



Submission



ANZCCART Public Consultation for an Australian Openness Agreement on Animal Research

**Prepared by the Coalition for the Protection of Greyhounds
March 2022**

End greyhound suffering

About the Coalition for the Protection of Greyhounds

The Coalition for the Protection of Greyhounds (CPG) is a not-for-profit committed to ending greyhound suffering by exposing the cruelty and corruption of the greyhound racing industry and lobbying for law reform. We have members across Australia, including Queensland.

We advocate for law reform that:

Implements whole-of-life tracking. Greyhounds in the racing industry are vulnerable to unnecessary euthanasia particularly those puppies who do not race and dogs who are rehomed by industry participants. A system must be implemented to monitor the welfare of each greyhound for their entire life.

Funds rescues and sanctuaries. Greyhound breeding nationally is six times the racing industry's capacity to rehome. To avoid healthy and rehomable greyhounds being put to death, state governments must fund private greyhound rehoming organisations and privately operated sanctuaries.

Increases penalties. Penalties are not proving a deterrent given the financial rewards offered by the industry. The industry must also strengthen associated regulation and enforcement.

Reduces breeding. According to the latest GRNSW Annual Report, around 25 per cent of greyhounds bred in FY20/21 were surplus to requirements. The greyhound racing industry must stop offering financial incentives for breeding and industry regulators must be empowered to set and enforce breeding numbers

Makes tracks safer. Approximately 850 greyhounds are injured each month and over 200 are killed each year on Australian tracks. To improve track safety, the greyhound racing industry must develop purpose-built straight tracks; reduce the number of starters from eight greyhounds to six, and install an extended lure at all tracks.

Introduction

CPG welcomes the opportunity to make a submission on ANZCCART's Australian Openness Agreement on Animal Research (the Agreement).

The Agreement is a voluntary pledge that is signed by some organisations that use animals for research purposes. The Agreement seeks to create more transparency and accountability in how and why animals are used in research or testing conducted in Australia.

CPG strongly supports the objectives of the Agreement, in particular in relation to greater transparency about the use of greyhounds in research and their fate post-research.

Please note that CPG made a submission using the ANZCCART online submission template. The contents of that submission are provided here in a different format, however, the content has not been changed.

CPG submission

General comments

It would be meaningful to include a short acknowledgement of how animals are being tested and/or used for research human-related findings. The science behind such research endeavours is also quite contested as canines are not a good animal model for human physiology and disease. Therefore any use of canines to further human science and medicine must be justified on the basis of relevance of the research outcomes.

Additionally, although this agreement operates as a 'catch all' provision for all animals, it would be worthwhile to delve into different species, especially species that are less appreciated by institutional ethics committees and standards. Such is the case with greyhounds. They are simply grouped with 'non-rodent' animals, and as such, information as to the standard of ethical research behaviour with greyhounds specifically is little to none, due to this categorisation.

<https://gateway.research.unimelb.edu.au/resources/ethics-and-integrity/assets/documents/animal/standards/final/STANDARD-Surgery-and-aseptic-technique-in-non-rodent-animals-FINAL.pdf>

It is evident that greyhounds are continuously utilised in research due to the high number of greyhounds discarded by the greyhound racing industry. The research involving greyhounds is sometimes extremely immoral and unethical. Thereby, by highlighting certain animals, ANZCCART can increase awareness of more specific issues, rather than a general acknowledgement of how testing infringes animal rights.

Outline of animal research regulations in Australia

Any enforcement issues with regulators should be outlined. Any differences between how these ethics practices are assumed on paper and actually applied in practice should be reinforced and illustrated in order to develop better compliance.

In the Australian Code for the Care and Use of Animals for Scientific Purposes, ethics procedures are left for institutions to ultimately define. Although including a set list of dot points (p.77), responsibility falls on institutions to determine what their ethics standards actually protect. Thus, enforcement issues may arise that need to be addressed.

Institutional accountability needs to be reinforced and outlined. Examining some past institutional responses to unethical practices

(<https://www.monash.edu/news/articles/monash-response-to-report-on-greyhound-testing>) it seems that accountability is lacking for any animal rights violations, and responsibility isn't taken. Therefore, although the main focus of the research code is animal welfare, some note on how this code operates in practice and its enforceability, as well as institutional accountability will be appreciated.

Further, there is no information made available about where greyhounds used in research are sourced and what financial transactions take place. Given State and Territory laws about tracking greyhounds (which are not nationally consistent), the public needs reassurance that researchers do not contravene such laws in their pursuit of greyhounds for research.

