

Submission information

Form: NHMRC Public Consultation: Draft Section 7: Cosmetic testing of the Australian code for the care and use of animals for scientific purposes, 8th edition (2013)

Submitted by Anonymous (not verified)

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161.146.227.184

Consultation documents

Supporting documents

Consultation date

Contact for further information

How to participate in consultation

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Submission reflects

Views

Organisation / Individual An organisation

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Questions

Do you think the responsibilities of institutions, investigators and animal ethics committees with respect to the ban on the use of animals for cosmetic testing are clear? If not, please outline:

- how you think the responsibilities should be changed, and
- the reasons for your proposal.

The scenarios document and decision tree are very informative and helpful tools.

The decision tree is accurate in its flow- Data from animal tests- Results show chemical is safe/can be used. The data from animal tests may not mean that the chemical is safe in humans so the option is safe/can be used is accurate as the animal tests may only provide one of these assurances. HRA appreciates this recognition.

Due to the many intricacies of the Act, it may be useful to give further detail on how institutions, investigators and animal ethics committees could work in conjunction with the Department of Health to ensure thorough auditing and compliance. Examples could include collaboration on declarations of compliance, publication of statistics, facilitating update of new non-animal methods and funding towards alternative approaches.

7.2 (ii) a chemical ingredient unless the proposed use of animals is justified by a purpose other than use in a cosmetic.

This could have different interpretations- does a purpose other than cosmetic use give justification without further consideration, or does the purpose have to be justifiable in its own right, i.e. the product is an essential product which is not currently available

Question

1

2- Do you have any other comments on how the *draft Section 7: Cosmetic testing* could be improved?

The approach outlined in the Act and the General Rules allows for the use of animal test data as a last resort for industrial chemicals that have other uses in addition to cosmetics where there is:

- a potential for humans or the environment to be exposed to the chemical

This is very broad and could apply to almost all situations- could this be more tightly defined in the Code? I appreciate the Code must be consistent with the Act.

There are some non-animal methods specific to chemicals that could be added to (iii) (governing principles) in light of the updated draft. These include read-across methods and adverse outcomes pathways.

Question

2

Conditions of use

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Permission to publish yes