

# Exploring Options for Nationally Consistent Collection and Publishing of Statistics on the Use of Animals in Research in Australia

## Issues Paper

### Purpose of this Issues Paper

The Australian Council for the Care of Animals in Research and Teaching ([ANZCCART](#)) is commencing a project to **explore options** for establishing a nationally consistent approach to reporting statistics on animal research in Australia.

The purpose of this Issues Paper is to:

- 1) Outline a proposal that would enable completion of the project by late 2024, and
- 2) Suggest key points for consideration as part of the project (see attached Appendix).

### Stakeholder consultation

A wide range of organisations such as regulatory authorities, research institutions and animal protection organisations has been invited to provide input into this project. Although the closing date for formal submissions has now passed, we are still willing to receive comments **provided they can be considered within the scheduled timeframe** of the project.

We are also willing to provide updates to individuals and organisations, even if they have not submitted comments.

If you would like to submit comments or if you simply wish to receive updates, please contact the Project Officer, Dr Malcolm France, at [malcolm.p.france@gmail.com](mailto:malcolm.p.france@gmail.com) with cc to [anzccart@adelaide.edu.au](mailto:anzccart@adelaide.edu.au) and the words 'national statistics' in the subject line. Please **clearly indicate if any content is to be kept confidential**.

### Background

Unlike many other countries, Australia has no nationally consistent program for collecting or publishing statistics on animals used in research. Instead, this responsibility rests with state and territory jurisdictions. Unfortunately, differences in reporting requirements create gaps in national figures that require extrapolation and may therefore be susceptible to error.

Formal recommendations for nationally consistent reporting date back at least to a 1989 Senate Select Committee report<sup>1</sup>, and similar recommendations came from the 2022 NSW parliamentary inquiry into animal research<sup>2</sup>.

Importantly, support for national reporting has come from a diversity of stakeholders spanning both the scientific and animal protection communities. Potential benefits include improved transparency

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<sup>1</sup> Parliament of the Commonwealth of Australia (1989) [Animal Experimentation. Report by the Senate Select Committee on Animal Welfare](#).

<sup>2</sup> NSW Parliament (2022) Report on [Inquiry into Use of primates and other animals in medical research in New South Wales](#).

and accountability, provision of more reliable data for policy development and resource allocation, improved community understanding, and alignment with international best practice.

While there are undoubtedly challenges in collating statistics across jurisdictional boundaries, there are precedents to show that these challenges are manageable. Examples include statistics compiled in the USA from the states, in Canada from the provinces and in the EU from the member states.

The last comprehensive review of national reporting was a paper prepared under the Australian Animal Welfare Strategy (AAWS) in 2013<sup>3</sup>. Further progress was hampered, however, when the AAWS lapsed the following year.

Several developments since then suggest that a new review is warranted. These include an international trend towards greater transparency in animal research (Australia recently became the tenth country to launch an [animal research openness agreement](#)), advances in data management infrastructure, and experience gained from national reporting systems in EU states and the UK.

## Project outline

The project will simply explore options for a nationally consistent approach to animal use statistics in Australia. **The endpoint will be an Options Paper for consideration by stakeholders.** The project will not involve decision-making or steps towards implementation of any options.

Consultation with state and territory regulators will be a central theme throughout the project. A wide range of other stakeholders (see Appendix on page 5) will also be approached for input which they may provide through interview, written submission, or both.

The project will also review relevant publications and current practice across Australian jurisdictions, and in countries where national reporting is well-established.

Progress updates will be available through avenues such as the ANZCCART website, the ANZCCART newsletter and via email.

Once the above material has been collated, a draft report will be prepared and after review by the ANZCCART board, will be issued to stakeholders for comment.

A final report incorporating stakeholder feedback (where possible) will be issued after review by the ANZCCART board.

If supported by the report's findings, ANZCCART will explore how further progress towards national reporting can be achieved in 2025.

## Coordination and funding

Development of the Options Paper will be led by the ANZCCART Project Officer, Dr Malcolm France.

