

Opinion paper

Ensuring ethical animal welfare research:

Are more ethics review committees the solution?

Review:

This paper gives a short opinion about animal ethics review committees, encompassing a lot of jurisdictions and fields of research.

The title asks “*Are more ethics review committees the solution?*”. We could as well wonder what is the relevance of the question. Indeed, in general, increasing the number of ethics committees is surely not a good solution since it will mechanically increase the variability and discrepancy between assessments (and that’s the main argument of the European Commission against high numbers of ethics committees in member states).

Lin. 33 To the question *What do ethics committees do?* the authors could have also considered the work of the FELASA-AAALAS working group (Bronstad et al, 2016, Laboratory animals). The paragraph is very concise. In addition, precisely, depending on the jurisdiction, ethics committees may do much more than that (training, disseminating culture of care, in-house inspection (US), etc.).

Line 41 and next. To the question “*When ethics approval is needed?*”

Researchers are not and should not be on their own. In Europe, they have to ask to the Institutional Animal Welfare Body (which has also to assess whenever it is needed, about the “needle prick” criterion). In other places, researchers may and should consult animal welfare specialists, veterinarians (specialists in laboratory animal science and medicine) and experimented colleagues.

The next paragraph makes a point which is very right about all which relates to ethology studies, farm animals, agricultural, wildlife research. Some regulatory work has to be done here; some loopholes exist.

The paragraph from line 74 is interesting, but a little amazing since in some other European countries, officially approved ethics committees are allowed and encouraged to review projects which are not mandatorily reviewed and not subjects to official authorization.

A lot of researchers criticize the ethics approval system saying that ethical assessments sometimes differ between committees. The main reason is that the animal ethics committees, in their current formats and duties are quite new in a lot of geographic areas. In addition, one could also answer that when a research paper is being sent to 3 or more reviewers, each review will be different. So, yes training of ethics committee members is very important, but also the ethics committees should have the right size and the right resources for operating smoothly and efficiently.

When “*the available committee does not have competence in the proposed research area*”, it should of course ask for external help, under a confidentiality and impartiality agreement.

Line 103, as stated above, this is a very important point that would need more insight and review of literature. Indeed, resources are one of the main points. Some countries allow pay-per-assessment, and some other settings depending on the country (in some, ethics committees are official state or region official bodies).

Line 104: “*Whereas influential researchers may be able to convince their institutions to establish their own committees,*” This is definitely not the right way to go. This may work correctly in very big

institutions, but overall, it is way better when ethics committees are either external to the institution (see Switzerland, Sweden, Germany), or multi-institutions so that the risk of bias is very low.

Lines 109 and next:

“reviewing all protocols independently of severity”: please explain why you raise this point. This is unusual.

Line 117 to 130: a lot of wishful thinking and obvious statements, which could be summed up better by citing the culture-of-care paradigm.

Line 126 *“We may be stating the obvious, but far too often animal research protocols are constrained by existing housing facilities and management procedures. Researchers, including the authors, may make use of the model species that happens to be available, without sufficient consideration for their suitability for the question asked or whether it is the species and experimental approach which will incur the least harm.”*

Well, this is also what animal facility managers, ethics committees and veterinarians criticize. Researchers should always try to find the best animal model for their studies (which means the species and the techniques/ interventions/ procedures), regardless of what is in-house. Then they should either implement it there or go elsewhere for learning the required skills or for performing their experiments, if this is not possible. On an ethical standpoint, using an animal model just because “it is here” is not acceptable.

Line 131 to 138: This would be like publishing all the ethical review, so that it can be checked and redone by editors, reviewers and readers? It would be far better and productive to publish all raw data of studies (Open Science, Diedrich et al, <https://doi-org.proxy.insermbiblio.inist.fr/10.1371/journal.pbio.3001810>). In addition, this implies a lack of confidence in ethics committees.

Line 150 *“It can be discussed whether this suffices on its own or whether an ethics committee also needs to be involved”*. This is not relevant. In many places, fortunately, the ethics committee review is mandatory anyway.

Line 153. Since I do not think that the overall question of the paper is relevant: the number of committees is not an issue at all, and it should not be increased (except of course in places where there are no animal ethics assessments).

Line 156 *“We also need to find ways of ensuring ethics committees are more harmonized across regions, by means of training, global guidelines (Petkov et al., 2022), and communication between ethics review bodies”* There have already been a lot of work on this topic (see above, Bronstad et al). Overall, when it comes to the ethics assessment part of the committees, the same requirements and values are already here. However, differences exist regarding the composition of ethics boards, training of their members and their roles. As always when harmonization is sought, it is a lot way to go. Indeed, everyone has to do small steps and a lot of people in the working parties tend to try to impose their values and ways.

Line 166 *“we recommend always explaining the ethical reasoning for a study in the scientific article(s) arising from it, whether or not an ethical approval has been/needs to be obtained. This will demonstrate the ethical thoughts behind the chosen protocol, making comparisons easier, and educate us on where the thresholds for approval are placed across jurisdictions. By reducing the*

number of requests ethics committees get, the more time they will have for the studies that really need a diligent review”

This part is really difficult to translate into concrete actions.

Line 168: *“This will demonstrate the ethical thoughts behind the chosen protocol, making comparisons easier, and educate us on where the thresholds for approval are placed across jurisdictions”*

As stated above, researchers should not be on their own to determine the thresholds. I do not agree with this part. It is not a solution to *“demonstrate ethical thoughts”* and then decrease requests for ethics committees (which would then work swiftly and have more time). The solution is to have well-dimensioned ethics committees, with the relevant resources. These committees should also be officially supervised by a national authority (which is mandatory in Europe member states, even if their attributions may differ a little between countries).

Conclusion of the review:

From the authors experience, and this is known to be true, in general, animal ethics committees are not very well suited to ethology, agricultural, wildlife and animal welfare research. The paper would have been far more interesting if clearly focused on these areas. Indeed, there are a lot of general statements which are not relevant for most research using animals. If the paper is a general overview about ethics committees, their number and relevance in research using animals, it brings few new contributions.

I suggest that the paper be therefore refocused and expanded on this particular interesting topic: animal ethics committees for ethology, agricultural, wildlife and animal welfare research, especially for non-laboratory animal species (there is only a hint in the title to the scope of the paper: “Ensuring animal welfare research”, but animal welfare research for laboratory animals exists too). What are the specific questions and differences? What does not work with the existing ethical review system? How could this be improved? Some elements are included here, but most statements are too general and do not apply to most cases.