

An Outline Proposal for the Introduction of CCTV in Animal Research Establishments

Executive Summary

It is our contention that a more comprehensive system for the regulation of animal experimentation is required. Installing CCTV in animal research establishments would be a cost-effective method of improving the monitoring of animal research and ensuring compliance with licence conditions.

- Currently, the equivalent of only 21 full-time staff are employed to monitor the work being carried out by 15,721 personal licensees under 2,614 project licences at 188 designated establishments.
- Inspections represent only a snapshot insight into laboratory practice, and cannot reflect the ordinary day-to-day activity.
- Even 'unannounced' visits give time for personnel to conceal any problems and, of course, an inspector is unable to see all of the animals in an establishment on each visit, especially in larger establishments. Given the level of security inside and around animal facilities, it will never be possible for inspectors to walk straight in unannounced.
- Serious violations of licence conditions occur on an annual basis. In 2009-2010, these included a marmoset beginning to recover consciousness as he was about to be bled to death, and rats experiencing severe adverse side effects after being given higher doses of a drug than specified on the project licence.
- Seventy per cent of infringements in 2009-2010 were reported by the researchers themselves, which means it is entirely plausible that these are merely the tip of a largely unreported iceberg. Critically, the most overt acts of cruelty, such as deliberate violence inflicted upon animals, would never be reported. Nor would they be committed in the presence of inspectors. CCTV is a valuable means of uncovering such violations.
- Undercover investigations by the National Anti-Vivisection Society (NAVS) and other groups have revealed a scientific manager misleading a Home Office inspector, as well as inadequate killing methods being used at Charing Cross and Westminster Medical School; and animal abuse and falsification of test data taking place at Huntingdon Life Sciences. The current inspection system is not equipped to identify such abuses.
- Animal Aid's recent undercover investigations at nine randomly chosen slaughterhouses found that, even with government-appointed veterinarians permanently on site, legal breaches and animal abuse are widespread. It is simply not possible for inspections alone to detect violations.
- A 2009 Ipsos MORI poll found that a significant proportion of the British public are sceptical about the regulatory system that governs animal experiments, with 31 per cent saying they didn't trust it. Sixty-five per cent said they would not be surprised if some animal experiments go on behind closed doors without an official licence.

- Worryingly, even the current programme of inspections could be dramatically reduced if the minimum requirements of EU Directive 2010/63 are implemented in the UK. The Home Office estimates that this would require a total of only 80 inspections per year, with three to five years between inspections for some establishments. The result of such a development would almost certainly be a severe loss of public confidence in the inspection process.
- A phased installation of CCTV cameras and associated recording equipment is therefore proposed. Initially, cameras would be placed in establishments undertaking animal procedures, and that have been identified as higher risk by the Home Office Animals (Scientific Procedures) Inspectorate (ASPI).
- Examination of the footage could then become an integral part of the inspection regime. Because of the high level of public scepticism about the regulatory system (see previous page), it is important that a process independent of the Home Office is established that can readily access and monitor the footage, feed back to ASPI and research establishments, and create a robust system for ensuring regulatory compliance.
- We recommend that an independent committee be established, consisting of competent and experienced individuals, including a veterinarian, independent scientists, animal behaviour and welfare experts and representatives from animal welfare groups. One or more full-time paid officers, with suitable experience and expertise, would view a random selection of the footage obtained from a select number of establishments on a rolling basis. They would report to the committee every six months, but more promptly with matters requiring urgent attention. Home Office inspectors would also have unimpeded access to all the footage.
- It is not anticipated that the recording and subsequent viewing of CCTV camera footage would breach the terms of the Directive. The proposal is simply another method by which the Inspectorate could fulfil its legal requirements, and would not represent a special provision or 'gold-plating'.

In terms of cost, we propose that the establishments themselves pay for the installation of CCTV cameras. Regarding the ongoing costs of monitoring the footage, we suggest that those who profit from the generation of animal data should be asked to provide the necessary funds – notably the biomedical industry, including pharmaceutical companies. It would also be appropriate to approach funding bodies such as the Medical Research Council (MRC) and the Wellcome Trust.

The total costs of such a scheme would be comparatively modest. It is the duty of the competent authority to ensure compliance with the law and licence conditions, and we see CCTV as an innovative and efficient means of accomplishing this objective.

