

Openness Agreement

on Animal Research in Australia

Public consultation feedback

Please enter your feedback in the table below and return via email to anzccart@adelaide.edu.au by **Monday 21 March 2022** with the words **“Openness Agreement”** in the subject line.

Name	Professor Duncan Ivison (on behalf of)
Institution (if applicable)	The University of Sydney
Position (if applicable)	Deputy Vice-Chancellor Research (DVCR)
Contact email address	animal.ethics@sydney.edu.au
Is this feedback on behalf of an individual or institution?	Institution
Date submitted	21/03/2022
General comments	
<p>The University of Sydney (the University) welcomes the opportunity to comment on the ANZCCART public consultation for an Openness Agreement on Animal Research.</p> <p>In principle, we see this initiative as a welcome step towards the openness and transparency needed to meet community expectations around animals involved in research and teaching. This is something the University strongly supports, and we welcome the opportunity to work with ANZCCART to progress this initiative.</p> <p>While we acknowledge the work that has gone into producing the draft Openness Agreement, we believe that the documents would benefit from further careful thought to ensure the goals of the initiative are achieved and that these are documents to which animal research and teaching organisations in Australia can willingly subscribe to.</p> <p>In compiling this response, we consulted Animal Ethics Committee (AEC) members, ethics administrators, members of the animal research and teaching community and the University’s media and public relations team.</p> <p>Overall, while we see the value of this initiative and support the premise of this agreement, we would like to provide further comment to clarify how various aspects of the proposal would work and understand what support would be available to ensure the successful implementation of the four Commitments.</p>	
Introduction	
Section	Comments
<i>“Why the Openness Agreement was developed”</i>	<ul style="list-style-type: none">• The opening paragraphs would benefit from further consideration to ensure the spirit and intent of the Openness Agreement is articulated. The statement in the fourth paragraph - <i>“we believe openness and clarity surrounding the use of animals in research and teaching is</i>

	<p><i>imperative to enable well-informed public discussion” - clearly articulates the aim of the Agreement and we believe would be a more powerful and persuasive opening statement.</i></p>
<p><i>“Outline of animal research regulations in Australia”</i></p>	<ul style="list-style-type: none"> • Animal research in Australia covers a broader range of activities than in many other countries¹. The public will assume animal research is ONLY germane to biomedical research if this breadth of activity is not explained at the beginning of this section, leading to misunderstanding of its relevance to state and territory legislation. We suggest ANZCCART considers the following text for this section: <i>“In Australia, the definition of ‘animal research’ covers a broader range of activities than in some other countries. For example, animal research may be observational or non-invasive studies in wildlife conservation or veterinary care and agricultural research and teaching activities aimed at improving animal welfare. These research and teaching activities are all required to undergo the same scrutiny as animal research designed to improve human health or investigate fundamental biological processes.”</i> • We strongly suggest removal of the statement <i>“veterinarian members are also often independent of the institution”</i>. It is not a requirement of the <i>Australian code for the care and use of animals for scientific purposes</i> (the Code) for the veterinary members to be independent from the organisation. The Code states a veterinary member is <i>“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.”</i> Universities with veterinary schools are likely to have veterinary members who are part of their organisation. • ANZCCART may consider expanding on <i>“animal research designed to improve human health or investigate fundamental biological processes”</i> to reference the legislative requirements for pre-clinical trials in animals prior to moving to human clinical trials. Members of the public often question why animals are needed before the human clinical trial stage and providing this information in the Openness Agreement or a webpage would help increase understanding, and support of, organisations that conduct this research. The below links could be considered to draft the wording for this addition: <ul style="list-style-type: none"> * Explainer: how do drugs get from the point of discovery to the pharmacy shelf? * 5 Things You Need to Know About the Drug Approval Process * https://www.fda.gov/drugs/information-consumers-and-patients-drugs/beginnings-laboratory-and-animal-studies * https://www.understandinganimalresearch.org.uk/news/animal-welfare-alternatives/do-we-need-to-test-all-new-drugs-in-two-species/ * https://www.ncbi.nlm.nih.gov/books/NBK24645/

¹ [ANZCCART conference proceedings 2021](#), presentations under the International experiences proceedings by Kirk Leech (Executive Director, The European Animal Research Association) and Nicole Clark (Animal Ethics Manager, The University of Sydney).

