

The Honourable Ian Hunter MLC
Minister for Sustainability, Environment and Conservation
Minister for Water and the River Murray
Minister for Aboriginal Affairs and Reconciliation
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Dear Mr Hunter

RE: ABOLITION OF BOARDS AND COMMITTEES

I am pleased to respond your letter of 1 August 2014 regarding the Premier's intention to abolish all state government boards and committees. The proposal was discussed by the SA Pathology/CAHLN Animal Ethics Committee (AEC) at its meeting of 23 July 2014.

Animal ethics, particularly the use of animals in biomedical research, is a subject of great community interest, sensitivity and concern. Accordingly, we believe that community expectations are best met by the authority that government oversight provides, and further that this is best achieved by the current arrangement whereby Animal Ethics Committees operate as statutory bodies.

The abolition of AECs represents a significant risk for both the Government and biomedical research in South Australia, a view unanimously supported by a meeting of all AEC Chairs and Executive Officers on 6/8/2014.

Unregulated animal experimentation is not acceptable to the community and hence abolition of AECs is not tenable.

Essential purpose

South Australia's AECs have a central role to play in ensuring biomedical research is conducted using the minimum number of animals consistent with research outcomes, and that those that are used are humanely treated and their welfare optimised.

Without the licence and independent approval process provided by AECs funding bodies will not release funds for research. Similarly, reputable national and international research publications require all submissions to be reviewed by an appropriately constituted AEC. Were AECs to be abolished the effect would be to shut down biomedical research in South Australia.

Efficiency

As presently constituted South Australian AECs provide exceptional value for money compared with their interstate counterparts. With only 12 AECs in South Australia, compared with hundreds in both Victoria and NSW we have a demonstrated capacity for, and commitment to, simplifying the administrative burden on researchers, whilst ensuring the impact on animal use is minimised.

The contribution of volunteers, who can be difficult to recruit to any purpose is prodigious, and should not be underestimated. That said the risk of overburdening those who do volunteer is real.

The Animal Welfare Unit at DEWNR has been pivotal in ensuring cooperation between AECs to achieve enduring efficiencies in the management of animals in biomedical research. The imminent adoption of mutual acceptance of inter-institutional applications is testament to the manageability of having such a small group of AECs, and the focus and support of the Animal Welfare Unit.

Independence

The current statutory arrangement reduces the likelihood of vested interests within institutions exerting undue influence on the appointment of members and the proceedings of AECs, to the detriment of independent evaluation of research projects involving animals, and is supported by the SA Pathology/CALHN AEC membership.

Similarly, the government having appointed an AEC is seen to be operating at arm's length from the issue of research involving animals.

To specifically address your final three dot points:

- The benefits and value add that AECs provide is clear, they reduce the risk of unregulated animal experimentation and provide the community with confidence that the potentially fraught relationship between animal welfare and important biomedical research is being responsibly managed.
- In addition to the general risks outlined above the risk of abolishing the SA Pathology/CALHN AEC is that the Department of Health would not have a mechanism to approve animal research under its control.
- With the migration of some research from Health to SAHMRI consideration should be given to consolidating the SA Pathology/CALHN and Women's and Children's Hospital AECs into a single entity.

It is my view, and that of the SA Pathology/CALHN AEC that retention of government oversight of AECs in South Australia is the most efficient and responsible course of action.

Please feel free to contact me should you require further information.

Yours sincerely,



MARK FITZ-GERALD
Chair SA Pathology/CALHN Animal Ethics Committee

Thursday, 7 August 2014

Cc Dr Bob Heddle Chief Pathologist and Research Director SA Pathology