July 12, 2019

Grant Guilford, Ph.D., Vice Chancellor Bart Ellenbroek, Ph.D., Chair, Animal Ethics Committee Members of the Animal Ethics Committee Victoria University of Wellington

Via e-mail: <u>vice-chancellor@vuw.ac.nz;</u> <u>bart.ellenbroek@vuw.ac.nz;</u> <u>aecadmin@vuw.ac.nz</u>

Dear Drs. Guilford and Ellenbroek and members of the Animal Ethics Committee,

We are writing on behalf of People for the Ethical Treatment of Animals (PETA) US, PETA Australia and our combined more than 6.5 million members and supporters. For the reasons stated below, we ask that Victoria University of Wellington commit to no longer approving the use of the forced swim test or funding research involving it.

It has been brought to our attention that on at least seven occasions since 2009, staff and students at Victoria University of Wellington have described the use of mice and rats in forced swim test experiments in published manuscripts and theses as well as on posters, which are referenced below.

University-affiliated authors have described the forced swim test as a method of assessing "pro-depressive effects" (Kivell, Paton, Kumar, Morani, Culverhouse, Shepherd, ... & Prisinzano, 2018; Morani, Schenk, Prisinzano, & Kivell, 2012; Young, 2015) and "depressive behaviour" (Morani, 2011) and as a way to evaluate "depressive-like effects." (Mathew, Prisinzano, & Kivell, 2016; Ewald, Bosch, Culverhouse, Crowley, Neuenswander, Prisinzano, & Kivell, 2017). However, as members of The New Zealand Anti-Vivisection Society (NZAVS) and Saving Animals From Exploitation (SAFE) have pointed out, the applicability of animals' behavior during the forced swim test to their mood, to depression in humans, or to the utility of a compound in treating human depression has been scientifically refuted.

The forced swim test does not reliably predict successful novel treatments for human depression—nullifying any scientific justification for conducting the test. Your letter in response to NZAVS' and SAFE's submission indicates that an investigator submitting an animal use proposal may be able to justify use of the forced swim test; however, if your committee were to consider the matter using a harm/benefit analysis to inform its decision, it would realize that approving such a request will always be ill-advised. Therefore, there is no real detriment to banning the forced swim test entirely. Doing so would not lead to the use of a "more harmful or less appropriate techniques," as the forced swim test is itself never appropriate.



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PETA scientists analyzed the use of the forced swim test and found that in tests of compounds selected by four companies, it was less predictive than mere chance at determining whether a compound would have antidepressant efficacy in humans. They also found that preclinical use of the forced swim test did not predict whether a compound had later been approved to treat human depression. More details regarding this analysis can be found on our poster "Are we throwing good antidepressants out with the swim test water?"

Because the forced swim test lacks scientific value and causes immense suffering to animals, we have launched a global campaign aimed at ending its use entirely. After discussions with PETA, three of the top ten pharmaceutical companies, <u>AbbVie</u>, <u>Johnson & Johnson</u>, and <u>Roche</u>, have committed to permanently ending forced swim test experiments. You can see a full list of the companies that have banned the forced swim test <u>here</u>. They have committed to no longer wasting time or money on a test method that simply doesn't work.

With opposition to the forced swim test growing, we are confident that we will convince a growing number of large companies and key stakeholders that they should end the use of this test. Clearly, entities whose financial security depends on conducting worthwhile research, who are actually in the market of developing antidepressant drugs, don't hesitate to abandon the forced swim test, demonstrating its lack of scientific necessity.

We hope to see Victoria University of Wellington move in the same progressive direction that these massive companies have and become the first university in New Zealand to **commit to no longer funding or conducting this cruel, irrelevant test**.

Thank you for your attention to this important issue. We hope you will reconsider your decision and look forward to your response.

Sincerely,

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