

June 27, 2017

Malcolm A. Lawson, Ph.D., M.B.A, AFAIM  
Director and Institutional Official  
Animal Care Services  
The University of Western Australia  
M720, 35 Stirling Highway  
Crawley, 6009  
Western Australia

Dear Dr. Lawson:

The AAALAC International Council on Accreditation has reviewed the report of the recent site visit to the Animal Care Services (ACS), The University of Western Australia, Perth, Australia. The Council commends you and the staff for providing and maintaining a quality program of laboratory animal care and use. Especially noteworthy were the institutional commitment and support for the accreditation process, evidenced in part by the significant support to the animal care and use program to include training, continuing education, and the certification of the veterinary certificate program in laboratory animal medicine (distance program); the cooperation and support during the site visit; the highly qualified and knowledgeable leaders, key personnel and staff; the sincere care for the animals by the ACS staff, with a strong sense of ownership and service that was also expressed by the Animal Ethics Committee members; the strong interest in learning new techniques, such as fish husbandry and care; the initiative taken by ACS to implement facility operation and animal well-being inspections by the Associate Director and Veterinary Officer, and developing less stressful methods for handling sheep; and the healthy animals observed during the site visit. The Council is pleased to inform you that the program conforms with AAALAC International standards as set forth by the *Guide for the Care and Use of Laboratory Animals*, NRC 2011 and the Australian National Health and Medical Research Council Code for the Care and Use of Animals for Scientific Purposes 8<sup>th</sup> Edition, 2013. Therefore, **FULL ACCREDITATION** shall continue.

Council acknowledges receipt of the correspondence dated May 15, April 27, April 7 and March 24, 2017 detailing actions taken relative to concerns expressed by the site visitors during the exit briefing. Specifically, the items addressed satisfactorily included: improving the management of controlled drugs and licensed material; planning to improve oversight of investigator procedure rooms/areas, including the ones located outside ACS managed facilities; clarifying the amendment review and approval process; providing additional heating, ventilation, and air conditioning system performance data; conducting a risk assessment for the activity and use of office space located within the Large Animal Facility (LAF); planning to enhance post-approval monitoring of animal care and use; developing analgesia guidelines for researchers; revising standard operating procedures (SOP) to improve feed storage practices; revising the sheep husbandry SOP to monitor environmental temperature for sheep housed indoors; developing a SOP to address proper storage of research equipment; revising signs for reporting animal welfare concerns, and posting signs in non-ACS managed procedure rooms; clarifying emergency power capabilities; developing a SOP for entrance and exit procedures for the LAF post-mortem room; reviewing the failure to adhere to the SOP on the transport of sheep; adjusting individually ventilated cage pressure in the infectious disease area; and enhancing environmental enrichment for sheep and zebra fish.

Enclosed are further recommendations for improvement of the animal care and use program. The Council on Accreditation notes that there is no obligation for institutions to make program changes based on suggestions for

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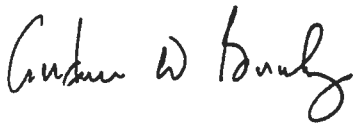
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improvement. Implementation of suggestions is, however, one means of promoting a high quality animal care and use program.

AAALAC International requires an Annual Report detailing changes made during the year in accredited units. If your institution chooses to implement program modifications in response to the suggestions described in the enclosure, the Annual Report provides an opportunity to summarize the actions taken. In the interim, AAALAC International expects to be apprised in a timely manner of significant programmatic changes or concerns should they occur. Please note that, at your request, AAALAC International will provide your institution with a separate letter simply verifying that your animal care and use program is accredited. Should you also wish to distribute an electronic copy of this letter to program staff, a Portable Document Format (pdf) version will be sent upon request.

Sincerely,

A handwritten signature in black ink, appearing to read "Andrew W. Grady". The signature is written in a cursive, flowing style.

