



Feedback on Te Ara Paerangi - Future Pathways

A submission from the New Zealand Anti-Vivisection Society (NZAVS)

Contact:

Tara Jackson

NZAVS Executive Director

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Summary

NZAVS is Aotearoa's leading organisation for campaigning to end the harmful use of animals in science.

Through this campaigning, we have developed relationships with many parts of the scientific community. What we have discovered is a shared hunger for improving science.

In this submission, we include ways that our area of science can be improved. Through establishing a shared vision for eliminating animal experimentation and harmful use of animals in research, testing and teaching as technology permits, and then allocating funding to support that vision, a large scale change can happen over time.

These changes would not just have far-reaching implications for animals used in science. They would also help blaze a trail to solve problems in other areas of science.

An Opportunity for All Kinds of Science.

Across the spectrum from advocacy groups like NZAVS to scientists actively using animals in their experiments, many people agree: the more we can do to reduce the number of animals used in science, the better. It is a rare instance of a shared consensus on the goal.

There are several obstacles to achieving this goal.

Coordination among scientists needs to be better. Often scientists are not aware of each other's work and may be unnecessarily repeating work. They may not always be aware that their questions have already been investigated. A shared database of all animal use for research, testing and teaching is something we are calling for to help alleviate this problem.

Scientists need to be more up to date with their methods. Methods that replace the use of animals in science are common in many fields, but often uptake is slow. A conscious and strategic effort needs to be made to keep scientists on the cutting edge of available methods.

Often scientists would be able to do their work more effectively if just one new technology could be developed. These scientists often have no choice but to slow their research until the correct tools are available – often relying on inferior animal-based methods instead. Greater investment in new technologies to replace the use of animals would improve the work of a huge number of researchers.

These issues are not unique. Every field of science will face these problems in some form. What is special about the field of animals in science is the passion for change. It's not only scientists who want to see change – there is a strong appetite amongst the public (and key decisionmakers) to make progress on these issues.

Through this mass appeal the collective will to address these issues can be rallied. Addressing these issues when it comes to animals in science can then blaze a trail for other areas of science.

How to start

NZAVS is working with various organisations across the sector to start aligning into a cohesive strategic direction.

The first step of our plan is to get everyone on the same page. That is why we are reaching out to projects like Te Ara Paerangi.

There are a few major ways that anyone can contribute to in these early stages.

The first is to codify a simple philosophy: that animal experimentation and the harmful use of animals in science should be phased out as technology permits. This is a philosophy that everyone already shares, but it needs to be formalised. NZAVS is asking organisations to adopt this as a formal policy in writing.

The second is to address funding. Funding decisions are a fundamental driver of the direction of science, and we would like to see the power of funding harnessed to help guide science away from the harmful use of animals as technology permits. Codifying the philosophy sets the goalpost; funding is what powers us to get there.

NZAVS has identified some key areas where funding priorities need to be adjusted to ensure progress towards the goal of eliminating the harmful use of animals as technology permits:

- Prioritisation of funding for research using non-animal-based and human-relevant methods.
- Prioritisation of funding for research to create non-animal-based and human-relevant methods.
- Funding for universities to develop courses on non-animal-based and human-relevant methods.
- Deprioritisation of funding for animal-based research.
- Funding for infrastructure for non-animal-based and human-relevant methods.
- Funding for retraining scientists to use non-animal-based and human-relevant methods.
- Government funding for bodies to aid with coordination of these efforts.

Out of the total research and development (R&D) expenditure of approximately 4.5 billion NZD in 2020, only \$55,000 is dedicated to the replacement, reduction or refinement of animals used in science (this funding is available biennially via the 3Rs awards which are co-ordinated by NAEAC). This is not a government initiative – we are yet to find any evidence of government funding for the replacement or reduction of animals used in science.

The issue of funding will likely come up a lot in Te Ara Paerangi's planning for the future of science. Including these considerations as a factor for planning for our scientific future will bring us one step closer to a world without the harmful use of animals in science.

In turn, as funding is allocated for bodies to coordinate these efforts, those larger issues can be addressed (like having databases coordinating the efforts of our scientists).

Continuing the Journey

Once these first steps are incorporated into the planning of Aotearoa's scientific future, it will become easier for the next steps: establishing that widescale coordination.

It is unlikely that the pathways programme will be able to get into this level of detail, but it should be something that the project is mindful of. Many of these issues are wider issues in science and addressing them here will provide an opportunity for other fields to follow.

Closing Thoughts

We hope these contributions can help shape the planning for the future of science in Aotearoa. We understand that this consultation is just one step in the process.

We would be thrilled to be involved with future steps. Please let us know if there are other ways we can participate.

What we are currently campaigning for

While much of this may be out of the scope of this submission, many parts of our **current Striking at the Source** campaign are relevant and we thought it would be worth notifying you of the changes we are currently asking for via a [public petition](#) that currently has over 20K signatures on it.

