Inquiry into the use of primates and other animals in medical research in New South Wales

Submission of the
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The Australian Veterinary Association (AVA)

The Australian Veterinary Association (AVA) is the only national association representing veterinarians in Australia. Founded in 1921, the AVA today represents 8500 members working in all areas of animal science, health and welfare.

Veterinary roles extend far beyond caring for the health and welfare of our pets and production animals. Veterinarians are the pathologists, field officers and inspectors that secure the safety of ourfood, ensure market access for our exports, help to safeguard the human population from zoonotic diseases, are members of Animal Ethics Committees and provide oversight of the welfare of animals involved in research.

The AVA welcomes the opportunity to provide feedback to the Committee's inquiry into the use of primates and other animals in medical research in NSW that will review and report on:

a) the nature, purpose and effectiveness of medical research being conducted on animals in New South Wales, and the potential public health risks and benefits posed by this research;
b) the costs associated with animal research, and the extent to which the New South Wales and Federal Government is commissioning and funding the importing, breeding and use of animals in medical research in New South Wales;
c) the availability, effectiveness and funding for alternative approaches to animal research methods and technologies, and the ability of researchers to meet the 3 R's of Replacement, Reduction and Refinement;
d) the ethical and animal welfare issues surrounding the importing, breeding and use of animals in medical research;
e) the adequacy of the current regulatory regime regarding the use of animals in medical research, particularly in relation to transparency and accountability;
f) overseas developments regarding the regulation and use of animals in medical research; and
g) any other related matters.

AVA Principles and Policies

AVA Statement of Principles[1]

Animals are sentient beings that are conscious, feel pain, and experience emotions[2]. Animals and people have established relationships for mutual benefit for thousands of years.

Humans have a duty of care to protect animals. Where a person does not meet his or her obligations to animals in his or her care, animals may suffer. When this happens, the law must be able to adequately intervene to enforce compliance and prevent suffering.

Animals have intrinsic value and should be treated humanely by the people who benefit from them. Owned animals should be safe from physical and psychological harm. They need access to water and species-appropriate food and shelter and should be able to fulfil their important behavioural and social needs. They must receive prompt veterinary care when required and have as painless and stress-free a death as possible.

Animals can be used to benefit humans if they are humanely treated, but the benefit to people should be balanced against the cost to the animal. They should not be used in direct combat or for purposes where suffering, injury or distress is likely to be caused.

[1] AVA Statement of Principles https://www.ava.com.au/policy-advocacy/policies/

[2] Mellor DJ, Patterson-Kane E, & Stafford KJ. *The Sciences of Animal Welfare*. UFAW Animal Welfare Series. Chichester UK: Wiley-Blackwell. 2009: 34-52

Humans should strive to provide positive experiences to promote a life worth living for the animals in their care. We should strive for continuous and incremental improvement in the treatment and welfare of animals.

Humans have a responsibility to care for the natural environment of free-living native animals. People should take steps to preserve endangered species and protect native animals from disease where possible.

AVA Policy - Animal experimentation, 2009[3]

There must be appropriate legislation and enforcement in all states and territories to ensure that the welfare of animals used in research, field trials and teaching is adequately protected. The principles in the Australian Code for the Care and Use of Animals for Scientific Purposes (2013) as amended from time to time should form the basis of the regulatory control of animal experimentation.

The Australian Veterinary Association Ltd. (AVA) should be actively involved in the development and review of such regulatory and advisory frameworks.

AVA Policy - Role of veterinarians in the care of use of animals for scientific purposes, 2016[4]

There are two main roles for veterinarians in the oversight of use of animals for scientific purposes:

i. As a member of an animal ethics committee (AEC)
ii. As an institutional or facility veterinarian

Veterinarians in either capacity must be registered with an Australian veterinary board.
All institutions using animals for research must employ facility veterinarians in sufficient numbers to adequately supervise animal interventions. Facility animal welfare officers (AWOs) should also be veterinarians.

Veterinarians serving as facility veterinarians must be responsible for practical oversight of procedures on animals involving anaesthesia, surgery and other invasive or potentially painful techniques. This is to ensure competency of operators and adequacy of analgesia and other refinements to minimise distress. The facility veterinarian must also have oversight of preventative health, husbandry, diagnostic or treatment interventions, and euthanasia techniques.

AVA Recommendations

1. The AVA supports and encourages a continuing commitment to animal research in NSW and the important role that it plays in the knowledge and improvement of health and wellbeing for humans, animals and/or the environment.

