



Australian Government
National Health and Medical Research Council

OFFICIAL



Australian code for the care and use of animals for scientific purposes

Report: Survey of stakeholders (2026)

Introduction

This document provides a summary report of the major outcomes from a survey conducted by the National Health and Medical Research Council (NHMRC). The aim of the survey was to assist with the identification of issues for consideration during the review of the [Australian code for the care and use of animals for scientific purposes](#), 8th edition (2013, updated 2021) (the Code).

Some issues raised by respondents to the survey are out of scope for the Code but are included in the report for transparency.

About the survey

Survey design and distribution

The survey was conducted from 2 December 2025 to 16 February 2026. Information about the survey was distributed to stakeholders via email, NHMRC's *Tracker* newsletter and social media platforms. The survey was conducted using NHMRC's [Consultation Hub](#). We received responses from all areas of the sector and the Australian community. A copy of the survey questions is at [Appendix A](#).

Analysis

Survey responses were analysed using a structured approach involving manual coding of feedback and appropriate grouping of similar content, followed by a thematic analysis supported by artificial intelligence methods. Responses with similar content were analysed as a group using the same method. The final analysis was checked for accuracy by staff in the Office of NHMRC.

What we heard

Strengths of the Code

Strengths of the Code identified by respondents included:

- the strong ethical framework centred on the 3Rs that supports structured ethical decision-making by investigators and Animal Ethics Committees (AECs)
- the principles-based, flexible approach enabling the Code to remain relevant across diverse settings
- the clear delineation of roles and responsibilities in the Code, including those for institutions, AECs, investigators and animal carers
- clear requirements for oversight by AECs, which are composed of a range of people with different roles and perspectives
- recognition of the lifetime experience of animals including the cumulative impact on an animal from multiple interventions, and the need for monitoring throughout the duration of a project
- the requirement that investigators and animal carers be adequately trained and competent
- the requirement for education and training of AEC members

- a clear structure and logical organisation into sections and chapters with a clear breakdown of topics and responsibilities, as well as its clarity of language
- a unified national framework which is widely recognised and respected domestically and internationally, and its influence in shaping research culture and ethical practice.

Major issues identified

Animal care and management

Guidance in the Code about animal care and management was seen by respondents as:

- too high-level and non-prescriptive, with the potential for variable welfare outcomes across institutions and animal species
- lacking clear requirements for housing, enrichment, monitoring, documentation, escalation of adverse events, analgesia, humane endpoints, cumulative lifetime welfare impacts, and management of overbreeding and unnecessary animal wastage
- species agnostic, with the need for species-specific guidance.

AEC operations

Respondents commented about the aspects of AEC operations including:

- perceived inconsistencies and inefficiencies in AEC operations
- perceived inconsistencies in decision-making between committees
- unclear delineation of responsibilities amongst AEC members
- a perception of disproportionate administrative burden on investigators for studies involving low risk to animal welfare
- poorly defined requirements for AEC monitoring of animal care and use
- insufficient guidance on approval thresholds for project applications, for urgent or out-of-session decision making including in response to incidents and unexpected adverse events, and for the handling of appeals and complaints.

Scope and application

Respondents identified the need for clearer guidance and associated definitions on what activities are in-scope for the Code. This is particularly relevant to: wildlife and field research including the distinction between management and research activities; animal husbandry; low-impact methods; cephalopods and decapods; and teaching activities in schools, vocational education and tertiary institutions.

Ethics review

While supportive of using the harm-benefit analysis framework during ethics review, respondents raised concerns about its subjective and inconsistent application, including:

- lack of structured, auditable tools for harm-benefit analysis and insufficient consideration of the scientific or educational quality of the proposed use of animals
- need for guidance on severity classification, acceptable thresholds of harm and the management of high-impact procedures and studies.

Respondents regarded the following limitations as undermining the robustness and credibility of ethical decision-making:

- lack of contextual or cultural ethical considerations relevant to Aboriginal and Torres Strait Islander peoples and communities or specific research settings
- limited guidance on conducting retrospective evaluation of whether anticipated benefits from animal use have been achieved.

Replacement and non-animal methods

Respondents requested clear guidance on how non-animal methods should be identified, evidenced, documented and assessed. Respondents noted that without clear responsibilities at all levels, including at the institutional level, the principal of 'Replacement' is difficult to embed in standard practice.

Harm assessment and severity

Respondents identified the following critical gaps in the framework for assessing animal harm:

- lack of mechanisms for phasing out high impact procedures
- inconsistencies in the severity classification of procedures across jurisdictions
- limited guidance on assessing cumulative harm across multiple procedures over an animal's lifetime
- lack of clear definitions distinguishing predictable versus unexpected harm
- insufficient specification of humane endpoints leading to variable interpretation and application.

Provisions for animals at the conclusion of their use

Respondents emphasised that end-of-use decisions are ethically significant and noted current advice in the Code could be strengthened. This should include advice on when rehoming or retirement should be prioritised and on how responsibilities should be assigned, and limits on the period of time for which animals may be used.

Guidance on when necropsy is required following the unexpected death of an animal and how the findings should inform refinement of future practices should also be considered.

