Animal-Free Science Advocacy
The future of science is animal-free

Renewing the Australian Animal Welfare Strategy

Australian Department of Agriculture, Fisheries and Forestry
October 2026

Survey questions re: Animals involved in research and teaching

Q22. The snapshot outlines the animal welfare frameworks for this group.

- Agree
- **Somewhat agree**
- Somewhat disagree
- Disagree

Q23. If you have opportunities for improving this section, please briefly explain them here and include evidence to support your suggestions.

AFSA welcomes the recognition of non-animal methodologies (NAMs), the lack of national animal use data, and the management of animals at the conclusion of their involvement in research. We recommend the following improvements.

First, identify the Code by its full title and edition: the *Australian code for the care and use of animals for scientific purposes* (8th edition, 2013, new section added 2021). The text should also acknowledge that NHMRC is currently reviewing the Code, providing a more informative and current account than stating only that it is reviewed 'periodically'. NHMRC Code review

Second, spell out the 3Rs—Replacement, Reduction and Refinement—at first mention and acknowledge relevant cross-government initiatives, including the *National Health and Medical Research Strategy 2026–2036* and its proposed National Collaborative Platform for Non-animal Technologies. This would better reflect the current policy context for advancing NAMs alongside the CSIRO report, which focuses specifically on medical product development. National Strategy

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Q24. The opportunities describe the areas where animal welfare can be improved for this group.

- Agree
- **Somewhat agree**
- Somewhat disagree
- Disagree

Q25. If you have opportunities for improving this section, please briefly explain them here and include evidence to support your suggestions.

First, we note that the opportunity to develop animal welfare improvement measures that enable comparisons of outcomes over time appears to have been removed. We suggest retaining a high-level commitment to developing and using fit-for-purpose welfare measures to inform continuous improvement. This aligns with the Code's emphasis on cumulative lifetime experiences and reviewing the effectiveness of strategies to safeguard animal wellbeing, without requiring the detailed evaluation plans or reporting obligations excluded from this consultation.

Second, we suggest strengthening the opportunities relating to species-specific welfare standards and guidance. The draft now frames further development and implementation of species-specific guidance primarily as something 'some stakeholders consider', rather than clearly recognising its potential contribution to consistent welfare improvements. The strategy should acknowledge the importance of approaches that address species-specific biological, physiological and behavioural needs, while leaving particular regulatory arrangements to the relevant jurisdictions.

Third, we propose adding an opportunity for increased public engagement on the use of animals in research and teaching, and alternatives methods available.

Finally, the snapshot identifies concerns regarding animals' lifetime physical and psychological needs and their treatment at the conclusion of research, but these issues are not explicitly reflected in the opportunities. Consider making lifetime welfare and appropriate end-of-use arrangements more explicit. We also suggest replacing 'animal wastage' with 'unnecessary breeding and use of animals' for greater clarity. We also suggest adding an additional opportunity for exploring sector rehoming and retirement options for animals post-research. 'Retirement' rather than 'rehoming' would be the appropriate term for non-human primates.