2. The AVA recommends a greater emphasis be placed on the provision of research grants to address the 3Rs (reduction, replacement and refinement) and alternatives to animals in research.

3. The AVA recommends the NSW Government includes veterinarians in all aspects of animal research to enhance application of the 3Rs, foster animal welfare and maximise quality of research through their:

- commitment to and knowledge of biological, behavioural and psychological needs of animals;
- specific knowledge and skills in animal research procedures including scientific design, confirmation of animal models, clinical health assessment, surgical interventions, anaesthesia, analgesia and diagnostic pathology; and

[3] https://www.ava.com.au/policy-advocacy/policies/miscellaneous-welfare-issues-animal-research-teaching/animal-experimentation/
[4] https://www.ava.com.au/policy-advocacy/policies/other-services-provided-by-veterinarians/role-of-veterinarians-in-the-care-and-use-of-animals-for-scientific-purposes/

- understanding of the impact of the human–animal relationship as it contributes to the five domains model of animal welfare[5]

4. The AVA recommends the formal inclusion of an appropriately qualified veterinarian on the Animal Research Review Panel (ARRP) by the addition of a nominee of the Australian Veterinary Association in the list of members.

5. The AVA recommends that a higher competency training be introduced involving online courses and ongoing training of researchers be a key responsibility of the institutional veterinarians. The institutional or facility veterinarians must have a hands-on role in directly assessing and approving the competence of researchers to undertake procedures on animals, and provide ongoing oversight and monitoring of the animals in their care. Importantly, the number of veterinarians employed by the facility to perform this role must be proportionate to the number of animals and commensurate with the risks, so that the program of veterinary care is appropriate and not merely nominal.

6. The AVA recommends a better harmonisation and standardisation of the animal research legislation across Australian jurisdictions to avoid the interpretative differences seen in legislation between the states and territories.

7. The AVA would support a move towards uniform commonwealth legislation aligned to the *Australian Code for the care and use of animals for scientific purposes (2013)* (The Code) to regulate animal research which is commonly undertaken collaboratively across many jurisdictions. This would bring Australia into line with the best practice international regulation observed in the UK and EU.

8. The AVA supports and recommends harmonisation and standardisation of annual animal use statistics across state and territories in Australia.

Terms of Reference Discussion

The AVA provides the following responses to each of the Inquiry's Terms of Reference.

(a) - the nature, purpose and effectiveness of medical research being conducted on animals in New South Wales, and the potential public health risks and benefits posed by this research.

The involvement of animals in medical research over several hundred years has demonstrably changed the face of human health, wellbeing and lifespan[6]. Concurrently it has also provided critical improvements in the wellbeing and lives of animals and contributed to significant environmental decisions that continue to benefit humans and animals[7]. Animal research has opened the door to biological understanding providing cellular and sub-cellular knowledge that has driven research discoveries that would otherwise have remained unknown. The mapping of the human genome for example, was enabled following the mouse genome being mapped in 2002[8].

This knowledge continues to provide insights to systems function, disease understanding and development of disease therapeutics and has assisted in the application of the 3Rs[9] including the development of alternatives to animals in research. There is, however, much that remains unknown and

[5] Mellor DJ, Beausoliel NJ et al. The 2020 Five Domains Model: Including Human-Animal Interactions in Assessments of Animal Welfare. Animals 2020, 10, 1882-1888

[6] https://anzccart.adelaide.edu.au/animals-in-science/benefits-of-animal-based-science#research

[7] Wittmann EJ, Baylis M. Climate change: effects on Culicoides-transmitted viruses and implications for the UK. Vet J 2000; 160: 107–117.

[8] https://www.animalresearch.info/en/medical-advances/medical-discovery-timeline/mice-genetics/; http://www.eara.eu/40-reasons

[9] https://www.nhmrc.gov.au/about-us/publications/information-paper-implementation-3rs-australia

without animal research this situation will continue. The Therapeutic Goods Administration (TGA) requirement for pre-clinical assessment of vaccines to ensure their safety and efficacy before moving to human clinical trials or release for use is a very clear demonstration of the risk to public health if animal research were to stop[10]. The European Animal Research Association (EARA) provides a graphic on how research involving animals contributed to COVID-19 research. There is considerable evidence that COVID-19 is just another step in the emergence of other diseases with a high risk of global impact. Animal research that addresses preparedness for further pandemics is imperative for future survival of the human species[11]. Recent research identifying a new variant of Hendra virus is another example of a zoonotic disease that could present a potential threat to the public should human to human transmissibility arise[12].