Transparency

Respondents identified insufficient transparency as a critical gap in the Code. The current reporting arrangements limit opportunities for shared learning across institutions and jurisdictions and weaken public confidence in oversight of animal use. Respondents noted the publication of non-technical project summaries and retrospective assessments of whether predicted benefits were realised would help to rectify this issue. While respondents noted the absence of mandatory, nationally consistent public reporting on animal use as a critical gap, this is the responsibility of the state and territory governments.

Education, training and competence

Variation in education and training and competency assessment across institutions was identified as a critical issue, with concern expressed about over-reliance on informal, laboratory-based training, and the absence of minimum standards and guidance about duration and reassessment of competency. However, detailed advice about competency-based education and training programs is beyond the scope of the Code.

Definitions and terminology

Respondents identified the following terms as lacking clarity and requiring greater definition: 'animal', 'research', 'procedure' and 'use', particularly in relation to decapods, embryos and foetal stages. Lack of clarity around terms such as 'prompt', 'prolonged' and 'significant' were seen as enabling inconsistent interpretation and risk-averse decision making. The absence of a clear definition for 'minor amendment' affects workload and efficiency for investigators as well as for the AEC.

Sentience

While supporting the recognition of sentience, respondents emphasised the need for translation of this recognition into stronger protections, higher ethical thresholds, recognition of the intrinsic worth of animals, and provision of practical standards and guidance particularly for decapods.

Concluding remarks

The NHMRC would like to thank everyone who took the time and effort to respond to this survey. Feedback received will be used to inform the next edition of the Code.

The purpose of the Code is to set the national framework for the ethical, humane and responsible care and use of animals for scientific purposes. It is informed by all stakeholders, including the Australian public. The Code is not intended to replace state and territory responsibility for the regulation of animal welfare.

To ensure the Code can deliver on its intended scope, it is important that it:

- encompasses all aspects of the care and use of animals when the aim is to acquire, develop or demonstrate knowledge or techniques in any area of science
- applies throughout the animal's involvement in activities and projects, including their acquisition, transport, breeding, housing, and husbandry, and provisions for the animals at the completion of their use.

To achieve this across the diverse contexts in which the Code is applied, and to support consistent and practical implementation across a wide range of situations, the Code needs to remain neutral on research policy and continue to maintain its non-prescriptive and species-agnostic approach, where relevant.

Given the breadth of considerations and the need to maintain this overarching national framework, it will not always be possible to directly incorporate all feedback received through the survey into the revised Code. However, all contributions have been carefully reviewed and will play an important role in shaping the ongoing development of the Code.

Appendix A – Survey questions – Australian code for the care and use of animals for scientific purposes

Questions about the respondent

1. Are you responding as an individual or on behalf of an institution? *(Required)*

- ☐ As an individual (Go to Question 2)
- ☐ On behalf of an institution (Go to Question 6)

Responding as an individual: About you

2. What type of institution or organisation are you associated with? *(Required)*

- ☐ Animal advocacy group
- ☐ Educational institution: Agricultural College
- ☐ Educational institution: Primary School
- ☐ Educational institution: Secondary School
- ☐ Government department/agency: Commonwealth
- ☐ Government department/agency: State or territory
- ☐ Hospital / Health service
- ☐ Professional peak body
- ☐ Research institution: Commercial
- ☐ Research institution: Non-commercial
- ☐ University
- ☐ Not applicable
- ☐ Other (please specify)

3. What is the name of your institution? *(Optional)*

4. What best describes you or your role? *(Required)*

- ☐ Animal Ethics Committee Chair
- ☐ Animal Ethics Committee Member
- ☐ Animal technician / animal carer
- ☐ Senior institutional leader/administrator
- ☐ Member of Australian community
- ☐ Research administrator: AEC governance
- ☐ Research administrator: Compliance
- ☐ Research leader
- ☐ Research student
- ☐ Researcher
- ☐ Teacher
- ☐ Veterinarian
- ☐ Other (please specify)

5. Do you currently use, or have you recently used (within the last 5 years), animals for scientific purposes, including for teaching? *(Required)*

- ☐ Yes (Go to Question 6)
- ☐ No (Go to Question 9)

6. If you answered yes to Question 6, what activity best describes your work? (Select all that apply) *(Required)*

- ☐ Agricultural research
- ☐ Diagnosis
- ☐ Environmental studies

- ☐ Field research
- ☐ Health and medical research
- ☐ Product testing
- ☐ Production of biological products
- ☐ Teaching
- ☐ Wildlife research
- ☐ Other (please specify)

Go to Question 9.

Responding on behalf of an institution: About your institution

7. What is the name of your institution? *(Required)*
8. What type of institution or organisation are you responding on behalf of? *(Required)*
- ☐ Animal advocacy group
 - ☐ Educational institution: Agricultural College
 - ☐ Educational institution: Primary School
 - ☐ Educational institution: Secondary School
 - ☐ Government department/agency: Commonwealth
 - ☐ Government department/agency: State or territory
 - ☐ Hospital / Health service
 - ☐ Professional peak body
 - ☐ Research institution: Commercial
 - ☐ Research institution: Non-commercial
 - ☐ University
 - ☐ Other (please specify)

Feedback

9. What are the critical issues that should be addressed during the review of the Code? *(Optional)*
10. Are there any critical gaps in the guidance provided in the Code? *(Optional)*
11. What approaches used in the Code work well? *(Optional)*
12. What approaches used in the Code do **NOT** work well? *(Optional)*
13. Are there any other comments that you would like to make? *(Optional)*