

Rebecca Halligan

Director Research Integrity and Ethics Administration

31 October 2019

Kim Filmer
Chief Animal Welfare Officer
Animal Welfare Unit
NSW DPI | Biosecurity and Food Safety
Orange NSW 2800
Email: animal.welfare@dpi.nsw.gov.au

Dear Kim,

Re: Consultation on Draft Research Animal Rehoming Guidelines

The University of Sydney welcomes the opportunity to provide feedback on the Draft Research Animal Rehoming Guidelines developed by NSW Department of Primary Industries and the Animal Research Review Panel.

Overall our stakeholders welcomed the guideline for rehoming research animals, but some concerns were raised about the feasibility of some of the detail. Please find attached the University's response to the specific questions raised.

On behalf of the University of Sydney, I would like to thank you again for providing the University with the opportunity to take part in this consultation.

Should you require further information relating to this feedback, please contact the Ethics Office (animal.ethics@sydney.edu.au).

Sincerely,

(Signature removed)

Rebecca Halligan
Director of Research Integrity and Ethics Administration



University of Sydney submission to the consultation on the Draft Research Animal Rehoming Guidelines.

October 2019

Consultations Questions:

Q1. Please provide your details

Name Ethics Office
Company The University of Sydney
Email Address animal.ethics@sydney.edu.au
Phone Number +61 2 8627 8174

Q2. What stakeholder group do you most closely identify with?

- Accredited research establishment representative
- Researcher
- Animal supply licensee
- Animal rehoming organisation
- Animal advocacy group
- Veterinarian
- Animal Ethics Committee Member
- Other (please specify)

Q3. Overall, do you support the draft Guidelines?

- Yes, I support these Guidelines
- No, I do not support these Guidelines
- I am unsure if I support these Guidelines
- Yes, I support these Guidelines but with changes

Please provide your reasons for response.

The University of Sydney supports the rehoming of animals used in research and welcomes guidelines to facilitate this. We have some concerns about the feasibility of microchipping and desexing animals for rehoming, which we believe will be difficult for large institutions to implement.

Q4. Do you believe the draft Guidelines will be effective in supporting research establishments, individuals and rehoming facilities to rehome animals after their use in research?

- Yes
- No
- I am unsure

If no or unsure, please explain why.

We believe that there may be logistical, financial and administrative challenges that may hinder the efforts of some accredited research establishments to rehome their research animals. We have identified some key challenges for consideration in our response to Q7.

Q5. Please tell us your views on rehoming animals for use in exhibition or display (such as rehoming animals to fauna parks).

The University supports the position proposed in section 1 part 4.

Q6. Do you believe the draft Guidelines are easy to understand?

- Yes
 No

Comments

Q7. Do you think there are any potential issues in being able to meet these Guidelines?

- Yes
 No

If yes, please provide reasons.

- Page 24 – Part 6 Special requirements of animals, section 3, parts 3) and 4)
The draft Guidelines state that before rehoming all pocket pets should be identified (e.g. implantation of a microchip).
 - Implanting rodents with microchips is not a common or well accepted practice in Australia. For example RSPCA NSW does not routinely microchip rats and mice before rehoming. It can also be difficult and costly. Reference to the microchipping of rodents should be removed.
- Page 20 – Part 4 Re-homing of animals, section 5., part 3) “...rehoming agreements should make provisions for continued communication and follow-up activities post rehoming”
We feel that this may not be practical and create an administrative burden. We also note that Part 2, 1. 2) states that “Once rehomed, the care and welfare of an animal becomes the responsibility of the new owner”.
- Page 23 – Part 6 Special requirements of animals, section 3, part 2)
The draft Guidelines recommend that rodents and rabbits be desexed prior to rehoming.
 - Desexing of rodents is not a common or well accepted practice in Australia. For example RSPCA NSW does not routinely desex rats and mice before rehoming. For female animals the surgery is also specialised, costly and carries animal welfare risks of its own. The procedure is best performed in specialized facilities and by experienced surgeons and so it is not practical for many administering institutions. Reference to the desexing of rodents should be removed, or the text should be adjusted to reflect these complexities.

Q8. Do you have any specific suggestions to improve the draft Guidelines?

Yes.

Administrative

- Page 1
It may be helpful to list the contributing authors, groups and committees involved in drafting the Guidelines to provide context and an understanding of the expertise involved.
- Page 14 – Part 3 Animal management, section 3., part 4)
Please consider listing fish as a species for rehoming.

Responsibilities

- Page 10 – Part 2 Accredited research establishments and researchers, section 4. part 2)
We propose that organisational policies and procedures for rehoming should be regularly reviewed. Mention of a two yearly review should be removed, as it poses significant administrative burden and may reduce willingness to adopt the guideline.
- Page 22 – Part 5 Post rehoming, section 1., parts 1) 2) and 3)
Where a rehoming organisation is used to rehome animals, the rehoming organisation should be included as a responsible party within these statements (e.g. ‘accredited research establishment or rehoming organisation’).

Record keeping

- Page 10 - Part 2 Accredited research establishments and researchers, section 2., part 2) (g) “Appropriate records should be kept by an accredited research establishment and researcher, including: (g) fate of the animal.”
Administering institutions are required to keep records about the ‘fate’ of an animal at the end of the project in which it is used (i.e. fate reporting classifications in Form L). A recommendation that administering institutions should keep records of the long-term fate of animals after rehoming is likely to create an unreasonable administrative burden and decrease the likelihood of institutions adopting the guideline.

Special requirements for animals

- Page 21 – Part 4 Rehoming, section 6., part 3) (a) *“The person in charge should ensure that containers used for transporting animals: (a) are of a size that enables animals to lie down flat, turn around, stand erect and stretch with adequate clearance”*
As this statement is not appropriate for all species, we recommend that it is amended accordingly.
- Page 23– Part 6 Special requirements of animals, section 2.
The following additional points should be added to the section on rehoming livestock. When rehoming many livestock species (cattle, sheep and pigs), the properties of new owners require a registered Property Identification Code (PIC) and animals must be fitted with a National Livestock Identification System (NLIS) tag in order to transport them from one property to another.