

Review of Philanthropy

Submission by Humane Research Australia

I am writing on behalf of Humane Research Australia (HRA), a not-for profit organisation advocating scientifically valid and humane non-animal methods of research. HRA works professionally and ethically to develop community-wide awareness of animal experimentation; pursues all reasonable channels to eliminate such experimentation and champions the benefits of realistic, scientifically effective alternatives to all forms of animal usage in research and teaching.

HRA welcome the Review of Philanthropy and the opportunity to submit feedback.

HRA's feedback is concentrated on the below terms of reference:

- 1) The need to realign DGR status with the values of today's Australians (2.ii, 3.ii, 5, 6)
- 2) Allowing Public Benevolent Institutions to properly support their communities (2.iii, 3.i)

DGR Status

As an organisation not providing direct care to animals, HRA is not able to receive DGR status as an animal welfare organisation. In the specific area of animal use in research and teaching, there is limited opportunity to provide hands-on direct care. Animals are under the custody of research institutions until their use in research has ceased. There are a small number of specialist groups which do so in the form of rehoming dog and cats from research institutions. These groups are fully deserving of their DGR status. However, transitioning to animal-free medical research requires a range of advocacy tactics, such as investigations, lobbying, media relations and public campaigning, all of which HRA employ. In common with many other animal welfare organisations, HRA objects to the current narrow definition of animal welfare. The way that 4.1.6 of the Tax Act narrows animal welfare down to organisations whose principal activity is 'providing *short-term direct care to animals*' is unfair and fails to recognise the essential role of non-care-giving groups such as HRA working to create systemic change.

HRA fulfils a vital function in bringing to light cruel and irrelevant research in what is a self-regulated industry greatly lacking in transparency. Without the provision of such information, community members would not be able to engage in the issue. HRA has a database of over 7,000 supporters, has received thousands of views on social media, and our mission to end animal experimentation has strong support in the Australian community. A 2018 opinion poll conducted by Nexus Research revealed that 70% of those polled oppose the use of dogs in research and 63% oppose the use of monkeys.

The current definition of animal welfare prevents our donors from receiving tax benefits and thus can deter donations; prevents HRA from applying for some grants which are open to DGR groups only, and also prevents access to scholarship programs which are restricted to DGR groups. Cumulatively, this has an impact on our financial sustainability, capacity, and effectiveness to deliver on our mission.

PBI Status

According to the ACNC, to be a PBI, a charity's main purpose must be to provide benevolent relief to humans who have a need that arouses compassion within the community. A charity that has a main purpose of relieving the distress or suffering of animals is not a PBI.

This is not in line with changing attitudes towards animals and the need for both justice and compassion to be exercised in the treatment of animals, as well as humans. In relation to the mission of HRA, we are motivated by both eliminating animal suffering as well as achieving superior human health outcomes through human-relevant research methods. However, this dual motivation is not recognised by the current PBI system.

As a small organisation with limited financial resources, we cannot offer competitive salaries or conditions comparable with those in the private, public or human-focussed charitable sector. The consequence of this is the inability to attract and retain the strongest, most qualified candidates, which is increasingly evident in the current economic climate. HRA recommend that benevolence be extended to both human and non-human animals to remove this obstacle. Enabling salary packing for animal welfare organisations would assist in the professionalism of such organisations.

I thank you for your consideration of HRA's submission.

Yours sincerely,

Rachel Smith
Chief Executive Officer
Humane Research Australia Inc