

DAVID G. ALLEN & REBECCA HALLIGAN

Letter to the Editor

The Function of Animal Ethics Committees

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The recent article “Why Animal Ethics Committees Don’t Work” by Denise Russell (2012) sets out the ethical and legal framework for Animal Ethics Committees (AECs) in Australia but concludes that, for a variety of structural reasons, “a large part of the ethical responsibilities of such committees cannot be fulfilled.” Russell’s account is strengthened by her claim to have inside knowledge of the way in which AECs operate based on “my acquaintance with the AECs at the University of Sydney over 2 decades.”

The authors of the present article are the chair of the University of Sydney AEC and the Director Research Integrity. This letter has been seen and approved by all the current members of the AEC. We refute some of Russell’s criticisms which seem to relate to the period before 2004 when the National Health and Medical Research Council (NH&MRC) published its current Code of Practice (2004) which regulates the activities of AECs. The principal aim of the AEC is to “ensure that the use of animals is justified, taking into consideration the scientific or education benefits and the potential effects on the welfare of the animals.” The committee is required to ensure that the principles of replacement (use of non-animal alternatives), reduction (in numbers of animals used) and refinement (that the experiments are appropriately designed and that any distress to animals is kept to a minimum) are observed. A number of mechanisms are

built into the legislation to ensure these principles are followed. Most important is that the AECs are required to have at least 1/3 of their members who are independent of the institution. These “independent members” are in two categories: members of an animal welfare organisation (Category C) and members of the community who have never been involved in animal research or teaching (Category D). The presence of these independent members at every meeting ensures that community values have the opportunity to emerge. These rules are strictly observed at the University of Sydney. Information about the composition of the committee is reported on an annual basis to the Animal Research Review Panel, Department of Primary Industries, New South Wales Government (ARRP). The ARRP also approves the appointment of new members to the AEC.

Russell suggests that “there is no mechanism inside or outside the AEC to deal with the moral dilemmas of some members.” She believes that if a member of the committee could not in good conscience endorse an outcome, their best option would be to resign. These comments do not reflect the current operation of the University of Sydney AEC. The purpose of the AEC is to debate the pros and cons of each proposal, particularly any ethical or moral issues, and this debate can be prolonged and detailed. If one member voices concerns we try to find a solution which alleviates the concerns but allows the experiments to continue in a way which preserves the outcomes. Our committee only approves proposals for which there is consensus acceptance. We often spend substantial periods debating specific ethical issues; for instance the appropriate housing for particular animal species and the extent to which a given procedure will affect the welfare of an animal. Where ever possible, we use the NHMRC Guidelines (2008) or other objective, published evidence but, inevitably, in many situations it falls to

the experience and ethical views of the members to reach a decision.

Another concern voiced by Russell is that “it is difficult for in-coming researchers in disciplines using animal research to buck the trend and consider alternatives.” Again our experience is very different from that of Russell. There are many alternatives to animal experiments including cell culture, mathematical modelling, epidemiology and clinical trials. All of these are widely used in the scientific community and researchers are free to use the methodologies that they believe are best suited to solving the problem that interests them. But most scientists believe that for many of the most complex biological issues, particularly those concerned with diseases, animal models are required to make progress. The role of AECs in this process is to ensure that researchers have given adequate consideration to the alternatives and they are required to state in the application the alternatives they have considered and why they have not chosen to use them. Russell cites examples of alternatives to animal experimentation that are developing in other disciplines and, like her, we applaud this development. In fact the University of Sydney offers an annual prize for the best alternative to animal experimentation. Obviously the researchers who decide such alternatives offer the best solution to their problem do not send applications to the AEC so that one cannot assess the success of this approach by scrutinising applications to the AEC as Russell implies.

Overall we believe AECs fulfil a valuable role in a number of areas. By inspection of animal holdings they maintain a high level of animal welfare in the animal holding areas. By scrutinizing every application to work with animals they ensure that proposed experiments have a clear and identifiable outcome

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and that any animal suffering is kept to the absolute minimum consistent with the importance of the biological question being asked. Random, unannounced inspections of animal holding and laboratories occur to ensure that the agreed procedures are followed. AECs frequently modify applications with the aim of replacing, reducing or refining animal usage. And often the expertise of the AEC members leads to improvements in the use of anaesthesia and analgesia which are mandatory for most painful procedures and follow similar principles to human medicine. The presence of independent members on the panel ensures that the standards thought acceptable are not simply those of animal researchers but represent those of the community as voiced by the independent members.

Of course if you believe that no restriction on animal welfare or existence can be justified in the pursuit of scientific knowledge, disease amelioration or food production, then you will never be satisfied by the operation of AECs. The current situation is that community acceptance of animal experiments for scientific advance is widespread, though not universal, and this is enshrined in the legislation that regulates the AECs. The AECs operate within this community and legislative acceptance and ensure that these values are also followed by animal researchers.

References

- National Health and Medical Research Council (2004). *Australian Code of Practice for the Care and Use of Animals for Scientific Purposes*, 7th Edition. <http://www.nhmrc.gov.au/guidelines/publications/ea16>
- National Health and Medical Research Council (2008). *Guidelines to Promote the Wellbeing of Animals Used for Sci-*

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entific Purposes. <http://www.nhmrc.gov.au/guidelines/publications/ea18>

Russell, D. 2012. "Why Animal Ethics Committees Don't Work." *Between the Species*. 15:127-142. <http://digitalcommons.calpoly.edu/bts/>