It is important to note that surveys show that public support for scientific research using animals remains high because of the regulatory oversight that includes veterinarians, and other community members[13].

It is also important to acknowledge that often animal research conducted for the potential benefit of humans provides insight into similar conditions in animals[14].

(b) - the costs associated with animal research, and the extent to which the New South Wales and Federal Government is commissioning and funding the importing, breeding and use of animals in medical research in New South Wales.

Animal research including teaching is rigorously regulated in Australia through the Code and state legislation. The Code prescribes all aspects of institutional and researcher obligations for the animals in their care and research. These obligations are administered on behalf of the institutions by their Animal Ethics Committee (AEC) with governance over the housing, care and husbandry, breeding, transporting, research involvement, training, monitoring, reporting and investigation of adverse events. These obligations are significant and if animal welfare, wellbeing and research quality are to be achieved at the required standard, it is expensive. Currently only modest contributions to these costs are provided from government coffers. Rather, the government departments contribute to these costs through significant administrative load that deflects resources away from the important core responsibilities of research support and training that maximises animal welfare. Grants are highly competitive and even when successful, researchers receive limited funding for animal research, and this comes only with an assurance that the research institution will subsidise the majority of the costs. It has been recognised that this has placed Australian researchers under considerable strain and there has been a constant flow of significant talent out of Australia[15].

This however is not just a risk of talent loss. There is a bigger animal welfare concern if animal research that could be done in this country under strict controls, moves offshore to countries where strict governance does not apply. In Australia, the regulatory controls ensure primary respect for animals in research, personal responsibility for animal welfare and that the welfare always comes ahead of research outcomes. Every project must convince an AEC that the research is fully justified, that the 3Rs have been addressed and the impact on the animals is managed to maximise their welfare.

There is a need for the NSW government to recognise that it has a responsibility to support animal research so that they do not replicate the threatened closure of the Animal Resources Centre in Western

[10] https://www.niaid.nih.gov/news-events/role-animal-research-mrna-covid-19-vaccine-development
[11] https://www.thelancet.com/journals/laninf/article/PIIS1473-3099(20)30123-7/fulltext
[12] Annand EJ, Horsburgh BA, et al. Novel Hendra Virus Variant Detected by Sentinel Surveillance of Horses in Australia. EID Journal 2022, 28, 3, 693-704
[13] https://www.swissinfo.ch/eng/swiss-voters-reject-animal-testing-ban/47343764; http://www.eara.eu/post/eu-responds-to-phase-out-call
[14] https://www.sydney.edu.au/news-opinion/news/2015/12/04/world-first--university-of-sydney-scientists-cure-dog-of-dementi.html
[15] Mannix L,. Australian science at crisis point. The Age, March 20, 2022

Australia[16] – a decision that was made for financial reasons without understanding the potential public health risk it proposed to vaccine development during a global pandemic. Governments must recognise that the value of animal research far outweighs the need for financial profit. The profit comes in the rewards to improved human health and wellbeing.

(c) - the availability, effectiveness and funding for alternative approaches to animal research methods and technologies, and the ability of researchers to meet the 3R's of Replacement, Reduction and Refinement.

Systematically over time, alternatives to animals in research have been developed. In the past much of this has been serendipitous but it has resulted in significant improvements on the impact on animals needed for research. Since the emergence of the 3Rs[17], researchers have been encouraged to consider how they can apply them to their research design. Today this is a key aspect of the AEC assessment of animal research proposals.

There is however a dearth of funding in Australia for development of alternative animal research methods and technologies that would reduce animal use, replace animals or refine studies to reduce the impact on animals. The NSW Government led the way in the establishment of the Animal Research Act in 1985, setting an example that was followed by all other Australian states and territories and by many other countries. It would be appropriate for the NSW Government to take this impressive initiative even further and establish grants specifically designed to encourage the development of alternatives to animal research and promotion of the 3Rs. Individual institutions are providing some funding for this - The University of New South Wales 3Rs Grant Scheme and the University of Sydney's 3Rs Award – but if real improvement is to be achieved, government grant funds need to be made available. It is important to note that other countries to which we should aspire are providing substantial funding for 3Rs research.

