

ANIMAL-BASED PROJECTS INVOLVING TWO OR MORE INSTITUTIONS

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Animal ethics and care for experimental purposes in Canadian institutions is subject to the policies and guidelines of the Canadian Council on Animal Care (CCAC) and is overseen, at the local level, by institutional animal care committees. The animal care committee's functioning is based on the [CCAC policy statement on: terms of reference for animal care committees](#) (CCAC, 2006).

An institution is responsible for the ethical acceptability of animal-based research, teaching, and testing undertaken by its faculty, staff, other personnel, or students, regardless of where the work is conducted. Most animal-based research, teaching, or testing is undertaken by investigators and teachers working within their own "home" institutions and overseen by their local animal care committee(s). However, in certain cases, investigators and instructors undertake animal work in one or several "host" institutions. In other cases, various parts of an animal-based project are carried out by, and in, several institutions or in the field.

The [CCAC policy on: animal-based projects involving two or more institutions](#) (CCAC, 2003) provides the framework for institutions to follow when developing a process for animal-based collaborative work. The following is a selection of frequently asked questions (and their respective answers) concerning this policy.

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1. What type of collaborative work falls under the CCAC policy?

The animal care committee has a responsibility to oversee any animal-based work that requires a protocol, and is undertaken by its faculty, staff, or students, regardless of where the work is conducted. Institutions should clearly outline the process for protocol submissions for individuals engaged in collaborative work. There is no exhaustive list of what constitutes collaborative work in the eyes of the CCAC, but in general, prospective live animal-based activities (including any input into protocol development such as contributing to experimental design) shared between researchers or institutions are considered collaborative, and must be approved and overseen by the institutional animal care committees.

Some examples of what the CCAC does not consider collaboration:

- the sharing of data (see question 2) or tissues between institutions;
- any contracted services such as animal-based training, leasing of animal housing/holding/procedural rooms, use of specialized equipment, the purchase of antibodies from a commercial supplier, etc.;
- researchers acting as co-supervisors for students from another CCAC-certified institution, unless the researcher contributes in some way to the development of the protocol or is involved in animal procedures in which case both animal care committees should review and approve the protocol; and
- researchers who hold an adjunct position at another institution and collaborate with researchers at that institution (in these cases, the protocol should be submitted to the animal care committee of that institution if it administers the research grant or funds).

For reasons of accountability and risk management, the CCAC strongly encourages institutions to be aware of any animal-based work that is undertaken by its faculty, staff, or students, regardless of where the work is conducted. In most cases this is done through protocol review and approval by the institution's animal care committee. However, in cases where the activities do not fall within the CCAC's broad definition of collaboration, the animal care committee and, at the very least, the senior administration should be aware of these activities. This can be accomplished, for example, by having the other institution(s) forward a copy of an approved protocol for information purposes, or by a declaration by the researcher that they are undertaking animal-based work with, or acquiring animal-based services from, a third party outside of the CCAC's definition of collaboration.

2. Should an animal care committee conduct an ethical review of research when one of its institution's researchers is involved in a project after the animal-based work has already been conducted (e.g., requested expertise) or it is considered secondary use of data?

The CCAC does not require the animal care committee to be involved in retrospective ethical review of animal-based work.

Ethical review by an animal care committee serves as a mechanism whereby potential harms to animals can be identified and mitigated prior to work being performed. When animal-based work has already occurred and data have already been collected (e.g., biological samples), an animal care committee has no mechanism to safeguard animal welfare and, therefore, conducting ethical review serves no purpose.

Some institutions have developed their own internal policies to manage situations of secondary use of data; however, it is the responsibility of the researcher and the institution to examine any ethical implications of the researcher's involvement in the work and publishing requirements prior to participation.

3. If one of our researchers is planning to conduct research at another host institution, which animal care committee should review the protocol first?

In most cases, the animal care committee of the home institution would review the protocol first and ensure it meets the ethical expectations of the institution. The home animal care committee would also verify that the project has received positive scientific or pedagogical merit review. The home institution would then conditionally approve the protocol and inform the host institution of such approval.

The host institution would then review the protocol and approve it if it meets the ethical expectations of the institution and if the institution can carry out the work in practice (e.g., sufficient and appropriate housing, veterinary and animal care resources, qualified and competent personnel handling animals, etc.).

The home institution should be informed of any relevant conditions or details accompanying the decision by the host institution, and any post-approval monitoring reports should be shared with the home institution. A well-defined arrangement between the animal care committees of the home and the host institutions, for monitoring the proposed project and the welfare of the animals, should be agreed upon before the project begins.

4. Are there special expectations from the CCAC when project components are undertaken at more than one institution, or in the field?