Introduction

Animal experiments in the UK continue to rise. 3.7 million experiments were started in 2010, equating to more than 10,000 every day. The figures are part of a conspicuous upward trend since the year 2000. Animal researchers are given permission to cause pain, suffering and distress that in other situations would result in prosecution. These procedures are policed by a small (and increasingly resource-limited) team from the Home Office Animals Scientific Procedures Inspectorate (ASPI). The equivalent of only 21 full-time staff are expected to monitor the work being carried out by 15,721 personal licensees under 2,614 project licences per year at 188 designated establishments.

Unsurprisingly, serious violations of licence conditions occur every year (see below). In 2009-2010, these included shocking examples of animals being inadvertently starved to death, drowned, decapitated, suffocated, poisoned or killed by overheating. Others were left in pain after spinal surgery, used by experimenters to practise abdominal stitching techniques; or began to recover from anaesthetic as they were about to be bled to death. Seventy per cent of the infringement cases in 2009-10 were reported by the researchers themselves. ASPI claims that this demonstrates a 'culture of compliance' – but it is surely possible that these breaches are the tip of a largely unreported iceberg. The current infrequency of inspections means that we cannot be certain what goes on behind closed doors. Crucially, the most shocking violations, such as mice having their necks broken with a pen on the corridor floor, which was uncovered by the British Union for the Abolition of Vivisection (BUAV) at Wickham Laboratories in 2009, would never be reported or committed in the presence of inspectors.

Undercover investigations by anti-vivisection groups are exceedingly rare, mainly due to the high security and secrecy surrounding animal laboratories. However, such investigations have proven to be extremely revealing. Footage from the NAVS investigation at the Institute of Neurology showed that assertions made in the project licence that enrichment was provided and monkeys were not displaying stereotypic behaviour, were clearly not true. Either enrichment was added only during inspections or the inspectorate simply ignored this breach.

Previously, a NAVS investigation of the John Radcliffe Hospital in Oxford caught on video technicians laughing and joking as they smashed mice against bench tops to kill them, and even

letting go of the mice and having them fall to the floor and run away. In another video, mice were not confirmed dead and were twitching as they were torn open by hand to have their organs harvested.

At Charing Cross and Westminster Medical School the NAVS uncovered a large number of breaches of the killing regulations, with the continued use of faulty gassing equipment. This resulted in some animals being thrown alive into dustbin bags for disposal. As a result, the establishment's licence of designation was revoked until the laboratory could satisfy the Home Office that certain procedures regarding killing were in place.

Also at the Institute of Neurology, the NAVS investigator reported, in a series of contemporaneous notes, how cats undergoing nerve experiments were receiving inadequate post-operative care. Subsequently, the Home Office confirmed that the project had been suspended briefly and that two post-operative cats had been euthanased. However, the Home Office did not address a NAVS question as to why the licensee was not overseeing the cats after such a serious operation. The Home Office inspector was present at the laboratory on the day of the post mortem of one of the cats, but was not present for the two days following the operation when the animal was suffering, nor present when the animal was euthanased, which was four days before the inspector's visit. CCTV would, in this instance, clearly have enabled the inspector to have assessed the actual levels of post-operative care and oversight by the licensee, giving a much fuller and more candid picture than the snapshot of the post mortem and accounts of the laboratory personnel.

Undercover investigations have even recorded cases where basic daily routines have been

missed. At St Mary's Hospital Medical School, the NAVS investigator noted that, during his absence for a day, other staff had not attended to his animals, leaving some without food.

At Huntingdon Life Sciences, the NAVS investigator found that poorly designed housing resulted in injuries to animals, including severed toes and other cuts, and one animal suffering a facial injury, which resulted in her being force-fed twice daily. Also at HLS, the NAVS investigator noted a high level of prolapses in monkeys held in restraint chairs. HLS have subsequently conceded that prolapses are a regular occurrence but claim they are less frequent than the investigator's contemporaneous notes reveal – CCTV would ensure that all such incidents were actually recorded and the truth could be ascertained. NAVS' video inside HLS shows researchers performing experiments on restrained monkeys, with the door open, and therefore in the sight of other caged monkeys. This is something that the European Directive says should not take place. Again, actions such as killing animals or experimenting on animals in front of others are impossible to monitor on an inspection-only basis.

In another incident, recorded by a NAVS undercover investigator, the scientific manager was reported as lying to a Home Office inspector. In one cage, the inspector found mice who had undergone ear biopsies, but the event had not been recorded by the technicians. The scientific manager, instead of admitting the mistake, convinced the inspector that 'the mice hadn't actually had ear biopsies and it was just a misunderstanding'.

