

MONITORING OF COMPLIANCE

*Summary of a presentation given at the NAEAC workshop for AECs
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The Animal Welfare Act 1999 requires animal ethics committees (AECs) to monitor compliance with conditions of project approval by researchers, and general animal care in their institutions. Policies and procedures for this should be in the code of ethical conduct (CEC).

There is no single method of monitoring that will ensure the AEC has confidence that project work is done in accordance with the conditions of project approvals, and that the animals are well looked after. Rather the AEC needs to carry out a range of activities, some of which it may do itself, and some of which may be carried out on its behalf by others or included in institutional processes that are part of other activities. For example checking farm facilities may be included in an internal audit of other farm activities such as drug control or health and safety.

The bottom line is that the AEC needs to ensure that it is confident it knows what is going on at all sites where animals are being used for research, testing or teaching.

The first part of the monitoring process is project approval. Every project must be approved by the AEC prior to commencement. Section 100 of the Animal Welfare Act covers specific items that must be considered by the AEC, and getting information about all of these will go a long way to ensuring that the AEC is well informed about the project work, the effects on the animals, actions being taken to reduce the 'costs' to the animals, and any follow-up care that may be needed. From experience, a well-designed application form that asks questions to cover the items in section 100 of the Act, will be a big help in guiding applicants, and also ensure that the AEC gets the information it needs.

During the approval process the AEC should consider if the project can be approved outright in accordance with the institution's CEC, or whether some specific conditions of approval may be needed. Such things as viewing a new researcher carrying out a task, visiting a new animal facility, or watching a procedure that is new to the AEC, may be included as a condition of approval.

The AEC should also consider what sort of monitoring of animals by researchers is required. The use of checksheets to record regular observations or measurements on animals such as demeanour, temperature, and appetite, especially for animals that have had surgery or other more "invasive" procedures should be encouraged. For some projects specific endpoints should be set, and the applicant must keep records to show that these were complied with.

The AEC should also be receiving some sort of reporting at the end of project work. This will vary to suit the institution, but in addition to the statistical data should include information about any issues that may have arisen during the project work, and specifically if there had been any unexpected animal outcomes. Suggestions for improvements (that relate to animal care) for any future similar work should be noted as well as a comment as to whether the work achieved the objectives set. Where project work is a pilot trial or is in sections, and the results of one section determine how the next part of the project will be carried out, the AEC should be asking for an interim report from the applicant. Where the project is one of a series, or a renewal of ongoing work, the AEC should insist on receiving a report for each completed project before the next one is approved.

To ensure that the AEC is systematic about approvals and monitoring there should be a clear understanding of the processes the AEC undertakes. Written procedures to supplement the CEC are recommended. Of particular importance to AECs that approve more than just a few projects each year is the means of keeping track of all the data. Use of spreadsheets, or even a database can be very helpful, and someone must have the responsibility of ensuring that this is kept up to date.

A distinct role for the AEC is to monitor the animal care in the institution, and in any parented institution. This includes not only the traditional laboratory animals, but also all animals involved in project work. Under New Zealand conditions this means that a number of AECs will need to be monitoring farm animal care, captured wild animals, and even considering the effects of project work on feral animal populations. There are a number of items to consider with regard to animal facilities and animal care. The state of the animal housing, such as the cages, the environment in which the cages are kept (room conditions) and farm facilities are all important. The staff who look after the animals, their training and expertise, and the supervision and management of these staff need to be considered. There should be documented procedures for the animal facility operations, and these should include standard

operating procedures (SOPs) for routine activities such as sample collection, anaesthesia and euthanasia. The operation of the animal facilities should be subject to regular internal review, and this should include keeping the documentation up to date.

Wherever possible the AEC members, or their specific representative, such as the Animal Welfare Officer, should be regular visitors to the animal facilities. This builds confidence for both the AEC and the animal care staff, and this in turn means any issues can be dealt with early on, rather than becoming major problems later.

Finally there must be a robust method of dealing with complaints. Consider how complaints are received. This should be very flexible as complaints can come from a wide variety of sources – insisting on a complaint in writing may mean that a report from a member of the public received by phone gets missed. Also is it possible for a junior member of staff to raise an issue in such a way that it can be followed up properly? There needs to be clear procedures about how the AEC deals with complaints, and these must be followed. Complaints could potentially involve senior staff members so the system must be robust. A complete investigation is essential, any adverse effects on animals must be dealt with, and project work may have to be terminated. There may also be a need for ongoing checking of the animals, the site or facility, and the people involved.

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