<i>“How the Openness Agreement works”</i>	No comment on this section
Our Commitments	
Commitment 1. <i>“We will be clear about our involvement in the use of animals in research or teaching.”</i>	No comment on this section
Commitment 2. <i>“We will enhance our institution’s communications with the media and the public about our use of animals in research or teaching.”</i>	<ul style="list-style-type: none"> • Some signatories may have concern with how the images, data or other material may be interpreted by the public and what types of images may be appropriate. ANZCCART may consider providing some tools, such as the sites listed below, to support signatories in providing images and data, if the signatories do not have a stock of their own animal and data images. *https://www.understandinganimalresearch.org.uk/resources/image-library/ * https://speakingofresearch.com/links/media-downloads/ • The use of “practical” in point one of this section, <i>“Where practical, this may also include images or video”</i> is unclear. This could be amended to <i>“Where considered appropriate, this may also include images or video”</i>.
Commitment 3. <i>“We will be proactive in providing opportunities for the public to find out about research or teaching involving animals.”</i>	No comment on this section
Commitment 4. <i>“We will provide an annual summary of our efforts to improve openness in the use of animals in research or teaching.”</i>	<ul style="list-style-type: none"> • It would be beneficial if it was made clear to signatories and supporters whether the whole “Annual Summary by Signatory or Supporter” will be made available for public consumption or if only sections of the Summary will be made available in an annual report by ANZCCART that summarises the submissions.
Addendum items	
<i>“List of Signatories” and “List of Supporters”</i>	No comment on this section
<i>“How this Agreement was developed”</i>	No comment on this section
<i>“Further information”</i>	No comment on this section
<i>“Acknowledgements”</i>	<ul style="list-style-type: none"> • It would be beneficial for signatories and supporters if details could be provided on the impact and success of openness agreements in other countries and whether there have been any surveys or evidence of the shift in the public’s awareness, understanding and trust in animal research the agreements aim to achieve? • Additionally, further detail should be provided to signatories and supporters on the annual cost participation has imposed on

	signatories and supporters in other countries, and whether this has been evaluated.
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Any other comments

Further amendments for consideration

ANZCCART may consider the following specific points raised during our consultations within the University.

- The heading “*Openness Agreement on Animal Research in Australia*” should be amended to “*Openness Agreement on Animal Research and Teaching in Australia*”.
- Attention should be paid to consistent use of terms. For example, ‘institution’ and ‘organisation’ are used interchangeably in the current draft.
- Amend the term ‘animals used in research’ to ‘animals involved in research’ or ‘animal research’. We are conscious of the use of emotive language and are concerned that the word ‘used’ can be interpreted as the animals purely being tools of research and teaching instead of being living creatures that we respect, value and care for. For example, we would not state ‘people used in research’ for a clinical trial, however, might instead use the expression, ‘people involved in research’.
- The Annual Summary template request signatories and supporters outline new initiatives to promote openness they have implemented during the reporting period. If there have been no new initiatives implemented due to lack of resources, then how would this impact the signatory or supporter?

Support for signatories and supporters

The University understands the importance of being open about animal research and teaching and is aware that several countries have implemented an openness agreement to increase the public’s awareness, understanding and trust in animal research. However, for the proposed Australian Openness Agreement to be as successful as in these other countries, further thought may be required on the following:

- To be as successful as the [Concordat on Openness on Animal Research in the UK](#), a commensurate level of support from Australian federal, state and territory governments would be critical. A clear understanding of the political appetite for such an agreement in Australia would encourage organisations to become signatories. The initiative represents an opportunity for a positive public collaboration between government and the university sector.
- Prior to becoming a signatory or supporter, organisations will need clarity on what initial and ongoing support will be provided by ANZCCART to assist in their preparation to meet the four Commitments and beyond the initial implementation stage. For example, to support Commitment 2, ANZCCART might consider facilitating access to media training for members of signatory organisations to ensure representatives engage with the media effectively on animal research and teaching at their organisation.

Finally, we commend ANZCCART for identifying the lack of consistency in the parameters of reporting animal research numbers across states, territories and even countries. Because of this inconsistency, these data sets cannot be used to judge how well a country or organisation is performing in animal research and teaching and in meeting the 3Rs (Replacement, Reduction, Refinement). It would be beneficial to provide this information to the public as well.

We hope these comments will assist ANZCCART in refining its proposal for an Openness Agreement on Animal Research (and Teaching) in Australia and we reiterate our in-principle support for the initiative, which aligns strongly with our key organisational values of openness and engagement.

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