When the licence of Charing Cross & Westminster Medical School was revoked, it was not as a result of a Home Office Inspection, but owing to a NAVS undercover investigation exposing the inadequate killing methods at the facility. And when Huntingdon Life Sciences almost lost its licence because of animal abuse and falsification of test data, leading to staff being prosecuted, it was due to an undercover investigation by Channel 4 in 1997. The current inspection system is simply not equipped to identify such abuses.

In short, the strongest argument for using CCTV to monitor animal research establishments is

that such a system could reveal unacceptable behaviour and deficiencies that inspectors miss. Inspections have clear limitations, and even unannounced visits give time for institutions to organise themselves and conceal anything incriminating. Given the level of security inside and around animal facilities, it will never be possible for inspectors to walk straight in unannounced. In addition, inspections offer a strictly limited insight into laboratory practice, and cannot reflect the ordinary day-to-day activity. Thus, abuses of animals by staff or inappropriately run procedures will simply never be identified by the current system.

These factors point to a need for a more robust, properly resourced system for auditing the actions of animal researchers. Animal Aid's recent undercover investigations into slaughterhouses have found that, even with permanent government-appointed veterinarians on site, legal breaches and animal abuse are widespread. It is simply not possible for inspections alone to detect violations. The current regulatory system must be both strengthened and rendered far more transparent in order to secure and maintain public confidence and trust, and ensure that licence conditions are not being violated. The installation of CCTV in animal research facilities could help meet these objectives.

Public confidence in the conduct of animal experimentation is a critical matter. A 2009 Ipsos MORI poll found that a significant proportion of the British public are sceptical about the regulatory system that governs animal experiments, with 31 per cent saying they did not trust it. Compared with 2008, fewer people agreed that the rules governing animal experimentation in Britain are tough (a fall of six percentage points to 58 per cent), that they are well enforced (down by five percentage points to 52 per cent), and that they trusted scientists not to cause unnecessary suffering (a fall of five percentage points to 48 per cent). Although around two-thirds of British adults trusted inspectors to discover misconduct, one in seven did not. Sixty-two per cent agreed that unnecessary duplication of animal experiments may be taking place (up four percentage points from 2008). Sixty-five per cent said they would not be surprised if some animal experiments go on behind closed doors without an official licence.

■ Staffing and workload of the ASPI

ASPI inspectors spend about one-third of their time visiting establishments, and about one-third assessing applications for licences and certificates. In 2010, the Inspectorate employed 27 inspectors but two departures in October reduced numbers to 25. In practice, this meant 21 full-time equivalents actively inspecting. These few individuals were tasked with inspecting work being carried out by 15,721 personal licensees under 2,614 project licences at 188 designated establishments.

To that end, 1,984 visits were made to places where scientific work on animals was conducted. 45.2 per cent of all visits were unannounced. In total, this amounted to 5,690 hours of contact time with those holding licences or certificates under ASPA. The average number of visits per inspector was 89.7, with a contact time of 257 hours. In the whole year, this equates to just over two hours of contact time per project licence, or a paltry 22 minutes per licence holder.

Worryingly, even this programme could be dramatically reduced if the minimum requirements of the EU Directive are implemented in the UK. The Home Office estimates that this would require a total of only 80 inspections per year, with between three and five years between inspections for some establishments. This would lead to a severe loss of public confidence in the inspection process.

It is worth emphasising that, even during unannounced visits, researchers will still have time to make changes to avoid problems, while the inspectors are at reception or commencing their visit with discussions with managers. It is also important to bear in mind that it is not possible for inspectors to see all of the animals and facilities on each visit, especially where the animals are being held in a variety of rooms over more than one floor. The NAVS investigations in UK laboratories have shown that laboratory staff are frequently aware of inspections in advance, and have documented several attempts to cover up malpractice prior to visits from inspectors. Indeed, in one case, wall planners were prominently displayed in the laboratory, warning staff when Home Office inspectors were due. In another instance, staff members were

advised by their senior manager to play down instances of poor animal health – for instance, kyky mice who had problems passing excrement and were dying as a result of blocked passages.

