

Openness Agreement on Animal Research in Australia

Public consultation feedback

Please enter your feedback in the table below and return via email to anzccart@adelaide.edu.au by **Monday 21 March 2022** with the words **“Openness Agreement”** in the subject line.

Name	Di Evans
Institution (if applicable)	RSPCA Australia
Position (if applicable)	Senior Scientific Officer
Contact email address	devans@rspca.org.au
Is this feedback on behalf of an individual or institution?	This is combined feedback on behalf of RSPCA Australia and relevant Member Societies
Date submitted	17 th March 2022
General comments	
<p>The RSPCA fully supports the concept and intention of an Animal Research Openness Agreement for Australia.</p> <p>Given that this is likely to be unfamiliar to many staff using and caring for animals in a research and teaching setting, we suggest that a ‘toolkit’ be developed to help relevant staff raise the topic with their management and/or with their research staff as required to assist them in being able to effectively communicate about the openness agreement to help garner support for its adoption.</p>	
Introduction	
Section	Comments
<i>“Why the Openness Agreement was developed”</i>	<p>We suggest that the introduction mentions;</p> <ul style="list-style-type: none"> - that public money is used to fund the vast majority of research so important and so the Agreement will assist in being transparent and accountable. - the OA provides an opportunity for the research sector to demonstrate a commitment to transparency and accountability which should include more publicly available info incl project summaries in lay terms
<i>“Outline of animal research regulations in Australia”</i>	Suggest providing more information on the role of AECs including application of the 3Rs, training and competency of all research and laboratory staff, that projects must only be conducted as approved by the AEC and that the AEC investigates and reviews any unexpected adverse events.
<i>“How the Openness Agreement works”</i>	If a signatory is meeting the commitments, then this information should be publicly available on their website to show

	accountability and transparency; presume that those not meeting the commitments will no longer be signatories
Our Commitments	
Commitment 1. <i>“We will be clear about our involvement in the use of animals in research or teaching.”</i>	<p>Consider adding another dot point;</p> <p>We will actively search, support and utilise non-animal alternatives.</p> <p>This would help the public to know that institutions are undertaking this (is a requirement under the 3Rs anyway so is not an additional task), which would give confidence that the use of animals is only done where absolutely necessary.</p>
Commitment 2. <i>“We will enhance our institution’s communications with the media and the public about our use of animals in research or teaching.”</i>	<p>The first point regarding how the Commitment will be met is about including information on animal research or teaching infers that this is restricted to media releases and other forms of communications with the latter being somewhat vague. It also appears to be limited to those activities which are designated as being significant to the work of the relevant institution. To avoid information being ‘selective’, we suggest that this statement includes a commitment to provide lay summaries of all animal research activities. This should not be onerous as the information should already exist, given that all project AEC applications require a lay summary.</p> <p>Furthermore, the RSPCA would like to see development of the agreement over time to include further reporting including the outcomes of all research activities involving animals etc.</p>
Commitment 3. <i>“We will be proactive in providing opportunities for the public to find out about research or teaching involving animals.”</i>	<p>Consider including something in terms of identifying and implementing activities which are proactive, i.e., allow and encourage public engagement, as the only aspects included to meet this commitment are to develop a policy and to respond (which isn’t being proactive)</p>
Commitment 4. <i>“We will provide an annual summary of our efforts to improve openness in the use of animals in research or teaching.”</i>	<p>Does it need to be stated that the annual summary that a specific format is required, i.e., the annual summary will contain x,y,z. This would allow anyone reading the OA to be informed of the type of information which is required to reported annually.</p> <p>Suggest adding the following highlighted clause to the first dot point:</p> <p>Provide a summary to ANZCCART each year highlighting our existing efforts to meet the requirements of each of the commitments and any new initiatives aimed at greater openness.</p> <p>It should also be made clear whether the information provided will be made public or not as well as clarity on who is reviewing their annual summary and on what basis are institutions measured to meet openness requirements.</p>
Addendum items	
<i>“List of Signatories” and “List of Supporters”</i>	No comment

<i>"How this Agreement was developed"</i>	No comment
<i>"Further information"</i>	No comment
<i>"Acknowledgements"</i>	No comment
<i>Any other comments</i>	
Should the public consultation have also including an opportunity to provide feedback on the Reporting template?	