Country	Initiatives
Switzerland	The Swiss 3R Competence Centre (3RCC) - funded by Switzerland's State Secretariat for Research, Education and Innovation (SERI). This provides research grants for development and refinement of 3R methods and their implementation.
Norway	Norecopa, - funded by Norway's Ministry of Agriculture and Food and Ministry of Trade, Industry and Fisheries. This is a platform offering information on the 3Rs with an inventory of alternatives to the use of animals.
UK	The National Centre for the Replacement Refinement & Reduction of Animals in Research (NC3Rs), funded by the UK Research and Innovation (UKRI), was established in 2004 to work with the research community to replace, refine and reduce animals used in scientific research. The NC3Rs awards several prizes, project grants and PhD scholarships for 3Rs research annually including International 3Rs prize.
New Zealand	The New Zealand Ministry of Primary Industries' Sustainable Food & Fibre Futures (SFF Futures). This provides funding for research involving the 3Rs.

While the current expenditure of other countries on 3Rs research is unknown, a 2008 review of national public funding programs in 16 European countries estimated the total annual expenditure on 3Rs research to be €17 million[18]. In 2017, the UK NC3Rs also reported that they had awarded £5 million in 3Rs research grants[19].

It might also be appropriate to encourage the major granting bodies that are federally funded (NHMRC, ARC) to consider providing parallel 3Rs research funding to animal researchers who receive their grants

[16] https://www.nature.com/articles/d41586-021-01896-x

[17] Russell W M S, & Burch RL. The Principles of Humane Experimental Technique. London: Methuen, 1959.

[18] Devolder, T. et al. (2008). A review of national public funding programmes in European countries. ALTEX, 25(3), 233-242.

[19] UK NC3Rs Annual Report 2017: https://nc3rs.org.uk/sites/default/files/2021-09/NC3Rs%20Annual%20Report%202017.pdf

to promote the development of alternatives to animals across Australia.

(d) - the ethical and animal welfare issues surrounding the importing, breeding and use of animals in medical research;

As noted in ToR(b), all animal research is rigorously governed in Australia. In NSW this governance consists of the *Animal Research Act 1985* (ARA), the *Animal Research Regulation 2021* and the *Australian code for the care and use of animals for scientific purposes (2013)* which is embedded in this legislation. The National Health and Medical Research Council (NHMRC) has produced a suite of additional guides and standards that apply to animals when involved in research and teaching. These, along with the fact sheets, policies and guides produced by the Animal Research Review Panel (ARRP) and department of primary Industries (DPI) also establish the compliance requirements for animal research. Other guidelines and regulations with which AECs may need to be familiar are the International Air Transport Association (IATA) Live Animal Regulations (LAR) and the Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES) which prescribes the restrictions and regulations associated with the movement of endangered species around the world. This is of particular relevance for non-human primates involved in research that may be sourced from other countries.

The Code provides an ethical framework for animal research, and teaching, balancing the potential impact on the animal against the potential benefits to humans, animals and/or the environment. The Code also sets out the responsibilities for institutions, researchers, animal carers and animal ethics committees (AECs). No aspect of animal research, whether it involves importing, transporting, breeding, housing or using animals can be conducted without approval from the AEC.

All research involving animals must be approved by an AEC. The composition of an AEC is defined by the Code, and requires at least four people, one from each of the four categories of membership:

Category	Description
Category A: Veterinarian	A person with qualifications in veterinary science that are recognised for registration as a veterinary surgeon in Australia, and with experience relevant to the institution's activities or the ability to acquire relevant knowledge.
Category B: Investigator	A suitably qualified person with substantial and recent experience in the use of animals for scientific purposes relevant to the institution and the business of the AEC. This must include possession of a higher degree in research or equivalent experience. If the business of the AEC relates to the use of animals for teaching only, a teacher with substantial and recent experience may be appointed.
Category C: Animal Welfare Member	A person with demonstrable commitment to, and established experience in, furthering the welfare of animals, who is not employed by or otherwise associated with the institution, and who is not currently involved in the care and use of animals for scientific purposes. Veterinarians with specific animal welfare interest and experience may meet the requirements of this category. While not representing an animal welfare organisation, the person should, where possible, be selected on the basis of active membership of, and endorsement by, such an organisation.
Category D: Independent Member	A person not employed by or otherwise associated with the institution and who has never been involved in the use of animals in scientific or teaching activities, either in their employment or beyond their undergraduate education. Category D members should be viewed by the wider community as bringing a completely independent view to the AEC and must not fit the requirements of any other category.

