Advice to Applicants Seeking to Conduct Projects in Other Countries

Applicants need to be aware that special provisions of the NHMRC Code (ss 2.6.9 – 2.6.14) apply to projects conducted in other countries by Australian investigators. The following advice aims to assist such applicants in addressing the special requirements as efficiently as possible for two different sets of institutional governance arrangements. Please note that according to 2 6.14 of the Code it is the responsibility of the applicant to provide the AEC with advice on how the proposed project can meet the principles of the Code, taking into account compliance with local requirements. Whilst provision of the information set out below provides no guarantee that an application will be approved, it will assist in providing the AEC with the type of information that makes approval a possibility.

A. Projects conducted in other countries in settings where there is no institutional governance separate from UWA:
Examples of where this may occur are in research conducted in territorial waters or in open natural environments. Applicants in these situations must address the following requirements as part of their application to the UWA AEC:
1. Show evidence that all regulatory approvals and permissions required by local law or custom have been obtained or are being processed.
2. Justify that the project is not conducted in another country as a mechanism of avoiding compliance with the Code [please note that ss 2.6.10 and 2.6.13(ii) of the Code asks institutions and investigators to address this point].
3. Explain how animal care and use will be adequately monitored, including independent monitoring where appropriate (s 2.6.12).

B. Projects conducted in other countries in settings where there is institutional governance separate from UWA:
Examples of where this may occur are in research conducted in the facilities of overseas universities, research institutes, research stations and zoological or wildlife parks. Applicants in these situations must address the following requirements as part of their application to the UWA AEC (the first three requirements are the same as in A above):
1. Show evidence that all regulatory approvals and permissions required by local law or custom have been obtained or are being processed.
2. Justify that the project is not conducted in another country as a mechanism of avoiding compliance with the Code [please note that ss 2.6.10 and 2.6.13(ii) of the Code asks institutions and investigators to address this point].
3. Explain how animal care and use will be adequately monitored, including independent monitoring where appropriate (s 2.6.12).
4. Provide a copy in English of the overseas institutional animal ethics approval (this is a UWA policy requirement);
5. Provide evidence that the approval granted in (4) will ensure outcomes that would be equivalent to those expected through application of the Code (s 2.6.11). This requirement may be addressed by either:
   (a) providing a letter in English signed by the head of the overseas research organisation or the ethics chair asserting this fact; or
   (b) addressing the relevant sections of the Code as to how equivalent outcomes will be ensured by the regulatory framework in the other country.

The AEC reserves a discretion to request copies in English of any institutional animal ethics application submitted at the overseas research organisation and copies in English of all relevant laws, codes and policies applicable in the other country. In general, the AEC will only request such resources when they are needed to resolve a challenging issue.