In short, we are asking the NZ Government to develop a comprehensive action plan to help end animal experimentation and embrace better technologies.

This is crucial as we haven't seen any significant changes in trends around how animals are used for science in NZ since this started being monitored in 1999:

Animals manipulated between 1999 and 2019



We either need to make significant changes now or stay stagnant. After conversations with multiple stakeholders, we have learnt that there is a general desire within the industry, to move away from animal experimentation and 'hopefully' one day no longer 'need' animals (specifically in research relating to human-health – we acknowledge that some areas will always rely on animal use such as vet research and research relating to conservation). Although this attitude and desire seems to exist, there are no solid plans at a government level in place to help make this happen.

With several key changes to the core of the industry, we believe that we will be able to turn things around and start seeing a significant decrease in the number of animals used at the same time as seeing an increase in the amount of high-quality research that we are producing. The core changes fall under the following 3 categories:

1. **Better allocation of funding**
2. **Greater openness and transparency**
3. **Stronger laws**

Under each category we have listed multiple key changes we believe need to be actioned by the NZ Government, as bullet points. There is 27 bullet points in total (listed below).

Better allocation of funding

Currently 0% of government funding into research is designated to the sole purpose of developing or utilising non-animal-based methods. The availability of funding would remove this barrier at the same time as acting as an incentive for researchers.

Key changes we are asking for:

1. Prioritisation of funding for research using non-animal-based and human-relevant methods.
2. Prioritisation of funding for research to create non-animal-based and human-relevant methods.
3. Funding for universities to develop courses on non-animal-based and human-relevant methods.
4. Deprioritisation of funding for animal-based research.
5. Funding for infrastructure for non-animal-based and human-relevant methods.
6. Funding for retraining scientists to use non-animal-based and human-relevant methods.
7. Government funding for bodies to aid with coordination of these efforts.

Greater openness and transparency

It is difficult for the public to learn about how and why animals are used in science, given that taxpayer's money is spent on research, the public have a right to be able to access this information. Even more importantly, the research community does not have open access to all research projects that have happened, are happening, and are planned to happen in NZ, this creates unnecessary duplication (a waste of not only money and other resources but also animals' lives).

Key changes we are asking for:

8. Mandatory filming of experiments involving animals. As a minimum the highest impact studies should be filmed and be available publicly.
9. A registration programme for those providing animals for research.
10. Birth to end-of-research tracing and transparency, so it is clear for any given experiment where the animals came from and where they went after the research.
11. Greater transparency for existing documents, requiring their publication.
12. Publish key details of all projects/manipulations involving the use of animals in research and testing to avoid unnecessary repetition in a nationwide database available to those who need it, i.e., animal ethics committees.
13. Ensure private research conducted on animals is made public, to avoid unnecessary repetition.
14. Research conducted overseas for New Zealand companies should be subject to the same standards of openness and transparency.

This will take an increased level of coordination among various scientific bodies to ensure that these standards are useful. For example, publishing all findings in a database will also require that this database has the buy-in of organisations like universities as well as ensuring ethics committees are trained in its use.

Increased resourcing should be made available, and a government body should be made responsible for coordination of these issues. This body could also oversee creating a strategic plan for funding to ensure that it is helping shift science over time.

Stronger laws

NZ still has some legal requirements for animal testing. These are acting as barriers for the progression of technology and better methods. In addition to this, there is no legal incentive for the use or development of non-animal-based methods.

Key changes we are asking for:

15. Government bodies commit to phasing out the use of animals in science as technology permits.
16. Phase-out all requirements for animal testing in New Zealand law.
17. Legislation amended to require that non-animal-based RTT methods be used over animal-based methods (alive or dead), where they exist.
18. An independent body for animal welfare, such as a Crown entity or commission.
19. A Minister for Animals separate from the Minister for Agriculture.
20. A comprehensive review of the efficacy of the animal model and the potential viability of non-animal-based methods as replacements.
21. Involvement of the public and advocacy groups like NZAVS in decision-making.
22. A requirement for all Animal Ethics Committees to have an expert on non-animal-based methods.
23. A requirement for all Animal Ethics Committees to make applications public.
24. A requirement for all Animal Ethics Committees to check for non-animal-based methods that may be able to replace animals when considering an application.
25. The establishment and maintenance of a database of non-animal-based methods, to aid Animal Ethics Committees.
26. The restructure of Animal Ethics Committees to minimise conflicts of interest. Scientists involved should not have a financial interest in animal-based-research – whether via employment or ownership of a company.
27. Sufficient funding for enforcement to ensure these objectives are met.

Point 15 is particularly relevant here. We would like all government bodies considering scientific plans to adopt the principle of phasing out the harmful use of animals in science as technology permits.

We are in the process of developing a comprehensive report on these key changes, why they need to be made and how they can be made. Once finished, we can email you a copy of the final report. If you have any questions or you would like to discuss anything further, please don't hesitate to contact us (contact details on page 1).