Veterinarians can fulfil four roles on an AEC. A veterinarian must be Category A but they may also be Category B and Category C if they meet the criteria for these membership categories. They can also be the Chair of the AEC.

Veterinarians bring a unique skill set to the AEC playing an active role in advising AECs on the welfare impact of procedures, refinements that would mitigate for pain and distress, direct assessment and

approval of anaesthetic, peri-operative protocols, and surgical techniques and determination of the competency of the researchers to undertake this research. They carefully consider all animal welfare risks and ensure that a monitoring plan has been designed for implementation that addresses these risks. Whichever role they fulfil on the AEC, veterinarians consider animal welfare first and foremost and ensure that the research protocol addresses this welfare at the standard required.

Veterinarians also fulfil roles as an Animal Welfare Veterinarian or Officer or as an Animal Facility Manager. In any of these roles or as a member of an AEC, veterinarians have knowledge of the welfare, husbandry and diseases of the animals being kept at the institution. They are responsible for providing a practical program of veterinary care including induction and competency training for researchers, supervision of research to ensure that the welfare of the animals is being comprehensively addressed and responding to animal health or welfare concerns as they arise. This care may be required on a 24/7 basis.

However, it must also be acknowledged that standards vary between research institutions, in terms of effective implementation of the *program of veterinary care*. The AVA has concerns that, while some institutions take this responsibility seriously and provide direct and consistent veterinary oversight of procedures, for others this implementation is still tokenistic and adverse events can and do occur. The AVA believes that facility veterinarians must have a hands-on role in directly assessing and approving the competence of researchers and technicians to undertake invasive or potentially painful procedures on animals. This will include direct assessment and approval of anaesthetic and peri-operative analgesic protocols as well as surgical technique. They must carefully assess animal welfare risks and then implement and oversee ongoing monitoring plans to suit these risks. Importantly, the number of veterinarians employed by the facility to perform this role must be proportionate to the number of animals and commensurate with the risks, so that the program of veterinary care is appropriate and not merely nominal. It is recommended that the government define minimum veterinarian-to-animal ratios for the program of veterinary care, and minimum standards for veterinary attendance and oversight in all research premises where animals are used. Attention to this aspect of Code implementation as well as transparency of arrangements is important to maintain the social license to use animals in research.

It is acknowledged that there is some shortfall in veterinarians available to fulfil these roles, but initiatives are in place at the University of Sydney to address this gap. There is an Animal Welfare Veterinary Internship program operating where young graduates are given a two-year opportunity to work in the animal research sector and undertake dedicated training. Additionally, final year Doctor of Veterinary Medicine students will be able to undertake placement with the Animal Welfare and Animal Facility veterinarians in a program that will commence in 2023.

Currently the Animal Research Review Panel (ARRP), a statutory body established in NSW under the ARA has twelve members appointed by the Minister for Primary Industries.

Its role is:

1) The investigation of matters relating to the conduct of animal research and the supply of animals for use in connection with animal research.
2) The investigation and evaluation of the efficacy of the Code of Practice in regulating the conduct of animal research and the supply of animals for use in connection with animal research.
3) The investigation of applications and complaints referred to it under the Act.
4) Such other functions as the Minister may from time to time confer or impose on it.

Currently there is no requirement for a member of the veterinary profession to be included on ARRP although it may happen simply because a ministerial or Vice Chancellors Committee nominee is a veterinarian. It is the opinion of the AVA that this is a gap that needs to be addressed. A panel with the responsibilities outlined will benefit from the presence of at least one member with qualifications, knowledge and skills in veterinary science. A nominee provided by the Australian Veterinary Association would ensure that this inclusion could be achieved with the most appropriate representative.

(e) - the adequacy of the current regulatory regime regarding the use of animals in medical research, particularly in relation to transparency and accountability.

The NSW regulatory governance of animal research is the most robust in Australia being the only state or territory to have an Act dedicated and contextualised to animal research. This aligns closely to best international practice as see with the EU Directive 86/609/EEC and UK Animals (Scientific Procedures) Act 1986.

The composition of the AECs ensures that at least one-third of the members present must be category C and D members. Together with these members, the category A veterinarian delivers the community assurance that every animal research project has been comprehensively reviewed at a desk-top level with a dedicated focus on animal welfare and wellbeing. It is essential that this is coupled with an active program of veterinary care which ensures direct veterinary oversight, training and monitoring of the research, and that the number of facility veterinarians is appropriate for the number of animals and risks involved. It is this that provides the social licence to undertake animal research and the reassurance that essential high-quality research is being conducted in an ethical manner that ensures and safeguards animal welfare.

Additionally, research institutions are required to report all animal statistics annually to the regulator. While this principle applies in all states and territories, there are differences between the states regarding which animals need to be included, how the animals are counted and the categorising of the research. Any animals used for teaching and all disciplines of research must be reported annually. NSW publishes an annual report of aggregated animal statistics but not all states and territories do this. While this provides transparency about animals used it is not consistently applied across Australia which makes benchmarking within Australia challenging. Lack of uniformity across Australia in these regards adds to community distrust and concern regarding a lack of transparency.

Equally concerning is the way in which animal statistics are gathered in other countries. In the US, rodents are not counted or reported. In the UK only animals used in biomedical research are counted whereas Australia counts animal in teaching and all research disciplines, including those where observation is the only activity. Australia counts every animal every year even if they are one animal present across two or more reporting periods. This makes it impossible to benchmark internationally and often leaves Australia looking as though it uses more animals than many other western countries.

So, while there is inherent transparency and accountability delivered by the regulatory environment there is a need to provide greater context so that the community can better understand the research being conducted.

Many countries[20] now have openness agreements in place to proactively engage with the public about the research that they undertake with animals. Recently, the New Zealand branch of the *Australian and New Zealand Council for the Care of Animal in Research and Teaching* (ANZCCART) published their Openness Agreement on Animal Research and Teaching in New Zealand[21] and are accepting signatory institutions that will commit to transparency and accuracy regarding their animal research and teaching communications. Australia's version of this agreement is currently under consideration and public consultation[22].

The AVA endorses the reporting requirements but in the spirit of national consistency would encourage that reporting differentiate between biomedical and other research. Given that the Code is a national statutory instrument, a decision to move to Commonwealth legislation for animal research would be one solution that the AVA would support. It would also support a move to embrace greater openness regarding animal research and teaching.

[20] UK, Spain, Portugal, Belgium, France, Germany and the Netherlands

[21] https://www.royalsociety.org.nz/assets/ANZCCART-Openness-agreement-July-2021.pdf

[22] https://anzccart.adelaide.edu.au/openness-agreement-public-consultation

(f) - overseas developments regarding the regulation and use of animals in medical research.

As previously noted in ToR(e), the NSW ARA aligns to the best practice international legislation for animal research and the AVA would not want to see this regulatory rigour diminished.

Harmonising of animal research legislation across jurisdictions, for example the definition of sentient animals, guidelines for animal housing, care and husbandry, annual reporting against uniform criteria with a further differentiation into biomedical and other research and teaching, would allow Australia to better benchmark against other countries and this would be welcomed. The AVA would however support a move to a single commonwealth Act that would provide this harmonisation and national consistency based on the principles outlined in the Code.

There have been moves overseas to hasten the cessation of animal research. The potential negative impact on human and animal health and wellbeing must be considered as well as the impact on the environment. It is pleasing to see in ToR(a) that the EU and Switzerland have specifically recognised through public support, that this decision should not be advanced. The determination to see research into the 3Rs and alternatives to animals, however, is one to be applauded.

(g) - any other related matters.

The AVA is keen to see competency training for research at a higher standard. It acknowledges and recognises the recently developed online ComPass training program[23] for anyone involved in animal research and teaching. The AVA would like to see completion of this course a mandatory prerequisite for all persons associated with animal research. Furthermore, training, certification and ongoing monitoring of researchers should be a key responsibility of the institutional veterinarians to guarantee that all animal research practices are mimicking best veterinary standards and delivering high quality animal care and welfare.

The AVA would also reinforce that the title of this inquiry buys into speciesism in a manner that would not be tolerated by the members of an AEC and certainly not by the category A veterinarians. Notwithstanding that there are some specific, relevant and informative NHMRC standards[24] that have been developed to provide greater clarity regarding some animal species, the AVA is assured that every species receives even handed consideration to ensure that its care and welfare are a point of focus in the research undertaken.

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[23] https://anzccart.adelaide.edu.au/compass

[24] Use of animals for testing of cosmetics; Ensuring quality in animal studies; Australian native mammals; Non-human primates; Genetically modified and cloned animals for scientific purposes; The 3Rs; Use of animals in NHMRC funded research