

# 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](mailto:anzccart@adelaide.edu.au) by **Monday 21 March 2022** with the words **“Openness Agreement”** in the subject line.

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Is this feedback on behalf of an individual or institution?	Organisation
Date submitted	25 February 2022
<b>General comments</b>	
<p>Obtaining information about the use of animals in research and teaching is essential to the work of HRA, and to informed debate on the issue of animal experimentation at a societal level.</p> <p>A 2018 opinion poll commissioned by HRA revealed that 81% of respondents felt governments do not provide sufficient information on the extent of animal experimentation in Australia.</p> <p>Currently, there are significant limitations to openness and HRA supports the development of an Australian Openness Agreement, whilst remaining cautious until tangible examples of increased transparency have been demonstrated.</p> <p>Our comments are below and please note we have made some comparisons with the NZ and UK Openness Agreements for general and specific comments.</p> <ol style="list-style-type: none"> <li>1. Please include a foreword in the final version. The UK and NZ both have a foreword from a senior scientific advisor/Chief Scientist. This is extremely important part of engagement.</li> <li>2. It is very important to include a statement on how information will be disseminated and how institutions will engage with Aboriginal and Torres Strait Islander peoples. The NZ OA includes this as their fifth point, and it is very important to include this in the Australian OA. Particularly, when research in animals also involves Australian Native animals. Their voice needs to be on this document.</li> </ol>	
<b>Introduction</b>	
Section	Comments
“Why the Openness Agreement was developed”	Explicitly state that much medical research in Australia is publicly funded and therefore, held accountable for translation of research funds into health outcomes for the public. This involves recipients of public funding being required to; 1) consult with consumers during research planning stages and; 2) report on the impact and translation of research activities into health outcomes for the consumers that ultimately fund the research.

	<p>There was a <a href="#">Senate motion</a> passed calling for increased transparency and accountability in the use of animals used in experimentation and research which could be referenced.</p> <p><i>‘Research in which animals are used is also often technically complex and may involve sophisticated technology, complex statistical analysis, international collaboration, and skills that can only be acquired through intense study’.</i></p> <p>There is no subsequent indication in the commitments that simplified or plain-language/non-scientific information should be made available so would suggest either removing this or adding this to one of the commitments – HRA would certainly be in favour of non-technical project summaries being made publicly available.</p> <p>Are Australia’s reasons for developing the Agreement identical to other countries, or are there different drivers? Perhaps it would be beneficial to give some Australian context - high user of animals in research, system of self-regulation, lack of investment in alternatives market, limited legal imperatives for transparency, therefore it is needed for reasons of accountability, transparency and public interest.</p> <p>Are there other motivations or expected impacts, such as reduced animal use or improved animal welfare due to increased scrutiny?</p>
<p><i>“Outline of animal research regulations in Australia”</i></p>	<p>Under the Code:</p> <p>2.1.10 Institutions should consider making publicly available:</p> <p>an annual report of compliance with the Code</p> <p>a summary of the independent external review report</p> <p>Could be worth including this as an indication of expected transparency that currently exists although not mandatory .</p>
<p><i>“How the Openness Agreement works”</i></p>	<p>Re the signatories/supporters, note that there are not two options for the New Zealand Openness Agreement, and assume this distinction resulted from the initial Australian consultations? Of the resistance HRA faces to transparency, regulators are at the forefront, and at the very least, would like their annual report to be mandatory, even if a modified form or only answering the applicable questions.</p> <p>Why would you bother being a supporter if you only fund the research and are not held accountable in any way for your supporting the OA? What do Supporters get out of the OA?</p> <p>Suggest add a section that states where reporting on the commitments will be made publicly available, if this is the intention.</p>
<p><b>Our Commitments</b></p>	
<p>Commitment 1. <i>“We will be clear about our involvement in the use of animals in research or teaching.”</i></p>	<p>Must add a section that states signatories must be realistic about the impact and translation of animal research, such as from the UK concordat: “... be realistic about the potential outputs of such research”</p> <p>Need to add similar to the UK statement:</p>

	<p>"We will be prepared to provide information explaining our involvement with the use of animals in research, and will be prepared to respond to reasonable enquiries about the nature of the animal research we support. Where there are reasons not to respond to enquiries we will explain those reasons to the enquirer."</p>
<p>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></p>	<p>Strongly support the identification of a point of contact for information about an organisation's use of animals in research and teaching</p> <p>Need to state explicitly whether the point of contact will be a dedicated ambassador or spokesperson, or simply an email address, and whom the point of contact would engage with i.e., the public or media, and how the point of contact details will be made available to the public i.e., coordinated through ANZCCART? A list on the ANZCCART webpage with an email contact?</p>
<p>Commitment 3. <i>"We will be proactive in providing opportunities for the public to find out about research or teaching involving animals."</i></p>	<p>Would like to see proactive engagement as well as responding to enquiries</p> <p>As worded, this commitment holds no accountability for being proactive i.e., a statement on a website is not proactive (it's a requirement to being a signatory), and responding to enquiries is not proactive.</p> <p>Need to include two statements such as those in the NZ OA:</p> <ul style="list-style-type: none"> <li>• We will consider ways in which activities can be facilitated that will allow public engagement around the use of animals in scientific, veterinary and medical research and teaching.</li> <li>• Where relevant, we will include information about the role of animals in talks or public events we take part in, for example at schools or with the local community.</li> </ul>
<p>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></p>	<p>The summary criteria or form should be stated or shown so signatories know clearly what is expected of them</p>
<p><b>Addendum items</b></p>	
<p><i>"List of Signatories" and "List of Supporters"</i></p>	<p>No comment</p>
<p><i>"How this Agreement was developed"</i></p>	<p>The time has now passed, but would have liked to have seen participation in the working group from regulators. HRA would have been a willing participant.</p>
<p><i>"Further information"</i></p>	<p>No comment</p>
<p><i>"Acknowledgements"</i></p>	<p>No comment</p>
<p><b>Any other comments</b></p>	
<p>Suggest an addition commitment (or possibly could be added as a bulletin point to an existing commitment) to <b>'Enhance understanding of our institutes use of non-animal research methods'</b>. This is also important to enable balanced viewpoints and increase public understanding of non-animal technologies.</p> <p>Perhaps some concrete examples could be provided from signatories in countries who have adopted the Openness Agreement as to what has been achieved/changed to supplement the FAQs.</p>	

Re the annual summary template, not clear whether these will be publicly available, or extracts thereof?

If a signatory fails to report or has not demonstrated openness, what is the consequence? For example, we understand that Vivotecnia was a signatory of an openness agreement despite committing severe breaches of legislation. This is necessary to maintain the integrity of the Agreement.

[https://www.europarl.europa.eu/doceo/document/E-9-2021-002517\\_EN.html](https://www.europarl.europa.eu/doceo/document/E-9-2021-002517_EN.html)

Suggest the form simply asks the signatory for evidence of how they have fulfilled commitments 1,2,3 and 4 in places of bullet points 2, 3 4 and 5.

Disagree that the question on reporting on the 3Rs is relevant as this is not directly related to the commitments and an existing legal obligation under the Code, unless it is expressed that an intention of the Openness Agreement to enhance the 3Rs, in which case would be more relevant.