



OUT OF THE LAB, INTO THE FIELD

Exploring animal research at POLEs

SUMMARY NOTES FROM WORKSHOP

30 SEPT-1 OCT 2019

KEBLE COLLEGE, OXFORD



OUTLINE OF THE EVENT

This workshop brought together 17 participants, including four from the Animal Research Nexus (AnNex) team,¹ a member of the AnNex Programme Advisory Committee, and an advisor to one AnNex project. One individual participated remotely. Attendees brought expertise from diverse areas, including: wildlife research and citizen science; research in veterinary clinics, farms, and zoos; and policy, philosophy, and social science relating to animal research.

The workshop began with an opening plenary on wildlife research ethics and regulation by Dr Julie Lane from the Animal and Plant Health Agency's National Wildlife Management Centre,² and followed with a full day of presentations and discussions. Speakers were asked to respond to a range of questions:

- How does the 'type' of animal – e.g., pets, wild animals, and those housed in zoos or farms – shape ethical obligations, veterinary treatment, and humane end-points? How does A(SP)A manage these ethical obligations and influence decisions?
- How are boundaries drawn between A(SP)A and non-A(SP)A work, and how do these boundaries shape research and animal welfare practice?
- How do the general public and other stakeholders engage with research at POLEs?
- How does taking scientific research with animals out of the laboratory shape the knowledge produced?
- How is research with animals outside of the laboratory best regulated?

The conversations at the workshop were wide-ranging, touching on practical, regulatory, and ethical issues relating to places other than licensed establishments (POLEs) under the Animals (Scientific Procedures) Act (A(SP)A), as well as other unregulated work with animals outside of the laboratory.

The workshop was invite-only, and designed small to maximise the sharing of experiences. Attendees did not necessarily speak 'on behalf' of their organisation. The following represents a short summary record of the main topics of discussion that cut across presentations on the day. Because the workshop was intended as a 'safe space' for participants to discuss their views openly, specific details on presenters or their areas of work are not included.

WHAT POLES CAN TEACH A(SP)A?

Discussion centred around what works differently (or the same) in POLEs compared with laboratory environments. Examples included the difficulty of ensuring humane end-points for wildlife, and the health status of animals brought under A(SP)A in wildlife and veterinary clinical research. It was observed that while in the laboratory researchers often create diseased animal models and try to cure them, in the veterinary clinic researchers attempt to cure already diseased animals, meaning that the net effect should be positive. Meanwhile, wild animals are brought under A(SP)A in a wide variety of conditions, but often offering medical treatment is problematic as it can interfere with the aims of the study.

While it was agreed that the practical implementation of A(SP)A is very different in each setting, there was less agreement on whether the ethical issues raised in and out of the laboratory differ or remain

¹ The Animal Research Nexus project is funded by a five-year Wellcome Collaborative Award and aims to deliver new thinking, research, and engagement to increase understanding of the social relations around animal research and generate new cultures of communication across them; see <https://animalresearchnexus.org>.

² Cover image courtesy of the Animal and Plant Health Agency's National Wildlife Management Centre.

constant. One view suggests similitude based on a fundamental harm-benefit calculus, the principles of which remain constant. Other views suggest that research in the wild, in the clinic, or on the farm brings in a wide range of additional ethical considerations relating to: animal welfare; scientific output; the presence of additional social actors (e.g., owners of animals and citizen scientists); and ecological concerns, such as the need to consider impacts of research not just on an individual animal, but on conspecifics and the entire ecological community (wildlife), household (pets), or social group/herd (farm animals) of which that animal is a part.

TRANSPARENCY AND PROFILE

The idea was raised that the public tends to conflate “animal research” with work in laboratories. This represents a double-edged sword. For example, public perceptions of both wildlife research and experimental veterinary treatment tend to be more positive than of laboratory-based biomedical research, although more empirical work on this would be helpful. The ethical justification and practical implications of greater transparency for non-A(SP)A wildlife research were considered. There was therefore discussion around the desirability of greater public awareness of what non-laboratory research involves, and how it differs (or not) from laboratory-based research. In this light, questions were also raised about whether there is an argument for greater transparency around POLEs and other non-laboratory research. For example, it may be useful to have published statistics on the number and varieties of UK POLEs (e.g., kind of setting and taxa involved), and on the number of licences granted for non-A(SP)A work such as those issued by statutory nature conservation organisations (SNCOs, e.g. Natural England, Scottish Natural Heritage).