Andrew W. Grady, D.V.M., M.S.  
Council President-Pro Tem

AWG:cma  
001558

Enclosure

cc: Simone Chapple, Associate Director, Animal Care Services

**Animal Care Services  
The University of Western Australia  
Perth, Western Australia  
File # 001558**

**Suggestions for Improvement:**

1. The Veterinarians (Category A members) on the Animal Ethics Committee (AEC) were not certified and did not have training and/or experience in laboratory animal medicine and science or with the activities and species commonly used at the University of Western Australia (UWA). The National Health and Medical Research Council Code Section 2.2.4[i] requires that the Category A member(s) of the AEC must be “a person with qualifications in veterinary science that are recognized for registration as a veterinary surgeon in Australia, and with experience relevant to the institution’s activities or the ability to acquire relevant knowledge.” *The Guide for the Care and Use of Laboratory Animals (Guide)*, NRC 2011 (p. 24) states "membership of the Institutional Animal Care and Use Committee includes a Doctor of Veterinary Medicine either certified...or with training and experience in laboratory animal science and medicine or in the use of the species at the institution." The institution must ensure that the veterinary member(s) of the AEC have the necessary qualifications and/or experience relevant to the University’s activities and species, in accordance with the Code and the *Guide*. Council acknowledges the correspondence dated April 7 and March 23, 2017 indicating that the Animal Care Services (ACS) Attending Veterinarian (AV) is an available resource to the AEC for information, advice, and to assist with protocol review; a plan for the Director of ACS to ensure that all AEC protocols to be implemented within the ACS would be signed by the Director of the ACS and the AV (or designee) with any notes of concern provided to the AEC; the appointment of an AV to be an AEC Category A member is being considered once both current members in Category A tenure expires in August 2017, and ensuring the appointment is consistent with UWA policy and that matters of conflict of interest are clarified with the UWA executive. In addition, AAALAC International’s Position Statement indicates the animal care and use program is the collaborative responsibility of Institutional Official (IO), AV, and the EC. The AV (or designee) has further responsibilities related to his/her role on the EC, including regular communication between AV and AEC (<https://www.aaalac.org/accreditation/positionstatements.cfm#vetcare>). Council urges completion of the plan to appoint a veterinarian with relevant experience/training to conform with recommendations of the *Guide*, the NHMRC Code requirements to serve as a Category A member of the AEC and AAALAC International’s Position Statement. Also, the AV should be given the opportunity to serve on and perform all AEC responsibilities, and have full voting privileges.
2. Cane toads were housed in two different types of caging systems: a large tub and metal caging with 11 cm height (45 cm x 37 cm floor space), with a metal lid. A majority of the toads were housed in the metal cages, but were also housed in the large tub on a weekly rotation during feeding. Department of Agriculture and Food 2013 – Conditions for Importing and Keeping Cane Toads for Scientific of Educational Purpose was used as the guiding document for toad space provisions, although using less density than the recommendations in the guidelines. However, the size of the metal cage was considered inadequate for large toads especially with the maximum density of up to 15 toads described in the SOP. The *Guide* (p. 56) notes at a minimum, animals must have enough space to express their natural postures and be able to make postural adjustments without touching

the enclosure walls, or ceiling, and be able to turn around....” In addition, performance standards must be met (<http://www.aaalac.org/accreditation/positionstatements.cfm#space> and [https://www.aaalac.org/accreditation/RefResources/SS\\_Amphib.pdf](https://www.aaalac.org/accreditation/RefResources/SS_Amphib.pdf)). Council acknowledges the diversity of amphibians and that their housing needs may vary based on the species. The housing of cane frogs in the metal caging system should be re-evaluated, and references applicable for the species should be used as a basis for addressing space/cage height, while ensuring performance standards are met. Council acknowledges the correspondence dated March 24, 2017 indicating the plan to improve the housing space for cane toads by replacing the metal caging system with a large tub with an expected completion date of September 2017. The completion of the plan should be fully implemented in a timely manner.

3. The use of non-pharmaceutical-grade compounds, such as urethane as an anesthetic agent for rats, was approved in Protocol RA/3/100/ 1101 and Avertin was approved as an anesthetic agent for mice in protocol RA/3/100. However, there was no justification provided in the protocol that was approved by the AEC. Both Avertin and urethane are non-pharmaceutical-grade agents. Whenever possible pharmaceutical-grade compounds must be used for the clinical treatment of animals and to prevent or reduce/eliminate animal pain or distress (e.g, anesthesia and analgesia) [http://www.aaalac.org/accreditation/faq\\_landing.cfm#B9](http://www.aaalac.org/accreditation/faq_landing.cfm#B9). The *Guide* (p. 31) indicates that the use of pharmaceutical-grade agents ensures that unwanted side effects are not introduced into studies conducted with experimental animals. Therefore, they should be used when available. The use of non-pharmaceutical-grade compounds should be described and justified in the animal protocol and be approved by the AEC. When a veterinary or human pharmaceutical-grade agent is not available, consideration should be given to the grade, purity, sterility, pH, stability, etc. of the non-pharmaceutical-grade compound. Council acknowledges the correspondence dated March 24, 2017 indicating that ACS referred to the ACS veterinary anesthesiologist for assessment and to provide clarification for the Director of ACS, researchers, Animal Welfare Officer, and the AEC. Council urges completion of this plan to ensure the use of non-pharmaceutical-grade anesthetic agents in the applicable protocols are justified, reviewed and approved by the AEC; pharmaceutical-grade agents are used when available; and when non-pharmaceutical-grade agents are used, they should be used in accordance with the *Guide*.