■ Infringements

Laboratory animals are exposed to a wide range of stressors and causes of distress and pain. In addition to the procedures to which they are subjected, they may be transported long distances by land, air or sea, and confined in small cages. Whether bred in the laboratory or transported there, these animals live in small and barren environments where, typically, they experience either overcrowding or isolation from their own kind, in an atmosphere where fear and pain predominates. The biochemical changes found in animals in laboratories in various studies, which indicate high levels of stress, are also known to affect outcomes. At the end of the experiments, the vast majority of animals are killed, using methods which may be violent. Investigations by the NAVS have also shown that animals are often killed or have procedures conducted on them within sight or communication distance of other animals, another bad practice too easily ignored in the rush to get work done.

If this were not enough, they may also be exposed to further distress due to 'infringements'. During 2009 and 2010, there were 62 recognised breaches of licence conditions. Seventy per cent were reported by the researchers themselves – they depended on the honesty of the experimenters for detection. Any assessment of the candour of research staff is entirely subjective, and this figure clearly does not preclude a large number of unreported violations by less forthcoming establishments.

A sample of recent infringements is included as an Appendix. They include a marmoset beginning to recover consciousness as he was about to be bled to death, and rats experiencing severe adverse side effects after being given higher doses of a drug than specified on the project licence. To avoid any charge of selective editing, they are presented exactly as reported by the Home Office. Taken

together, they demonstrate a neglectful disregard of animals by at least some establishments or personnel. With the constraints on Inspectorate time outlined above, it is not possible to say how many more such cases went undetected. The crucial point is that overt and gratuitous acts of cruelty, such as those uncovered by the NAVS and the BUAV, would not have been reported.

The current arrangements lack transparency and a sense of due process, which undermines public confidence in both the Home Office Inspectorate, and the system itself. It also goes against the principles of the new Directive.

The Introduction of CCTV in Animal Research Establishments

Given the above, it is our contention that a more comprehensive system for the regulation of animal experimentation is now required. The issue is especially pressing as the transposition of the EU Directive threatens to undermine public confidence in the inspection regime. If only the minimum number of visits mandated in the Directive were to be carried out, it would represent a decrease of 96 per cent in the number currently undertaken. While such a drastic cut is unlikely to occur, a significant decrease does remain probable, with fewer unannounced visits and greater periods between checks.

In this current financial climate, any proposal to help fill the resultant void that could incur substantial extra cost to ASPI is unlikely to progress. We maintain that closed circuit television systems could provide a cost-effective method to improve the monitoring of animal research, and ensure compliance.

A phased installation of CCTV cameras, and associated recording equipment, is proposed. Initially, cameras would be placed in establishments where animals undergo procedures, rather than in purely breeding centres. The first installations should occur in institutions identified as higher risk by ASPI. As the risk assessment is not in the public domain, it is not possible to suggest specific establishments. It is not proposed here that the details of such institutions would need to be disclosed. An analysis of the impact of the first wave of installations should be undertaken, with the involvement of appropriate stakeholders, prior to any decision on further steps.

■ Positioning of cameras

To be effective at ensuring regulatory compliance, the cameras would need to be positioned in certain key areas – corridors where animals are kept temporarily, animal accommodation, and

procedures and killing areas are all of legitimate concern. It should be possible to observe clearly the unobscured view from each camera at all times, and particularly important views should be captured from more than one angle.

■ Maintenance

CCTV cameras and recording equipment would need to be maintained in good working order at all times. The equipment should be checked at least once a day to ensure that it is operating correctly. Establishments would need to set up appropriate procedures to ensure that these checks are made. Planning and installation of CCTV should conform to the technical standards as set out in the British Security Industry Association's (BSIA) code of practice. Further guidance is obtainable from the British Standards Institution.

■ Informing staff

All staff working in the areas covered by the cameras would need to be informed that cameras are being used and the reason for their use, including a warning that footage might be used to support a prosecution. Staff would be required by their employer to give their written approval to be filmed, and for the recorded footage to be made available to the Home Office inspectors and other relevant bodies. Establishments would need to

display a sign or signs, in a place where it is likely to be seen by all persons who work in the areas covered by the cameras, warning that CCTV cameras are in operation.

■ Retention of footage

Recorded footage should be retained for an agreed interval (we suggest a minimum of two years), throughout which time it should be available for viewing and copying, on request, by Home Office inspectors and other relevant bodies. Establishments should offer them all reasonable assistance in viewing and copying footage in accordance with their requests. The footage should be continuous, and not excised, edited or otherwise interfered with during the period for which it should be retained.

■ Independent monitoring of footage

Examination could then become an integral part of the inspection process. However, a system of camera surveillance is only as good as the system for monitoring the footage. Because of the high level of public distrust regarding the regulatory process (see page 1), it is important that an independent element is established that can access and monitor the footage, and provide feedback to ASPI and research establishments.

