



23 September 2005

GTEC Secretariat  
Office of the Gene Technology Regulator  
MDP 54  
PO Box 100  
Woden  
ACT 2606

Dear Sir/Madam,

I write in response to your invitation to comment on the draft *National Framework for the Development of Ethical Principles in Gene Technology*.

The Australian Association for Humane Research Inc. is a non-profit organization that challenges the use of animals in medical research on both ethical and scientific grounds. We maintain that real medical progress can only be made through studying our own species and not artificially-induced diseases and conditions in animals.

Whilst we have no specific comments relating to the draft itself, we would like to take this opportunity to voice our opposition to the genetic modification of non-human animals.

We are particularly concerned that genetic engineering is the cause of an increasing number of animals being used in research. Rather than adhering to the 3R's Principles of reducing, refining and replacing animals in research, Gene Technology is instead causing a huge surge in the statistics.

The genetic manipulation of animals causes great suffering – both in the reproductive techniques themselves, such as superovulation, insemination and embryo transfer, as well as in the detrimental effects that often result in the modified animal. It also creates a tremendous wastage of lives when we consider the number of resultant animals that do not express the desired phenotype. It has been suggested that less than 1% of embryos result in live animals and many of these develop serious abnormalities.

We also acknowledge the following further concerns documented by Christiansen, S.B., & Sando, P. (2000). Bioethics: limits to the interference with Life. *Animal Reproduction Science*, 60-61, 15-29.

- Insertion of foreign DNA can lead to unpredictable responses from totally unrelated genes.

- Invasive techniques cause stress to animals and animals used in biotechnology are often subjected to multiple invasive procedures.
- Transgenic animals tend to be behaviourally retarded, have joint problems and lower survival rates.

The genetic modification of animals is even more unjustified when it is for the purpose of increasing productivity of farmed animals. The animals currently used for food and fibre already produce to their capacity, and current intensive housing facilities fall very short of fulfilling adequate welfare standards. The manipulation of these animals to produce an even higher yield is merely a further assault to their already exploited bodies.

Considering the above concerns, as well as the fact that results from any animal tests cannot be extrapolated to humans with sufficient accuracy, AAHR considers that any research, including gene technology should NOT involve the use of non-human animals.

Yours sincerely,

Helen Rosser  
Chief Executive Officer  
***Australian Association for Humane Research Inc.***