AWERBS AND PROCEDURAL ETHICS

Questions were also posed about the desirability of Animal Welfare and Ethical Review Bodies (AWERBs) paying greater attention to POLEs and other non-laboratory research, especially given the stark disparities between the close and careful monitoring of A(SP)A work, and the sometimes complete absence of scrutiny extended to, for example, non-licensed, non-regulated trapping and marking conducted by local wildlife groups. This could potentially include drawing AWERB attention to how regulation and research practice work differently in and out of the laboratory, as well as extending the scope of AWERBs beyond research regulated by A(SP)A to include, for example, overseas research and work with animals not protected by A(SP)A (e.g., insects). Some AWERBs are already asked to go beyond the remit defined by A(SP)A, although little is known about the extent of such broadening of AWERB oversight or its effectiveness.

TRAINING, COMPETENCY, AND SUPPORT

It was pointed out that researchers who work at POLEs may lack support networks where they can discuss practical and ethical issues arising in their work with researchers from similar fields. The idea of creating such a support network was discussed.

Researchers working at POLEs may also work alongside other actors, such as volunteer citizen scientists in wildlife research who might assist with non-A(SP)A parts of research activities. Questions centred around training and competency in such circumstances; for example, to what extent should researchers re-train or oversee volunteers? This, in turn, led to a discussion of variable standards of training in relation to non-A(SP)A work with different animal taxa. For example, training by the British

Trust for Ornithology is thorough for those working on birds, but training is far more variable for those working on non-avian taxa.

OVERSIGHT AND REGULATION

Two specific areas of concern were raised as potentially requiring greater oversight or attention to purpose and ethics: trapping of wild animals, which is minimally regulated for some species; and the work of veterinarians, specifically around taking samples for non-treatment purposes and undertaking experimental (or highly novel) veterinary treatments. Relating to the latter point, some raised the idea that there is a need to revise the RCVS guidelines around the distinction between research and Recognised Veterinary Practice, and to clarify the meaning of “immediate group” in these guidelines.

PURPOSE AND VALUE

Questions were raised around how best to ensure that people doing work in these areas (primarily citizen scientists and vets) carefully think about the ethics and purpose of their work. The idea was raised that regulations like A(SP)A have the advantage of requiring careful consideration of animal welfare, harms, and benefits, considerations which perhaps require greater attention in some non-A(SP)A work. However, concerns were raised about extra regulation potentially stopping a lot of valuable and minimally harmful work, such as the activities of citizen scientists.

Questions were raised about how to encourage some of the principles of A(SP)A – such as care for animal welfare and weighing harms and benefits – in the absence of regulation. In essence, discussion centred around how best to foster a “culture of care” in non-A(SP)A research. Proposed ideas included the promotion of an easy guide, which could take the form of an acronym or mnemonic for example. With realisation that issues under discussion go well beyond regulation and guidelines and penetrate into deeply held assumptions of different social groups, discussions also dwelt on the possibility of more extensive forms of sentimental education, such as the introduction of material on animal welfare and related topics including ethics into school curricula.

DEFINING SCIENCE (AND GOOD SCIENCE)

Further discussion in relation to citizen science and experimental veterinary treatment focused on the rigour of scientific methodology, the quality of the data collected, and how data are subsequently made available. These were considered generally problematic areas, but were also in turn linked to discussion about the definition of science itself according to A(SP)A and therefore what is included or excluded with respect to that legislation.

While A(SP)A’s definition of science is formed in relation to intended *purpose*, it was argued that this leads to confusion amongst those who are prone to understand science in terms of *method*. Academic scientists in particular may express frustration when they hear of unregulated activities that appear to be conducted using scientific methodologies, and have difficulty understanding why there is discussion of regulating some activities that clearly do not match up to their view of the scientific method. It was suggested that licence applications have sometimes been rejected on the basis of being insufficiently rigorous methodologically, suggesting that ideas about method might also sometimes feature in the interpretation of the legal definition of science.