We recommend that an independent committee be established, consisting of competent and experienced individuals, including a veterinarian, independent scientists, animal behaviour and welfare experts and representatives from animal welfare groups. One or more full-time paid officers, with suitable experience and expertise, would view a random selection of the footage obtained from a number of establishments on a rolling basis. They would report to the committee every six months, but more promptly with matters requiring urgent attention.

Home Office inspectors would also be empowered to access all footage, either randomly or from specific institutions (perhaps following or preceding inspections). A more effective (and technologically straightforward) idea would be to have a real-time televisual link between the ASPI headquarters and the riskiest establishments, which could be viewed at any time.

■ CCTV and EU law

It is not anticipated that the recording and subsequent viewing of CCTV camera footage would breach the terms of the Directive. The proposal is simply another method by which the Inspectorate could fulfil its legal requirements, and would not represent a special provision or 'gold-plating'.

In terms of cost, we propose that the establishments themselves pay for the instalment of CCTV cameras, beginning with those that have a history of infringements. Regarding the long-term costs of monitoring the footage, we suggest that those who profit from the generation of animal data would be suitable candidates, namely the biomedical industry, including pharmaceutical companies. It would also be appropriate to approach funding bodies such as the MRC and Wellcome Trust.

The total costs of such a scheme would be comparatively modest. It is the duty of the competent authority to ensure compliance, and we see CCTV as an innovative and efficient means of accomplishing this, and also of engendering greater public confidence that the law is being observed.

Appendix – Category B Infringements

According to the Home Office, ‘typically, the outcome of a category B infringement will be to send a letter of admonition (i.e. a warning) to the person or persons involved, although in some cases the Home Office may require further action (such as additional training, or altered management practices) or it might apply an additional condition to the licence or certificate’.

- 1** ‘Three rats, which had undergone cervical spinal surgery the previous day, were in poor condition and had not received the required post-operative analgesia. The animals were subsequently given analgesia, and when seen later by the inspector had recovered well. The incident was discovered by the inspector. The licensee was admonished, and was required to undergo re-training in modules 1 to 4 (See Annex J to Home Office Guidance).’
- 2** Six horses had jugular cannulae inserted under local anaesthesia. The cannulae were held in place by stay sutures. Substances were administered, and blood samples were taken, via the indwelling cannulae, over a six-hour period. This was done without relevant personal or project licence authority. The incident, which was self-reported, occurred because the licensees did not check the personal and project licences before starting the procedure. The establishment reviewed and improved staff management and supervision. The project licensee and a personal licensee were admonished, and the project licence holder was required to undergo re-training in module 5.’
- 3** ‘A personal licensee attempted to take a blood sample by cardiac puncture from a conscious chicken. The supervisor intervened to stop the licensee, though the chicken at that stage had suffered a needle stick. The procedure was not authorised by either the personal or the project licence, and would not have been authorised, had licence authority been sought. The personal licence holder had, previously, performed the procedure while working in another country. The incident was reported to the inspector by the establishment’s Home Office Liaison Officer. The personal licensee was admonished, and was allowed to work only under direct and continuous supervision for the next year.’
- 4** ‘Twenty conscious adult rats were decapitated, without project licence authority, over a period of three months. The project licence holder and the personal licensee mistakenly believed that decapitation of adult rats was a Schedule 1 method of humane killing. The incident was reported to the inspector by the Certificate holder. The personal licensee, the project licensee and the Certificate holder were admonished. The Certificate holder took steps to improve the supervision and management of programmes of regulated work, to reduce the likelihood of recurrence.’
- 5** ‘Two mice were inadvertently left over the weekend in an imaging chamber where they were discovered three days later. One mouse was found dead; the other mouse was alive and well and was returned to its home cage. The incident was self-reported to the inspector. The establishment revised its procedures to ensure that no animals could be left in the imaging chamber, or the procedure room, at the end of the day. The personal licence holder was admonished.’
- 6** ‘The holder of a project licence and a personal licence raised antibodies in rabbits using a regime with more frequent

administrations of antigen than was authorised by the project licence. There had also been delay in the humane killing of a number of those rabbits showing adverse effects. Further investigation revealed inadequate labelling of pens and a failure to check licence authorities before proceeding. The incident was discovered by the inspector. The establishment acknowledged the operational deficiencies and took steps to remedy them. The licensee was admonished.'

