but instead is artificially induced in the research animal. This can result in the same symptoms being expressed but the underlying illness is not the same as in its human form. Treatments then try to cure the symptoms of the falsified illness but are not addressing nor curing the real problem, which may have been caused, or further affected, by social and environmental factors rather than biological factors alone.

Even vivisector and former director of Wellcome Research Laboratories, Dr Miles Weatherall admitted: 'Every species has its own metabolic pattern, and no two species are likely to metabolise a drug identically.'

Having expressed our view in this regard however, there are nevertheless a number of points within the Bill (outside the scope of welfare) which we commend.

### **99 Matters of responsibility**

*1 (l) ensuring that the public is aware that proposals for cruel experiments will be scrutinized.*

Unfortunately researchers who use animals are seldom questioned about their methodology and the public are denied access to knowing what happens to animals nor how inaccurate the results can be when extrapolated to humans. They therefore continue their practices as the public (incorrectly) believes it to be a 'necessary evil' for medical progress.

An article which appeared in the UK Guardian newspaper referred to a “public which doesn't necessarily understand the issues”. This exemplifies the dangerous perception that researchers are the authority who should not and cannot be questioned. This unfortunate conclusion has allowed users of animals to continue their unethical and unscientific work unabated for too long. With such work being shrouded in secrecy, the public is denied access to knowing the truth of what is actually happening and are therefore not able to make an informed judgement nor can they object accordingly.

Whilst researchers continue to use animals in medical research they are wasting precious resources - time and money - that should be used to find better, more ethical and scientifically-valid ways. Unfortunately however, whilst no one questions their methodology they will continue to work



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unopposed, backed by huge vested interests. We therefore encourage the transparency of animal-based research.

*1 (n) actively encouraging, through grants and incentive schemes, research into alternatives to animal experimentation.*

The move away from animal use is not simply a matter of replacing such procedures with alternative non-animal methods, but rather, there is a need to re-evaluate the entire process of how we approach medical research.

Far more emphasis needs to be placed on epidemiology, clinical research and autopsies so that we can address the real disease rather than a replica in a model of another species.

Despite claims by some researchers that alternative methods are not yet sophisticated enough to replace animal tests, they are certainly more dependable and produce more accurate results than tests on species who differ from humans in their metabolism of toxins, rates of detoxification and protein binding, absorption of chemicals, mechanisms of DNA repair and lifespan – all factors that would have a profound effect on the efficacy of drugs. Genomics, proteomics, nanotechnology, pharmacogenomics and phage display are just a small list of examples of some of the emerging technologies that can replace outdated and unreliable animal tests and we certainly encourage further research into these areas:

#### **100 Data bank**

*(1) The Authority must establish a data bank of all experiments using animals, carried out in both Australia and overseas.*

*(2) The Authority must establish a data bank of alternatives to experiments using animals that are carried out in Australia and overseas.*

We consider it absurd that such databanks are not already in existence. Their absence merely illustrates that researchers are unwilling to share information and suggests that their motives are more likely to be for self promotion rather than an altruistic desire to advance medical progress. It is imperative that if we are to avoid the repetition of unnecessary animal tests and genuinely improve the wellbeing of Australians we MUST ensure that information is shared amongst the research community.

#### **Summary**

The use of animals in medical research can never be justified - neither on ethical nor scientific grounds. There has been too much damage caused by the inaccurate extrapolation of information from non-human animals to humans, and with 21<sup>st</sup> century technology we should be moving away from such archaic research methods and looking toward more humane and scientifically-valid methodologies.

We also consider that animal welfare legislation, codes of practice, animal ethics committees serve to reinforce to the community that animal research is justified – so long as pain and suffering is minimized and animals are provided with environmental enrichment. It has been stated that, “AECs are a vital part of animal experimentation”.



Researchers may fear that without using animals there would be no medical progress, but that is certainly not the case. If one road is blocked then we must take another route – and in this case a much better route. Medical progress WILL continue and researchers WILL find other better ways, for that is what science is all about.

We thank you for this opportunity to express our views on this issue and hope that they will be taken into consideration.

Yours sincerely,

Helen Rosser  
Chief Executive Officer  
***Australian Association for Humane Research Inc.***