

Submission to the review of the Australian and New Zealand Standard Research Classification (ANZSRC).

Humane Research Australia is a not for profit organisation that challenges the use of animal experiments and promotes more humane and scientifically-valid non-animal methods of research. We wish to take this opportunity to highlight two areas that have not been addressed in the discussion paper but which are crucial if we are to monitor the excessively high usage of animals in Australian research, as well as the efficacy of their use.

Statistics of animal use.

Australia maintains no national collection or collation of animal use statistics, unlike many other countries. Even at state/territory level, there are often 4-year delays in reporting, extremely inconsistent collection and reporting methods between jurisdictions and institutions, and some states and territories don't even collect statistics at all.

The lack of statistics collation at a national level, and even at state/territory level, means that the 3Rs principles (Refining, Reducing, and Replacing animal use in research), or any other national policies that aim to limit the use of animals in research and teaching, are very difficult to implement, given that there is no accurate way of measuring change.

The current statistics reporting system in Australia is state- and territory-based. This system is inadequate for a number of reasons:

- Only three states regularly collect and make the statistics publicly available – Victoria, New South Wales and Tasmania.
- There is significant inconsistency between states/territories, and even within them due to variable institutional reporting methods.
- There is no standardised format for the collection or reporting of statistics. Furthermore, the responsibility of collection often changes departments. HRA also often finds discrepancies even within the data that is reported in a usable format.
- Procedure severity categorisation is determined by indicative rather than the actual level of impact.

Due to these shortcomings, it is difficult to collate an accurate picture of the national use of animals in research and teaching. Therefore, the figures collated and published by HRA each year are approximate, some being based on averages, and thus usually represent very conservative numbers of total animal use.

International precedents

Australia has a responsibility to follow the example of other jurisdictions, such as Canada, the United Kingdom, the European Union, and New Zealand, and set up an annual national animal use report system. Given that Canada, with over 10 provinces, and the European Union, made up over 28 member nations, effectively collect and collate statistics, it is very difficult for Australia to make the case that it is 'too difficult' to collect national statistics in a uniform format from our 8 states and territories.

What needs to change

There is a critical need to set up a national framework for the collection and collation of national statistics of animals used in research.

It is essential that we have a nationally consistent and reliable procedure for reporting and publishing annual statistics on animal use in research and teaching - particularly in order to facilitate transparency and accountability, especially given much research is tax-payer funded.

The reporting of national statistics and relevant analysis is also important to make them meaningful, informative, and understandable to the general public, and thereby allow for open and honest debate around animal experimentation.

Additionally, HRA would like to see:

- More comprehensive and accurate category breakdown of the 'purpose of research' and 'severity of research' categories, i.e. the avoidance of generalistic terms
- Details on the amount of research that was publicly funded
- Increased openness and transparency in research through the provision of details on what (if any) benefit was obtained

Lack of reporting negative results with the potential consequence of unnecessary duplication of studies.

It is also of major concern in that there is no central and national database in which animal studies are registered. It is essential – to avoid wasting financial resources and animals' lives on repeat experiments - that a national registry be established for this purpose.

Further, to avoid publication bias and to increase accountability it is evident that Australian research needs a central database where animal research projects are registered **before** the research starts - similar to clinical trials registers, such as ANZCTR <http://www.anzctr.org.au/> or ClinicalTrials.gov .

Some journals now make it a pre-requisite for publication of (human) trials that the research has been registered with such a database.

Without these two components of statistical reporting it will remain nearly impossible to monitor the use and the (in)effectiveness of animal use in Australian research. This can only result in a huge waste of resources as well as remaining to be a hurdle to clinical translation and the achievement of

genuine medical progress. Humane Research Australia therefore strongly urges that these issues are addressed in the ANZSRC review.

Thank you for the opportunity to raise these important concerns.

Sincerely,

A handwritten signature in black ink, appearing to read 'Helen Marston', with a long horizontal flourish extending to the right.

Helen Marston
Chief Executive Officer.

3rd April 2019