7 'A licensee mistakenly re-used a macaque on a procedure without appropriate project licence authority. This was due to an oversight in the drafting of the licence, as the intention was to request re-use following mild procedures where no adverse effects had been encountered, as indeed was the case here. Record keeping requirements were reviewed within the establishment with all health and procedural records now integrated within each individual animal's records, and an additional independent sign-off required for all reuse.'

8 'A licensee undertook procedures in four mice to investigate problems being encountered with wound closure in an embryo transfer programme. Instead of seeking advice from care staff, the individual tried to resolve the problem by practising different closure techniques. The individual failed to appreciate that there was no authority to conduct such investigations, but felt under pressure to resolve the problems which were delaying the research programme. As a consequence the licensee has undertaken re-training and now has an improved appreciation of the need for good communication with care staff.'

9 'Four guinea pigs died of asphyxiation after power to an air-conditioned chamber was accidentally switched off. This was a genuine error in a well-managed establishment – additional oversight was introduced to prevent recurrence.'

Appendix – Category C Infringements

According to the Home Office, 'typically, the outcome of a category C infringement will be to amend, revoke or suspend the licence or certificate, and to send a letter of admonition to the licensee or Certificate holder'. As the examples below demonstrate, a telling-off is usually seen to be adequate.

1 'Thirty-four genetically altered mice died, and a further 14 were killed humanely, as a result of a failure of the temperature control unit within the animal room which resulted in raised room temperature. The alarms had been switched off and the failure of the steam valve to close was attributed to faulty maintenance. The incident was self-reported to the inspector. A number of engineering and managerial changes were implemented to prevent a recurrence. The Certificate holder was admonished.'

2 'In a poorly designed experiment using 14 mice, six died and a further six were required to be killed humanely. The degree of severity imposed exceeded the severity limit attached to the procedure and notification to the Home Office was not provided. Furthermore, personal and project licence records were found by the inspector to be defective. The incident was reported by the Certificate holder who then took internal disciplinary proceedings. The licensee was admonished, and required to

undergo re-training in modules 1 and 5. In addition, the project licence was varied, requiring greater detail of each experiment. The personal licence was also varied, requiring supervision by an experienced personal licensee until such time as the licensee was considered to be competent.'

- 3** 'On two separate occasions, the failure of a water pipe in an animal house resulted in the deaths by drowning of a number of guinea pigs. Both incidents were self-reported to the inspector. After the first incident, a programme of work was put in place to replace old pipe connections. The replacement programme was running behind schedule when the second incident occurred, following which the programme was completed the next day. A pressure alarm was fitted to detect any fall in the water pressure and trigger a call-out requiring a response from the recipient and to trigger isolation of the water flow if the pressure drop was to last longer than 30 seconds. The Certificate holder was admonished.'
- 4** 'Two ferrets which drank a quaternary ammonium disinfectant (Super Q) that had mistakenly been put in their drinking water were, after some delay, killed humanely. After an internal investigation at the establishment, new standard operating procedures were put in place. The incident was self-reported to the inspector. The Certificate holder was admonished.'
- 5** 'Twenty-four rats were given doxorubicin (a chemotherapy drug) at dose levels that were higher than specified on the project licence. The adverse effects which occurred, which

included severe signs of toxicity or death, exceeded those permitted by the licence. The project licensee failed to notify the Home Office of the breach of severity limit. The infringement was found by the inspector. The project licensee and the personal licensee were admonished. The project licensee was required to undergo re-training in modules 1 and 5 and the personal licensee in module 1.'

- 6** 'Failure to provide adequate food led to the death of 25 mice and failure to carry out daily checks resulted in the death of a further mouse from overgrown teeth. The infringement was self-reported to the inspector. The animal technician involved was suspended while the establishment conducted an internal investigation. The technician was found to have falsified animal care records and was subsequently dismissed from the establishment. The Certificate holder instituted prompt and positive actions to prevent recurrence, implementing a full review of the animal facilities management and instituting the recommended changes. The Certificate holder was admonished.'
- 7** 'A marmoset was being used to provide tissue and blood for use by various scientific groups. While under deep non-recovery anaesthesia, the animal was to be exsanguinated. Unfortunately, the animal began to recover consciousness; movement was observed. An overdose of anaesthetic was administered by injection and death quickly ensued. The personal licensee was placed under close supervision, and the certificate holder introduced a number of measures to prevent recurrence.'

This Proposal has been submitted by the following groups:

