



Professor Emma Johnston AO FAA FTSE FRSN
Deputy Vice-Chancellor (Research)

05 July 2024

The Hon. Murray Watt
Minister for Agriculture, Fisheries and Forestry
Minister for Emergency Management
Suite G04 Kay House
35 Scarborough Street
Southport, QLD, 4215

University of Sydney submission for the renewal of the Australian Animal Welfare Strategy (AAWS)

Dear Minister,

The University of Sydney (the University) welcomes the opportunity to participate in the 2024 public consultation for the renewal of the Australian Animal Welfare Strategy (the strategy).

As an institution with a strong commitment to animal welfare and ethical research and teaching involving animals, the University supports the overall intent of the strategy. There are many examples of medical and scientific research involving animals, which have delivered enormous benefits for communities across Australia in terms of population health, animal health and welfare, biosecurity, and economic growth and development. The feedback we offer in this submission seeks to assist the Department of Agriculture, Fisheries and Forestry in designing a strategy that facilitates Australia in achieving the best outcomes for animal welfare, while ensuring the research sector is supported to deliver outcomes from which humans, animals and the environment can continue to benefit.

Terminology

The language eventually employed in the strategy and its accompanying resources should reflect Australian legal and community expectations regarding animal research. We recommend that the phrases 'use of animals in research or teaching' or 'animals used in research or teaching' are amended to 'research or teaching involving animals', 'animals involved in research or teaching' or simply 'animal research or teaching'. This is an important consideration in Australia's societal and research environment, which encompasses highly diverse cultural perspectives regarding animals.

The phrasing we suggest acknowledges that research and teaching activities involving animals undergo thorough ethical review by an Animal Ethics Committee, which acts as their advocate and guardian by law. The words 'use' or 'used' are problematic because they could be interpreted by the public, and by researchers, as implying animals are 'tools' of research and teaching instead of sentient creatures for which we, as a community, and as research and teaching institutions, have whole of life respect and care. Whilst it may appear to be an inconsequential change, research suggests that [language has significant power to shape the thoughts and emotions](#) of our communities.

Proposed approach

The strategy is proposed to be released in six chapters, each dedicated to one animal group, with the final chapter released by 2027. A process timeline for implementation of the strategy would be valuable for ensuring transparency, accountability and management of stakeholder expectations.

The new national strategy for animals involved in research and teaching is proposed to be the final chapter released. However, we recommend that this area is prioritised for earlier attention. There is a need for Commonwealth leadership at a time of increasing interest in the area from the community, State and Territory governments and parliaments. The sooner the Commonwealth can clarify the details of its strategy for this area, the greater the prospects for achieving policy coordination, consistency and resource-sharing across jurisdictions.

Animal research and teaching is subject to specific, robust regulations, such as the [Australian code for the care and use of animals for scientific purposes 8th edition 2013](#) (the Code), and state-based legislation, such as the *Animal Research Act 1985* in NSW. It is oversighted by bodies that have the balance of expertise necessary to ensure high standards of animal welfare are achieved in research and teaching settings. For example, Animal Ethics Committees (AECs) are responsible for approving and monitoring research within accredited animal research organisations in accordance with the Code. AECs have an in-depth understanding of disciplinary context and research organisations' obligations to prioritise animal welfare. This gives them a unique ability to evaluate research that balances its likely impact on the animals against the potential benefits of the research to humans, animals and the environment.

Any proposed changes to animal welfare policies and regulation must be carefully considered to ensure that the roles of different regulatory bodies remain clear. Care is also needed to minimise unintended consequences for animal welfare and the conduct of beneficial medical and scientific research nation-wide. A renewed national framework can add significant value by promoting best practice in animal research. It can also help guide the approaches of other jurisdictions by articulating essential principles for developing and implementing animal welfare legislation. A national position would also help to harmonise state and territory approaches to legislation and decision-making.

Proposed vision

Fourteen years have passed since the original strategy was last reviewed in consultation with stakeholders. Review and renewal of the vision statement should therefore be prioritised to ensure it remains appropriate as a statement of the strategy's overarching purpose. The wording of the existing vision statement is:

"To establish an Australian animal welfare system that brings stakeholders together, identifies national priorities with actions and outcomes, and demonstrates to the public and international partners that Australia values the welfare of all animals."

The existing wording can be interpreted as placing more emphasis on the perception of stakeholders than on the welfare of animals. The renewed strategy's primary focus is on respect for animals and a strengthened commitment to protect their welfare. The vision statement needs to reflect this focus and align clearly with current community expectations.

Proposed work streams

The strategy needs to be developed through genuine consultation with Aboriginal and Torres Strait Islander communities about the impact the strategy may have on culturally significant sites, communities, activities, and flora and fauna.

We found it challenging to determine whether the breadth of the proposed work streams would be sufficient to cover all priority areas because of the lack of detail provided in the discussion paper. We suggest that each description includes clarification regarding roles and responsibilities, relevant domestic and international settings, and how the actions established for each chapter will be allocated to appropriate work streams. This will assist stakeholders to understand how each work stream links back to the strategy.

We recommend that the 'Research and Development' stream consider the establishment of a national '3Rs (Replacement, Reduction and Refinement) Centre', similar to the UK [NC3Rs](#); dedicated to improving welfare of the animals involved in research and teaching. The University of Sydney has obtained support from the NSW Office of Health and Medical Research and the NSW Chief Scientist & Engineer regarding a proposal for a 3Rs Centre in collaboration with the University of New South Wales and a working group of other NSW and ACT universities. Subject to funding, this Centre will promote innovative 3Rs projects, such as model validation and development of complementary alternatives to address legislative changes, improved biostatistical design protocols that validate animal requests, reducing the need for animals in drug development and registration, refining research protocols to minimise impact on animals, and developing replacements for animals in research. At the current time, it is the first proposed 3Rs Centre in Oceania.

A national 3Rs Centre could contribute to the development of a clinical skills and simulation laboratory that provides healthcare, procedural and surgical training for animal researchers and veterinary medicine students, similar to the [Sydney Clinical Skills and Simulation Centre](#). Development of such a laboratory would both reduce the need for animals in training for research techniques, and produce trainees with enhanced experience, thus improving the welfare outcomes for animals involved in research.

The Challenges

Developing a fit-for-purpose national strategy that suits all audiences is a challenge that will be best addressed by ensuring that the strategy is based on scientific evidence, broad sector and community consultation, and balanced views.

In our own sector, we believe that increasing public awareness through greater transparency and sharing information about animal research plays an important role in addressing this challenge. For this reason, the University of Sydney recently became a signatory to the [Openness Agreement on Animal Research and Teaching in Australia](#). A [recent survey](#) conducted on a representative sample of the Australian public illustrates this point. Many respondents were unsure about the use of animals in research, but largely because they desired greater transparency and information on animals involved in research and teaching. Around two-thirds of respondents were interested in understanding more about research being done to improve the welfare of animals used in research, and the alternatives to using animals. This resonates with similar responses in many countries, [such as the UK](#).

The time it currently takes to develop and implement improvements in animal welfare science is, in our view, largely attributable to the lack of systems to promote and enable modernisation and improvement of procedures in animal research and teaching. The lack of empirical evidence from the Australian experience could be addressed in the form of an Australian 3Rs Centre (as explained above). This is an area that the National Health and Medical Research Council (NHMRC) is beginning to address by accepting grant applications that focus on [research into the 3Rs](#).

The Opportunities

We are pleased that animal welfare has become part of national conversations, including around biosecurity, animal health and productivity. It should be considered in balance with

challenges facing humans and the environment, in alignment with the One Health and [One Welfare](#) approach, which seeks to sustainably balance and optimise the health of animals, humans and ecosystems.

Establishing a Task Group for Animals in Research and Teaching is an additional opportunity the renewed strategy could consider. This group could promote consistency in definitions, reporting and legislation across jurisdictions, as well as sharing of best practice approaches. Its function would be similar to the [Animal Welfare Task Group](#) (AWTG) which promotes consistent welfare regulations for farm animals. As the largest funders for animal research activities in Australia, the NHMRC and the Australian Research Council should be involved in discussions about establishing such a group.

We reiterate our in-principle support for the AAWS, which aligns strongly with our key organisational values of respect and welfare for animals, and hope these comments will assist with the refinement of the strategy.

Should you require further information or additional comments relating to this feedback, please do not hesitate to contact our Animal Ethics Manager at animal.ethics@sydney.edu.au.

Yours sincerely,

(signature removed)

Professor Emma Johnston
Deputy Vice-Chancellor (Research)