Commitment 1: We will be clear about our involvement in the use of animals in research or teaching

It would be worthwhile to include another provision that emphasises efforts made to avoid use of animals and exploring non-animal models for research relevant to human physiology and disease. Institutions should be aware and transparent about any aspects of the research animal supply chain that makes it easier to use animals than non-animal models. With greyhounds specifically, few papers openly acknowledge the core reasons as to why there is an over-abundance of greyhounds that are used in research (greyhounds are bred only for the racing industry). Perhaps by institutions setting an 'acknowledgment' criteria for all institutional research involving animals, understanding by the research and broader community of these issues can be enhanced. Institutions using animals for research must take the lead in raising awareness of animal welfare issues and concerns.

Additionally, as mentioned before, there is no real emphasis on ethics committees or standards for greyhounds. Research shows that labs have come to 'rely' on greyhounds in their pursuit of knowledge, yet additional protections for greyhounds have not been cemented. Instead, they are grouped with 'non-rodent' animals, and thus, core issues are not addressed. In 2016, around 80 greyhounds were used in published Australian research, spanning over two years:

<https://www.theage.com.au/national/victoria/university-labs-dependent-on-racing-greyhounds-activists-warn-20161007-grxhnh.html>

ANZCCART Australian Openness Agreement on Animal Research

More recent statistics or information is almost impossible to access, with heavy uncertainties about the position of greyhounds in research. Humane Research Australia has estimated that around 78 greyhounds have been used for dental, kidney and heart experiments across the country in 2019. This information needs to be verified by institutions.

<https://www.humanerresearch.org.au/discarded-by-the-racing-industry-ending-up-in-research-labs/>

Therefore, there should be a provision that requires full transparency to address the current underreporting of the use of animals in research and their fate once the research is finished. Conditions of those underreported animals (with an emphasis on greyhounds) in institutional settings, and their treatment prior to, or after experimentation should be clearly elaborated on. Some institutions do not provide this information, which raises obvious transparency issues. Institutions who are signatories to this agreement should be able to decrease their hesitancy to provide medical reports or research on animals.

<https://www.sydney.edu.au/science/schools/sydney-school-of-veterinary-science/animal-doctor-nation-program.html>

Institutions also need to further acknowledge where they source their animals from, and whether a financial incentive exists to source a particular animal. Understandably, some information would remain private, however, increasing transparency in such matters would promote animal wellbeing.

Under the current system, a number of unethical practices relating to greyhounds have been reported:

<https://www.theage.com.au/national/victoria/victoria-lab-experiments-kill-100-dogs-for-drug-and-dental-research-20151204-qlg0q1.html>

<https://www.humanerresearch.org.au/dogs-deliberately-suffocated-hearts-removed-transplanted-and-killed/>

<https://www.smh.com.au/environment/conservation/destruction-of-greyhounds-distresses-vet-students-20140201-31tvv.html>

<https://www.theage.com.au/national/victoria/university-labs-dependent-on-racing-greyhounds-activists-warn-20161007-grxhnh.html>

https://www.hsvma.org/index.php?option=com_content&view=article&id=532:humane_veterinary_education_uncovering_ethical_alternatives&catid=23:students&Itemid=93

Commitment 2: We will enhance our institution's communications with the media and the public about our use of animals in research or teaching

As stated previously, the use of certain animals in research is underreported. This is especially so with greyhounds, with almost no information as to their treatment in research laboratories being reported in mass media since 2016. This lack of up-to-date information needs to be amended to inform the public of relevant and recent practices. It would be a poor reflection on Australian researchers if the publicity regarding the cruel practices in the greyhound racing industry revealed in 2015 led to less transparency of the use of greyhounds in research

Commitment 3: We will be proactive in providing opportunities for the public to find out about research or teaching involving animals

Institutions should take care to ensure that access to information about the use of animals, especially greyhounds, in research is not restricted, for instance via institutional login. All of this information should be clearly and readily available to the public.

Commitment 4: We will provide an annual summary of our efforts to improve openness in the use of animals in research or teaching

Extra emphasis should be placed on underreported animal species, and how the institutions took active steps to lessen the gap in transparency and public knowledge for those animals. As such, those animals should be clearly identified in the institutional annual report. Additionally, these reports need to demonstrate clear transparency about the number of animals used, the donations given, where those animals are sourced, research funding sources and take note of any overrepresented animals. Institutions should also openly take responsibility for all instances of where animals died during the research or were euthanised after completion of the research, and attempt to provide unbiased justification for such instances.

Other comments

The use of greyhounds in research on human disease or physiology is of limited value because they are not a good research model for human physiology. This is but one example where institutions and funding bodies approve research that subjects animals to experimental procedures with little practical relevance. This is unethical and all signatories must do better at identifying and stopping such research.