



2 September 2008

Dr Anne Fawcett
Animal Welfare Branch
NSW DPI
PO Box 100
BEECROFT NSW 2119

Dear Dr Fawcett,

Thank you for your email dated 20 August (from Lynette Chave) inviting AAHR to comment on the draft guidelines for the housing of mice in scientific institutions.

Whilst we appreciate the efforts made by individuals to improve the living conditions of those animals unfortunate enough to be used in research, AAHR feels it would be inappropriate to comment on a system that we consider to be scientifically flawed and are fundamentally opposed to. We also consider that improving the welfare of laboratory animals serves to endorse the belief that they are at all necessary and detracts from the efforts to find replacement – the most crucial element of the Three R's Principle.

Clearly there is a need to re-evaluate the entire process of how we approach medical research. Far more emphasis needs to be placed on epidemiology, clinical research and autopsies so that we can address the real disease rather than a replica in a model of a species that differs from us anatomically, genetically and metabolically.

The problem of "species differences" has been illustrated by reports of drugs administered to children to treat attention deficit hyperactivity disorder that have led to strokes, heart attacks, hallucinations and convulsions. We suspect that such drugs (Ritalin and Dexamphetamine) were also tested on animals before going to human trials.

These are certainly not isolated incidents. Vioxx and celebrex were subjected to extensive animal tests which again did not predict the negative responses witnessed in humans.

It is becoming more and more apparent that reliance on animal-based research is nothing more than a quantum leap of faith and cannot continue as traditional research practice. It is absolutely essential that if Australia wants to be at the forefront of medical progress we must be instrumental in the development and validation of non-animal alternatives - research that is less costly, less risky and far more applicable to the study of human disease and ailments.

Yours sincerely,

Helen Rosser
Chief Executive Officer