For these projects, the animal care committee of each institution involved must receive, review, and approve a written protocol detailing the animal-based work before any such work is undertaken within the facilities for which it is responsible, or in the field. This protocol must also provide a description of the project as a whole. Where parts of a project take place at different institutions or in the field, each animal care committee may choose to approve and monitor only those parts that take place at their institution or are undertaken by its faculty, staff, other personnel, or students in the field. It is essential that each animal care committee is cognisant of all aspects of the project and ensures that any cumulative impact of procedures on animals is considered. A well-defined arrangement between the animal care committees for monitoring the proposed project (shared post-approval monitoring reports) and the welfare of the animals, should be agreed upon before the project begins.

5. How should scientific merit be addressed for collaborative animal-based projects?

The institutions involved are responsible for ensuring that animal-based research has been demonstrated to have scientific merit through a process that meets their standards, regardless of where the research takes place. The research administrations of the organizations involved should work together to ensure that the project has been found to have scientific merit through independent reviews by expert peers, or that such a process will be applied (possibly by one organization on behalf of the others).

6. Who is responsible for conducting post-approval monitoring?

Each CCAC-certified institution has a responsibility to ensure that the work conducted by its faculty, staff, other personnel, or students is undertaken as approved in the protocol, regardless of the location of the work. If work is conducted at another institution or in the field, a clear agreement should be in place with regards to accountability, authority, and communication. Generally, the animal care committee of the institution where the work is being carried out should conduct post-approval monitoring activities due to their proximity to the work. In any event, all documentation from post-approval monitoring activities must be shared with the animal care committee of the individual's home institution.

7. Who is responsible for handling non-compliance issues?

An institution should define a clear process for handling non-compliance whether the work is to be conducted at their institution, at a host location, or in the field. The home institution remains responsible for the conduct of its faculty, staff, other personnel, or students. Similar to post-approval monitoring activities, any instances of non-compliance must be reported to the animal care committee of the researcher's home institution in a timely manner. In cases of multiple, recurring, or serious non-compliance issues in which disciplinary actions might be warranted, the research administrations of the institutions involved should work together to ensure that the proper course of action is taken.

8. Who is responsible for providing training for personnel working with animals in collaborative projects?

Visiting researchers should have received relevant training at their home institution. However, the animal care committee of the host institution should request supporting documentation for all members of the visiting research team to confirm that they are properly trained and competent to perform all animal-related procedures described in the approved protocol. Where visiting investigators lack the necessary knowledge, skills, and competency to carry out animal-based procedures, there must be close supervision until appropriate levels of competency are achieved and demonstrated.

9. One of our researchers is planning to undertake a research project while on sabbatical leave in another country. Should the work be covered in an animal use protocol?

An institution is responsible for the ethical acceptability of animal-based research, teaching, and testing undertaken by its faculty, staff, other personnel, or students, regardless of where the work is conducted. Consequently, the animal care committee must review and approve all animal-related work proposed by its faculty, even if the project will be conducted during a sabbatical leave. Post-approval monitoring in these cases can be a challenge and the CCAC leaves it up to institutions to ensure as best they can that the work is undertaken ethically in appropriate facilities.

10. One of our researchers is planning to undertake a research project in a non CCAC-certified institution. What are the responsibilities of our animal care committee?

An institution is responsible for the ethical acceptability of animal-based research, teaching, and testing undertaken by its faculty, staff, other personnel, or students, regardless of where the work is conducted. In

cases where the work will be conducted in a non CCAC-certified institution, the animal care committee must review and approve the protocol before any work begins, and must ensure through monitoring that the work is undertaken ethically in appropriate facilities. This would include ensuring the competency of those involved in animal-based activities as well as the oversight of approved protocols.

11. Who should report animal numbers to the CCAC each year?

The expectation for reporting animal data differs depending on the type/location of the collaboration:

- When all of the collaborating institutions are CCAC-certified, the host institution (i.e. where the animals reside) should report those numbers to the CCAC. If for some reason this is not possible, another collaborating institution may report the numbers, as long as this is determined upfront and the animals are only reported to the CCAC once.
- When collaborative wildlife projects are undertaken in the field, institutions should decide upfront which institution(s) will be reporting animal numbers, to avoid under or over reporting.
- When only one of the collaborating institutions is CCAC-certified (e.g., in the case of international or industry partnerships), the certified institution should be responsible for reporting animal numbers, regardless of where the animals are kept and whether or not they are reported to another competent authority.

12. Does the home animal care committee have to conduct a site visit of the host facility or location?

Both institutions have a responsibility to ensure that the location(s) where animal work is being undertaken or where animals are housed is appropriate and meets CCAC guidelines. This assurance can be gained by either requesting information from the other animal care committee or by conducting a site visit.