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Committee Secretary
Senate Standing Committees on
Environment and Communications
PO Box 6100
Parliament House
Canberra ACT 2600

By Email: ec.sen@aph.gov.au

13th January 2016

Dear Committee Secretary,

Submission on the Environment Protection and Biodiversity Conservation Amendment (Prohibition of Live Imports of Primates for Research) Bill 2015

Humane Society International (HSI), one of the world's largest animal protection organisations, writes on behalf of our 60,000 Australian supporters in regards to the Bill named above which proposes to amend the *Environment Protection and Biodiversity Conservation Act 1999*. This amendment would make it unlawful to import primates for research purposes into Australia, and is intended to ensure that Australia does not participate in the trade of wild-caught primates for experimentation. HSI strongly supports this Bill. Its' introduction would not ban the use of primates for research or the importation of primates for other purposes, such as for zoos. The introduction of this amendment also represents a perfect opportunity for Australia to demonstrate that it does not support or contribute to the unethical global trade in primates for research to the international community.

HSI's views

HSI believes that the use of animals for research and testing is totally unacceptable, inaccurate and outdated. Instead, Australian researchers should be using non-animal research methods which have been proved to be more accurate and of greater relevance, producing improved results faster. HSI also supports the 3R principle for the use of animals in research, namely replacement, refinement and reduction, thereby reducing unnecessary suffering and abuse. We strongly support a ban of the importation of live primates for research, particularly given that Australia has three government-funded facilities in both Melbourne and Sydney that already breed primates in captive colonies for research.

Primates are virtually the only animals taken from the wild in large numbers for biomedical research. Even though breeding colonies exist, it is still estimated that over 1,000,000 primates are taken every year from the wild, with over two thirds being used for biomedical research.

Primates imported into Australia

HSI understands that between 2000-2009, Australia allowed the import of:

- 331 pig-tailed macaques listed on the International Union for Conservation of Nature (IUCN) Red List of Threatened Species as vulnerable to extinction (from Indonesia)
- 250 long-tailed macaques listed on the IUCN Red List (from Indonesia)
- 71 owl monkeys listed on the IUCN Red List (from the US).

Australia has not permitted the import of live non-human primates for research since 2009. However, in 2014 another 37 macaques were imported into Australia for experimentation from France.

The Primate Trade

Each year thousands of monkeys are traded globally for the international animal research industry. Both India and Bangladesh banned primate exports in the late 1970s, making Southeast Asia the main culprits of the wildlife trade.

In the early 1990s the international markets began to demand pedigrees of the specimens, so suppliers created the first long-tailed macaque breeding operations in Indonesia. The first was set up in 1987, but more followed over the next few years (Shepherd, 2010). Some are trapped and caught in the wild, whilst others are bred in captivity and kept in cramped cages on large-scale facilities. In Asia these facilities provide wild caught monkeys, selling them as captive breeds. Many monkeys living on islands such as Tinjil Island are caught from the wild but then labelled as “captive-bred” because the whole island is described as a “breeding facility”.

Undercover operations have shown them to be caught using brutal means, and then kept in dirty cramped conditions. They are then subjected to gruelling long journeys to their destination for research. Between 1988 and 1991, one primate import company from the UK disclosed a mortality rate of almost 19% for the monkeys they transported from Indonesia. The illegal trade in primates is also seen as a major threat to biodiversity conservation. Coupled with the high rate of tropical deforestation claiming their fragile habitat, the situation for these primates has reached crisis point.

BUAV Investigation

In 2009 an international animal protection group called the British Union Against Vivisection (BUAV) carried out an undercover investigation into the trade of primates for research in Indonesia. They concluded that their excessive trade in the long-tailed macaque for research violated CITES to which the country is a party. They found a staggering 15,100, or threefold increase, in the number of primates allowed to be trapped in 2009 for research. BUAV called the official Indonesian “ban” on the export of wild primates for research a sham.

CITES

Australia is a signatory to the *Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES)*, thereby committing to making sure international trade in flora and fauna does not threaten their survival. This means that these wild-caught primates may not be traded because all non-human primates are listed as CITES specimens. Indonesia is also a signatory to the same CITES convention, however, there is no policed restriction on wild-caught monkeys.

NHMRC

Australia’s *National Health and Medical Research Council’s (NHMRC)* policy on non-human primates for scientific purposes states that “whenever possible investigators obtain non-human primates from National Breeding Centres”, and “non-human primates imported from overseas

must not be taken from wild populations and must be accompanied by documentation to certify their status.”

Inaccuracy of animal research

Biomedical and pharmaceutical research claims the lives of an estimated 100,000 to 200,000 non-human primates worldwide each year, fuelling the primate trade to meet demand. Despite this, strong evidence suggests that research using animal models provides unreliable results. Increasing numbers of scientists and clinicians are challenging animal experimentation on medical and scientific grounds. Some examples of this evidence are listed below:

- The *Food & Drug Administration (FDA)* in the US found that nine out of the ten drugs successfully tested on animals will fail in human trials¹.
- In the UK a survey commissioned by *Europeans for Medical Progress* in 2004 found that 82% of general practitioners said they were ‘concerned that animal data can be misleading when applied to humans’².
- Most efforts to produce lung cancer in animals failed after more than 50 years of attempts, and this questioned the cigarette-lung cancer theory. Consequently health warnings were delayed for years – meanwhile thousands of lives were lost to lung cancer³.
- The monkey model for polio misled researchers about polio’s mechanism of infection and clinical course, delaying progress against the disease.
- Human investigations strongly indicated that asbestos causes cancer in the 1940s, yet animal studies repeatedly failed to demonstrate this, delaying the necessary workplace precautions in the US for decades⁴.

Drug failures and research that never delivers because of irrelevant animal models not only delays medical progress, but also wastes resources and risks the health and safety of volunteers in clinical trials. HSI instead urge the use of more sophisticated human-relevant research tools. Techniques such as nanotechnology, genomics, microfluidic chips, epidemiology and computer modelling have been shown to generate more accurate results in less time.

The voice of Australians

In 2013 Humane Research Australia commissioned a Nexus Research Poll which revealed that most Australians (60%) are opposed to the use of primates in research.

Labor MP Mike Symon presented a petition of more than 10,000 signatures in 2011 to the House of Representatives which called for a ban on the importation of primates for research.

We’re certain that if they knew, most Australians would be horrified that Australia still allows the importation of live primates for experiments.

To conclude, HSI strongly supports this Bill because it would ensure Australia does not participate in the unethical trade of wild-caught primates for use in experimentation for the research industry. Thank you for the opportunity to provide comment on this inquiry.

Yours sincerely,

Verna Simpson
Director
HUMANE SOCIETY INTERNATIONAL

¹ *FDA Issues Advice to Make Earliest Stages of Clinical Drug Development More Efficient* (Press release, 12 January 2006)

² *Doctors don’t trust animal experiments* – Safer Medicines (<http://www.safermedicines.org/latestnewsitem.php?pid=1>)

³ Northrup E. *Men, mice, and smoking, in Science Looks at Smoking*. New York, Coward-McCann, 1957, p 133.

⁴ Enterline PE. *Asbestos and cancer, in Gordis L (ed). Epidemiology & Health Risk Assessment*. New York, Oxford University Press, 1988.