The Project Officer will be supported by an Advisory Panel comprising one individual in each of the following categories:

- Experience as a government regulator involved in collection of animal use statistics;
- Experience as a research ethics administrator involved in submission of animal use statistics;

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<sup>3</sup> Bain, S and Debono, K (2013) *Review of Current Practices and Needs to Inform Public Presentation of Animal Usage for Scientific Purposes in Australia*. Australian Animal Welfare Strategy.

- A representative of Animal-Free Science Advocacy;
- Experience as a Category D (community) member of an AEC.

In addition to the Advisory Panel, expertise may be engaged from other sources such as specialist consultants or contacts with relevant experience.

The Project Officer's time and direct costs will be funded by ANZCCART. Members of the Advisory Panel will be asked to contribute their time on a *pro bono* basis. It will be the responsibility of ANZCCART to secure or negotiate funding for other expenses (including consultancy fees if applicable).

## Timeframe

The following timeframe is proposed to allow for sufficient stakeholder consultation:

- **Early to mid-April:** Release 'Issues Paper' to stakeholders with an invitation to nominate a representative of their institution to participate in an interview and/or make a written submission.
- **June:** Stakeholder interviews; written submissions due by end of June.
- **July:** Project Officer and Advisory Panel to review interview findings and written submissions.
- **August:** Preparation and submission of draft Options Paper to the ANZCCART Board for review and approval.
- **Early September:** Release of draft Options Paper to stakeholders with invitation to comment.
- **Mid-September:** Presentation of project update at ANZCCART conference.
- **End of October:** Deadline for feedback from stakeholders on draft Options Paper.
- **November:** Incorporation of stakeholder feedback and finalisation of report for presentation to ANZCCART Board for review and approval.
- **Early December 2024:** Issue finalised Options Paper to stakeholders.

## Contact and further information

Please direct enquiries to Dr Malcolm France, ANZCCART Project Officer, at [malcolm.p.france@gmail.com](mailto:malcolm.p.france@gmail.com) with cc to [anzccart@adelaide.edu.au](mailto:anzccart@adelaide.edu.au) and the words 'national statistics' in the subject line. You may also call Malcolm on 0401 719 456.

# Appendix: Proposed issues for consideration

## Operational considerations

- Oversight and governance
- Liaising with state and territory regulators
- Regulatory considerations
- Funding (set-up costs and ongoing operation)
- Implementation (staging?)
- Data management:
  - Hosting, URL and webpage maintenance
  - IT systems
  - Security, backup, privacy and confidentiality
  - Data entry, collating and formatting
- Other administration:
  - Stakeholder liaison
  - Communications, social media, handling enquiries

## Content

### *Species (including stage of development)*

- Mammals
- Fish
- Reptiles
- Amphibians
- Cephalopods
- Decapod crustaceans
- Other?

### *Research categories*

- Basic biomedical (human and veterinary)
- Applied biomedical (human and veterinary)
- Diagnostics and biological products
- Wildlife/conservation/environmental
- Agriculture/racing
- Animals in teaching (primary/secondary school, tertiary, professional skills training)
- Other?

### *Breeding*

- Species/number of lines
- In-house breeding vs external supplier
- Wastage including sex ratio
- Other?

### *Animal welfare impact*

- General categories
- Use of pain management

### *Reporting cycle*

- Calendar year, financial year or other?

### *Other initiatives*

- Rehoming
- 3Rs initiatives

## Stakeholders to be consulted

- State and territory regulators and Commonwealth government
- Openness Agreement Signatories and Supporters
- Others (in alphabetical order):

Animal Defenders Office

Animal Health Australia

Animal Justice Party

Animal-free Science Australia

Animals Australia

ANZCVS MMLA chapter

ANZLAA

APVMA

Aust. Academy of Health & Medical Sciences

Aust. Alliance for Animals

Aust. Industrial Chemicals Intro. Scheme

Aust. Research Council

Aust. Veterinary Association

Beagle Freedom Australia

CSIRO

Liberty Foundation

MAWA

Medical Research Institutes

NHMRC

RSPCA Australia

Signatories & Supporters of the Openness Agreement

Sentient

UAR Oceania

Universities

Wildlife/conservation organisations

Malcolm France

ANZCCART Project Officer

Last updated: 4 July 2024