

27 September 2016

Samantha Robertson
A/g General Manager
NHMRC Ethics and Governance Section
National Health and Medical Research Council
ethics@nhmrc.gov.au

Dear Samantha

Re: Best practice methodology in research involving animals, targeted consultation draft August 2016

The Charles Sturt University Animal Care and Ethics Committee (CSU ACEC) was consulted and member's comments are summarised below.

Firstly it was noted that the document was extremely accurate in defining issues that are encountered with animal based research and how these issues are relevant to nearly all institutions, investigators and AEC's. The NHMRC teams are to be commended on this strong consultation document.

The CSU ACEC thought that a number of issues mentioned should have a more targeted review or be expanded upon within the document.

The first of these is the use of animals in "Pilot studies".

In this instance researchers often develop their research and subsequent application based upon previous work in an area and use a certain animal model which is possibly not the most appropriate but is used because it is more convenient/cheaper than other models e.g. using mice when in fact other larger animal models may be more suitable. The ACEC recommend that in these instances consultation with all relevant parties should be conducted before the animal of use is decided upon. This should not be limited to previous literature but also consultation with current researchers in relevant areas and if available an Animal Welfare Officer (AWO) veterinarian or veterinarian from an AEC or other area. Therefore the best animal for the research will be derived at and prevent wastage because of the use of an inappropriate animal model.

The statistical analysis of data is an important facet of all research.

The use of appropriate numbers of animals is paramount to obtaining meaningful statistically supported data from proper experimentally designed research. This needs consultation with a suitably qualified statistician. Researchers may themselves take courses and have some training in statistics but do not often or necessarily have the in-depth knowledge that a statistician gains from constantly working with data at an institutional level. This again is particularly relevant where, for example pilot studies in medical research, numbers are minimal. Often these numbers may be too low to allow for a large biological variation that can occur in animals that are not specifically bred for research. These animals are often used and the consequence of such action is data that does not give clear conclusions. This can result in experiments being repeated needlessly and animal wastage can occur. Therefore it should be

recommended that researchers consult a qualified statistician employed by a university or an outside suitably qualified person.

Negative results are often not reported

As noted in the document, negative results are often not reported. It is often difficult to have negative results published and this can result in some work being repeated needlessly, again increasing the risk of animal wastage. It is recommended that perhaps all negative results should be registered in some form and all researchers advised to consult this before embarking upon research in particular areas. Furthermore, often small projects are neither reported nor published. These again should be registered so such research where animals are used is not needlessly repeated.

Overall it was agreed that the document clearly sets out and defines the important issues that face researchers using animals. The proposed strategies and recommendations were felt to be highly relevant and practical to impose therefore, making this a very relevant and practical document for researchers using animals and the committees who advise and critique their work

Thank you for affording us the opportunity to review this document.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Mary T Kelly', written in a cursive style.

Professor Mary T Kelly

Deputy Vice-Chancellor (Research, Development & Industry)