



13 April 2006

Secretariat
Animal Welfare Committee
NHMRC (MDP 33)
GPO Box 9848
Canberra
ACT 2601

Dear Sir,

**Guidelines for the generation, breeding, care and use of genetically modified and cloned animals for scientific purposes.
2nd round of public consultation 2006**

Thank you for the opportunity to respond to the above draft document.

A number of concerns were raised in our submission to your first round of consultation. After reading your draft document we note that these concerns have not been addressed and we therefore reiterate the following:

Ethical and welfare issues related to the production and use of genetically modified and cloned animals.

Your document states “*The mainstream position of the scientific as well as the wider community is that the particular intrinsic value of humans and certain animal species permits the use of animals in research for the advancement of human and non-human health and wellbeing.*”

We question the validity of this statement. We could certainly agree that it may be acceptable within much of the scientific community as they have a vested and academic interest in its continuation, however the wider community may not be so supportive.

Community acceptance of genetic modification, and indeed animal research in general, is unfortunately based on the false impression that non-human animals serve as relevant models for human disease. The general population is largely unaware of the dangerous repercussions that have occurred from reliance on animal research and therefore base their acceptance on media reports and false claims by researchers and pharmaceutical companies that animal tests give promise to miracle cures. In reality however, the extrapolation of results from one species to another cannot be relied upon. Community acceptance of any practice therefore cannot be used as justification if the community does not have an adequate understanding of the issue or the ramifications.

We consider that a full review on the use of animals in medical research is long overdue, and should be conducted immediately, so that the public can learn for themselves the true damage, rather than benefit, that it causes to human health. We must dispel the myth that it is a "necessary evil" and finally acknowledge that it is simply dangerous science.

Guidelines:

Despite the existence of more humane and equally effective options, tail biopsies of mice (without anaesthesia in younger mice), retro-orbital blood collection and toe clipping are still permitted.

While we notice that some of these practices are "discouraged," the NHMRC need to adopt a stronger position if we are to expect researchers to adhere to these guidelines. It would not be difficult for a researcher to convince an ethics committee that "no other means is practicable" and it is unlikely that a category C or D member would have the scientific expertise to challenge that claim.

We therefore urge you to disallow these practices by prohibiting them in the guidelines.

Thank you again for allowing us the opportunity to submit our comments. We do hope that on this occasion the above concerns are taken into consideration.

Yours sincerely,

Helen Rosser
Chief Executive Officer
Australian Association for Humane Research Inc.